

5th E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj,

PREPARED FOR



**UNIQUE MEGHNAGHAT
POWER LIMITED**

Unique Meghnaghat Power Limited



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5th E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj, Bangladesh – Oct-Dec 2023

Final Report
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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AAQ	Ambient Air Quality
AI	Aspect Impact
AIIB	Asian Infrastructure Investment Bank
AoI	Area of Influence
ARIPA	Acquisition and Requisition of Immovable Property Act
BCPA	Bangladesh Crop Protection Association
BECR	Bangladesh Environmental Conservation Rules
BFSCD	Bangladesh Fire Service & Civil Defense
BIWTA	Bangladesh Inland Water Transport Authority
BLA	Bangladesh Labour Act
BLR	Bangladesh Labour Rules
BOD	Biochemical Oxygen Demand
BPDB	Bangladesh Power Development Board
BWA	Bangladesh Water Act
BWR	Bangladesh Water Rule
CAAB	Civil Aviation Authority of Bangladesh

Acronyms	Description
CAR	Corrective Action Request
CCGT	Combined Cycle gas Turbine
CCPP	Combined Cycle Power Plant
CEMS	Continuous Emission Monitoring System
CIA	Cumulative Impact Assessment
CL	Casual Leave
CMB	Common Monitoring Basin
CO2	Carbon di oxide
CoC	Cycle of Concentration
COD	Commercial Operation Date
COVID	Corona Virus Disease
CSR	Corporate Social Responsibility
CW	Cooling Water
DEG	Deutsche Entwicklungs- und Investitionsgesellschaft
DG	Diesel Generator
DIFE	Department of Inspection for Factories and Establishments
DoE	Department of Environment
DWP	Demineralized Water Plant
E&S	Environment & Social
ECA	Environmental Conservation Act
ECA	Ecologically Critical Area
ECC	Environmental Clearance Certificate
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EL	Earned Leave
EMF	Electric and magnetic Field
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
ERM	Environmental Resources Management
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan

Acronyms	Description
ESMS	Environment and Social Management System
ETP	Effluent Treatment Plant
FGD	Flue gas Desulphurization
FGL	Finished Grade Level
FNTP	Full Notice to Proceed
GBV	Gender Based Violence
GE	General Electric
GHG	Green House Gas
GIIP	Good International Industry Practice
GIS	Gas Insulated Switchyard
GLC	Ground Level Concentration
GoB	Government of Bangladesh
GRM	Grievance Response Mechanism
GSA	Gas Supply Agreement
GT	Gas Turbine
GW	Ground Water
H ₂ S	Hydrogen Sulphide
HAZOP	Hazard and Operability
HDD	Horizontal Directional Drilling
HFL	High Flood Level
HIRA	Hazard identification and Risk Register
HP Steam	High pressure Steam
HR	Human Resource
HRSG	Heat Recovery Steam Generator
HSD	High Speed Diesel
IDCT	Induced draft-cooling tower
IEC	Installation, Erection and Commissioning
IEE	Initial Environmental Examination
IFC	International Finance Corporation
ILO	International Labour organization
Km/Hr	Kilometer/Hour
KPI	Key Performance Indicator

Acronyms	Description
kV	kilovolt
LESA	Lenders' Environmental and Social Advisor
LGED	Local Government Engineering Department
LoI	Letter of Intent
LOTO	Lock Out Tag Out
LP Steam	Low Pressure Steam
LPG	Liquefied petroleum Gas
LRP	Livelihood Restoration Plan
MPEMR	Ministry of Power, Energy and Mineral Resources
MPR	Monthly Progress Report
MSDS	Material Safety Data Sheet
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NEPC	Northeast No.1 Electric Power Construction Co Ltd
NFPA	National Fire Protection Association
NG	Natural Gas
NOC	No Objection Certificate
NOx	Nitrogen Oxides
OCC	Optimized for Cycling and Constructability
OPEC	OPEC Fund for International Development
P&ID	Piping and Instrumentation Diagram
PAH	Poly Aromatic Hydrocarbons
PAP	Project Affected Person
PCB	Poly Chlorinated Biphenyls
PEL	Permissible Exposure Limit
PGCB	Power Grid Company of Bangladesh
PLF	Plant Load Factor
PPA	Power Purchase Agreement
PPE	Personal Protective Equipment
PS	Performance Standard
PUC	Pollution Under Control
PVC	Poly Vinyl Chloride

Acronyms	Description
PWD	Public Works Department
RAP	Rehabilitation Action Plan
RCC	Reinforced Cement Concrete
RMS	Regulatory Metering Station
RoW	Right of Way
SCB	Standard Chartered Bank
SE	Socio Economic
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SFL	Strategic Finance limited
SO ₂	Oxides of Sulphur
SPM	Suspended Particulate Matter
ST	Steam Turbine
STP	Sewage Treatment Plant
SWAS	Steam and Water Analysis System
TDS	Total Dissolved Solids
TGTDCL	Titas Gas Transmission and Distribution Company Ltd
TL	Transmission Line
TSS	Total Suspended Solids
UHRL	Unique Hotel and Resorts Limited
UMPL	Unique Meghnaghat Power Limited
USP	Unsolicited Proposal
WARPO	Water Resources & Planning Organisation
WHO	World Health Organization
WMP	Waste Management Plan
WTP	Water Treatment Plant

EXECUTIVE SUMMARY

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh ("Project"). A consortium led by UHRL named "Unique Meghnaghat Power Ltd" ("UMPL"), is developing this project. It is understood that Lenders are evaluating opportunity of equity investment in the project and have appointed ERM as Lenders' E&S Advisor (LESA) to support their due diligence prior to financial close as well as for periodic monitoring during the investment period.

As part of this engagement, ERM has so far conducted initial ESDD in January 2021 followed by five periodic E&S compliance monitoring of the project during construction phase. This report present findings/observations of the 5th EHSS compliance monitoring audit.

