



## **1 NRE Enforcement:**

**Program Latihan Penguatkuasaan Untuk  
Pegawai JPS Bagi Pelaksanaan Perintah  
Kualiti Alam Sekeliling (Perwakilan Kuasa  
- Penyiasatan Ke Atas Kawalan Hakisan  
Dan Kelodakan)**



## Module 6

# BMPs INSPECTION

THE GOOD , THE BAD AND THE BMPs  
OPTION AND SELECTION

(Prepared by Nor Razzaman Hamzah)



# SEQUENCE OF ENFORCEMENT INSPECTION

## ◆ PRE-INSPECTION

## ◆ FIELD INSPECTION

### □ EVIDENCE COLLECTION

- Samples
- Photographs
- Documents

## ◆ ENFORCEMENT INSPECTION REPORT

## ◆ FOLLOW-UP ACTION

- Follow-up visit- EIA 5-08(EIA 4-08 Citation and Notices S 31 & 37)
- Analysis samples result

## ◆ Investigation Paper



# ENFORCEMENT INSPECTION REPORT (Non-compliance / Violation)

- ◆ Prevention and control measures outline in the EIA Report. [ESCP Report](#)
- ◆ Approval Conditions: [Previous](#) [New](#)
  - ➔ ESCP
  - ➔ BMPs
  - ➔ Discharge

## **Enforcement Action:**

1. Citation
2. Notices under Section 31 & 37
3. Legal action under Section 34A(7)



# ENFORCEMENT FOLLOW-UP ACTION

1. Follow-up visit to verify corrective actions taken base upon previous issued citations and notices. (EIA 5-08 and Section 31 & 37).

At this stage, one must produce a new enforcement inspection report that may be reported on EIA 5-08 only and Section 31 & 37 compliance or both with fresh/new EIA 3-08 and EIA 4-08.

2. Analysis report received from Chemistry Department stating non-compliance from the previous visit.
3. Proceed with Investigation Paper process.



## Course Material Notes

- ◆ Please refer to JPS TRAINING MODUL 6  
PART 4 The Inspection SUNWAY  
MELAWATI



# SUMMARY

## ◆ Flow Form Usage



# PRE-INSPECTION



# PRE-INSPECTION

- ◆ Prevention and control measures outline in the EIA Report.
- ◆ ESCP
- ◆ BMPS list
- ◆ Previous inspection reports:
  - [Walk the site form: Tracking mechanism](#)



# **EROSION AND SEDIMENT CONTROL PLAN (ESCP)**

**Cad. Skim Perumahan 195 Unit Rumah Di Atas Lot  
30086 dan Lot 30087, Mukim Setapak, Kuala Lumpur  
oleh SUNWAY MELAWATI SDN BHD**



# The Proposed Development

- ◆ Total Site Area: 22.8 ha (56.4 ac)
- ◆ Total Area to be developed for residential 16.3 ha
- ◆ Ecological park: 16 acres (Class IV- Northeast)
- ◆ Development of Earthwork in 2 parcels and commence at the same date
- ◆ Excess earth is shipping out to dumping ground



## Topography:

Pre- dev 81m (SW)- 200m (NE)

Post-dev 86.5 m– 169.25m



## EDP/0631/C/SD/ESCP/001

	PARCEL 1	PARCEL 2
EW CUT	373704	775651
EW FILL	344960	152790
SURPLUS	28744	622861
DURATION (MONTH)	10	22



LIST PROPOSED BMPs	PARCEL 1 (QTY)	PARCEL 2 (QTY)
Wash Trough Earth Drain Diversion Channel Check Dam Sediment Pond Silt Fence Turfig Retaining Wall Interlocker Paver Berm Drain Interceptor Drain Toe Drain (at cut/fill berms) Cut-off Drain Drainage Blanket		



# Sediment Basin

- ◆ Basin type : dry
- ◆ Design Storm : 3 month ARI
- ◆ Soil Type :  
Type C – Coarse grained sandy, sandy loam: < 33%  
< 0.02mm
- ◆ Runoff Coefficient: Type 5(Bare earth, Earth with sandstone)
- ◆ Silt Filtration?
- ◆ Pegs
- ◆ Close Turfing
- ◆ Size?



# Land Disturbance

- ◆ Minimize erosion and sedimentation following approaches:
  - (i) Identify and limit the boundary
  - (ii) Determine and limit access points and roads
  - (iii) Minimize disturbance to necessarily required.




# Site inspection and management

- ◆ Weekly inspection
- ◆ Immediately
  - Before site closure
  - After heavy rainfall event



# EIA Approval Letter

 JABATAN ALAM SEKITAR  
WILAYAH PERSEKUTUAN  
KEMENTERIAN SUKSESAMA  
TINGKAT 1-2, WISMA SCA  
NO. 3, JALAN SUNGAI BESI  
57100 KUALA LUMPUR

Telefon: 03-9221 5543  
Telefaks: 03-9221 6437

Ruj. Tuan :  
Ruj. Kami : AS(B)F50/011/100/718 Jilid II (r#)  
Tarikh : 28 Disember 2007

Pengarah Urusan  
Melawati Development Sdn. Bhd.  
No.1, Lorong Perak  
Pusat Bandar Melawati  
53100 KUALA LUMPUR

Pengarah Urusan  
Sunway Melawati Sdn. Bhd  
Level 3, Menara Sunway  
Jalan Lagoon Timur, Bandar Sunway  
46150 PETALING JAYA

RECEIVED  
14 JAN 2007  
OO's Office  
Sunway City Berhad

Tuan,

Laporan Penilaian Awal Kesan Kepada Alam Sekeliling (EIA) Bagi Cadangan Pembangunan Bercampur Di Atas Lot PT 3638, PT 3639, PT 3640, PT 8653-PT 8655 Dan PT 8667, Mukim Setapak, Wilayah Persekutuan Kuala Lumpur

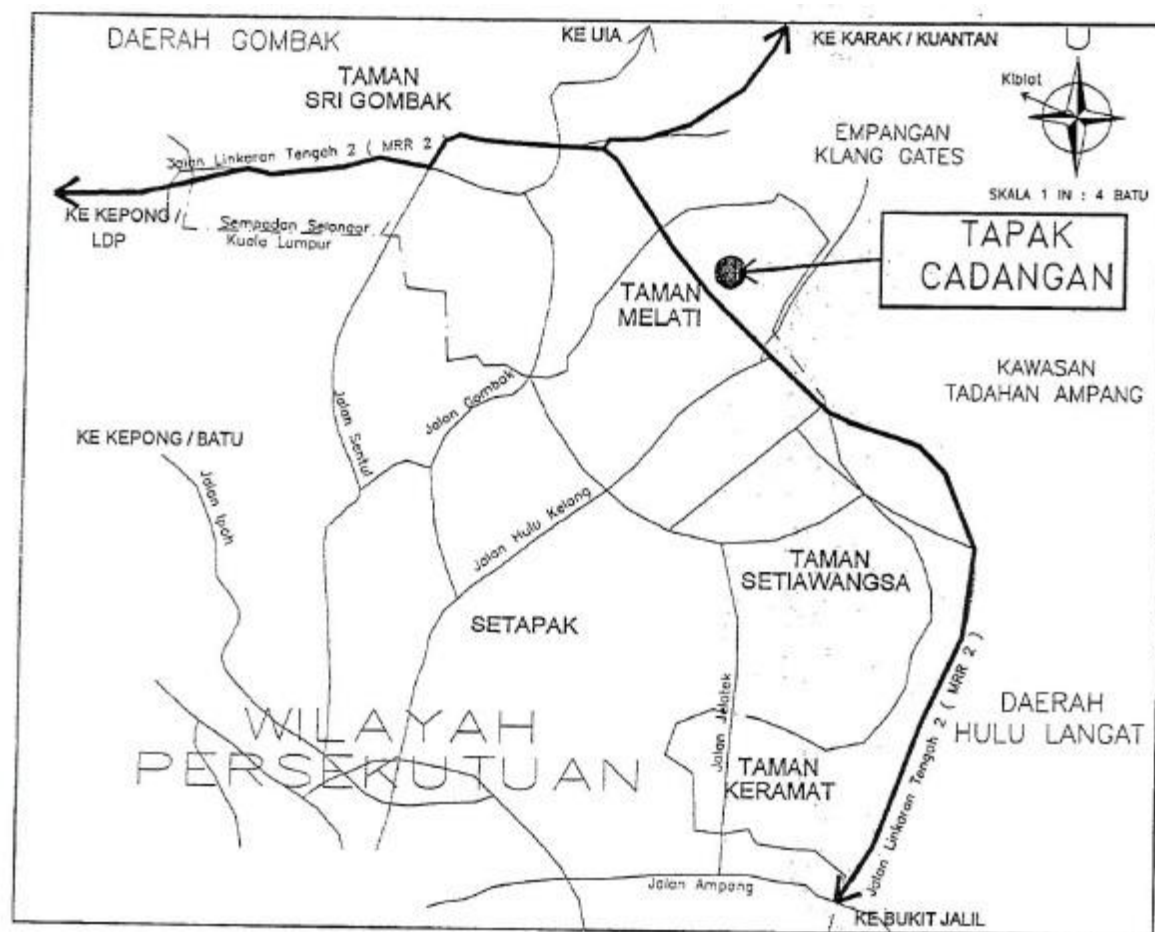
Saya diarah merujuk kepada perkara tersebut di atas.

2. Dimaklumkan bahawa Jabatan Alam Sekitar telah menerima Laporan EIA cadangan projek yang disediakan oleh perunding EIA, YES Enviro Management Sdn. Bhd. melalui surat rujukan YES-HOME/MDSB&SMSB/041207 bertarikh 4 Disember 2007.
3. Laporan EIA berkenaan telah dikaji dengan teliti dan dibincangkan di Mesyuarat Jawatankuasa Sehenti (One Stop Agency, OSA) di pejabat ini pada 13 Disember 2007. Maklumat tambahan sebagai maklumbalas kepada isu-isu yang telah dibangkitkan di dalam mesyuarat juga telah diterima oleh Jabatan ini 17 Disember 2007 melalui surat rujukan YM-HOME/MDSB/SMSB/14/12-04 bertarikh 14 Disember 2007
4. Setelah mengkaji Laporan EIA dan maklumat tambahan yang dikemukakan, Jabatan ini mendapati bahawa Laporan EIA tersebut **mematuhi Seksyen 34A(2), Akta Kualiti Alam Sekeliling 1974**. Dengan itu, sukacita dimaklumkan bahawa Laporan EIA ini diluluskan dan tertakluk kepada syarat-syarat kelulusan seperti di **LAMPIRAN A**. Selain dari syarat-syarat kelulusan seperti di **LAMPIRAN A**, pihak tuan juga hendaklah mematuhi semua Peraturan-Peraturan yang berkaitan di bawah Akta Kualiti Alam Sekeliling, 1974.

