

## SECTION D: ENVIRONMENTAL AND SOCIAL CONSTRUCTION MANAGEMENT PLANS

### CHAPTER D5: PETROLEUM AND FUELS CONSTRUCTION MANAGEMENT PLAN

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## 5 PETROLEUM AND FUELS MANAGEMENT

### 5.1 INTRODUCTION

This Petroleum and Fuels Construction Management Plan is designed to ensure the effective storage, management and disposal of petroleum and other fuels by the Oyu Tolgoi Project. The plan contains the methods that Oyu Tolgoi will use to prevent adverse effects occurring during the construction phase, and the monitoring plans to assess potential effects and determine the effectiveness of mitigations implemented.

The plan establishes guidelines for the management of petroleum and fuels, including identification of applicable "Project Standards", mitigation controls and monitoring programmes.

### 5.2 OBJECTIVES

The objectives of this Management Plan are to:

- Outline the applicable standards with regards to petroleum and fuels management (Project Standards);
- Identify potential sources of impacts associated with petroleum and fuels;
- Define the procedures for petroleum and fuel management;
- Define roles and responsibilities;
- Define monitoring and reporting procedures; and
- Define training requirements.

### 5.3 SCOPE

The Oyu Tolgoi Project is committed to comply with various environmental standards which are managed through the Management Plans as described in *Chapter D1: Environmental and Social Management Plan (ESMP) Framework*. The ESMP Framework sets out the management framework for Management Plans for the following phases of the Project (see the *Chapter D1: ESMP Framework* for the definition of these phases):

1. Construction Phase
2. Operations Phase

This Petroleum and Fuels Construction Management Plan is part of the suite of construction phase Management Plans. The plan covers all aspects of petroleum and fuel management during the construction phase including:

- Identification of appropriate storage facilities;
- Procedures for the management and maintenance of storage facilities;
- Procedures for petroleum and fuels transportation and handling; and
- Employee training awareness.

Particular reference is made here to the following construction management plans that have direct cross-linkages to petroleum and fuel management:

- The Construction Emergency Response Plan (*Chapter D20*) (e.g. in relation to accidental hydrocarbon releases);
- The Construction Water Resources Management Plan (*Chapter D7*) (in relation to contamination of surface and groundwater in the event of an accidental hydrocarbon release);
- Construction Community Health, Safety & Security Management Plan (*Chapter D18*) (in relation to contamination of surface and groundwater resources used by herders or the local communities in the event of an accidental hydrocarbon release);

- The Construction Waste Management Plan (*Chapter D8*) (specifically in relation to the management and disposal of spent oil);
- The Topsoil Management Plan (*Chapter D4*) (in relation to the potential for fuels to impact the soils);
- Plans within the Oyu Tolgoi Health and Safety Management System (e.g. management of hazardous materials and in relation to fire/explosion risks);
- Atmospheric Emissions Construction Management Plan (*Chapter D2*) (specifically in relation to sulphur content of fuels);
- Transport Construction Management Plan (*Chapter D11*) (transportation of fuels); and
- Hazardous Material Construction Management Plan (*Chapter D12*).

#### 5.4 ASSOCIATED IMPACTS

The key potential sources of impact related to the management of petroleum and fuels during construction relate to risk of accidental release of hydrocarbons to the environment, accidental exposure to workers, and fire and explosion risks. Potential impacts associated with these risks, if poorly managed, include:

- Impact to soil and/or groundwater, which may result in degradation of the resource and requirement for remedial action;
- Impacts on herder livelihoods due to contamination of the surface or groundwater and impacts on ability to water animals;
- Impacts on human health & safety due to either direct exposure or through fire/explosion;
- Air emissions associated with the combustion of fuels, including sulphur content and emissions of SO<sub>2</sub> (see *Chapter D2: Atmospheric Emissions Management Plan*); and
- Air emissions associated with diffuse emissions from storage of fuels.

These impacts were identified in a number of different impact chapters relating to the different environmental and social media.

#### 5.5 PROJECT STANDARDS

Fuel handling and storage standards applicable to the Project are summarised below:

- **Mongolian standards:**

The Mongolian standard applicable to fuel or petroleum handling is MNS 4628: 1998 Fuel Substation Distribution Technical Requirements for Construction and Equipment. In addition there are environmental quality standards in relation to water quality that would be applicable in the event of a major accidental hydrocarbon release and these are addressed in *Chapter D7: Water Resources Management Plan* and the *Chapter D20: Emergency Response Plan*.

