

Annexure10: ENVIRONMENTAL MANAGEMENT PLAN

10.1 INTRODUCTION

The Environmental Management Plan (EMP) is aimed at mitigating the possible adverse impact of a project and ensuring the existing environmental quality. The EMP converse all aspects of planning, construction and operation of the project relevant to environment. It is essential to implement the EMP right from the planning stage continuing throughout the construction and operation stage. Therefore the main purpose of the Environmental Management Plan (EMP) is to identify the project specific activities that would have to be considered for significant adverse impacts and the mitigation measures required.

The construction phase impacts are mostly short term, restricted to the plot area and not envisaged on a larger scale. In the operational phase, the environmental impacts are due to continuous operation of the project; hence, the emphasis in the Environment Management Plan (EMP) is to minimize such impacts. The following mitigation measures are recommended in order to synchronize the economic development of the project area with the environmental protection of the region.

The emphasis on the EMP development is on the following:

- ▲ Incorporating Green Building concept from Design to Implementation stage.
- ▲ Mitigation measures for each of the activities causing environmental impact.
- ▲ Monitoring plans for checking activities and environmental parameters and monitoring responsibilities.
- ▲ Roles, responsibilities and resource allocation for monitoring; and
- ▲ Implementation of the Scheduled plan.

Environmental Management Plan has been discussed in the following sections separately for Construction phase and Operational phase:

10.2 EMP DURING CONSTRUCTION PHASE

During Construction phase, the activities which need to be monitored and managed from the point of pollution are explained in detail in the subsequent sections.

10.2.1 LEVELLING AND SITE CLEARANCE

Before the site was used by BMRCL for Metro work. There are debris in the site which will be cleared by BMRCL. Also, site has level difference of 3.6 m, so levelling and excavation will be done for basement preparation and it will be restricted to minimize the excavation.

Table 10.1: Environmental Management during Levelling and Site Clearance

| Environmental Impacts | Mitigation | Remarks |
|---|--|---|
| Noise generation: Caused due to Excavators and Bulldozers | <ul style="list-style-type: none"> • Most optimum no. of operation by the heavy equipment. • Selection of equipment with less noise generation to be used. • The earth moving equipment shall be periodically checked and maintained for noise levels. • The workers shall be provided with adequate PPEs such as ear plugs to reduce the impact of high noise levels. | To reduce noise level, Equipment provided with noise control devices is only used. |
| Dust generation: Levelling operations results in the emission of the dust. | <ul style="list-style-type: none"> • The site cleared shall be periodically watered to reduce emission of dust particles. • Barricades have been provided all around the site to suppress the dust. • The workers shall be provided with PPEs such as nose masks and goggles to reduce impact on health. | The construction water requirement will be sourced from external authorized tanker water suppliers. |

10.2.2 TRANSPORTATION OF CONSTRUCTION MATERIALS

During the transportation of construction materials, minimum no. of vehicles will be used. Most optimum route is planned to reduce the impact of transportation activity on the environment.

Table 10.2: Environmental Management during Transportation

| Environmental Impacts | Mitigation |
|------------------------------|---|
| Noise generation | <ul style="list-style-type: none">• Quality fuel is used.• Periodic maintenance of the vehicles is required. |
| Dust generation | <ul style="list-style-type: none">• Quality packaging of the construction materials.• Construction materials shall be covered with tarpaulin sheets to prevent the material from being air borne.• The vehicle speed shall be regulated.• PPEs such as nose masks shall be provided to the workers transporting materials to reduce impact of air borne dust on their health.• Wheel washing facilities shall be provided for all vehicles. |
| Vehicular emissions | <ul style="list-style-type: none">• Periodic emission check for vehicles is required.• Clean fuel shall be used for vehicles. |

10.2.3 CONSTRUCTION ACTIVITIES

During the construction work, the following impacts are identified to monitor and mitigate the level of impact.

Table 10.3: Environmental Management during Construction

| Environmental impacts | Mitigation | Remarks |
|---|---|--|
| Noise generation | <ul style="list-style-type: none">• Selection of less noise generating equipments.• Personnel Protective Equipments (PPEs) such as ear plugs and helmets shall be provided for construction workers.• The working hours shall be imposed on construction workers. | Implementation responsibility: Contractor – Civil Works. |
| Dust generation | <ul style="list-style-type: none">• PPEs in the form of nose masks and goggles shall be provided for construction workers.• Use of water sprays to prevent the dust from being air borne.• Providing barricades all around the project site. | Implementation responsibility: Contractor. |
| Water Discharge from construction works | <ul style="list-style-type: none">• Sewage generated will be collected in a collection tank & will be lifted to BWSSB sewage treatment plant for further treatment. | Implementation responsibility: Contractor. |
| Air Emissions from construction machinery | <ul style="list-style-type: none">• Periodic check and regular maintenance of construction machinery for emissions.• Clean fuel shall be used in equipments. | Implementation responsibility: Contractor. |

10.2.3.1 WASTEWATER DISCHARGE

The sewage generated from the construction labours during construction is estimated to be about 2.4 KLD. This will be collected in a collection tank & will be lifted to BWSSB sewage treatment plant for further treatment.