CURRENT PROJECT STATUS

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with NEPC and have commenced site construction activities. Review of the Monthly Progress Report (MPR) shared by UMPL for January 2024 indicated the progress status as stated below:

- **The project has achieved COD on 19 January 2024**
- Completed Dependable Capacity Test (DCT) and other contractual tests
- Gas Turbine (GT) system checked and prepared for start-up
- Release Nitrogen preservation of HRSG, Removing Dehumidifier of Gas Turbine & Steam Turbine; HRSG water filling, GTG Hydrogen filling, and BOP equipment restart.
- Gas Turbine and steam turbine (ST) running on baseload
- A total of 2885 Punchlist items completed of the total of 3077. No Major works pending for civil unless few punch list is carry forward to warranty period
- Key activities planned for Feb to April 2024 includes conducting remaining contractual test, functional test, thermal performance test, emission test and PAC.

ENVIRONMENT LINKED OBSERVATIONS

Wastewater recycling: Review of the site clearance conditions requires UMPL to develop and implement a plan to facilitate 100% wastewater recycling during operations. However, discussion with EPC consortium reveals that as per the design both Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) to be installed and operated will be having two separate outfalls with no provision for wastewater recycling. Presently, the site is yet to develop a wastewater recycling plan to support to demonstrate compliance with the aforesaid regulatory requirement. It is therefore recommended to develop and implement a plan for 100% wastewater recycling for project operations or explore provision of seeking necessary exemption/waiver on this condition while obtaining Environmental Clearance

BERC Registration for Gas Supply Pipeline: With COD declared in January 2024, UMPL has written to TGDCL vide letter dated 3 Dec 2023 seeking sharing of the BERC license for gas supply pipeline. However, copy of the same is yet to be shared for review and validation.

Hazard Identification & Risk Assessment: Documentation review indicates that UMPL along with the O&M contractor – NEPC-S has developed a HIRA matrix for operations whereas the AI matrix for the said stage is yet to be developed to include the potential environmental impacts associated with flue gas emissions, wastewater discharges, hazardous waste management, fuel storage and handling, water consumption, operations of high noise machineries/equipment. This is identified to be of significance as the project is currently operational with COD being declared on 19 Jan 2024.

E&S Management Plans: In accordance with the UMPL ESMP for operations the following key E&S management plans/procedure is required to be developed and implemented: Air Quality Management Procedure; Spill Prevention and Control Procedure; Occupational Health & Safety Plan; Wastewater Management Plan; Environmental Monitoring Plan and Incident Reporting and Investigation Procedure.

Noise Barrier wall: The site has prepared a Noise Prevention and Control Plan for operations with noise barrier wall (~3m height) reportedly to be constructed on top of the project boundary wall for which the budget has already been approved by UMPL Board of Directors. Reportedly construction of boundary and retaining wall is expected to commence in Dec 2023 and be completed by Mar 2024, with the installation of noise barrier expected to be completed by Jun 2024.

Environmental Monitoring: UMPL has not undertaken any monitoring of treated STP effluent to assess conformance with the inland surface water discharge standards specified in Schedule 3 of the Bangladesh Environmental Conservation Rules (BECR), 2023. With respect to the ETP, the treated effluent is being subjected to third party testing of following parameters - pH, SS, TDS and COD with results dated 16 Jan 2024 found to be in compliance with the BECR inland surface water discharge standards specified in Schedule 4 of the said Rules. However, UMPL has not updated the wastewater monitoring program for operations to cover the additional 28 parameters as specified in Schedule 4 of BECR, 2023.

UMPL has installed Continuous Emission Monitoring System (CEMS) for both HRSG and bypass stack with results found to be in conformance with the emission standards specified in the Air Pollution Control Rules, 2022. However, UMPL has not undertaken any third-party source emission monitoring as specified in the ESMP for operations for validation of the CEMS results.

Green House Gas (GHG) Emissions: With project COD declared in Jan 2024, UMPL is yet to undertake annual quantification of GHG emissions during operations in accordance with internationally recognized methodologies and good practices (IPCC).

Workplace & Machine Safety:

HEALTH & SAFETY LINKED KEY OBSERVATION

Emergency Response Planning: Review of the emergency response plan developed indicates the same need to be amended in line with the current operations E&S organogram. Also, the emergencies identified in the plan need to be updated to include other high risk

scenarios - hydrogen leak, LNG leak etc. along with specific emergency response and evacuation process for all scenarios identified. The plan is also found to lack details of the emergency response team comprising of first aid, firefighting and rescue team members in Form 22 (as per BLR, 2015 provision) along with details of the emergency response equipment in place.

Electrical Safety: The electrical wiring and earthing of the UMPL operational units is not found to be subjected to annual review and certification by government licensed Wiring Inspector or Institution as per Bangladesh Labour Rules (BLR), 2015 requirements. UMPL has also appointed certified wireman for undertaking Class A, B and C type electrical equipment installation and maintenance, however there is no certified supervisor available for the same as per the provision of Electrical Safety Rules, 2020.

Machine & Equipment Safety: Reportedly, site is involved in the operation of lifting equipment in the form of EOT Cranes, chain pulley blocks, lifts etc. for operations. However, the aforesaid lifting equipment has not been subjected to inspection and certification by a competent person (as approved by Department of Inspection for Factories & Establishment, Bangladesh) prior to its first-time use/installation as specified in the Bangladesh Labour Rules (BLR), 2015 and records maintained in prescribed format (Form 24).

Occupational Health Surveillance & Monitoring: UMPL has developed an occupational health surveillance checklist for operations workforce which is to be implemented on an annual basis. As discussed, UMPL is yet to undertake pre-employment medical examination of the operational workforce (~80) through a registered practitioner and issue a certificate of fitness in Form 26(A) and maintain the health examination records in Form 26. Furthermore, UMPL has also not developed and implemented an Occupational Health Surveillance Procedure to this regard. UMPL has also not developed and implemented an EMF Safety Program as per the IFC Sectoral EHS Guidelines requirements.