*(Sila susatkan rujukan Jabatan ini apabila berhubung)*

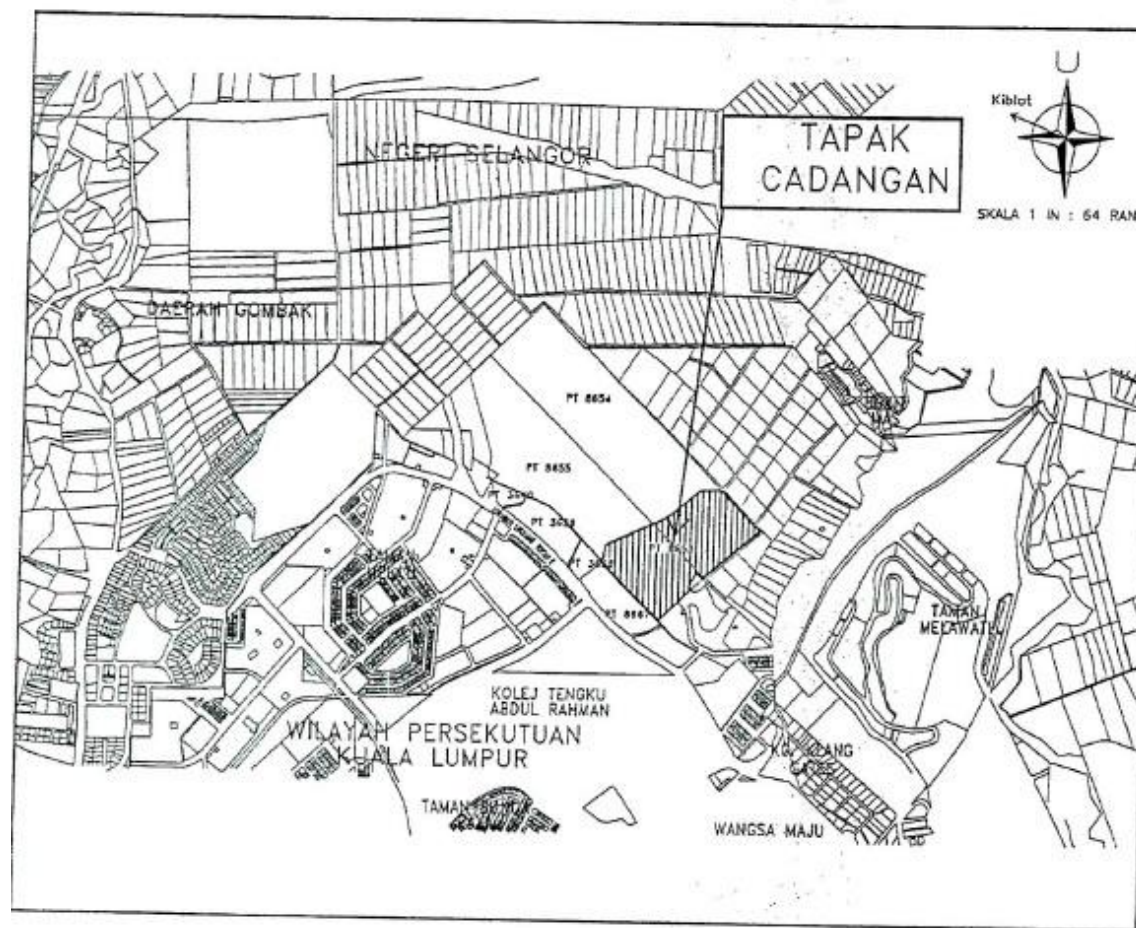


# Key Plan



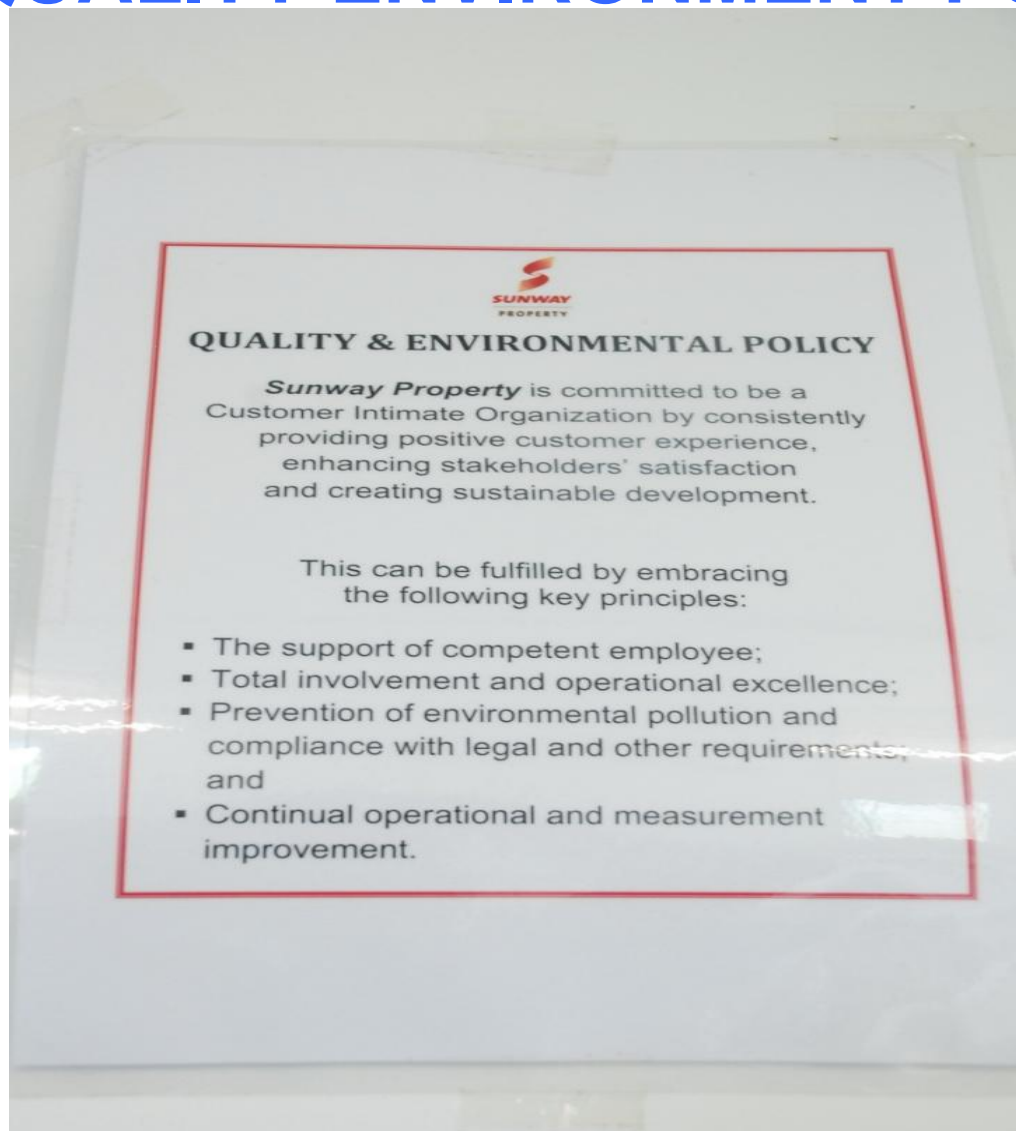


# Location Plan





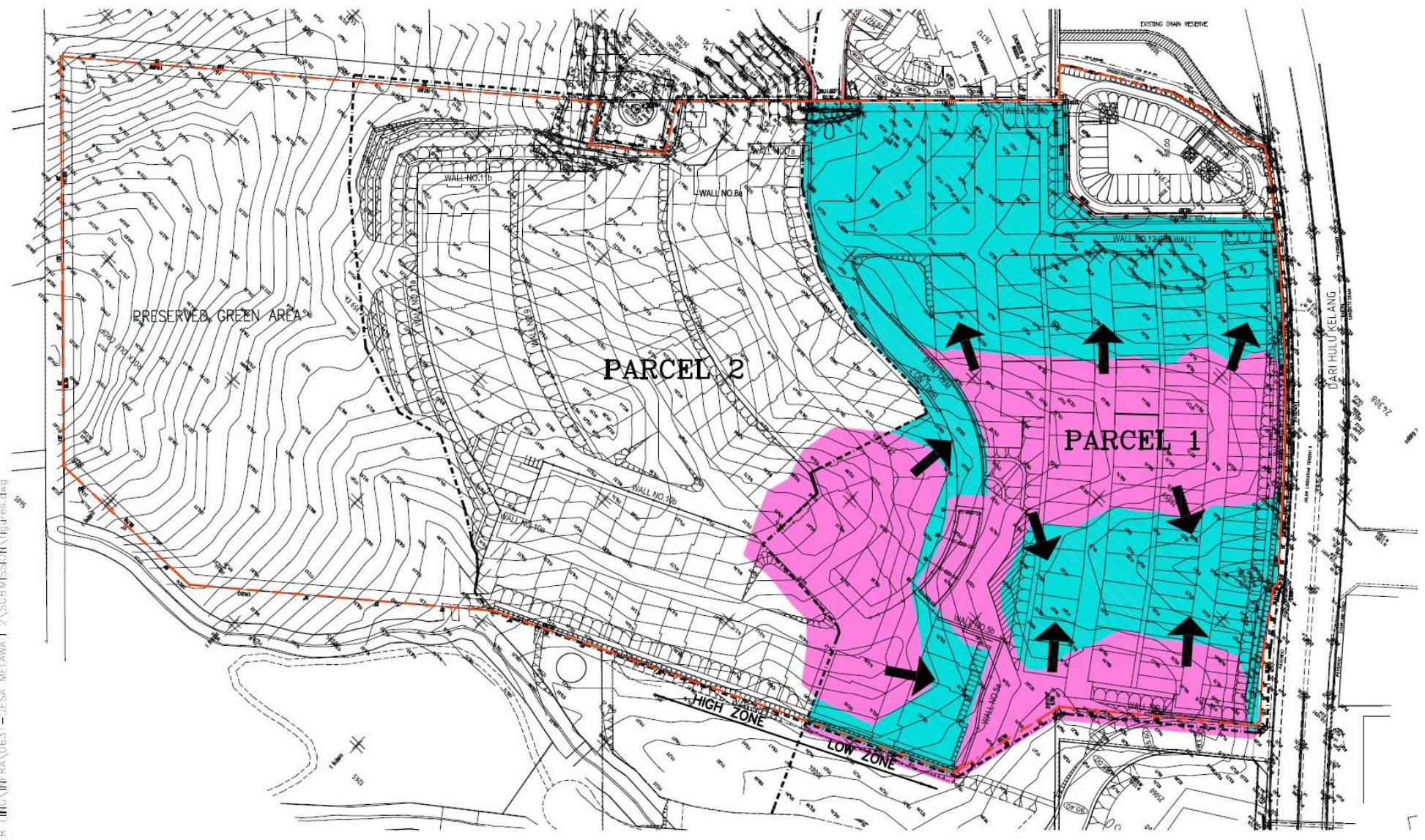
# QUALITY ENVIRONMENT POLICY





# Proposed Earthworks Sequences

- CUT AREA
- FILL AREA
- HAULAGE DIRECTION OF EARTHWORKS
- BOUNDARY LINE



D:\JF\0001\ER\_1\00\INFRA\0631-DESA MELAWATI\_2\SUBMISSION\figures.dwg

FIGURE 3A

EARTHWORKS SEQUENCE FOR PARCEL 1

- LEGEND**
- CUT AREA
  - FILL AREA
