



Soltec

Environmental Management Plan

PL-EHS-0004_en

Change control

Version	Date	Section involved	Issued	Reviewed	Approved
01	18/09/24	All	J.R.Esteban	F.Ortuño	S.López
02	08/19/2022	2, 4.2, 4.5, 4.8, 4.9	F.Ortuño	F.Ortuño	S.López

Table of Contents

1	Introduction.....	3
2	Applicable Regulations	3
3	Environmental Aspects.....	3
4	Description of Measures.....	4
4.1	Waste Generation	4
4.2	Atmospheric Emissions	4
4.3	Wastewater	5
4.4	Land Effects	5
4.5	Resource Savings.....	6
4.6	Noise Generation	6
4.7	Diverse Effects.....	7
4.8	Effects on Fauna.....	7
4.9	Effects on Flora.....	8
4.10	Effects on Ecological Heritage	8
4.11	Effects on Landscape.....	8
5	Surveillance Program and Monitoring of Environmental Variables.....	9
5.1	Motivation and Targets	9
5.2	Environmental Monitoring Methodology	9
5.3	Environmental Monitoring Program during the Project Implementation Phase	9

1 Introduction

This Environmental Management Plan is drafted with the aim of serving as a tool to reduce the environmental impact of constructing a Photovoltaic Facility with SOLTEC solar trackers.

The Environmental Management Plan complies with SOLTEC's environmental policy and includes applicable objectives, procedures and requirements.

The best environmental practices proposed in this document should be considered to develop tasks comprising the Project's Environmental Monitoring Plan.

The Environmental Management Plan aims to detect deviations from the forecast impact analysis occurred throughout the construction phase. If deviations are significant and could seriously affect the environment, corrective actions could be implemented before their impact is irreversible.

To manage and coordinate environmental actions, SOLTEC's environmental management system, commensurate with the UNE-ISO-14001 Standard, should be implemented.

All project participants should know and understand the content of the Environmental Management Plan.

#

2 Applicable Regulations

To consider specific environmental regulations applicable in the countries where projects are carried out, updating this section in line with existing laws and norms.

3 Environmental Aspects

The environmental aspects to be considered during the implementation phase of the project, are as follows:

Environmental project aspects:

- Waste Generation
- Atmospheric Releases
- Wastewater Discharges
- Land Effects
- Resource Savings
- Noise Generation
- Diverse Effects

Potential Aspects should also be included.

4 Description of Measures

4.1 Waste Generation

- With regards to waste generation at the project site, measures should be included in the Waste Management Plan drafted by SOLTEC for each project. Such measures should comply with the country's regulations for generation and management of construction and demolition waste.
- SOLTEC should register itself, in line with existing regulations in each country, as a company generating waste (hazardous and non-hazardous), as applicable.
- Once the project is finalized, all materials, packaging or site debris in the area should be removed and dispatched to an authorized agent.

4.2 Atmospheric Emissions

The main atmospheric emissions will come from vehicles at the construction site and dust generated by their traffic.

- Avoid fast vehicle traffic (project site speed limit: 20 km/h (12.5 mi/h))
- Water the site using a tanker truck to prevent dust emission.
- Clean muddy pathways after it rains.
- Avoid earthwork activities in case of strong or very strong winds.
- Ensure trucks drive with their loads fully covered, especially when transporting free-flowing, powdery materials. Loads should not protrude trailer height and be covered with secured tarps during transport.
- Improve pathway surfaces through compaction, periodic watering and periodic cleaning.
- Ensure proper equipment maintenance and periodic equipment checks.
- Prioritize the use of low-consumption and low-emission machinery and vehicles.
- Control, review and finetune machinery motors at the project site.
- Prevent dust generation at material storage areas. To do that, reduce the free fall of aggregate materials and ensure storage areas containing granular soil and materials are protected with natural barriers or placed leeward.
- In case of strong winds, dust-generating activities should be aborted.
- Temporary stockpiling areas should be as close as possible to the work area to prevent excessive load transport. It is also necessary to establish a plan specifying supply needs to ensure materials are not stored for a long time, hence limiting loading-unloading operations as these generate large amounts of dust.
- If needed, it might be necessary to measure suspended particles and particle emission levels, to ensure compliance with applicable air quality regulations in each country.

4.3 Wastewater

Wastewater should be properly managed, preventing its discharge to the environment. Wastewater generated at the project site should be sent to a septic tank, which should be installed at an earlier stage.