Life & Fire Safety: In accordance with the BFSCD approved firefighting floor plan for the project buildings, UMPL has made provision of active and passive fire protection system in the form of multi detectors, smoke detectors, sprinklers, gas detector, gas suppression system, manual call points, emergency lighting etc. at strategic locations. Based on site visit undertaken for sample buildings within the project, following key gaps/deviations have been identified:

- Lack of sprinkler system at the 3rd floor staircase of Control Room Building and remote indicators along all staircase landings of the said building.
- Lack of smoke detectors with remote indicators at the DM plant building. Provision of hose reel as per the approved plan is also lacking at the said building.
- Lack of sprinkler system and hose reels at the staircase landings of dormitory and canteen building.
- Provision of fire alarm control panel lacking at the electric fire pump room as per the approved plan

Fire safety assessment: In alignment with Section 8.1.3 of Project EHS Plan, Site is required to undertake a Fire Safety Assessment to verify and validate the design to assess the fire protection requirements. Reportedly the site has engaged Safety Wings to conduct the Fire Safety assessment, however review of the report does not specify the compliance status with respect to applicable regulatory requirement including BNBC and NFPA standards. The

functionality of the firefighting infrastructure is also not found to be mentioned in the said document. Hence it could not be established to ensure whether it is in alignment with the applicable regulatory requirement such as BNBC 2020.

SOCIAL LINKED OBSERVATION

Overtime and minimum wage rate compliance: Non-conformity with rest to overtime payment rate and revised minimum wage rate for construction workers (published in August 2021), were highlighted in previous audits. UMPL has agreed to ensure payment of differential amount of overtime hours performed and minimum wage payment to eligible workers to ensure compliance requirement. In this regard, a detailed assessment on differential amount for eligible workers is prepared.

Releasing of the differential amount is not being initiated now, in view of potential business interruption related risk that were discussed in detail during last site visit. In ERM's 5th E&S Monitoring visit (Feb 2024), it was apprised that project COD was achieved on 19th January 2024 and calculation of differential amount is completed and it has considered period till January 2024. Next steps towards payment release includes formation of back wage committee, Bank Account opening for depositing the fund for differential amount and the initiating payment to eligible construction workers. It was also apprised that payment disbursal is likely to be initiated by May/June 2024.

1. INTRODUCTION

1.1 BACKGROUND

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh (hereinafter referred to as "Project"). Unique Hotel & Resorts Limited (UHRL) is the major sponsor of the project with 51% shareholding. A consortium led by UHRL named "Unique Meghnaghat Power Ltd" (hereinafter referred to as "UMPL" or "Company"), is developing this project. It is understood that Lenders are evaluating opportunity of equity investment in the project and have appointed ERM as Lenders' E&S Advisor (LESA) to support their due diligence prior to financial close as well as for periodic monitoring during the investment period.

1.2 OBJECTIVES

As Lenders' environmental and Social Advisor (LESA), ERM's overall role is to support Lender's investment decision and follow-up approach by independently assessing the Company's operations and activities (existing and planned) against the Assessment Framework (see Section 1.3). ERM is required to identify gaps, describe necessary mitigation and management measures, assist the finalization of the ESIA report in accordance with the lenders' environmental and social safeguard policies and follow-up actions. This will be followed by periodic Environmental and Social (E&S) Monitoring i.e. quarterly during construction phase, quarterly for 1st year of operations and annually during operation for the following 2 years to verify compliance within assessment framework (Refer Section 1.4).

1.3 WORK SCOPE – PERIODIC E&S MONITORING

The E&S Monitoring will be undertaken during both construction and operational phases in order to verify compliance within the assessment framework stipulated, which will include verifying the following:

- adequacy of the Company's E&S monitoring report.
- adequacy of the Company and contractor staffing and expertise to properly execute and monitor the E&S aspects of the operational activities.
- implementation status of the contractually agreed Environmental and Social Action Plan (ESAP) and all related processes and documents, as well as any deviations.
- adequacy of the Environmental and Social Management System.
- the implementation status of the Environmental and Social Management & Monitoring Program (ESMP) under special consideration of CO₂ emissions (considering use of gas / HFO).
- general site condition and cleanliness, and work execution.
- any known contractual problems with sub-contractors.
- any changes in the original operational plan and their impact.

- any indications for concerns with regard to the relation with local communities, former landowners (or users) or workers.
- any impacts on livelihoods.
- effectiveness and efficiency of stakeholder engagement and GRM.

1.4 APPLICABLE REFERENCE FRAMEWORK

The E&S Monitoring was carried out against the following the Assessment Framework

- Applicable local, national, international environmental, social (including occupational health and safety) legislation, and guidelines.
- ILO conventions covering core labour standards and the basic terms and conditions of employment.
- DEG Exclusion List.
- AIIBs ESP, ESSs and ES Exclusion List
- IFC Performance Standards (PS) 1–8, January 2012.
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines, April 2007.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Thermal Power Plants.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Transmission Lines.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Gas Distribution System.
- IFC`s Stakeholder Engagement Handbook.
- Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets; and
- Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence.

1.5 ERM TEAM

A three-member ERM team had conducted the physical site walk around and consultations from 19-20 February 2024 as part of the 5th E&S monitoring exercise undertaken for the project construction phase. The composition of the ERM team were as follows

- **Dhritiman Ray (Environmental Specialist & Team Leader):** Dhritiman having 22+ years of experience in undertaking environmental and social impact assessments, environmental due diligence, independent environment reviews, urban planning, environmental permitting and waste management in India, Bangladesh, Nepal, Sri Lanka, Myanmar, Maldives and Zambia. He has extensive experience working with government institutions, private sectors and lenders in developing projects in the energy, transport and manufacturing sectors, and is well-versed with various international benchmarks such the Equator Principles, the World Bank Operational Procedures, and the IFC Performance Standards.