  - COMPLETED AREA
  - HAULAGE DIRECTION OF EARTHWORKS
  - BOUNDARY LINE

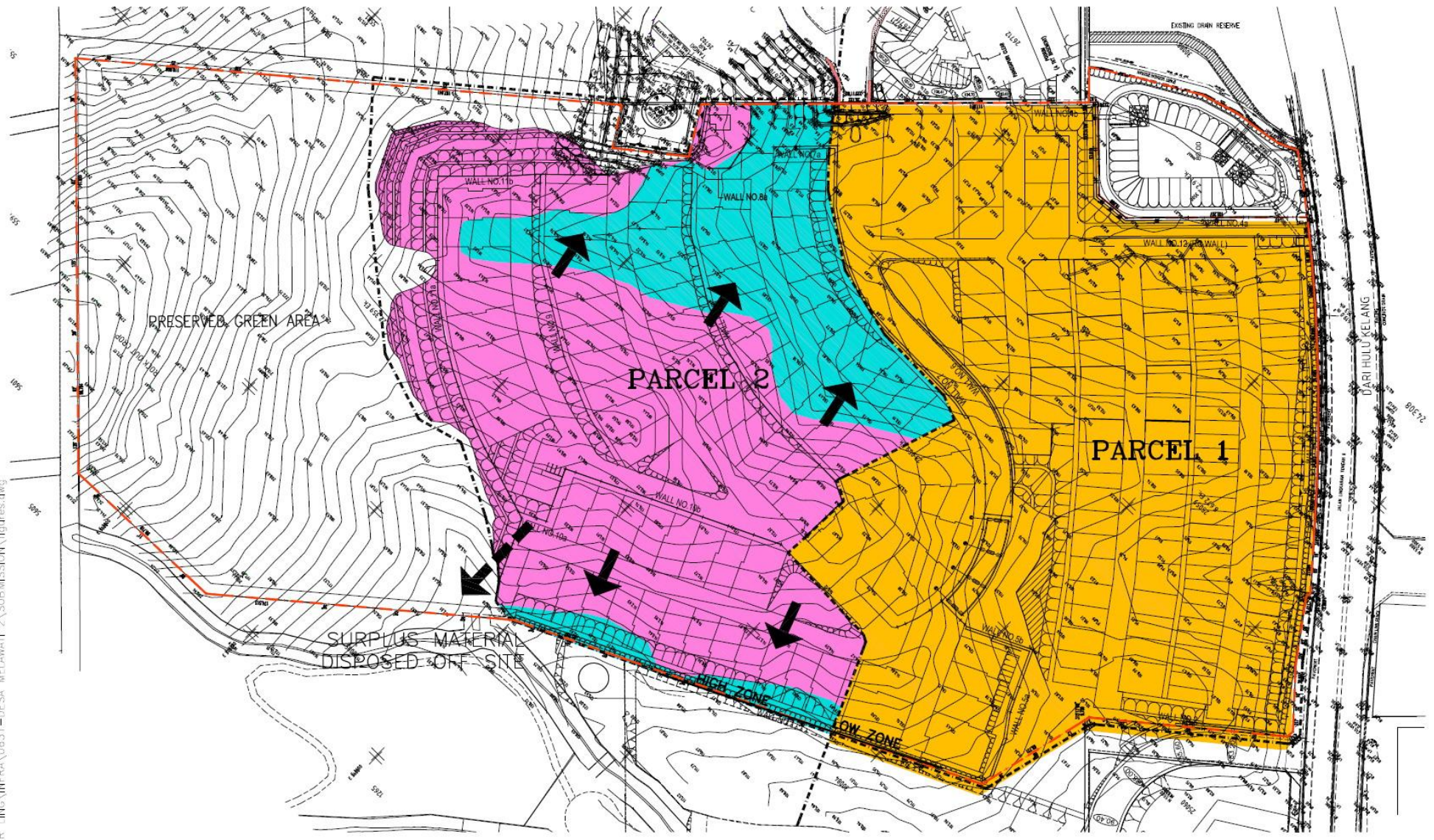


FIGURE 3B

EARTHWORKS SEQUENCE FOR PARCEL 2

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STORMWATER FLOW DIRECTION  
BOUNDARY LINE

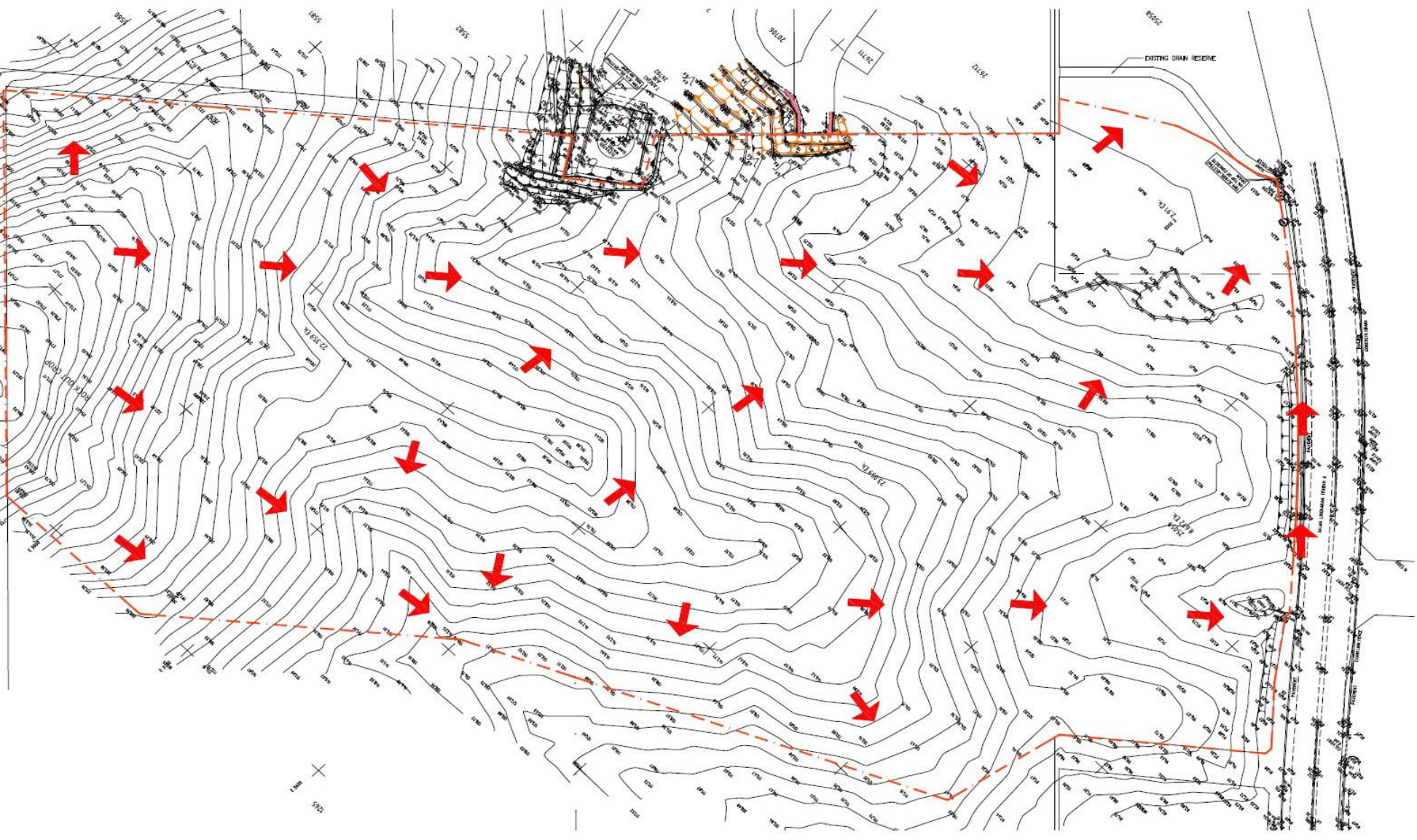


FIGURE 4

EXISTING DRAINAGE PATTERN AND FLOW PATH







- LEGEND**
-  STORMWATER FLOW DIRECTION
  -  PROPOSED DRAINAGE
  -  DRAIN FLOW DIRECTION
  -  PROPOSED PIPE CULVERT
  -  SUMP
  -  BOUNDARY LINE