- **International standards:**

IFC General Environmental Health & Safety Guidelines and the Environmental Health and Safety Guidelines for Mining cover several aspects of petroleum and fuels management.<sup>1 2</sup>: Specific applicable requirements include:

- Transfer of hazardous liquids (including fuels) to storage tanks in areas provided with impervious surfaces;
- For above ground tanks in excess of 1,000L, provision of secondary containment with a capacity of the larger of 110% of the largest tank or 25% of the combined tank volumes in the storage area; and

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<sup>1</sup> International Finance Corporation. *Environmental, Health & Safety Guidelines for Mining*. 10 December 2007.

<sup>2</sup> International Finance Corporation. *General Environmental, Health & Safety Guidelines* 30 April 2007.

- Periodic reconciliation of tank contents.

The Petroleum and Fuels Construction Management Plan also takes into account certain EU legislation on petroleum storage and handling namely:

- European Parliament and Council Directive 94/63/EC of 20 December 1994 on the control of volatile organic compound (VOC) emissions resulting from the storage of petrol and its distribution from terminals to service stations; and
- European Parliament and Council Directive 2009/126/EC of 21 October 2009 on Stage II petrol vapour recovery during refuelling of motor vehicles at service stations.

It is recognised that vapour recovery is not practicable at Oyu Tolgoi given the lack of vapour recovery facilities in Mongolia.

#### ■ **Rio Tinto Standards**

Rio Tinto has two specific of standards that address waste management issues:

- B4 Hazardous Substances
- E5 Hazardous Materials & Contamination Control

These standards will be fully implemented as part of the operations-phase social and environmental management systems. During the construction-phase, the Rio Tinto waste management standard are being integrated into Oyu Tolgoi operating procedures but do not constitute Project Standards.

## **5.6 ROLES & RESPONSIBILITIES**

In addition to the specific responsibilities identified in Section 7 below, general responsibilities for the management of petroleum and fuels are defined below. Overall lines of responsibility between Oyu Tolgoi and the Contractors are described in *Chapter D1: ESMP Framework*. More specifically for petroleum and fuel management, the following roles and responsibilities apply.

#### **The Oyu Tolgoi Environmental Department will:**

- Have overall responsibility for the implementation of this Management Plan;
- Provide technical support to Oyu Tolgoi Departmental Managers;
- Provide guidance to contractors on the applicable standards and appropriate mitigation controls; and
- Have Environmental officers who will ensure all Oyu Tolgoi Departments, Principal Contractors (and their sub contractors) meet the requirements outlined in this plan through a programme of periodic audits and inspections.

#### **Principal Contractor (contracted directly by Oyu Tolgoi) will:**

- Undertake petroleum and fuel management in accordance with this plan and ensure standards are met; and
- Develop their own management plans and inspection procedures, consistent with the requirements outlined in this plan, prior to the commencement of works which will entail handling of petroleum and fuels.

#### **Workplace supervisors (typically a nominated contractor representative overseeing a particular task including fuel storage facility managers/supervisors):**

- Provide oversight to ensure that petroleum and fuel handling procedures are adhered to and adequately implemented; and
- Prevent practices that might lead to environmental or safety incidents.

## **5.7 MITIGATION MEASURES AND MANAGEMENT CONTROLS**

The mitigation measures and management controls that are to be implemented during the Construction Phase to minimise the risks and impacts during the management of petroleum and fuel are described in the table below. These procedures will apply to any legacy facilities which Oyu Tolgoi has so that these

are brought into compliance with the requirements of this procedure. Contractors are required to incorporate the measures outlined in the table below within their own working procedures.