- **Subhradeb Pramanik (Health and Safety Specialist):** Subhradeb Pramanik holds a Master Degree in Environmental Science and is presently working as a Partner at ERM India in Kolkata office. He has over 16 years of experience in field of EHS audits, due-diligence, site assessment and environmental impact assessments (EIAs) studies. Over the years he has played a key role in managing numerous projects in oil & gas, roads, mining, chemical, manufacturing, power and transmission sector. His primary focus and experience lies in the development and implementation of management systems, compliance monitoring, regulator reviews and EHSS performance audits. Apart from this he has also worked as a key EHS auditor for both Inogen Group and ARCADIS SENES India to support the implementation of their Due Diligence and Phase I & 2 programs for nearly 50 projects for key multinational clients in textile, metallurgical, chemicals and building sector.
- **Tufail Khan (Social Specialist):** Tufail Khan is a Senior Consultant with the Impact Assessment & Planning Practice at ERM India Pvt Limited. Over his 14 years of experience, Tufail have worked with SENES Consultants India Pvt (A Canadian Environment Consultancy firm), THDC India Ltd (A Mini Ratna PSU in Hydro power generation projects) and currently with ERM India Pvt Ltd at Gurgaon. Carrying out studies related to Social Impact Assessment and Resettlement & Rehabilitation have been his core functional areas throughout his total experience. Construction projects, Hydro power project, Thermal power projects, Wind power projects, solar power projects, mining projects etc. are the sectors wherein he has been actively involved and worked. Tufail has also long experience of implementing Resettlement & Rehabilitation action plan and working with communities at very grass root level.

1.6 APPROACH – E&S MONITORING

The approach to the E&S Monitoring was broadly divided into the following tasks:

- Kick of Meeting
- Desktop based documentation review.
- Physical visit to the site and consultation with UMPL and EPC representatives; stakeholders such as workers and affected communities.
- Reporting

1.6.1 KICK OFF MEETING

The site visit began with a kickoff meeting with the E&S management representative of UMPL, GE-NEPC consortium (EPC) and NEPC-S O&M team at the UMPL site office. The kickoff meeting helped in developing understanding on the current status of the Project implementation and developments at the site. The ERM team also explained the purpose of the assignment as well as shared the approach and key activities that were planned in the course of the monitoring.

Applicable local, national, international environmental, social (including occupational health and safety) legislation, and guidelines.

1.6.2 DESKTOP DOCUMENTATION REVIEW

A virtual Data Room (VDR) was created before commencement of the review wherein UMPL had uploaded the relevant documents, as shared through an information request list. The relevant Project documents pertaining to the EHS, and social compliances identified in the ESAP and ESMMP were reviewed at the site. This was aimed at understanding the ongoing implementation, record maintenance, internal monitoring and reporting and mandatory regulatory compliances required for the project. The list of documents reviewed as part of the E&S monitoring exercise has been furnished under **Appendix B**.

1.6.3 SITE VISITS & CONSULTATIONS

The ERM team accompanied by the representatives of the Project team undertook site visits of the key Project components to assess the status and compliance with respect to EHS and social/labour issues and legal obligations. During the site visit the team made physical and visual inspection/verification of the construction and operation phase activities and on-site management of EHS and labour issues. This was followed by the consultations with the project affected communities and worker groups. Key activities undertaken during the course of the E&S monitoring visit is presented in **Table 1.1** below.

TABLE 1-1 SITE VISIT & INTERVIEWS – KEY ACTIVITIES PERFORMED

S. No	Date	Activities
1.	19 February 2024	- Opening Meeting with UMPL site team and GE senior Management. - Discussed current project execution status. - Review of site-specific EHS Procedures and checklist, existing permits, licenses and associated records, Discussion on ESMP implementation status with NEPC and GE EHS Team. - Review of stakeholder engagement records, GRM records and discussion on progress of LRP implementation. - Review and detailed discussion on documentary evidence of other HR and labour compliance related pending actions items as per the ESAP.
2.	20 February 2024	- Walkthrough at Work area belonging to NEPC subcontractors (Man is Power, Meghna Enterprises), Occupational Health Centre, Jetty area, Batching Plant Area etc. inside power plant premise. - Walkthrough the material laydown and worker camp area along with site representatives and discussion with housekeeping team, drivers' security personnel (Elite Security). - Consultation with local community at Doodhghata village; - Consultation with LRP implementation agency at their site office in Doodhghata village.

1.6.4 REPORTING

Information from various sources and direct observations made by ERM have been collated and compared against the reference framework components along with status of the compliance with respect to project ESAP, ESMMP and legal requirements.

1.7 LIMITATIONS & ASSUMPTIONS

While this assessment has endeavored to provide a comprehensive review against the requirements of the Applicable Standards, however, there remain certain limitations to the assessment that should be considered:

- This report is based on the site walkthrough, stakeholder consultations and review of information made available to ERM till date. Note that the findings in this report are subject to change depending upon other information that may come up in future. We cannot guarantee that these activities will necessarily yield complete information.
- The independent review is a high-level assessment of environmental and social risks/issues and should not be construed as a detailed legal compliance review to the conditions stipulated by enforcement agencies in the regulatory approvals and limited to the environmental and social approvals already accorded to the Project and shared with ERM.
- The findings and observations made herein are based on application of professional judgement. The findings should be viewed in the context of the applicable scope and objectives of the study and the limitation on time and resources made available to the consultants for the successful completion of the study. Kindly also note that the scope of work did not include any sampling, analysis of environmental media, collection of primary data, engineering design or development of technical specifications or cost estimates among others.

1.8 USE OF THE REPORT

ERM is not engaged in consulting or reporting for the purpose of advertising, sales promotion, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. Client acknowledges that this report has been prepared for their exclusive use and agrees that ERM reports, or correspondence will not be used or reproduced in full or in part for such purposes and may not be used or relied upon in any prospectus or offering circular. Client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this assessment and report will mention or imply the name of ERM.

Nothing contained in this report shall be construed as a warranty or affirmation by ERM that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental or social liability.

ERM may grant other financial institutions involved in the financing of the Project ("Other Parties") the right to rely on Services or work product generated by or for ERM pursuant to the Contract ("Work Product"), provided that each Reliant Party is specifically identified by name, any agreed consideration is paid, and that these Other Parties deliver to ERM, a signed copy of

ERM's standard reliance letter. The reliance letter shall govern the Other Parties' right to rely on the Work Product.