FIGURE 5

PROPOSED DRAINAGE PATTERN AND FLOW PATH

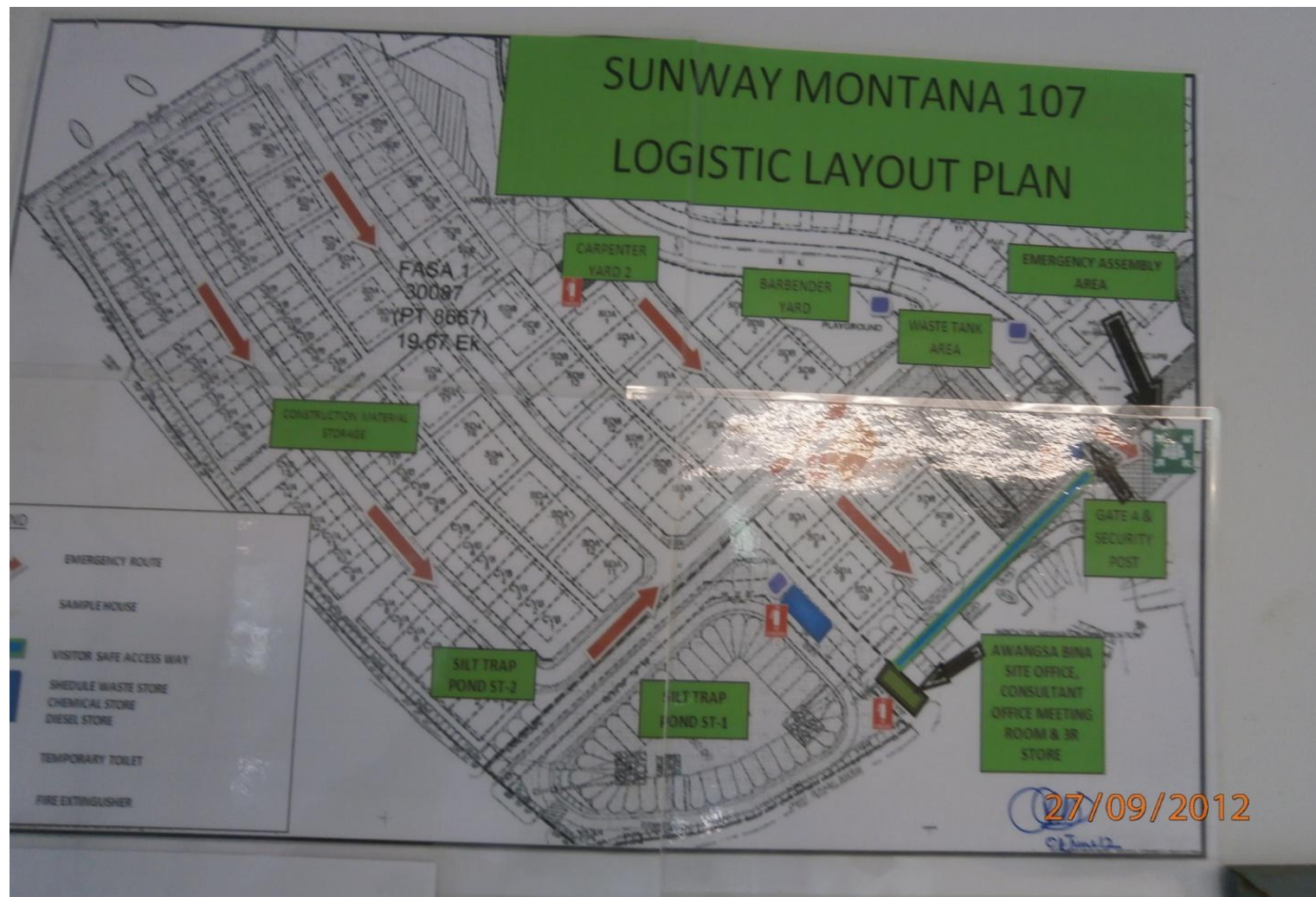


# Location Plan





# Logistic Layout Plan





# FIELD INSPECTION



## INSPECTION

- ADJACENT AREA
- ENTRANCE/EXIT
- ACCESS /CONSTRUCTION /HAUL ROADS
- CRITICAL AREA-(Wherever soils detachment likely to occur.)
- SENSITIVE AREA-(Wherever pollutants can make way out across) boundary)
- RUN-ON
- BORROW AREA
- DISPOSAL AREA
- BARE AREA
- CONCENTRATED FLOW
- STREAM/RIVER CROSSING/DIVERSION
- DRAINAGE AREA
- PERIMETER CONTROL
- INDIVIDUAL BMPs

EiMAS  
Environment Institute of Malaysia

26/9/2012 1:52am



# Reference Documents At The Time Of Inspection



# Revised ESCP- EDP/0631/C/SD/ESCP/001





# Site Sketch Map

Lampiran E9  
BORANG K 4-06 - PETA LAKAR TAPAK PROJEK/PREMIS

**PETA LAKAR TAPAK PROJEK / PREMIS**

Nama Projek/Premis: CADANGAN PEMBANGUNAN BERCAKUP

Alamat : L07 M 363F, P1 3637, P1 2640, P1 3653, P1 3655, P1 36

Tajuk  
**PEMBANGUNAN BERCAKUP**

Petunjuk:  
**BERSITIMAMA  
DI DALAM  
PELAKSANAAN**

Dilukis oleh:  
**OT MOHAMAD HAIRIL**

Disemak oleh:

Jabatan Alam Sekitar-Negeri  
**PEMBANGUNAN DAN  
SUKSES WILAYAH  
PERSEKUTUAN**

PETUNJUK:

RW : Retaining Wall      : Kawasan Kerja  
 → : Drain                      S : Sample diambil.  
 P : Pond                        S.O : Site office  
 : Pintu Masuk Utama      : Arah gambar diambil

**PENGESAHAN JABATAN ALAM-SEKITAR**  
**PEMBANGUNAN DAN SOLIDAN**

Tandatangan:

Nama : **MOHAMAD HAIRIL**

Jawatan : **PENDAPAT SYUKUR TERA**

Cop Rasmi :

Tarikh : **27/9/2012**

**PEMAJU PROJEK/ PREMIS**

Tandatangan:

Nama : **JASON LOW**

Jawatan : **PEN-PENKURUS**

Cop Rasmi :

Tarikh : **27/9/2012**



# ESCP

- ◆ **The proposed earthwork sequences were not fully followed.**
- ◆ **Inadequate ESCP**

- ◆ **Corrective Actions Required:**

- **Revise**

- Enforcement Action:**

- Citation**

- Notices Section 31 & 37**

- Question: Can proceed Section 34A(7)?**



# Syarat-Syarat Baru EIA

[Link to New General and Specific AC](#)



# ESCP



## ESCP Variation

- ◆ Produced ESCP at the time of inspection not match with the one submitted earlier, EDP/0631/C/SD/ESCP/001.
- ◆ Even with the yet to be approved ESCP issued during the inspection, BMPs component such as diversion, check dam and pond 2,3 & 4 were not either followed the standard and specification specified or not in placed at all.
- ◆ Overall finding of the inspection proved the existing ESCP is not adequate.



## EIA 4-08 (Inadequate ESCP)

- ◆ Refer [EIA 4-08](#)
- ◆ Issue notice section 31/37 base upon the aforementioned violations.
- ◆ **You may decide whether to proceed with enforcement inspection or not. You may defer enforcement inspection until new revised ESCP is approved. The justification towards this decision is due to existing approved ESCP is almost completely no meaning or useless. (Personal opinion)**



## EIA 4-08 (Inadequate ESCP)

- ◆ Inspection is actually still have to be conducted to look for the matching and variation between the ESCP and the project site.



# ESCP

## Important Notes:

- ❖ Make sure that the new revise ESCP submission must strictly adhered to the minimum requirement set forth in Guideline for ESC and MSMA published both by JPS.
- ❖ ESCP shall be prepared according to contributing drainage area as well as according to construction stages especially involving large area.



# THE INSPECTION



# LIST BMPs

PARCEL 1 (QTY)

PARCEL 2 (QTY)

- ◆ Wash Trough
- ◆ Earth Drain
- ◆ Diversion Channel
- ◆ **Check Dam**
- ◆ Sediment Pond
- ◆ Silt Fence
- ◆ Turfing
- ◆ **Retaining Wall**
- ◆ **Interlocker Paver**
- ◆ **Berm Drain**
- ◆ **Interceptor Drain Toe Drain**
- ◆ **Cut-off Drain**
- ◆ **Drainage Blanket**



# INSPECTION

- ◆ ADJACENT AREA
- ◆ ENTRANCE/EXIT
- ◆ ACCESS /CONSTRUCTION /HAUL ROADS
- ◆ CRITICAL AREA-(Wherever soils detachment likely to occur.)
- ◆ SENSITIVE AREA-(Wherever pollutants can make way out across boundary)
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- ◆ CONCENTRATED FLOW
- ◆ STREAM/RIVER CROSSING/DIVERSION
- ◆ DRAINAGE AREA
- ◆ PERIMETER CONTROL
- ◆ INDIVIDUAL BMPs



# PROJEK SUNWAY MELAWATI SIGNBOARD

PROJEK :	CADANGAN PEMBANGUNAN SEBAHAGIAN SKIM PERUMAHAN STRATA 107 UNIT DI FASA 1 ( KESELURUHAN FASA 1 DAN 2 195 UNIT ) YANG MENGANDUNGI :	
	a) 57 UNIT RUMAH TERES 3 TINGKAT b) 50 UNIT RUMAH BERKEMBAR 3 TINGKAT BERSERTA SEBUAH RUMAH KELAB 2 TINGKAT, SEBUAH PONDOK PENGAWAL, 1 BUAH PENCAWANG ELEKTRIK DAN TEMBOK PENAHAN DI ATAS LOT 30087, MUKIM SETAPAK, KUALA LUMPUR	
	UNTUK TETUAN : SUNWAY MELAWATI SDN. BHD.	
PEMAJU :	<b>SUNWAY MELAWATI SDN. BHD.</b> (606358-V) LEVEL 3, MENARA SUNWAY, JALAN LAGOON TIMUR, BANDAR SUNWAY, 46150 PETALING JAYA, SELANGOR DARUL EHSAN. TEL : 03-5139 9200 FAX : 03-5639 9992	
AKITEK :	<b>SA ARCHITECTS SDN. BHD.</b> (121315-V) A-3A-1, NORTHPOINT OFFICES, MID VALLEY CITY, NO. 1, MEDAN SYED PUTRA UTARA, 59200 KUALA LUMPUR. TEL : 03-2283 3633 FAX : 03-2282 8632	 
JURUTERA STRUKTUR DAN AWAM :	<b>EDP CONSULTING GROUP SDN. BHD.</b> (462791-W) 24-1, JALAN USJ 10/1, SUBANG JAYA, 47620 PETALING JAYA, SELANGOR DARUL EHSAN. TEL : 03-5635 1003 FAX : 03-5635 1496	
JURUTERA JENTERA & ELEKTRIK :	<b>PLY &amp; ASSOCIATES SDN. BHD.</b> (780838-P) UNIT C-317, 3RD FLOOR, BLOCK C, KELANA SQUARE, NO. 17, JALAN SS7/26, KELANA JAYA, 47301 PETALING JAYA, SELANGOR DARUL EHSAN. TEL : 037804 3251 FAX : 03 7804 3252	
JURUKUR BAHAN :	<b>ECONCOS CONSULTANTS SDN. BHD.</b> (664140-H) NO. 43, JALAN 5/62A, BANDAR MENJALARA, 52200 KUALA LUMPUR TEL : 03-6277 4921 / 6921 FAX : 03-6276 4921	
LANSKAP AKITEK :	<b>PTA DESIGN</b> (556737-U) SUITE 6.08, THE AMP WALK NORTH BLOCK, NO. 218, JALAN AMPANG, 50450 KUALA LUMPUR. TEL : 03-2166 9898 FAX : 03 2171 2113	
KONTRAKTOR	<b>AWANGSA BINA SDN BHD</b> (263857-T) 12 JALAN USJ 21/7 47630 SUBANG JAYA SELANGOR DARUL EHSAN TEL : 03-8023 3763 FAX : 03-8023 3086	
RUJ. PERINTAH PEMBANGUNAN & TARIKH LULUS :	<b>OSC(B)A13U2100922-022(PTKM101027)</b>	<b>24 JAN 2011</b>
RUJ. PELAN BANGUNAN & TARIKH LULUS :	<b>BPU20SC20104440</b>	<b>6 MAY 2011</b>
KONTRAKTOR KERJATANAH :	<b>BINAFORM SDN. BHD.</b> (CO. NO. 329405-V) 42-2, JALAN PJS 8/2, MENTARI PLAZA, BANDAR SUNWAY, 46150 PETALING JAYA, SELANGOR DARUL EHSAN. TEL : 03-5633 6755	 JKKP/WP/12/03/8593
RUJ. PELAN KERJATANAH & TARIKH LULUS :	<b>(28)dIm.DBKL /JKA /U2/377 / 2010/1</b>	<b>9 JUN 2011</b>
NO PENDAFTARAN TAPAK :	<b>IKKP/WP/11/03/8518</b>	