**Table 5.1: Mitigation Measures and Management Controls- Petroleum and Fuels Management**

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
PF01 - a	Fuel Storage (general design)	All fuel storage during construction	<ul style="list-style-type: none"> <li>All pipeline materials will be carefully selected, taking into account corrosion potential and material transfer.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation
PF01 - b	Fuel Storage (general design)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Storage facilities will be designed to comply with American Petroleum Institute (API) Std 650 'Welded Steel Tanks for Oil Storage' or other applicable international standards. API 650 establishes minimum requirements for material, design, fabrication, erection, and testing for vertical, cylindrical, aboveground, closed- and open-top, welded carbon or stainless steel storage tanks</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation
PF01 - c	Fuel Storage (general design)	All fuel storage during construction	<ul style="list-style-type: none"> <li>In accordance with manufacturers design protocols, shut-off and diversion valves will be installed on all pipelines and processing facilities to enable selected pipeline segments or facilities to be separated into emergency intervals</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation
PF01 - d	Fuel Storage (general design)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Dedicated fittings will be used to ensure that fuels are only transferred between the correct tanks.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation
PF02 - a	Fuel Storage (general management)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Smoking will be strictly prohibited from any areas where fuel loading operations take place.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage area manager	Audit
PF02 - b	Fuel Storage (general management)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Storage facilities will have the applicable Material Safety Data Sheets (MSDS) available</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage area manager	Audit
PF02 - c	Fuel Storage (general management)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Appropriate signage will be used to identify potential spill risks</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage area manager	Audit

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
PF02 - d	Fuel Storage (general management)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Any accidental damage to containment structures will be inspected immediately and appropriate repairs undertaken. The extent of damage will be reported in writing to the mine and plant manager, or designate, as well as remedial repairs effected together with the date of repairs and any follow up inspection. Any release of fuels or other substance will be cleaned up.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage area manager	Audit
PF02 - e	Fuel Storage (general management)	All fuel storage during construction	<ul style="list-style-type: none"> <li>The condition of bulk storage tanks for fuels and lubricants will be inspected regularly.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage area manager	Audit
PF03	Fuel Storage (spill containment)	All fuel storage during construction	<ul style="list-style-type: none"> <li>The base of containment areas will be sloped so that spilt oil may be recovered and removed.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation  Audit
PF04 - a	Fuel Storage (location)	All fuel storage during construction	<ul style="list-style-type: none"> <li>There will be no buried hydrocarbon storage tanks.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit
PF04 – b	Fuel Storage (location)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Bulk storage facilities will be located with appropriate separation from offices and camps</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit
PF04 – c	Fuel Storage (location)	All fuel storage during construction	<ul style="list-style-type: none"> <li>No permanent bulk storage facilities will be located in the SGSPA</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit
PF04 - d	Fuel Storage (location)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Mobile/temporary fueling stations will be based no closer than 200 m from any herder well or spring.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit
PF05 - a	Fuel Storage (spill prevention)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Bulk fuel storage will be equipped with pressure relief valves to reduce a build-up of pressure which could cause leaks.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit
PF05 - b	Fuel Storage (spill prevention)	All fuel storage during construction	<ul style="list-style-type: none"> <li>Above ground tanks will be equipped with volume-measuring devices, which serve as an indicator for losses occurring within the tanks and the internal pipeline system.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors	Design documentation Audit

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
PF06 - a	Drum Storage	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ All drum storage of fuel and lubricants, where practicable, will be:               <ul style="list-style-type: none"> <li>○ under cover from both rain and sun; and</li> <li>○ afforded secondary containment.</li> </ul> </li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Construction Hazardous Materials Management Plan Audit
PF06 - b	Drum Storage	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ All fuels and lubricants will be managed in line with the Construction Hazardous Materials Management Plan (<i>Chapter D12</i>).</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Construction Hazardous Materials Management Plan Audit
PF07 - a	Inventory management	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ Total amounts of petroleum and fuel products received on site will be reconciled against amounts ordered.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Audit
PF07 - b	Inventory management	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ Fuel and gasoline use will be automatically metered as it is distributed from bulk tanks</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Audit
PF07 - c	Inventory management	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ Generally, the metered volumes of fuel stored will be summarised routinely and reconciled against manual dipping of the tanks. The exception will be used for power generators where weekly fuel use will be recorded only (no reconciliation with manual dipping).</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Audit
PF07 - d	Inventory management	All fuel storage during construction	<ul style="list-style-type: none"> <li>■ Lubricant and other petroleum products will be routinely inventoried on a regular basis.</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Audit