1.9 LAY OUT OF THE REPORT

The draft report is structured as under:

Section 1 (This Section):	Introduction
Section 2:	Project Appreciation and Current Status of the Project
Section 3:	ESAP & ESMMP – Compliance Status
Appendix A:	Photo Documentation
Appendix B:	List of Documents/Information Reviewed

2. PROJECT APPRECIATION & CURRENT PROJECT STATUS

2.1 THE PROJECT

Unique Meghnaghat Power Limited (UMPL), a Joint Venture Company constituted by the consortium consists of Unique Hotel & Resorts Limited (UHRL), GE Capital Global Energy Investments BV and Strategic Finance Limited (SFL), has been incorporated in the year 2018 for development of 600-Megawatt (MW) Gas based Combined Cycle Power Plant (CCPP) project with net output of 588.31 at Dudhghata mauza in Pirojpur union of Sonargaon upazila under Narayanganj district, Bangladesh. The consortium of UHRL, GE and SFL has been selected by Bangladesh Power Development Board (BPDB), Government of Bangladesh (GoB) through Unsolicited Proposal (USP) basis. The LoI (Letter of Intent) was issued by BPDB on 25th June 2018. GE has made a consortium with NEPC for project construction and commissioning activity. Corresponding agreements like Power Purchase Agreement (PPA) with BPDB, Gas Supply Agreement (GSA) with Titas Gas Transmission and Distribution Company Limited (TGTDC), Implementation Agreement (IA) with Power Division, Ministry of Power, Energy and Mineral Resources (MPEMR), GoB and Power Grid Company of Bangladesh (PGCB) have also been executed. The proposed site is located in 21.07 acres of land to the South-west of the Dhaka-Chittagong Highway and right bank of branch channel of Meghna River. This project is expected to be funded by Asian Infrastructure Investment Bank (AIIB), DEG and OPEC Fund for International Development (OPEC Fund) under financial advisory of Standard Chartered Bank (SCB). Summary of the project is presented below:

TABLE 2-1 PROJECT DETAILS - SNAPSHOT

UMPL 584MW Gas Fired Power Project	
Location	Dudhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh
Project owner	Unique Meghnaghat Power limited (UMPL)
EPC Contractor	General Electric Global Services (GmbH)
Area of Land proposed	21.07 acres
Government Land/Private Land	Private Land from 343 landowners
Plant Load Factor	84.6% with minimum availability of 90%
Electricity Generation	584 MW, however EPC Contractor has guaranteed 588.31 MW
Unit Configuration	Power block of 600 MW with HRSG, one steam turbine and two generators
Fuel Type	Natural Gas (NG)
Gas Supply	Titans Gas Transmission and Distribution Company Limited (TGTDC) through 20-inch diameter subsurface pipeline across the Meghna river

Bangladesh. The site is about 1.46 km from Dhaka-Chattogram highway to the south-west, about 3.49 km south-west of the Sonargaon upazila headquarter and about 3.28 km away from Mograpara bus stand by road. The project site is situated on the right bank of the branch channel of Meghna River. The location of the proposed project site lies, geographically between 23°37'4.57"N; 90°35'19.23"E and 23°36'53.20"N; 90°35'34.55"E. The project location on satellite imagery is presented in **Figure 2.1**.

2.1.3 PLANT LAYOUT

The proposed power plant would be consisting of main block area and auxiliary area. The main block would be comprising of gas turbine hall, HRSG, steam turbine hall, main transformer, and HV unit auxiliary transformer. The auxiliary area will include boiler make-up water treatment plant, industrial wastewater treatment plant, chemical dosing room, mechanical draft counter flow cooling tower, C.W. pump house, mechanical accelerated clarifier, raw water intake pump house, comprehensive water pump house, service & firefighting water basin, raw water basin and potable water basin, filter and sanitary wastewater treatment plant. A site layout map is presented in **Figure 2.3**.

2.1.4 KEY PROJECT COMPONENTS

ERM has the following understanding of the Project, key project facilities and specific requirements for the project operations:

- Single flow open circuit type gas turbine controlled by Local Control Cubicle and the Central Control Room.
- Heat Recovery Steam Generator (HRSG) at downstream of gas turbine and auxiliaries.
- Steam Turbine Generator plant and auxiliaries.
- Feed water system for delivering feed water from low pressure drum to the HRSG economizer inlet header and supplies spray water of HP steam system, HP bypass system and reheat steam system.
- Condensate system to deliver condensate accumulated into condenser hot well to the LP steam drum of HRSG via the condensate extraction pumps.
- Cooling water system to supply make-up water for demineralized cooling water for gas turbine oil coolers, gas turbine generator hydrogen coolers, steam turbine oil coolers, steam turbine generator air coolers, pumps, steam and water samplers, air compressors, and any other equipment requiring cooling water and to reject the waste heat to the auxiliary cooling water via the closed cooling water coolers.
- Plant Water System to draw water from the Meghna River by 2 X 100% raw water make-up pumps located in the intake water pump house. A closed cooling water system employing Induced draft-cooling tower (IDCT) has been envisaged for each proposed unit to minimize the plant water intake requirement.
- Wastewater Treatment System wherein the wastewater from De-mineralized Water plant and other service area will be treated in the neutralizing pit and effluent treatment plant to the required degree. The total effluent available after treatment from effluent Treatment Plant will be utilized partially for plantation and the balance effluent shall be routed to the outfall.
- A 400kV Gas Insulated Switchyard (GIS) for evacuation of power, import of power for start-up / shut down / station auxiliary power through Unit Transformers.

2.1.5 KEY PROJECT FACILITIES

2.1.5.1 NATURAL GAS SUPPLY

As indicated in the ESIA Report daily requirement of Natural Gas would be approximately 96192 million standard cubic foot (mscf). The gas will be supplied by Titas Gas Transmission and Distribution Company Limited (TGTDC), which is at distance of 500-700 m across the Meghna Branch Channel. Gas Supply Agreement (GSA) has already been signed between TGTDC and UMPL. Reportedly and as observed the site has already laid 20inch dia X ~600m pipeline across the Meghna River using horizontal directional drilling (HDD). Leak test of the pipeline has also been completed with pipeline currently under operation.