# ADJACENT AREA (OFFSITE)



# Buildings on South-East (Clean)



27/09/2012



# MRR2 Highway on South-West: Evidence of silts deposition along the Sandbag perimeter barrier





# MRR2 Highway on South-West: Evidence of silts deposition along the perimeter drain





## At site perimeter during storm event





# Muddy water from the project site overflows into MRR2 highway roadside drain during heavy storm event.





# Nice Picturesque Signboard



15/08/2012 15:26



# SERIOUSLY IMPACTED



# MRR2 Highway





# Observe the tore fence and the quantity of earth eroded





# Residential Area





# ADJACENT AREA

- ◆ Buildings on South-East (Clean)
- ◆ MRR2 Highway on South-West: Evidence of silts deposition along the Sandbag perimeter barrier
- ◆ MRR2 Highway on South-West: Evidence of silts deposition along the perimeter drain



## COMMENT

- ◆ Evidence of mudflow along the perimeter drain indicates a non-compliance project site.
- ◆ Sandbags used for perimeter control should have been placed along the side slope serve as earth bank barrier.
- ◆ Silt fences should have been used in lieu of sandbags.
- ◆ In earlier construction stage of the land disturbing activities along the boundary, pre-limit a wider space by establishing earth bank combine with diversion channel that can serve as barrier and runoff conveyance structure/medium. Once the Parcel 1 development area is stabilized, the then pre-limit working space at the boundary shall be attended to.
- ◆ The stretch along the perimeter boundary to MRR2 should also be constructed a few more (3 units) of sediment traps.
- ◆ Other BMPs that shall be installed and implemented around this area includes check dams, seeding and proper earth drains.



# Corrective Actions

◆ EIA 4-08



# ENTRANCE



# Entrance to the Project Site is kept cleaned





# Interlocker Pavement





**Small sediment trap used as a secondary control after wash trough combined with hump/water bar prevent dirt water from flowing down the road surface.**





# ENTRANCE

- ◆ Entrance to the Project Site is kept cleaned
- ◆ Interlocker Pavement
- ◆ Small sediment trap used as a secondary control after wash trough combined with hump/water bar prevent dirt water from flowing down the road surface.



## COMMENT

◆ Clean entrance.



# ACCESS /CONSTRUCTION /HAUL ROADS



# Active Construction Road 1 (5-8 % gradient)





# Active Construction Road 1 (5-8 % gradient)





# Active Construction Road 2 (5-10 % gradient)





## Active Construction Road 2 (5-10 % gradient)





# Storm event



22/08/2012 18:04



# Active Construction Road 2 (5-10 % gradient)





# Active Construction Road 2 (5-10 % gradient)





# Active Construction Road 2 (5-10 % gradient) green northern boundary





# Active Construction Road 2 (5-10 % gradient)





# ACCESS /CONSTRUCTION /HAUL ROADS

- ◆ Active Construction Road 1  
(5-8 % gradient)
- ◆ Active Construction Road 2  
(5-10 % gradient)
- ◆ Active Construction Road 2  
(5-10 % gradient) green northern boundary



## COMMENT

- ◆ Actives construction roads preferably must implement stabilization with gravels or crusher run.
- ◆ Wherever required, maximize the use of rolling dip, broad-based dip and water bar BMPs along the sloping or grades access to break and divert the potential runoff erosive flow, volume and direction.
- ◆ Establishing the road ditch is among the best method to control sediment-laden runoff. Construction of slot checks along the ditch may settle the sediment. Channel lined (riprap) with suitable stone sizes and mixtures with respect to runoff flow rate may reduce runoff velocity to weaken the erosive flow and promote settling capability.
- ◆ Method of grading by establishing in-slope and out-slope will naturally construct earth drain.
- ◆ Construction of earth bank along the critical side slope of the alignment may help to prevent runoff running onto the slope.



# Corrective

◆ EIA-4-08



# **SEDIMENTATION AREAS (OFFSITE/ON-SITE)**



# Silted Drainageway Parcel 2





# Silted Drainageway Parcel 2





# Silted Drainageway Parcel 2





# Silted Drainageway Parcel 2. End point of drainageway been constructed earthen dam and with pipe outlet point.





# Without proper structure and maintenance, this embankment may give way





# SEDIMENTATION AREAS (OFFSITE/ON-SITE)

- ◆ Silted Drainageway Parcel 2
- ◆ Silted Drainageway Parcel 2.  
End point of drainageway been constructed earthen dam and with pipe outlet point.
- ◆ Without proper structure and maintenance, this embankment may give way



## COMMENT

- ◆ Series of sediment trap/basin shall be constructed along the drainageway.
- ◆ Erosion and sediment control measures around this catchments area must be thoroughly revised and applied accordingly.



# Corrective Actions

◆ EIA-4-08



# **BORROW AREA (OFFSITE/ONSITE)**



# BORROW AREA

- ◆ None since this project having surplus of earth.



# DISCHARGES



# Public Main Drain





# Discharge Point





# Discharge Point





# Discharge



21/07/2012 18:02



# DISCHARGES

- ◆ Public Main Drain
- ◆ Discharge Point



## COMMENT

- ◆ Make sure to have a safe and accessible discharge point.



# **EVIDENCE OF CONCENTRATED FLOW**



# Access Road





## Building Construction Area 2



27/09/2012



# Building Construction Site Area 2



25/07/2012 09:13



# Building Construction Site Area 2



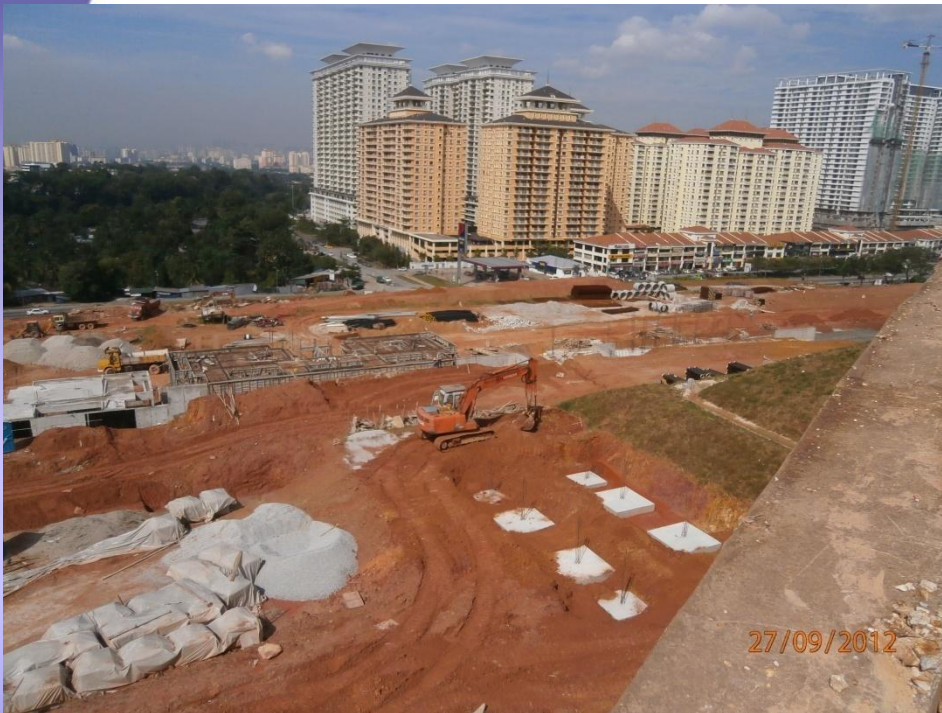


## Building Construction Site Area 2





## Building Construction Site Area 2





# At Junction of Access Rd 1 and Rd 2 Near Retaining Wall





# EVIDENCE OF CONCENTRATED FLOW

- ◆ Access Road
- ◆ Building Construction Area 2
- ◆ At Junction of Access Rd 1 and Rd 2 Near Retaining Wall



## COMMENT

- ◆ Indicate unmanaged runoff flow.
- ◆ Use the maximum extent of runoff BMPs and wherever required apply temporary cover.



# Corrective Actions

◆ EIA-4-08



# CRITICAL AREAS



## Slopes were not protected





# Unprotected



27/09/2012



# Unprotected





# CRITICAL AREAS

- ◆ Slopes were not protected



## COMMENT

- ◆ Cut and fill skills of slopes plays an important role in reducing the potential erosion problem. To complete certain cut/fill slope may take month, so method used such as terraces, benches and rounding the edge of the unfinished cutting of the most upslope shall reduce the vulnerability of the slope surface.
- ◆ Application of runoff BMPs such as temporary earth, interceptor, toe, cut-off and berms drains is mandatory in dealing with slopes formation process. Incomplete slopes formation that left exposed of more than 2 weeks shall be temporarily covered.



# Corrective Actions

- ◆ EIA 4-08
- ◆ Notice S31



# EVIDENCE OF GULLIES



## Gullies not likely to form maybe due to hard soil surface properties





# BARE AREA



## BARE AREA

- ◆ Almost all of the incomplete / active construction area left exposed and unprotected.



# Almost all of the active construction area left unprotected



27/09/2012



# Almost all of the active construction area left unprotected





## Even awaiting for landscapes work to commence, shall be temporary covered





# BARE AREA

- ◆ Almost all of the incomplete / active construction area left exposed and unprotected.
- ◆ Even awaiting for landscapes work to commence, shall be temporary covered



## COMMENT

- ◆ Not a single effort to temporarily cover with seeding or hydroseed seen around this project area particularly active or changing site elevation and condition.