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
PF08 - a	Fuel transfer/ filling	All fuel storage/ handling during construction – Mine Licence Area	<ul style="list-style-type: none"> <li>A supplier will fill fuel tanks in the main fuel farm; fuelling is the responsibility of a licensed contractor who will be supervised by the storage/work area manager.</li> </ul>	Principal contractors Storage/work area manager	Audit
PF08 - b	Fuel transfer/ filling	All fuel storage/ handling during construction – Mine Licence Area	<ul style="list-style-type: none"> <li>Prior to fuel transfer the operator will verify that: all fuel transfer hoses have been connected properly and couplings are tight; transfer hoses are not obviously damaged; fuel transfer personnel are familiar with procedures; for fuelling stations, personnel are located at both the fuel truck and fuel transfer tank(s) and have the ability to shut off fuel flow manually; a means of communication has been established between the two people transferring fuel; and a high liquid level shutoff device can be substituted for the person at the delivery tank, in which case operation of the shutoff will be verified each time it is used.</li> </ul>	Principal contractors Storage/work area manager	Audit
PF08 - c	Fuel transfer/ filling	All fuel storage/ handling during construction – Mine Licence Area	<ul style="list-style-type: none"> <li>Transfer fuel as per established procedures of the fuelling contractor in accordance with Oyu Tolgoi requirements.</li> </ul>	Principal contractors Storage/work area manager	Audit
PF08 - d	Fuel transfer/ filling	All fuel storage/ handling during construction – Mine Licence Area	<ul style="list-style-type: none"> <li>The Contractor (or fuel transfer personnel, or mine employee in the case of fuelling station tanks) will clean up and report any accidents or spills immediately to the control room.</li> </ul>	Principal contractors Storage/work area manager	Audit
PF09	Fuel transfer/ filling	All fuel storage/ handling during construction – Off site and mobile tankers	<p>Wherever possible fuel transfers will take place within the main fuel farm transfer locations (see PF08). In situations where refueling must take place away from the main fuelling areas, for example refueling of equipment that is immobile or located in remote construction areas associated with road or pipeline construction, additional measures shall be taken including:</p> <ul style="list-style-type: none"> <li>Any refueling or storage of liquid fuels will not take place in or within an unsafe distance of ephemeral watercourses or springs (see also <i>Chapter D7: Water Resources Management Plan</i>).</li> <li>Mobile tankers (used for refueling of heavy plant) will be equipped with equipment to minimise the risk of accidental spills/clean up equipment (spill kits/drip trays) in the event of a spill.</li> </ul>	All contractors	Audit and inspection

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
PF10 - a	Used fuel/drum management	All fuel storage/handling during construction	<ul style="list-style-type: none"> <li>All used petroleum products will be collected in tanks marked "Waste Oil" and disposed of under the supervision of the maintenance manager.</li> </ul>	Principal contractors Storage/work area manager	Audit Construction Waste Management Plan
PF10 – b	Used fuel/drum management	All fuel storage/handling during construction	<ul style="list-style-type: none"> <li>Empty petroleum containers will, unless otherwise required by law, be stored on site in a designated area and returned to the supplier on back hauls.</li> </ul>	Principal contractors Storage/work area manager	Audit Construction Waste Management Plan
PF10 - c	Used fuel/drum management	All fuel storage/handling during construction	<ul style="list-style-type: none"> <li>All associated wastes will be managed in line with the Construction Waste Management Plan (<i>Chapter D8</i>).</li> </ul>	Principal contractors Storage/work area manager	Audit Construction Waste Management Plan
PF11	Emergency Response	All fuel storage/handling during construction	<ul style="list-style-type: none"> <li>Emergency response planning will be managed via the Construction Emergency Response Management Plan (<i>Chapter D20</i>).</li> <li>Any impacts from loss of containment of fuels that may result in contamination of water resources utilised by herders or local communities will also be managed in accordance with the Construction Community Health, Safety and Security Management Plan (<i>Chapter D18</i>).</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Audit Construction Emergency Response Management Plan Construction Community Health, Safety and Security Management Plan
PF12	Vessel overflow prevention	All fuel storage/handling during construction	<p>Vessel overflow prevention will be undertaken, including the following measures:</p> <ul style="list-style-type: none"> <li>Use of written procedures for transfer operations and ensuring that operators are trained in these procedures;</li> <li>Use tank gauges to ensure clear awareness of contents;</li> <li>Use of dripless hose connections for vehicle tanks and fixed connections with storage tanks;</li> </ul>	Oyu Tolgoi Env. Dept Principal contractors Storage/work area manager	Design documentation Audit