- In addition to this, Site is constructing another temporary jetty of approximate dimension of 55m X 12m-16m having 600 MT material handling capacity, for unloading of engines.

As observed and reported during the current visit, UMPL is currently in the process of decommissioning the jetties as the project is currently in operations stage.

2.1.5.3 POWER EVACUATION LINE

Power generated from the proposed power plant will be evacuated to the nearest grid substation of PGCB through 400 kV Single Circuit (S/C) overhead transmission line. 400kV grid sub-station belonging to PGCB will be located around 800 m from the project site. Evacuation of power from the proposed power plant will be done at 400 kV level. The 400-kV single circuit transmission lines between power plant 400 kV substation and PGCB grid sub-station, for this purpose, will be under the scope of this project. Further detailed interconnection plan with PGCB nearest grid substation along with Load flow, short circuit and transient stability with due consideration of capacity addition of proposed 584 MW project will have to be carried out by UMPL in coordination with PGCB.

2.1.5.4 CONSTRUCTION CAMP/LAYDOWN AREA

A total of 12 acres land in Dudhghata mouza has been taken on temporary lease for three years from Hamdard Laboratories (WAF), a Bangladeshi Company for setting up construction camp/laydown area. The land was filled up by UMPL by using river sand up to the road level for constructing temporary construction campsite. The construction camp/laydown area presently comprise of the following:

- Office area and living area for UMPL, GE and NEPC.
- Provision of warehouses comprising of shed warehouse as well as Class A & Class B warehouses.
- Provision of material storage in open storage yards.

2.1.5.5 SEWAGE TREATMENT PLANT (STP) & DISCHARGE PIPELINE

Sewage generated from the site is currently being treated through a modular STP. The STP would consist of Biological Oxidation tank, secondary sedimentation tank, sludge tank and disinfection tank. The treated effluent is being discharged to a public sewage channel through a 105 m long discharge pipeline.

In addition to the above with project now in operations, an Effluent Treatment Plant (ETP) and STP has been installed and being operated in the main plant area to treat the process wastewater and domestic effluent respectively prior to its discharge into the abutting Meghna River.

2.1.6 PROJECT ASSOCIATED FACILITIES

2.1.6.1 ACCESS ROAD:

The Project location will be accessed through an earthen branch road coming out from Dhaka-Chittagong Highway. The distance between Highway and project site is approximately 1.5 km. There is no alternate access road available for connecting the

2.1.7 CURRENT PROJECT STATUS

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with NEPC and have commenced site construction activities. Review of the Monthly Progress Report (MPR) shared by UMPL for January 2024 indicated the progress status as stated below:

- **The project has achieved COD on 19 January 2024**
- Completed Dependable Capacity Test (DCT) and other contractual tests
- Gas Turbine (GT) system checked and prepared for start-up
- Release Nitrogen preservation of HRSG, Removing Dehumidifier of Gas Turbine & Steam Turbine; HRSG water filling, GTG Hydrogen filling, and BOP equipment restart.
- Gas Turbine and steam turbine (ST) running on baseload
- A total of 2885 Punchlist items completed of the total of 3077. No Major works pending for civil unless few punch list is carry forward to warranty period
- Key activities planned for Feb to April 2024 includes conducting remaining contractual test, functional test, thermal performance test, emission test and PAC.

2.1.8 STATUS OF E&S INDICATORS

The status of E&S indicators as obtained from the project MPR for January 2024 is presented in Table below:

TABLE 2-2 PROJECT E&S DASHBOARD – JANUARY 2024

SL #	Indicators	January 2024	Cumulative
A	Health & Safety		
1.	Fatality	0	0
2.	Significant/Major Injury	0	0
3	Lost Time Incident (LTIs)	0	0
4	Near Miss	0	12
5	Medical Treatment Case	0	1
6	First Aid Case	1	30
7	Potential Severe Event	0	1
8	Fire/Explosion	0	1
9	Stop Work – EHS	07	297
10	Warning letter issued	02	236
11	Safety Rewards	38	2377
12	Training Hours	231	45559
13	EHS Inspections	7	362

SL #	Indicators	January 2024	Cumulative
14	Emergency Drill	0	18
15	Toolbox Talks	31	1442
16	Monthly Manhours	172824	10645408
B	Environment		
1.	Spillage	0	0
2.	Contaminated soil (m3)	0	0
3	Contaminated concrete (m3)	0	0
4	Scrap Metals (tonne)	18	179.25
5	Wooden Palette (tonne)	12	181.7
6	Plastic Packaging (m3)	3	46.49
7	Domestic food waste (bins)	65	2270
8	Used oil (litres)	1500	4660
9.	Contaminated Rags (kgs)	10	93.5
10	Medical waste (kg)	0.5	11.6
11	Surface water consumption (m3)	100047.55	114859.55
12	Laydown water consumption (m3)	79	4058
13	Treated sewage discharge (m3)	33	834
C	Social		
1.	Grievance Recorded	0	12
2.	Stakeholder Engagement	1	11

Source: GE-NEPC MPR January 2024

Note: With project COD declared on 20 January 2024, reportedly the project operational E&S metrics will be reported by NEPC-S (O&M team) going ahead

2.1.9 PROJECT MANPOWER REQUIREMENT

The present workforce strength at ongoing construction site as observed during ERM's visit is presented in Table 2.3 & 2.4 below.

TABLE 2-3 CURRENT MANPOWER INVOLVED AT SITE

SL #	Employer	Manpower size
1.	UMPL Employees	56(30 corporate management staff + 12 site management staff + 26 Support)
2.	GE employees	50 (35 Officers + 15 Support)

SL #	Employer	Manpower size
3	NEPC Management staff employee	20 (08 Chinese + 12 Bangladeshi)
4	NEPC workers (Chinese)	75
5	NEPC Subcontractor Workforce (total of 4 subcontractors engaged)	301
	Total	502

Manpower break-up of the sub-contractors engaged by NEPC is presented below.