- Septic tank content should be analyzed by an authorized agent.
- Portable chemical toilets for use by project personnel, should be installed.

4.4 Land Effects

- Fence off the project site.
- The site can only be accessed through designated pathways, with should have ditches on both sides and cross-section drains to properly channel runoff water.
- Any obstacles generating water accumulation, should be removed.
- Watercourses or areas near them should be discarded as stockpiling areas.
- The affection area should be accurately marked, fencing it off in the layout point.
- The topsoil layer directly or indirectly affected by the project site should be stockpiled in non-contaminated areas, in piles not exceeding a height of 1.5 meters and preventing their mixture with inert materials. The aim of doing so is to facilitate aeration and prevent compaction so that topsoil can be used again.
- Topsoil will be opened with the aim to break compact soil profile areas, enhancing their structure and aeration.
- It is required to have an area conditioned to house machinery, with a waterproof surface and the necessary treatment devices.
- Excavation materials should be reused at the project site, moving them to nearby areas or using them to enhance lots, provided they are not placed outside designated areas.
- In case of inadvertent concrete spillage, the affected soil should be removed and transported to a designated container for removal to an authorized landfill.
- To prevent oil spillage at the project site, equipment should be perfectly maintained; equipment maintenance and repair work should be carried out on waterproof surfaces with spillage bunds and impermeable plastic material.
- The equipment yard at the project site needs to be inspected daily to detect potential leaks (dripping).
- In case of accidental oil spillage, it is necessary to clean the area and have an authorized agent remove the waste.
- In case of accidental gas-oil spillage at the project site, it is necessary to clean the area and have an authorized agent remove the waste.

4.5 Resource Savings

The resources that should undergo stricter environmental control are water, electricity, fuel, aggregates and earths.

- Whenever possible, aggregates from a recycling yard should be used.
- Industrial water should be used for project activities.
- Water consumption during project activities should be monitored, to identify deviations and set savings targets.
- Water facilities need to be in perfect maintenance conditions to prevent leaks.
- Lighting and electrical equipment at project site offices, should be used rationally.
- Activities should be correctly planned to optimize the use of electrical equipment onsite.
- Project site equipment and machinery should be maintained properly.
- Power consumption should be monitored to detect deviations and set savings targets.
- Machinery should be stopped in case of long waiting periods (over 60 seconds) and, in general, whenever possible.
- The speed limit at the project site is limited to 20 km/h (12.5 mi/h).
- For gas engines, begin driving right after startup.
- For diesel engines, wait some 3 seconds before driving.
- Proper machinery maintenance conditions should be ensured.
- The use of low-consumption vehicles should be prioritized.
- Information campaigns on energy saving initiatives will be launched amongst employees.
- HVAC systems will be regularly inspected to optimize energy consumption.
- Water usage on pathways will be optimized; it is preferable to use industrial water.

Plumbing installations should be inspected to detect leaks, focusing on wastewater and discharge water pipes.

4.6 Noise Generation

Increased environmental noise maybe be disturbing and alter the psychological or physical wellbeing of living creatures.

- Noise levels should be measured periodically.
- Equipment should be kept in perfect conditions by means of periodic inspections.
- Reactive mufflers and springs should be used, bearing rotation speed should be modified and exhaust pipe condition and towing vehicle box adjustment should be controlled periodically.
- The number of equipment running simultaneously should be limited.
- Activities should be planned to minimize equipment usage.
- Equipment should only be used during legal operating hours, according to local regulations.

- No tasks susceptible of generating noise and vibration should be carried out at night time (10 PM to 8 AM).
- When required, workers should be provided with hearing protection.
- Movable machinery should be operated smoothly, avoiding unnecessary acceleration.
- Power generating units should be closed at all times.
- Elastic covers should be placed on hoppers and tippers.
- The noisiest equipment and machinery at the project site should be soundproofed (e.g. using mufflers in machinery with internal combustion or air pressure systems).

4.7 Diverse Effects

This section, which includes effects not mentioned in previous sections, focuses mainly on action areas adjacent to salt flats, lakes, rivers or any natural environment subject to special protection by the Regional Administration.