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			<ul style="list-style-type: none"> <li>■ Use of automated shut-off valves;</li> <li>■ Use of fill pipe secondary containment;</li> <li>■ Use of designed overflows and capture points for any overflow;</li> <li>■ Use of pipe valves with automated overfill protection; and</li> <li>■ Only ordering volumes of hazardous liquids that will fit inside the receiving container.</li> </ul>		
PF13	Fuel transport	All fuel transport during construction	All fuel transport will be managed in accordance with the Transport Construction Management Plan ( <i>Chapter D11</i> ) and the Emergency Response Plan ( <i>Chapter D 20</i> ).	Oyu Tolgoi Env. Dept Principal contractors Fuel transport managers	Construction Management Plan Audit
PF14	Reporting	Fuel usage	Quarterly reporting of petroleum and fuel management shall be prepared covering: <ul style="list-style-type: none"> <li>■ A summary of fuel handling activities undertaken during the reporting period;</li> <li>■ Any material deviations or non-compliances with this Management Plan;</li> <li>■ Planned fuel handling activities during the next reporting period; and</li> <li>■ Any issues of concern.</li> </ul>	Oyu Tolgoi Mining Department	Monthly reports

## 5.8 TRAINING

All employees of Oyu Tolgoi and Contractors to Oyu Tolgoi responsible for petroleum and fuels handling and storage activities shall be provided with toolbox training. Specialist training will also be provided to storage facilities managers and key personnel involved in activities which involve the handling of fuels and petroleum.

Hauliers of fuel (both on site and off site) will have appropriate training and hauling will be undertaken in accordance with *Chapter D11: Construction Traffic Management Plan (Chapter D11)* and in a manner that minimises the risk of an inadvertent release of fuels.

## 5.9 MONITORING

The monitoring measures that are to be implemented during the Construction Phase to ensure compliance with the Project Standards (see *Section 5.5*) are described in the table below. In the event that any monitoring results identify a non-conformance with the Project Standards, these will be investigated and corrective actions identified (see *Chapter D1: ESMP Framework* for further details).

The Project will, as part of its Management Systems, develop and implement a petroleum and fuels management audit/inspection programme (for Oyu Tolgoi and Contractor activities) to verify compliance with applicable Project Standards outlined in *Section 5.5*. Specific monitoring requirements are further detailed below.

**Table 5.2: Monitoring Measures – Petroleum and Fuel Management**

ID	Topic/Aspects	Parameters	Methods	Periodicity	Location
PFM01	Fuel Inventory	Volumes of petroleum products	The Oyu Tolgoi Mine Service Department will maintain an inventory of all petroleum products (e.g. kerosene, diesel, etc.) purchased, delivered, stored and used.	Monthly updates	N/A
PFM02	Fuel handling	Various	The Oyu Tolgoi Mine Service Department will collect and maintain records on fuels and lubricants in consultation with the mine manager, for reconciled bulk inventory; weekly use summaries; weekly reconciliation for each storage tank; overfill alarm tests; pressure tests (if applicable); inspections and maintenance checks of storage tank system, piping and delivery system; any alteration to the system; reports of leaks or losses; reports of spill responses; and records of training	Weekly/various	N/A

Note that air monitoring around the combustion sources is discussed in the Atmospheric Emissions Management Plan (*Chapter D2*).

## 5.10 KEY PERFORMANCE INDICATORS

Oyu Tolgoi will continue to evaluate petroleum and fuel management performance. Specific monitoring provisions are detailed in Section 5.9 above. Key Performance Indicators (KPIs) to assess its petroleum and fuel management are presented in *Table 5.3*.

**Table 5.3: Key Performance Indicators**

ID	KPI	Target	Monitoring measure
PF-KPI01	Number of reported non-compliances with the mitigation controls identified in this Management Plan ( <i>Table 5.1</i> )	Minimise non-compliances and demonstrate continued improvement in number of reported non-compliances	See 'means of verification' column in <i>Table 5.1</i>
PF-KPI02	Number of reported incidents of fuel spills outside of containment.	Minimise incidents and demonstrate continued improvement	Incident Reports