





Manildra Solar Farm Construction – Environmental Representative (ER) Inspection Report


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Date of Inspection	11/10/2017	Location of Inspection	Manildra Solar Farm
ER	Demelza Scott	Proponent Representative	Bjorn Schultz
Weather	Fine and sunny	Construction Contractor Representative	Baz Tuppin Andrew Conning
Follow up from previous inspection	Corrective Actions: CA 130917 – 01: Conduct appropriate checks and inductions on subcontractors, their staff and plant/equipment prior to conducting any work on the project.		
Inspection Summary	Improvement Opportunity - 2 Corrective Action - 1 Open Corrective Actions: CA 130917 – 01: Conduct appropriate checks and inductions on subcontractors, their staff and plant/equipment prior to conducting any work on the project. CA 111017 – 01: Fence rocky outcrops within the development envelope that are not to be disturbed including a 2.5m buffer as per FFMP or provide justification for not fencing. Appendix A Corrective Action Register to track identification and close out of corrective actions.		
Comments / Observations	Construction has commenced with the following activities being conducted at the time of audit; construction of the BAR on Packham Drive, cut and fill earthworks, stockpiling of materials, fencing and chipping of vegetative materials. The site was tidy at the time of inspection. Erosion and sediment controls for the cut and fill earthworks were in place and managing sediment risk well. The site presented a low environmental risk at the time of inspection.		

Signed: 

Demelza Scott, Environmental Representative

Issue	Observations & Corrective Actions	Due Date	Photographic Record
Site Compound	<p>Site access control has been set up since the last inspection and contractors were on site constructing the BAR on Packham Drive.</p> <p>The sides of the main access road have been formed and seeded as part of progressive rehabilitation.</p> <p>The main access road appears to be in good condition and handling the movement of heavy vehicles for delivery of plant and materials to site.</p>		

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Dust	<p>At the time of the inspection, two water trucks were operating on site to manage dust for the works on Packham Drive and the earthworks on Arrays 7 and 8. There was minimal dust being generated as part of the works.</p> <p>Heavy vehicles were observed to be using designated temporary tracks.</p> <p>There were no deliveries to site during the site inspection.</p>		

Issue	Observations & Corrective Actions	Due Date	Photographic Record
Waste	<p>Waste and recycling bins were observed on site and waste was observed to be segregated. RCR have not received a waste docket for the first removal yet. RCR have not inducted the waste collection driver and he attended site on the day of the inspection and did another waste collection.</p> <p>Refer to CA 130917.</p>		 

Issue	Observations & Corrective Actions	Due Date	Photographic Record
Chemicals and Fuels	<p>The CEMP states that the main construction compound will include a dedicated refuelling station that is bunded, with topsoil stripped, overlain with heavy plastic sheet and material placed and compacted on top. RCR advised that they are conducting onsite refuelling however are yet to set up a designated, lined and bunded refuelling area. Refuelling is conducted in accordance with an SWMS (as is required by the CEMP), which was sighted. SWMS includes pre-start checks, spills, fire and training. The copy of the SWMS provided appears to be in draft and has not been approved or signed onto by any site personnel.</p> <p>A contractor is going to be engaged to refill the refuelling trailer at site although this hasn't commenced yet.</p> <p>Spill kits and fire extinguishers are maintained on site at the generator and refuelling trailer.</p> <p>Andrew Conning, HSE Advisor has conducted Dangerous Goods / Hazardous Substances training, sighted statement of attainment from PeopleSafe Australia.</p> <p>Brefni maintain a fuel truck and have been conducting refuelling of their plant on site.</p> <p>Improvement Opportunity 111017 – 01: Finalise Refuelling SWMS, and induct and sign on all relevant construction personnel to the SWMS.</p>	26/10/17	

Flora and Fauna

All trees to be cleared as part of the project have been felled and Geolyse have provided a draft Post Clearing Report. Protocol 7: Hollow Bearing Tree Removal appears to have been followed. Trees identified for removal were marked, pre-clearing survey was conducted by a qualified ecologist, the ecologist was present during tree felling and conducted a post clearing inspection and report. The post clearance report did not make reference to the placement of nestboxes as per the FFMP. This is to be reviewed at the next ER Inspection.

Tree trunks have been taken offsite for firewood for the local aged care units as per an agreement with the landholder. Stumps have been ground and a contractor is operating on site to chip other vegetative material. Mulch has been used in the pedestrian walkway and will be used for the mulch berm.