4.8 Effects on Fauna

- Hunting fencing should be installed to prevent birds from crashing. Rectangular plates should be installed on the fence.
- Activities should be properly planned so that fauna is not affected.
- The area will be surveyed to detect the potential presence of bird and/or animal nests or shelters.
- Rescue protocols should be complied with to ensure proper management of fauna potentially affected by the project site. In case nests of protected species were found, works should be aborted and competent authorities should be notified. Disturbances for threatened birds should be minimized by granting a 200-meter radio exclusion area (minimum) until new instructions are received from the authorities.
- No searches aimed at scaring off mammals and birds from the action area, will be carried out.
- The work area should be clean, removing all trash.
- Noise levels, vibrations and dust generation should be limited, especially during mating and nesting seasons.
- The speed limit at the project site should be limited to 20 km/h (12.5 mi/h).
- The Environmental Monitoring Plan should be strictly followed.
- It is necessary to observe whether project works disturb nearby animal habitats, reacting accordingly.
- An ecological 8-hectare corridor should be established to create a suitable ecotone for local birds.

4.9 Effects on Flora

- Activities should be properly planned so that flora is not affected.
- The work area should be limited, including access routes and auxiliary facilities.
- In case of significant dust accumulation, vegetation should be watered.
- No material stockpiling is allowed in natural vegetation areas, not even temporarily.
- Relevant project personnel should be informed when important or protected species and groups are spotted.
- Using weed killers or pesticides, as well as stripping vegetation outside the project area, are forbidden activities.
- Operational sites should be equipped with certified fire extinguishing devices to protect the area and environment.
- The speed limit at the project site should be limited to 20 km/h (12.5 mi/h).
- Ecological corridors should be restored, if they existed beforehand.

4.10 Effects on Ecological Heritage

- Activities should be properly planned to minimize the impact on adjacent heritage.
- Earthworks in sensitive areas should be monitored closely.
- It is necessary to obtain information and diagrams from competent authorities.
- The most sensitive areas should be identified and signposted, with heavy machinery not being allowed in such areas.
- The necessary means should be used to protect any heritage that could be affected by the project site.

4.11 Effects on Landscape

- Support structures for maintenance of specific waste areas and machinery, should be disassembled. Portable facilities used during tasks, should also be removed. The affected site should be conditioned by removing or eliminating any type of project debris, especially that from site foundation works during project development.
- Materials and colors more easily integrated into the environment should be used, preferably soil-like colors. Temporary facilities should be as discreet as possible, ensuring their sequential installation and absence of waste.
- Light fittings should be designed to project all generated light onto the ground, thus preventing increased light pollution in the area. Furthermore, it is recommended to get rid of the maximum number of light fittings as possible and, at the same time, try to use low consumption lighting systems.
- It is necessary to monitor temporary stockpiling areas to ensure their height is limited.

- Official setting-back distances to adjacent lots and pathways need to be confirmed, thus preventing interference with farming activities in the surrounding area.

5 Surveillance Program and Monitoring of Environmental Variables

5.1 Motivation and Targets

The Environmental Monitoring program aims to establish a mechanism that ensures both compliance with proposed protective and corrective measures, as well as to detect unforeseen changes.

The program also establishes various control elements monitored through a set of indicators that show their evolution at all times.

- Correct application of proposed measures and their adequacy to applicable environmental integration criteria, should be monitored.
- The quality standards of materials and means used, should be verified.
- The effectiveness of established and implemented protective and corrective measures, should be checked. When effectiveness is rendered unsatisfactory, the cause should be determined and remediation actions should be established.
- Unforeseen impacts should be identified and suitable measures to reduce, remove or compensate them, should be foreseen.

5.2 Environmental Monitoring Methodology

Monitoring activities are based on the development of indicators which, in a quantitative and simple manner, contribute to estimating the level of completion of foreseen measures and the results achieved following their application.

Two types of indicators exist:

- **Completion indicators**, assessing effective application and completion of proposed corrective measures.
- **Efficiency indicators**, assessing results obtained after corrective measure application; these indicators quantify their level of effectiveness.

5.3 Environmental Monitoring Program during the Project Implementation Phase

Monitoring the proposed environmental action program is achieved by means of the Environmental Inspection Point Program, which includes the following sections based on specific monitoring targets:

- Control Point

- Characteristics to be monitored
- Non-conformity limit or criterion
- Frequency
- Reference or record documentation

All information gathered following control and monitoring activities, is used to draft Monitoring Reports which are made available to Project Management. Such information should establish the measures needing implementation in line with task evolution and environmental protection measure effectiveness.