# Corrective Actions

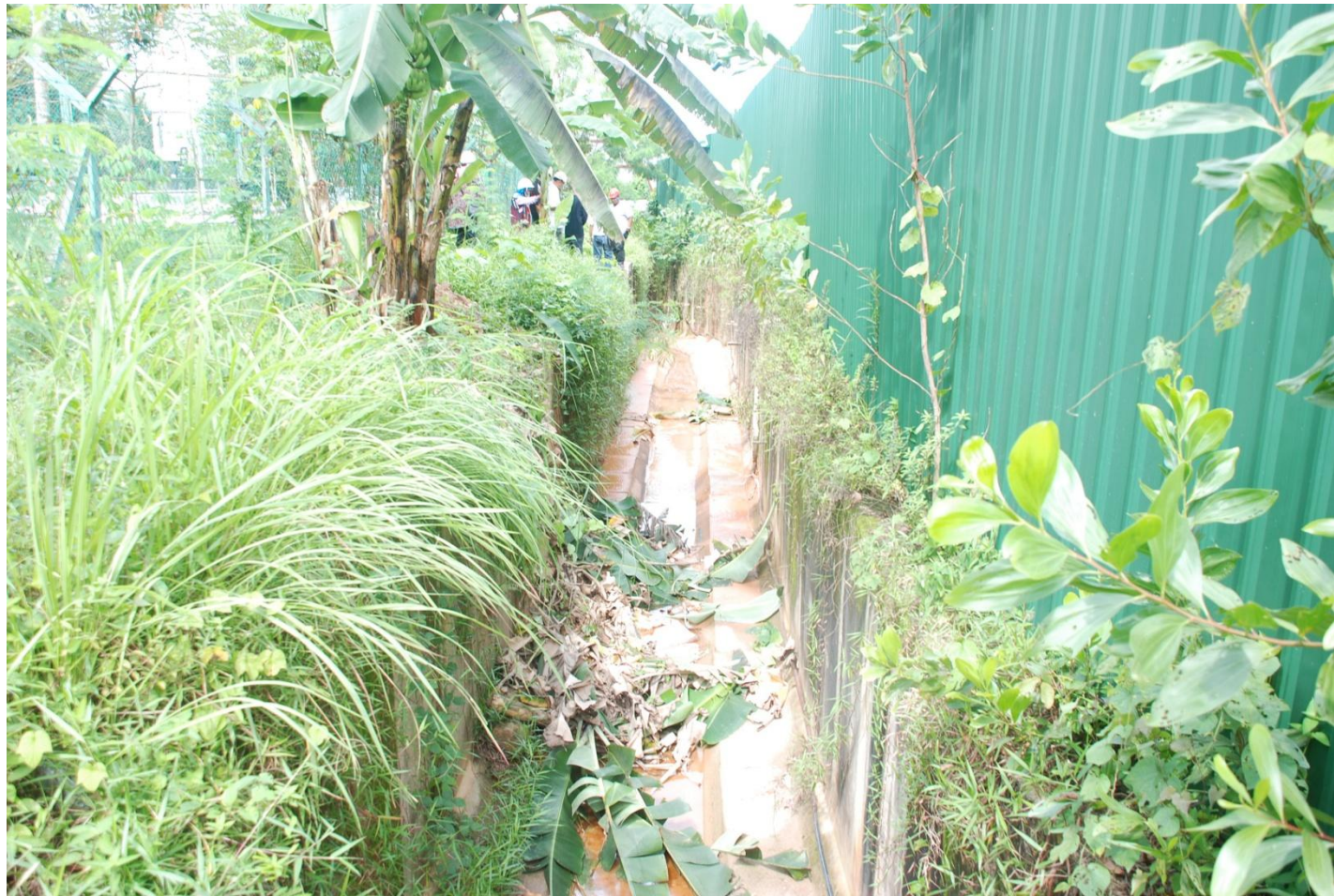
- ◆ EIA 4-08
- ◆ Notice S31



# SENSITIVE AREAS



# Public neighbourhood drain





## Drained to main drain





# Waterway culvert across MRR2 Highway





# SENSITIVE AREAS

- ◆ Public neighbourhood drain
- ◆ Drained to main drain
- ◆ Waterway culvert across MRR2 Highway



## COMMENT

- ◆ Obviously this site is not complying as evidence of silts deposited not far from discharge point.
- ◆ Indicator.



# RUN-ON

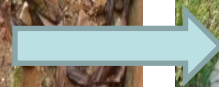
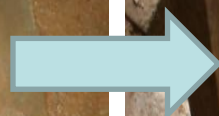


## RUN-ON

- ◆ Not sighted any run-on flows onto the site. However two dirt washing facilities within the jobsite **drain** washed water into Sediment Basin 1 may overload the said basin capacity.



# Dirt washed water facility drains into SB 1





## COMMENT

- ◆ Dirt washed water should have been discharged separately since sediment trapping control provided would be enough to filter sediment from shoes washing.



# Corrective Actions

◆ **Give advice.**



# **STREAM OR DRAINAGE CROSSING / DIVERSION**



# Free runoff flow practice shouldn't be allowed for any reason



Crossing location

Runoff direction



# Culvert Crossing



# High channel gradient shall apply inlet/outlet protection around culvert





# Outlet Of Culvert Crossing





# Undermining



15/08/2012 14:59



# Further down channel





# Access road Crossing



# Access road Crossing







# Another internal road crossing needs to install/construct Culvert or Broad-based dip BMPs





# STREAM OR DRAINAGE CROSSING / DIVERSION

- ◆ Free runoff flow practice shouldn't be allowed for any reason
- ◆ Culvert Crossing
  - High channel gradient shall apply inlet/outlet protection around culvert
- Access road Crossing
- Another internal road crossing needs to install/construct Culvert or Broad-based dip BMPs



## COMMENT

- ◆ Any crossing preferably use pipe culvert or bridge. Other BMPs such as broad-based dip may workable even for active construction roads. Protection must be applied around the crossing depending on the channel conveyance medium.



## Corrective Actions

- ◆ EIA 4-08 or EIA 3-08 wherever related.



**De-silted Materials Disposed On-Site**

# **DISPOSAL AREA**



# Temporary disposal area for de-silting material shall be contained properly and stabilized





# DISPOSAL AREA

- ◆ Temporary disposal area for de-silting material shall be contained properly and stabilized



## COMMENT

- ◆ Must install perimeter barrier control and preferably cover.



# Corrective Actions

## ◆ EIA 4-08.



# INDIVIDUAL BMPs INSPECTION



# **BEST MANAGEMENT PRACTICES (BMPs)**

## **THE INSPECTION**



# **SITE PLANNING AND MANAGEMENT BMPs**



# SITE PLANNING AND MANAGEMENT BMPs

- ◆ Preservation of existing vegetation and trees. (Delineation)
- ◆ Preserving topsoil for the next construction
- ◆ Phasing/Scheduling/Sequencing of construction works in line with installation of erosion and sediment measures.
- ◆ Training & Certification of employees towards understanding of pollution control.
- ◆ On-site erosion and sediment control material resource such as Biomass, Plant Nursery (native), Gravels & rocks.



# **PRESERVE EXISTING TREES & VEGETATION**



# PRESERVE EXISTING TREES & VEGETATION

- ◆ 16 Acres on the northeast site of project area is preserved as green area.



## COMMENT

- ◆ The development area was completely cleared without temporarily preserved existing vegetation significantly promotes erosion and sedimentation problem.



Phasing / Scheduling / Sequencing of construction works in line with installation of erosion and sediment measures.



## Phasing/Scheduling/Sequencing of construction works in line with installation of erosion and sediment measures.

- ◆ Obviously not been practiced.



## COMMENT

- ❑ The project implementation planned into two phases but construction will be implemented simultaneously. This condition normally meant for engaging two separate contractors to take over the construction activities separately.
- ❑ However the scheduling of both phases were not implemented by incorporating ESC elements and BMPs installation stages into their construction process. This is obvious to observe run-off discharged from Parcel 2 (uphill development) is conveyed into SB 1 sited in Parcel 1 while land disturbance in this area are yet to be stabilized. This may be due to many conflicting issues during the course of construction of which affected the staging and sequences of planned construction process.
- ❑



# Corrective Actions

- ◆ Too late.
- ◆ Legal action?
- ◆ EIA-3-08.



# RESOURCE ON-SITE **BIOMASS**



# BIOMASS

◆ Disposed off-site



## COMMENT

- Some of the branches established during site clearing may be used as mulching or brush barrier BMPs.



# RESOURCE ON-SITE ROCKS FOR BMPs



# ROCKS

- ◆ Being informed the source was not available on-site.



## COMMENT

- On-site rocks or stones material if available may be used as check dam and riprap BMPs.



# STOCKPILE TOPSOIL



# STOCKPILE TOPSOIL

- ◆ No stockpile was seen on-site



## COMMENT

- Topsoil should have been stockpile for the purpose of seeding and turfing BMPs activities.



# SALVAGE TREES (TRANSLOCATION)



# SALVAGE TREES

◆ Not practiced.



## COMMENT

- Protect the native trees around the site and saving cost and time as well as expedite the trees growing for the purpose of landscaping.



# ESTABLISH NURSERY



# ESTABLISH NURSERY

◆ Not practiced



## COMMENT

- ◆ Save cost and time. Made immediate availability of the grass/shrubs during the time of needed.



# EROSION CONTROL



# EROSION CONTROL LIST

- ◆ **SOIL ROUGHENING**
- ◆ **MULCHING & HYDROMULCHING**
- ◆ **SEEDING & HYDROSEEDING**
- ◆ **TURFING**
- ◆ **RECP**
- ◆ **PLASTIC SHEET & GEOTEXTILE**



# HYDROSEEDING



**Not seen other than slopes along the southwest side of the project site parallel to MRR2 highway.**





# HYDROSEEDING

- ◆ Not seen other than slopes along the southwest side of the project site parallel to MRR2 highway.



## COMMENT

- ◆ Temporary Hydroseeding should have been applied to all of the critical slopes nevertheless it may be complete or not.



## Corrective Actions

- ◆ Implemented properly and functioning.
- ◆ EIA-3-08.



# TURFING



# Sediment Basin Embankment and Side-slope well turfed





Other areas are not seen, except around the perimeter along the MRR2 highway.





# TURFING

- ◆ Sediment Basin Embankment and Side-slope well turfed.
- ◆ Other areas are not seen, except around the perimeter along the MRR2 highway.



## COMMENT

- ◆ Must be applied immediately upon completion of slopes and any other unattended flat surface areas.



## Corrective Actions

- ◆ Nicely done and functioning.
- ◆ EIA-3-08



# TEMPORARY PLASTIC SHEET COVER



# Being informed that this low quality plastic sheet can only last for one month





## Parcel 2: The only slope temporarily covered with low quality plastic sheet





# TEMPORARY PLASTIC SHEET COVER

- ◆ Parcel 2: The only slope temporarily covered with low quality plastic sheet



## COMMENT

### ◆ Installation:

- The many exposed slopes around the site, only two slopes have been covered with plastic sheet.
- Low quality material.
- Installation not to the standard and specification such as sheet was not staked, no lengthwise and crosswise overlapped at edge, not trench and extend at top and bottom of slope.

### ◆ Maintenance:

- Tore sheets were not replaced.



## Corrective Actions

- ◆ Use high quality plastic sheet.
- ◆ Shall follow standard and specification.
- ◆ EIA 3-08



# SEEDING



# SEEDING

◆ None



## COMMENT

- ◆ Any expected unattended flat surface for a long time should be seeded.



# ROLLED EROSION CONTROL PRODUCTS



# Matting





# Matting





# Matting





# Matting – Staple/rebar





# Matting

- ◆ Installed at one slope location GPS:



# COMMENT

## ◆ Installation

- Material used was not made available by contractor.
- For the 1:1 slope, one must use high strength material combined with hydroseeding.



## Corrective Actions

- ◆ Nicely done and working.
- ◆ EIA-3-08



# SOIL ROUGHENING



# SOIL ROUGHENING

◆ Not practiced.



## COMMENT

- ◆ A very good practice in reducing erosion potential on slope surface especially incomplete slopes awaiting for cover BMPs.