TABLE 2-4 CONTRACTOR MANPOWER BREAK-UP

S. No	Sub-contractors	Scope of work	Manpower size
1	Man is Power corporation	Main Plant & Lay down	250
2	Meghna Enterprise	Main Plant & Lay down	31
6	Elite Force (Security)	Main plant and lay down	80
	Total		361

2.1.10 PROJECT SCHEDULE

The proposed schedule for the project has been presented in the Table below.

TABLE 2-5 PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS

SL #	Project Component	Planned	Actual/Forecast
1.	Signing of EPC Contract between GE and UMPL	30 August 2019	30 August 2019 (A)
2.	Full Notice to Proceed (FNTP)	23 October 2019	23 October 2019 (A)
3.	Clear and Unhindered access to site	23 October 2019	1 December 2019 (A)
4.	GT on Foundation	7 April 2021	22 January 2022 (A)
5.	HRSG OCC Modules (Installation Started)	25 February 2021	4 September 2021 (A)
6.	GT Generator on Foundation	8 April 2021	22 January 2022 (A)
7.	ST Generator on Foundation	19 April 2021	12 March 2022 (A)
8.	Commencement of Cold Commissioning	17 August 2021	20 March 2023 (A)

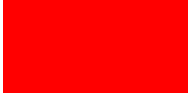
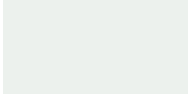
SL #	Project Component	Planned	Actual/Forecast
9.	Completion of Back Energization	23 August 2021	25 June 2023 (A)
10.	Fuel Gas Available	23 October 2021	5 June 2023 (A)
11.	GT First Firing in Simple Cycle	4 December 2021	15 August 2023 (A)
12.	Completion of 1st Synchronization	12 December 2021	21 August 2023 (A)
13.	Completion of Steam Blowing	24 December 2021	25 October 2023
14.	First Steam to Turbine	13 January 2022	3 November 2023
15.	Completion of Trial Operation	16 June 2022	19 January 2024
16	Completion of Performance Test*	22 June 2022	Subject to availability of gas
17	PAC (Provisional Acceptance Certificate)*	22 June 2022	Subject to availability of gas

Source: UMPL

* Performance Test Completion and PAC date is contingent upon availability of gas.

3. COMPLIANCE STATUS – ESAP, ESMMP, LRP, SEP, GRM IMPLEMENTATION

The compliance status based on the site visit and review of documents as on 19-20 February 2024 has been presented in **Table 3.1** and relevant sub-sections. To define the status of various action items, colour coding has been used for easy referencing, which is as follows:

	Action Item Closed/ Complied		Satisfactory Progress
	Partially Complied		Not Complied/ Delay
	To be assessed during Operations/Decommissioning		Document Pending

3.1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS

The observations made by the ERM audit team with respect to the project EHS aspects as outlined in the ESAP, EMMP and applicable local and national regulations have been presented in **Table 3.1** below.

TABLE 3-1 PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (19-20 Feb 2024)	Progress Status	Recommendations
1.	EHSS Regulatory Permitting/Compliance							
1.1	Develop and implement a plan for 100% wastewater recycling for project operations. Update the green belt development plan to ensure 33% coverage of the project area.	S. No 1.1, Table 3.1	UMPL	Copy of wastewater recycling plan Copy of greenbelt development plan	6 months prior to COD	Review of the site clearance conditions requires UMPL to develop and implement a plan to facilitate 100% wastewater recycling during operations. However, discussion with EPC consortium reveals that as per the design both Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) to be installed and operated will be having two separate outfalls with no provision for provision for wastewater recycling. As earlier recommended, UMPL has now developed a plan to reuse 100% of the treated waste for green belt development however this is not assessed to be feasible given it is not validated through a comprehensive water balance diagram and additional wastewater treatment measures through installation of Reverse Osmosis (RO) Plant. Also, there are potential limitations of implementation of this Plan especially during the monsoon months (July - Sep 2023). Presently, the site is yet to develop a wastewater recycling plan to support to demonstrate compliance with the aforesaid regulatory requirement. Review of the updated green belt development plan indicates that the current area proposed for green belt has now been increased from 6.22 acres to 6.95 acres which represents 33% of the total project area. The green belt development plan will be implemented within the plant (near transmission tower, along internal roads etc.) constituting 6.41 acres of the total project area. Remaining green belt (0.54 acres) to be developed outside plant i.e., along the project access road and project peripheral boundary. As noted during the site visit, tree plantation is currently ongoing within the main plant area.		Develop a feasible plan for 100% wastewater recycling plan for project operations or explore provision of seeking necessary exemption/waiver on this condition while obtaining Environmental Clearance

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (19-20 Feb 2024)	Progress Status	Recommendations
	including a checklist to assess compliance with the Plan requirements on a periodic basis.					applicable for all site workers including sub-contractor workers. With project now in operations, NEPC-S – the O&M contractor has developed the following E&S plans/procedures for operations phase: • Permit to Work • Caustic, Acid and Chlorine Handling Procedure • Emergency Response Plan • Electrical Safety Program • First Aid • Spill Prevention and Response Procedure • Waste Management Procedure • Community Development Procedure • Grievance Redressal Mechanism/Procedure • Noise Exposure Evaluation and Hearing Conservation • Compressed Gas Cylinder Management Procedure • Flammable Liquid Handling Procedure • Machine Guarding Procedure • Pest Control Procedure • Stakeholder Engagement Procedure <u>However, the following plans/procedures is yet to be developed for operations as per the ESMP requirements viz. Occupational Health & Safety Management Plan, Air Quality Management Procedure, Incident Reporting & Investigation Procedure, Wastewater Management Plan and Environmental Monitoring Plan.</u>		
2.6	Ensure mobilization of the remaining EHS Supervisors by NEPC as per the organogram. Document and integrate the roles and responsibilities of the UMPL EHS Manager and Assistant Manager – Community Development in the EHS Plan.	S. No 2.7, Table 3.1	UMPL & EPC	Copy of appointment letter NEPC EHS Supervisors. Documented roles and responsibilities UMPL EHS Manager and Assistant Manager –	Immediately, prior to first disbursement	In line with the ESAP recommendation, the EPC consortium has deployed a Project EHS Manager (GE), Assistant EHS Manager (GE) and 2 Project EHS Manager (NEPC) and the same has been presented in the EHS organogram along with the EHS Supervisors, Site Doctor & Paramedic, EHS Trainer, Lifting Specialist & Coordinator and Certified Scaffolder. In addition to the above, GE and NEPC has mobilized 7 and 15 EHS Supervisors respectively and the same was found to be depicted in the EHS Organisational chart.		Mobilize the EPC EHS Supervisor on a fast-track basis for the warranty period. Define the roles and responsibilities of the aforesaid EHS Supervisor and O&M EHS/Fire safety personnel mobilized