Environmental Management Plan
PL-EHS-0004_en

Version: 02
 Date: 08/19/2022
 Page 11 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Dust generation caused by earthworks during project site actions.	Dust emissions	Do not humidify project site areas	WEEKLY depending on equipment used, weather conditions and work pace	Environmental Registration Inspection
		High speed of machinery and trucks when driving to or inside the project site.	WEEKLY depending on equipment used, weather conditions and work pace	Environmental Registration Inspection
		Do not cover truck trailers with adjustable tarps	WEEKLY depending on equipment used, weather conditions and work pace	Environmental Registration Inspection
Soil discharge due to machinery movements	Soil discharge	Machinery transit through unsuitable areas	WEEKLY	Environmental Registration Inspection
		Machinery yard badly located	WEEKLY	Environmental Registration Inspection
		Machinery transit outside the project site area	WEEKLY	Environmental Registration Inspection



ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Waste generation at the project site	Proper waste management	Do not segregate different types of waste	WEEKLY	Environmental Inspection Registration
		Waste management through a non-authorized agent	Every time waste is removed	Waste management support documentation
		Not managing used oil according to existing regulations	Every time waste is removed	Waste management support documentation
		Incorrect location of landfills	Weekly during earthworks	Environmental Inspection Registration
Material consumption at the project site	Control of stockpiling, storage and handling conditions at the project site	Not fencing off storage areas for project site materials and not monitoring storage conditions.	When starting activities	Environmental Inspection Registration



ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Perception of the environment	Control of landscape impact	Failure to restore the environment	After finalizing the project and removing auxiliary facilities	Environmental Registration Inspection
		Not dismantling auxiliary facilities at the project site	When completing activities	Environmental Registration Inspection
		Not collecting and ensuring final management of materials stockpiled during construction	When completing activities	Environmental Registration Inspection
Soil	Control of area boundaries	Not staking the occupation area prior to stripping	Weekly	Environmental Registration Inspection
Waste and material residues generated at the project site	Control the management, segregation and location of material waste and residues at the project site	Waste outside designated areas Poor housekeeping at the project site and uncontrolled waste	Weekly	Environmental Registration Inspection



ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Hazardous waste (product containers, truck and machinery oil and fuel, cleaning and maintenance work residues)	Control of hazardous waste segregation and location	Mixture of hazardous waste Not disposing of hazardous waste in designated containers	Weekly	Environmental Registration Inspection
	Inspection of hazardous waste containers	Containers poorly labeled and/or in bad condition Insufficient number of containers	Weekly	Environmental Registration Inspection
	Inspection of storage area	The waste storage area is not roofed and the floor is unprotected	When beginning storage activities	Environmental Registration Inspection
	Inspection of storage conditions	Not collecting and ensuring final management of materials stockpiled during construction	When completing activities	Environmental Registration Inspection
	Control of maximum storage time	Over 6 months	After the 6 th month following storage	Environmental Registration Inspection
Hazardous waste (product containers, machinery oil and fuel, cleaning and maintenance work residues)	Control of completed management activities	Not having documentation to support management activities carried out	Whenever waste is removed	Documents supporting management activities

ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
	Control of used oil management	Not requesting evidence that used oil management activities were completed	Whenever waste is removed	Documents supporting management activities
	Control of hazardous waste segregation and location	Mixture of hazardous waste Not disposing of hazardous waste in designated containers	Weekly	Environmental Inspection Registration
Waste generated at the project site (sand, mortars, protruding floors, vegetable residues...)	Proper waste management	Not reusing or recycling reusable/recyclable waste	When starting an activity that makes it necessary	Environmental Inspection Registration
		Not segregating different waste	Weekly	Environmental Inspection Registration
		Not requesting evidence that used oil management activities were completed	Weekly	Environmental Inspection Registration
Urban-type waste	Control of urban waste (or similar) management, segregation and location activities	Presence of residues from terrain activities or cleaning tasks	When waste generation starts and every time waste is removed	Logbook



Environmental Management Plan
PL-EHS-0004_en

Version: 02
 Date: 08/19/2022
 Page 16 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM

ENVIRONMENTAL MANAGEMENT MEASURES FOR PROJECT MATERIALS AND SOILS

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
		Presence of hazardous or inert waste inside urban containers	Weekly	Manager documentation
		Urban waste outside designated containers, leading to disturbances or risks until it is removed	Weekly	Environmental Inspection Registration
		Not managing waste removal activities in coordination with the city hall or an authorized company, and not having evidence of end waste destination (controlled landfill)	At the start of works at the project site	Environmental Inspection Registration