# MULCHING & HYDROMULCHING



# MULCHING & HYDROMULCHING

◆ Not practiced.



## COMMENT

- ◆ Available source material such as Biomass either by shredding or packed branches may be used for mulching and brush barrier/layer BMPs respectively.



# REVEGETATION



# REVEGETATION

◆ None



## COMMENT

- ◆ Should be practiced similar to seeding and turfing. It normally involves the previously vegetated areas and application of native grass/shrubs.



# RUNOFF CONTROL



# RUNOFF CONTROL LIST

- ◆ DIVERSION
- ◆ EARTH BANK
- ◆ EARTH DRAIN
- ◆ RIPRAP
- ◆ CUT-OFF DRAIN
- ◆ BERM DRAIN
- ◆ INTERCEPTOR DRAIN



# EARTH DRAIN



# Parcel 1: Earth drain (Access Rd 1) draining from Building Construction Area 1





## Parcel 1: Earth drain (Access Rd 1)





# Parcel 1: Earth drain (Access Rd 1) End Point





## Parcel 2: Earth drain





## Parcel 2: Earth drain





# EARTH DRAIN

- ◆ Parcel 1: Earth drain (Access Rd 1) draining from Building Construction Area 1
- ◆ Parcel 1: Earth drain (Access Rd 1)
- ◆ Parcel 1: Earth drain (Access Rd 1) End Point
- ◆ Parcel 2: Earth drain



## COMMENT

- ◆ For very large platform, earth drain must be constructed around the exposed surface by dividing necessarily the suitable surface areas to prevent flow accumulation that may generate erosive flow manner (concentrated flow).



## Corrective Actions

- ◆ Improperly done and evidence of overtopping as well as undermining of drain slope and bed.
- ◆ EIA-3-08



# EARTH BANK



**Not seen other than slopes along the southwest side of the project site parallel to MRR2 highway.**





# EARTH BANK

- ◆ Not seen other than slopes along the southwest side of the project site parallel to MRR2 highway.



## COMMENT

- ◆ Installation:  
Good application along the site boundary but not fully constructed according to the specifications such as break of continuity direction into sediment basin, bank width, side slope, check slots /dam, concave top surface and seeded.
- ◆ Practice that to be used throughout the site for the purpose of diversion and perimeter barrier control.



## Corrective Actions

- ◆ Improperly done and evidence of overtopping as well as undermining of drain slope and bed.
- ◆ [EIA-3-08](#)



# DIVERSION



# Diversion Channel drain runoff from Parcel 2 uphill





## Lined with stones (Riprap)





# Crossing over Access Rd 2 and continuing into channel draining into SB2





## Cross over Access Road 2





# Concrete dam (claimed as Check Dam)





# Concrete dam (claimed as Check Dam)





## Drains through culvert crossing (lined with concrete piles)





# Overtopping culvert crossing



17/07/2012 15:46



## Outlet of culvert crossing (lined with concrete piles)





## More downstream (lined with mixed stones and concrete)





# Storm event



22/08/2012 18:01



# Further downstream without lining





# Expected wash away material downstream during high flow. Another construction road crossing





## Further downstream



17/07/2012 15:46



## Further downstream





# Runoff turned erosive with increase gradient and starts to undercut channel bed.





## Observe wash away concrete piles





# Visible Check Dams during storm recede



22/08/2012 17:59



# Eroded channel bank



22/08/2012 18:02



## Sub-division access road crossing





## Direction flow to SB2





# Diversion Channel drain to SB2



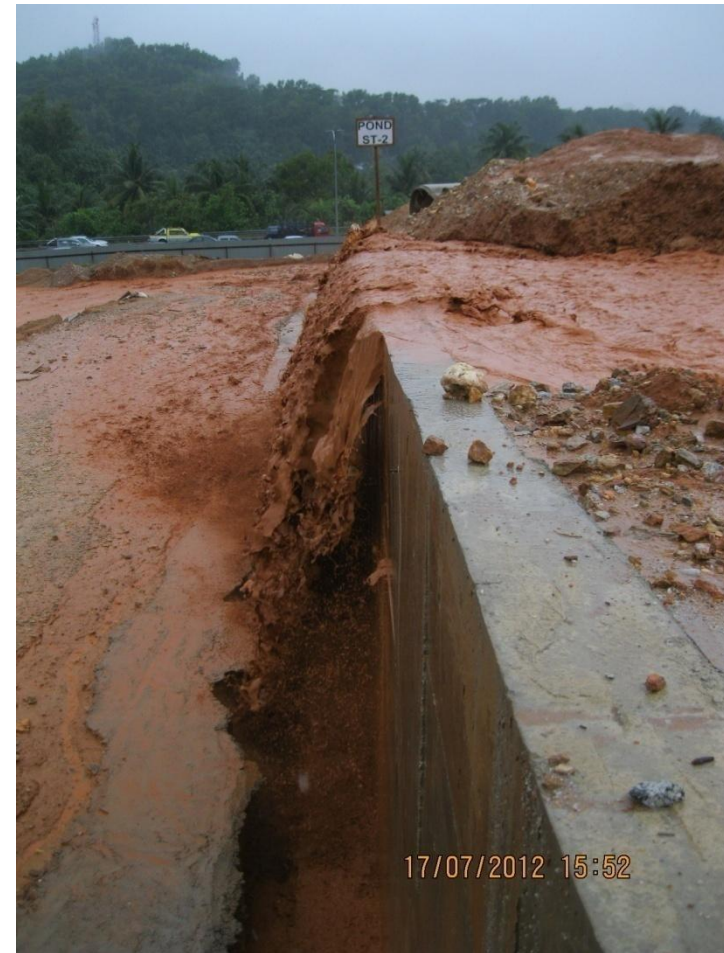


# Diversion Channel drain to SB2





# Bypass SB2





## Bypass SB2 overflow to SB1



17/07/2012 15:56



## Flow into SB1



17/07/2012 16:01



# DIVERSION

- ◆ Diversion Channel drain runoff from Parcel 2 uphill and along site boundary at perimeter along MRR2



## COMMENT

- ◆ Follow strictly standards and specifications been set.



## Corrective Actions

- ◆ Improperly done and evidence of overtopping as well as undermining of drain slope and bed.
- ◆ [EIA-3-08](#)



# CHECK DAM



# IMPROPER CHECK DAM





# Concrete dam (claimed as Check Dam)





# Concrete dam (claimed as Check Dam)





# IMPROPER CHECK DAM



22/08/2012 17:59



## COMMENT

- ◆ Follow strictly standards and specifications been set.



# Corrective Actions

- ◆ Consider not done or installed.
- ◆ EIA-3-08



# RIPRAP



# RIPRAP





# RIPRAP





# RIPRAP





# RIPRAP





# RIPRAP

(Comparison within 2 months)





# RIPRAP

(Must consider specification)





## Further upslope



20/07/2012 18:17



## Further upslope



20/07/2012 18:17



## COMMENT

- ◆ Follow strictly standards and specifications been set.



## Corrective Actions

- ◆ Installation not according to standards and specifications.
- ◆ EIA-3-08



# OUTLET PROTECTION



## No outlet protection around culvert





# Rock Outlet Protection

(Observe the stone placed in the pipe  
pose possibility of dam break)



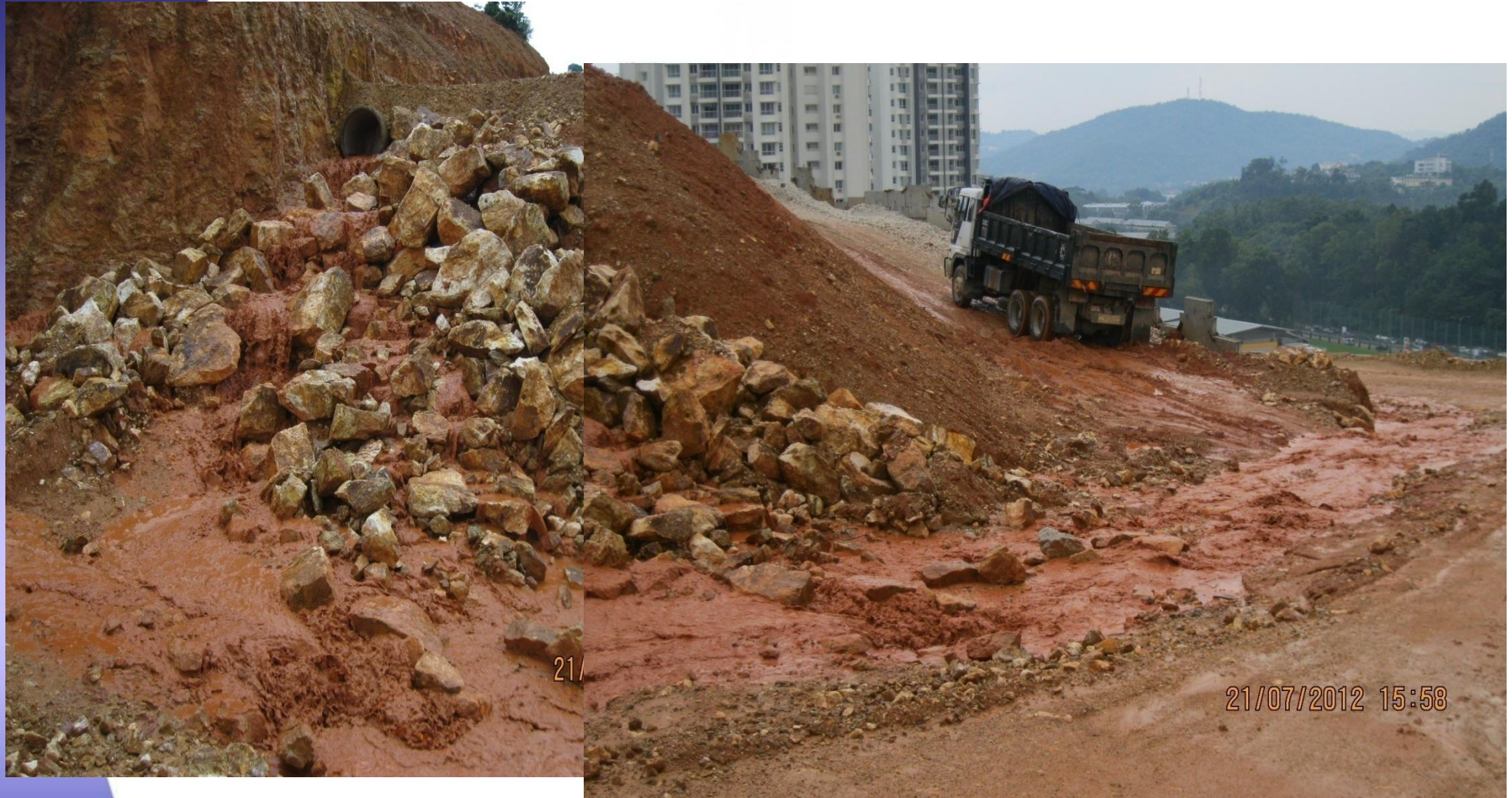


## Discharge not conveyed properly downstream (Must extend apron)





# Storm Event



21/

21/07/2012 15:58



# OUTLET PROTECTION

- ◆ No outlet protection around culvert
- ◆ Rock Outlet Protection  
(Observe the stone placed in the pipe pose possibility of dam break)
- ◆ Discharge not conveyed properly downstream  
(Must extend apron)



## COMMENT

- ◆ Shall follow standards and specifications been set.