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (19-20 Feb 2024)	Progress Status	Recommendations
						sampling is undertaken on a monthly basis and samples analyzed for the following parameters – pH, BOD, DO, COD, TSS, TDS, ammoniacal nitrogen, total chromium, lead, mercury, Total Dissolved Solids (TDS), Oil & Grease and Total Coliform with results found to be in compliance with the newly notified BECR, 2023. <i>Ground Water Quality Monitoring</i> Review of the quarterly GW monitoring report for the Apr-Jun 2023, reveals the ground water has monitored from 4 areas (3 at main plant site and 1 at worker camp). As recommended in the last audit report, the drinking water monitoring suite has been updated to cover all 55 parameters with results found to be in compliance with <i>Schedule 2 of the BECR, 2023</i>, with results found to be in compliance to the aforesaid standards except for nitrite. <u>The concentration of nitrite (4 mg/l) drinking water at the project site is still found to be exceeding the standard of 1 mg/l.</u> <i>Storm Water Quality Monitoring</i> The site has undertaken monitoring of stormwater from the outfall at both main project site and worker camp. The monitoring encompasses the following parameters – temperature, pH, TSS, oil and grease, total residual chlorine, total chromium, copper, iron, zinc, lead, cadmium, mercury and arsenic with the results found to be in compliance with the IFC EHS Guidelines for Thermal Power Plants. <i>Treated Sewage Monitoring</i> Review of the monthly treated STP effluent monitoring report reveals the effluent has been analyzed for pH, temperature, BOD, COD, TSS, sulphate, phosphate, nitrate, oil and grease and total coliform with results found to be in compliance with the standards prescribed in Schedule 3 of BECR, 2023. The effluent is generated from the STP located at the worker camp and is being discharge to a natural drainage channel. <i>Soil Quality Monitoring</i>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (19-20 Feb 2024)	Progress Status	Recommendations
						Review of the quarterly soil monitoring report reveals the soil samples has been collected from the project site, worker camp cum material laydown area and nearby agricultural land. The soil samples so collected has been analyzed for pH, electrical conductivity, heavy metals, nitrogen, phosphorus, potassium, calcium and magnesium. Currently there are no soil standards in Bangladesh against which the results could be validated. <i>Operations Phase - Environmental Monitoring</i> The following observations is made with respect to operations environmental monitoring: • <u>UMPL has not undertaken any monitoring of treated STP effluent at the main plant site to assess conformance with the inland surface water discharge standards specified in Schedule 3 of the Bangladesh Environmental Conservation Rules (BECR), 2023.</u> • Review of monitoring report dated 16 January 2024 reveals that the treated effluent from ETP is being subjected to third party testing being limited to the following parameters - pH, Suspended Solids (SS), Total Dissolved Solids (TDS) and COD with results found to be in compliance with the inland surface water discharge standards specified in Schedule 4 of the BECR, 2023. <u>However, U MPL has not updated and implemented the wastewater monitoring program for operations to cover the additional 28 parameters as specified in Schedule 4 of the aforesaid Rules.</u> • U MPL has installed Continuous Emission Monitoring System (CEMS) for both HRSG and bypass stack with results found to be in conformance with the emission standards specified in the Air Pollution Control Rules, 2022. <u>However, U MPL has not undertaken any third-party source emission monitoring as specified in the operations ESMP for validation of the CEMS results.</u>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (19-20 Feb 2024)	Progress Status	Recommendations
	Share details of the Safety Committee composition along with meeting minutes.					competency, use appropriate PPEs and safety equipment viz. flame arrestors, make provision of necessary firefighting equipment at the hot work area etc. Sample document review and physical visit to the site indicates that the site made provision of fire blankets and stand by "fire watch" in the work permits as per the IFC General EHS Guideline requirements. Sample inspection of the work areas also indicate the workers involved in such high hazard activities are equipped with appropriate PPEs. <i>Safety Committee</i> In accordance with the BNBC, 2020 requirements, a Safety Committee has now been constituted to efficiently manage all safety related affairs. The GE-Site in Charge acts as the head of the Committee which meets on monthly basis. Documentation review indicates monthly safety committee meeting minutes being maintained and corrective actions identified. <u>For operations, reportedly a Safety Committee is yet to be constituted in accordance with the provisions of the Bangladesh Labour Rules (BLR), 2015 post completion of the performance test.</u> <i>Height work</i> As observed during the site walkaround, every open side floor/platform including stairways of under construction building onsite is provided with temporary hard barricading of appropriate height. Also as recommended in the ESAP, the hard barricading railing for such buildings were now provided with toe boards as per BNBC requirements. In this regard and as earlier recommended, site has developed and implemented a standalone height work permit system with all scaffolds being provided with coloured tags specifying its "USE/NO USE" status. Inspection of sample areas indicated workers operating on such scaffolds equipped with appropriate PPEs like safety harnesses etc. For ladders being used, an inspection checklist is also found to be available and implemented. <i>Confined Space Entry</i>		space entry permits being issued. Engage a DIFE approved agency to conduct inspection and certification of all lifting tools and equipment's and maintain records in Form 24.