Environmental Management Plan
PL-EHS-0004_en

Version: 02
 Date: 08/19/2022
 Page 17 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM				
MEASURES TO REDUCE ACOUSTIC, SOIL OR DISCHARGE CONTAMINATION				
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE				
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Noise, dust and gas emissions resulting from truck and machinery traffic at the project site	Control of periodic vehicle inspections	Not having a valid VET (for vehicles that need it)	Periodic (depending on the vehicle)	Copy of VET certificates
	Noise and machinery control	Not having a certificate of conformity or label from the manufacturer	Weekly	Environmental inspection record
		Not using noise reduction systems on machinery and vehicles at the project site	At the start of operation	Environmental inspection record
		Non-compliance with periodic machinery and muffler inspections	Weekly	Copies of manufacturer specifications and revision certificates
		Not using low noise compressors and drillers	Weekly	Environmental inspection record
	Speed control	Fast traffic at the project site (v>20 km/h (12.5 mi/h))	Weekly	Environmental inspection record



Environmental Management Plan

PL-EHS-0004_en

Version: 02
Date: 08/19/2022
Page 18 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM				
MEASURES TO REDUCE ACOUSTIC, SOIL OR DISCHARGE CONTAMINATION				
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE				
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
	Control of machinery performance	Not performing specific inspections after detection of performance deficiencies	Weekly	Environmental inspection record
	Control of machinery yard location in auxiliary facilities	Placing them near residential areas	When starting activities	Placing them near residential areas
Noise, dust and gas emissions resulting from truck and machinery traffic at the project site	Control of dust generation	Not watering project site pathways and areas periodically	Weekly	Environmental inspection record
		No covers used during aggregate transport activities (adjustable tarp)	Weekly	Environmental inspection record
		Not washing tires at the project site exit	Weekly	Environmental inspection record
One-off, identified discharges caused by spillages, machinery loss, oil and lubricant spillages during maintenance on electromechanical equipment	Work areas	Not removing contaminated elements and managing them as hazardous waste	Weekly	Environmental inspection record
		Not installing decanting ponds	When starting activities	Environmental inspection record



Environmental Management Plan

PL-EHS-0004_en

Version: 02
Date: 08/19/2022
Page 19 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM				
MEASURES TO REDUCE ACOUSTIC, SOIL OR DISCHARGE CONTAMINATION				
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE				
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
	Machinery yard	Not waterproofing the machinery yard	When starting activities	Environmental inspection record
		Not installing spillage bunds (trays)	When starting activities	Environmental inspection record
Discharge of washing machine water	Control of cleaning water management	Discharge of cleaning water with carried-over pollutants	At the start of cleaning operations	Environmental Inspection Record
		Washing activity carried outside designated areas	Weekly	Environmental Inspection Record
Discharge of wastewater from auxiliary facilities at the project site	Water treatment	Not using an authorized agent to treat wastewater	Weekly	Environmental Inspection Record
		Not maintaining the septic tank	Weekly	Environmental Inspection Record
	Management of auxiliary facilities	Machinery traveling near auxiliary project site facilities	Weekly	Environmental Inspection Record



Environmental Management Plan
PL-EHS-0004_en

Version: 02
 Date: 08/19/2022
 Page 20 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM

MEASURES TO REDUCE ACOUSTIC, SOIL OR DISCHARGE CONTAMINATION

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Hydrological system	Yard wastewater treatment	Auxiliary facilities located in exclusion areas	When starting activities	Environmental Inspection Record
	Machinery and facilities	Not installing elements that prevent soil filtration	At the start of works	Environmental Inspection Record
		Not installing spillage bunds	At the start of works	Environmental Inspection Record
		Not installing spillage bunds under full storage containers to prevent inadvertent discharges	At the start of works	Environmental Inspection Record