## Corrective Actions

- ◆ Installation not according to standards and specifications.
- ◆ EIA-3-08



# DISSIPATER



# Dissipater





## COMMENT

- ◆ Shall follow standards and specifications been set.



## Corrective Actions

- ◆ Installation not according to standards and specifications.
- ◆ EIA-3-08



# SOIL RETENTION



# AE Wall







# Retaining Wall



27/09/2012



# AE Wall in Progress





# Storm Event





# Storm Event



22/08/2012 18:04



## COMMENT

- ◆ Shall follow standards and specifications been set.



## Corrective Actions

- ◆ No evidence of soil movement.
- ◆ EIA-3-08



# INLET PROTECTION



# Sandbag Inlet Protection (connector box sump)





# Storm Event





# No Storm Drain Inlet Protection





# No Storm Drain Inlet Protection





# No Storm Drain Inlet Protection





# Storm Drain Inlet Protection

- ◆ Sandbag Inlet Protection (connector box sump)



## COMMENT

- ◆ Shall follow standards and specifications been set.
- ◆ Should be applied at many more locations:
  - Suitable sediment basin inlet point
  - All of storm drain inlet point



# Corrective Actions

- ◆ Properly installed.
- ◆ EIA-3-08



# PIPE SLOPE DRAIN



# PIPE SLOPE DRAIN

◆ None



## COMMENT

- ◆ Many possible locations may be installed at critical locations to convey upslope runoff downslope.



# TEMPORARY CUT- OFF DRAIN



# TEMPORARY CUT-OFF DRAIN

◆ Not sighted.



## COMMENT

- ◆ Many possible locations may be installed at critical locations to convey upslope runoff downslope.



# FLUME / CHUTE



# FLUME / CHUTE

◆ None



## COMMENT

◆ Not so applicable.



# ROLLING DIP / BROAD-BASED DIP / WATER BAR



# ROLLING DIP / BROAD-BASED DIP / WATER BAR

◆ None



## COMMENT

- ◆ Many possible locations may be installed at critical locations to convey upslope runoff downslope.



# LEVEL SPREADER



# LEVEL SPREADER

◆ NONE



## COMMENT

- ◆ Suitable for Stormwater BMPs but may be applied at suitable location and site condition.



# SEDIMENT CONTROL



# SEDIMENT CONTROL LIST

- ◆ SILT FENCE
- ◆ SEDIMENT BASIN/TRAP
- ◆ WASH TROUGH
- ◆ CONSTRUCTION ROAD STABILISATION
- ◆ BRUSH BARRIER



# WASH TROUGH AND STABILIZED ENTRANCE/EXIT



# Tire Wash Facility





# Rumble Grating





# Recycle water pond





# Storm event





# WASH TROUGH AND STABILIZED ENTRANCE/EXIT

- ◆ Tire Wash Facility
- ◆ Rumble Grating
- ◆ Recycle water pond and sediment trap



## COMMENT

- ◆ Good applications of tire wash facility.  
Consider frequent maintenance of the recycle water compartment to remove the fast accumulated sediment due to active washing.



## Corrective Actions

- ◆ Check the frequency of maintenance especially the clean out.
- ◆ EIA-3-08



# CONSTRUCTION ROAD STABILIZATION



# Compaction





## Stabilized surface with crusher run





# CONSTRUCTION ROAD STABILIZATION

- ◆ Compaction
- ◆ Stabilized surface with crusher run at the access track of material storage area.



## COMMENT

- ◆ Earth compaction serves a good method of soil stabilization but tends to promote runoff volume due to impervious surface. Proper roadside drain and diverter should be constructed to avoid free flow and standing water that may rut the surface and induce erosion during heavy vehicles movement.



## Corrective Actions

- ◆ Smooth compaction road surface shall be provided with roadside drain and runoff diverter or water bar.
- ◆ [EIA-3-08](#)



# SILT FENCE



## Silt Fence – the only 50 metres installed





## Silt Fence – the only 50 metres installed





# Silt Fence – the only 50 metres installed





# SILT FENCE

- ◆ Silt Fence – the only 50 metres installed.



## COMMENT

- ◆ Shall follow standards and specifications been set.
- ◆ Many potential location at the site should be applied especially the site boundary at perimeter along MRR2 highway as suggested in the ESCP.



## Corrective Actions

- ◆ Shall follow standards and specifications been set.
- ◆ EIA-3-08



# SEDIMENT BASIN / TRAP



# SEDIMENT BASIN 1



# Sediment Basin 1

**RISER  
COVERED  
WITH  
FABRIC**





**GOOD TURFED  
EMBANKMENT**

**SERVICE  
ACCESS**

26/9/2012 9:26pm



# De-silting material dumped beside the pond





# Foreign material placed on the pond embankment





# Overview of Sediment Basin 1





## Riser close-up





# Storm event





# Storm event



17/07/2012 15:42



## Site Office next to SB1 (upstream)



02/05/2012 03:59



## COMMENT

- ◆ Shall follow standards and specifications been set.
- ◆ Overload or under capacity.
- ◆ Construct many more.
- ◆ Establish forebay and baffles.
- ◆ Make use of PAM.



## Corrective Actions

- ◆ Shall follow standards and specifications been set.
- ◆ EIA-3-08



# SEDIMENT BASIN 2



## Sediment Basin 2





# Sediment Basin 2





## Sediment Basin 2





## INLET POINT 2 & 3





## INLET POINT 2





## COMMENT

- ◆ Shall follow standards and specifications been set.
- ◆ Overload or under capacity.
- ◆ Construct many more.
- ◆ Establish forebay and baffles.
- ◆ Make use of PAM.



## Corrective Actions

- ◆ Shall follow standards and specifications been set.
- ◆ EIA-3-08



# SEDIMENT BASIN 3



## Sediment Basin 3



27/09/2012



## Sediment Basin 3

Evidently direct sediment-laden runoff flows down steep sloping access road.





# Sediment Basin 3 Discharge Point





## Contributing disturbed area that drains runoff into Sediment Basin 3





## A suitable location to construct additional sediment basin after SB3





# Overview of SB3



27/09/2012



## COMMENT

- ◆ Shall follow standards and specifications been set.
- ◆ Overload or under capacity.
- ◆ Construct many more.
- ◆ Establish forebay and baffles.
- ◆ Make use of PAM.



## Corrective Actions

- ◆ Shall follow standards and specifications been set.
- ◆ EIA-3-08



# BRUSH BARRIER



# BRUSH BARRIER

◆ NONE



## COMMENT

- ◆ Potentially being used during early stage of site clearing.



# FIBER ROLLS / WATTLES



# FIBER ROLLS / WATTLES

◆ NONE



## COMMENT

- ◆ May be used as slope breaker and subdivision perimeter barrier.



# TURBIDITY CURTAIN



# TURBIDITY CURTAIN

◆ NA



# POST CONSTRUCTION (STORMWATER BMPs)



## Awaiting for cascade drain





# Awaiting for cascade drain



27/09/2012



# Awaiting for cascade drain



27/09/2012



## Awaiting for cascade drain



27/09/2012



# Completed Cascade drain



27/09/2012



# Interlock Paver





# POST CONSTRUCTION (STORMWATER BMPs)

- ◆ Cascade drain
- ◆ Interlock Paver



## COMMENT

- ◆ Must incorporate associate BMPs for Post-construction versus During construction.



# Corrective Actions

◆ EIA-3-08



# GENERAL CONSTRUCTION CONTROL



# Misappropriate





# Bad Location





# Waste oil container





# Compressor, Schedule Waste Container and Skid Tank



27/09/2012



# Schedule Waste Store





# GENERAL CONSTRUCTION CONTROL

- ◆ Inappropriate practice (skid tank)
- ◆ Bad Location
- ◆ Waste oil container
- ◆ Compressor, Schedule Waste Container and Skid Tank
- ◆ Schedule Waste Store



# MAINTENANCE ISSUES



# Just imagine the thickness of the silts





## COMMENT

- ◆ Establish scheduled and contingency program. Please refer to execution method of Performance Monitoring.



## Method Statement

- ◆ No method statement was made available during the time of inspection pertaining to how runoff from Parcel 2 to be convey or drain out environmentally safe from the project site.



## COMMENT

- ◆ Whenever unavailable method statement of construction process around critical and sensitive area, one must request the environmental Method Statement so as to outline and lay the detail methodology that includes standards and specifications to be used for preventing and minimizing erosion and sedimentation problems.



# Performance Monitoring

- ◆ No performance monitoring document was made available at the time of inspection.



## COMMENT

- ◆ If Performance Monitoring is really not being done, then surely this project site is not complying at all time ever since it started. This reflects the documentation of the conducting duties during the course of installation, inspection and maintenance works.



# CONCLUSION



# CONCLUSION

- ◆ Phasing was not adhered to.
  - SB1 should be used as a Stage 2 additional operating sediment pond during Parcel 2 earthwork advances whenever Parcel 1 area is totally stabilized.
  
- ◆ Preventive measures was not practiced at all.
  - Being informed that the process of SB 1 cleaned out consumed non-stop of 3 weeks of de-silting work involving 100 trips of lorry transporting uphill to the disposal site costing up to RM 40k.



# CONCLUSION

- ◆ Runoff control and management were not planned and implemented.
- ◆ Disturbed area were not stabilized and left exposed for long time.
- ◆ The extents of soil disturbance at a time are very large.
- ◆ BMPs installation, inspection and maintenance were not adhered to standards and specifications been set.



# ENFORCEMENT INSPECTION REPORT (Non-compliance / Violation)

- ◆ Prevention and control measures outline in the EIA Report. [ESCP Report](#)
- ◆ Approval Conditions: [Previous](#) [New](#)
  - ESCP
  - BMPs
  - Discharge

## **Enforcement Action:**

1. Citation
2. [Notices under Section 31 & 37](#)
3. Legal action under Section 34A(7)



# ENFORCEMENT INSPECTION REPORT

## ◆ Apendiks 16-Laporan Siasatan EIA



## Follow-up Action

- ◆ Serve notice to take corrective actions duly.
- ◆ Any legal action to be taken due to any violation shall reference to that specific approval condition. Make sure that evidence collection must base on the requirement of the burden of proof related to the aforementioned approval condition.



# ENFORCEMENT FOLLOW-UP ACTION

Verification of corrective actions taken base upon previous issued citations and notices.

EIA- 5-08



# THANK YOU

# QUESTIONS?