To date, rocky outcrops have been left insitu where they are not in the vicinity of trees to be removed. The FFMP Protocol 2 requires that rocky outcrops within the development envelope are fenced with a 2.5m buffer, wherever possible. This was not observed to be occurring on site.

Where rocky outcrops were in the vicinity of trees to be removed and posed a risk to personnel, individual rocks were moved to an area immediately adjacent to their original location. This is consistent with the FFMP Protocol 6.

AWTS irrigation area is showing some signs of growth with irrigation of treated effluent from site facilities.

FFMP states that, where security considerations permit, perimeter fencing will not contain barbed wire, particularly the top strands. Perimeter fencing was observed to be constructed with three top strands of barbed wire.

Corrective Action 111017 – 01: Fence rocky outcrops within the development envelope that are not to be disturbed including a 2.5m buffer as per FFMP or provide justification for not fencing.



26/10/17


Improvement Opportunity 111017 – 02: RCR to provide copy of Australian Standard for Power Station Security and correspondence from First Solar that requires the top strand barbed wire in perimeter fencing.



26/10/17



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Traffic	<p>Plant and vehicle drivers were observed to be actively using the UHF network to communicate traffic movements around site.</p> <p>Sighted Council Works Permit for activity on a public road (Packham Drive BAR construction) and RCR plant acceptance documentation for Pad Foot Roller that was working on Packham Drive.</p>		 

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Noise	<p>RCR have been conducting test pile driving in an area adjacent to the site compound to determine noise levels and test mitigation measures. Once this activity commences it will constitute 'High Noise Activity'.</p> <p>RCR have not applied for Out of Hours Work approval yet.</p>		

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Soil and Water	<p>RCR have cleaned out the former farm dam, and formed and seeded the batters. The dam receives water from catchment runoff and a supply from the landholder. Sediment fencing has been installed upslope and downslope of the dam as an erosion and sediment control measure and encourage access at the designated point. A pump and standpipe have been commissioned this week for filling site water trucks. RCR had laid rock at the fill point however it has not been sufficient to prevent muddying of the access way. RCR have identified this as an issue in their Weekly Environmental Inspection and plan to lay additional rock to stabilise the area.</p> <p>The site received 16mm in 36hrs over the weekend. Although this did not trigger a wet weather inspection as per the CEMP, RCR conducted a Wet Weather Inspection to check the effectiveness of erosion and sediment controls.</p>		 
Community Consultation	RCR have notified Council directly of the commencement of works on Packham Drive and notified the community through the Community Information Sessions.		
Complaints	There have been no complaints reported to date.		

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<i>Incident Management</i>	<p>There have been no incidents reported to date.</p> <p>RCR have not delivered any specific training for incident management/response. A training plan including incident training required for specific roles is yet to be developed.</p>		
<i>Permits and Approvals</i>	<p>RCR obtained a Works Permit from Council for the works on Packham Drive.</p>		
<i>Performance Monitoring</i>	<p>RCR have developed a Compliance Tracking spreadsheet and are starting to populate it with actions from the Weekly Environmental Inspections and ER Inspections. RCR will provide a copy prior to the next ER Inspection.</p> <p>The Weekly Environmental Inspections are proactively identifying environmental issues and implementing corrective actions to address.</p> <p>RCR and First Solar are conducting Monthly Meetings and environment is on the agenda. Actions from the meetings will be recorded in the Compliance Tracking spreadsheet.</p>		
<i>Induction and Training</i>	<p>Sighted induction documentation for Ethan Lewin who is one of the fencing contractors working on site on the day of the inspection. It included all relevant documentation including completed induction checklist, drivers licence and construction induction.</p>		

Appendix A Corrective Actions Register

Reference	Action	Category <i>A: Stop Work</i> <i>B: Immediate Action</i> <i>C: Closed within 2 weeks</i> <i>D: Non-critical</i>	Date Opened	Responsibility	Date Closed
170810 – 01	Maintain spill kits in areas that are readily accessible in the event of a spill.	B	10/08/2017	RCR SCECO	13/09/2017
170810 – 02	Manage trenches in accordance with Protocol 4: Trenching to minimise trap hazard for fauna.	B	10/08/2017	RCR SCECO	13/09/2017
130917 – 01	Conduct appropriate checks and inductions on subcontractors, their staff and plant/equipment prior to conducting any work on the project.	C	13/09/2017	RCR SCECO	
111017 – 01	Fence rocky outcrops within the development envelope that are not to be disturbed	C	11/10/2017	RCR SCECO	

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	including a 2.5m buffer as per FFMP or provide justification for not fencing.				