ENVIRONMENTAL INSPECTION POINT PROGRAM

MEASURES TO REDUCE VISUAL, CULTURAL OR SOCIOLOGICAL IMPACT

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Socio-economic background	Nuisances for neighbors	Not fencing off the project site	At the start of works at the project site	Environmental Record Inspection
		Carrying out unauthorized night tasks	Weekly	Environmental Record Inspection
		Presence of dust around populated areas	Weekly	Environmental Record Inspection
Perception of the environment	Integration in the environment	Use of materials or techniques not integrating in the project site environment	Weekly	Environmental Record Inspection
Waste and material debris from activities	Housekeeping at the project site Presence of materials and waste.	Presence of waste in work areas. Presence of waste at the project site	Weekly	Environmental Record Inspection
	Actions on landscape units	Containers and premises are not disassembled, and site materials are found in nature	When completing activities	Environmental Record Inspection



ENVIRONMENTAL INSPECTION POINT PROGRAM					
MEASURES TO REDUCE CONSUMPTION AND FOSSIL FUEL USAGE					
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE					
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION	
Fuel usage (gas, fuel, diesel, etc.)	Control of machinery downtime	Not keeping track of periods when machinery is not operating	At the start of works at the project site	Environmental Record	Inspection
	Control of machinery maintenance plans	Not following control guidelines specified in machinery maintenance plans	At the start of works at the project site	Environmental Record	Inspection
Use of materials	Control of recycling and reuse activities at the project site	Not recycling or reusing recyclable/reusable materials	When completing activities	Environmental Record	Inspection
Energy consumption	Consumption/usage control	Using artificial light at the project site when there is still natural light	At the start of works at the project site	Environmental Record	Inspection
Substance consumption/usage	Storage and handling conditions	Storage outside designated areas Inadequate stockpiling conditions Containers/packages in bad condition	At the start of works at the project site	Environmental Record	Inspection



ENVIRONMENTAL INSPECTION POINT PROGRAM				
MEASURES TO IMPLEMENT IN CASE OF EMERGENCY				
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE				
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
Accidental rupture of hazardous substance containers at the project site	Potential discharge into the environment	Not keeping containers closed when not in use	Weekly	Environmental Record Inspection
		Not having a list with emergency phone numbers in the office container: Fire station, Local police station, Environment agency	At the start of work activities	Environmental Record Inspection
		Not placing containers on concrete surfaces or on collection bunds	Weekly	Environmental Record Inspection
		Not having absorbents to contain a potential spillage	Weekly	Environmental Record Inspection
Fire or explosion at the project site due to: accidental rupture of fuel tank, office container fire	Atmospheric Releases Toxic discharge due to extinguishing activities Waste generation (hazardous and non-hazardous)	Not having fire extinguishers at the project site (stand in required strategic points)	At the start of work activities	Environmental Record Inspection
		Not having emergency phone numbers in the office container: Fire station, Local police station, Environment agency	At the start of work activities	Environmental Record Inspection



Environmental Management Plan

PL-EHS-0004_en

Version: 02
 Date: 08/19/2022
 Page 24 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM					
MEASURES TO IMPLEMENT IN CASE OF EMERGENCY					
UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE					
CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION	
Machinery rupture at the project site	Potential discharge into the environment	Not having absorbents (sand, sawdust, rags) at the project site to control spillages	At the start of work activities	Environmental Record	Inspection
Accidental fuel tank rupture	Discharges into the environment	Not controlling the spillage in the early stages	When occurred	Environmental Record	Inspection
Cooling equipment rupture in portable office containers	Cooling gas emissions	Not controlling emissions immediately by calling the supplier	When occurred	Environmental record	inspection
		Not having in the portable office container the phone number of the company in charge of equipment maintenance	At the start of work activities	Environmental record	inspection
Impact on power lines	Risk of worker electrocution	Not controlling machinery movements	Weekly	Environmental record	inspection
		Not signposting the presence of power lines	At the start of work activities	Environmental record	inspection
	Fire risks	Not carrying out work in line with supplier instructions	Weekly	Environmental record	inspection



Environmental Management Plan

PL-EHS-0004_en

Version: 02
Date: 08/19/2022
Page 25 / 25

ENVIRONMENTAL INSPECTION POINT PROGRAM

MEASURES TO IMPLEMENT IN CASE OF EMERGENCY

UNIT IN CHARGE: ENVIRONMENTAL MONITORING TEAM AT THE PROJECT SITE

CONTROL POINTS	CHARACTERISTICS TO BE MONITORED	NON-CONFORMITY LIMIT OR CRITERION	FREQUENCY	REFERENCE OR RECORD DOCUMENTATION
		Not informing suppliers immediately after a negative event occurs	When impact occurs	Environmental inspection record