10.2.3.2 DISPOSAL OF EXCAVATED EARTH

The excavated earth which is generated during construction will be reused for development of landscape and pavement area formation therefore there will not be any solid waste problem from the generation of excavated earth.

10.2.3 PERSONNEL SAFETY SYSTEM

It is planned to adopt safe working practices which shall govern all construction works undertaken throughout the project. Following Safety Aids to all labourers will be provided:

- Safety Helmets
- Safety Belts/harness
- Safety Shoes
- Hand gloves
- Gumboots while concreting
- Safety Goggles while welding/Stone dressing etc.
- Face masks and full body kit while Pest control

Implementation of Safety procedures such as:

- Using proper lifting techniques.
- Using Safe Scaffolds.
- Hot work permits for Fabrication and welding.
- Height Work Permits

BUDGETARY ALLOCATION FOR EMP DURING CONSTRUCTION

| Sl. No. | EMP Aspects | Cost |
|----------------------------|--|--------------------|
| Capital Investment | | In Lakh |
| 1. | Barricades all-round the site | 0.8 |
| Total | | 0.8 |
| During Construction | | Lakhs/annum |
| 1. | Purchase of water from external authorized suppliers | 16.0 |
| 2. | Disposal of Solid Waste from project site | 1.5 |
| 3. | Plantations of saplings around the periphery and maintenance | 1.0 |
| 4. | Environmental Monitoring –Air, water, Noise | 1.0 |
| 5. | EMP cell | 2.0 |
| Total | | 21.5 |

10.3 EMP DURING OPERATION PHASE

Following are the identified operational phase activities in the impact assessment, which may have an impact on the environment.

- ▲ Air quality
- ▲ Water quality
- ▲ Noise quality
- ▲ Solid waste disposal
- ▲ Landscape development
- ▲ Storm water management

10.3.1 AIR QUALITY MANAGEMENT

The air pollutants likely to be emanated from the proposed project are SPM, SO₂, NO₂, HC and CO mainly due to burning of liquid fuel (HSD) in DG.

Exhaust from the DG set will be emitted through stacks of adequate height for dispersion of gaseous pollutants. The green belt development is also proposed covering about 15.15% of the plot area. Following table presents the EMP for air quality management during operation phase.

Table 10.4: Air Quality Management during Operation Phase

| Environmental Impacts | Mitigation |
|------------------------------|--|
| DG set | <ul style="list-style-type: none">• Equipment selected will ensure the exhaust emission standards as prescribed as per the latest amendments from the CPCB.• DG will be used as a stand-by unit.• Periodic check-up and maintenance will be ensured. |
| Ambient air quality | <ul style="list-style-type: none">• Ambient air quality monitoring will be done as per the prescribed norms at regular intervals. |

10.3.2 WATER QUALITY MANAGEMENT

Water requirement of the project will be met through BWSSB, as mentioned earlier. Water balance is presented earlier section.

The sewage generated from the proposed project is about 180 KLD which will be treated in the proposed STP of capacity 180 KLD. The treatment scheme for domestic effluents generated from project has also been discussed in earlier section. Treated water will be reused for HVAC, for flushing and for gardening. Following table presents the EMP for water quality.

Table 10.5: Water Quality Management during Operation Phase

| Environmental impacts | Mitigation |
|--|---|
| Effluent from domestic water consumption | <ul style="list-style-type: none"> • Treated with proposed state-of-the-art sewage treatment plant to produce tertiary treated water this is ultimately reused for secondary purposes such as for flushing and for gardening. • Water conservation measures will be encouraged. |

10.3.3 NOISE MANAGEMENT

High noise generating units such as DG sets will be provided with acoustic enclosures. Landscape on the project boundary will further act as noise barrier and helps in attenuation of noise. Following table presents the EMP for noise levels.

Table 10.6: Noise Management during Operation Phase

| Environmental Impacts | Mitigation |
|------------------------------|---|
| Noise from DG area | <ul style="list-style-type: none"> • Acoustic enclosures will be provided to DG sets. • DG set will be installed in an area (utility section) where the access will be restricted. • Use of PPEs (ear plugs) will be made mandatory in this area. • Selection of equipment to ensure residual noise level of <65 dB (A). • Noise levels will be checked periodically using a noise dosimeter. |

10.3.4 SOLID WASTE MANAGEMENT

The solid wastes generated during the operation phase can be categorized under three types:

Wet Garbage: Food waste, Lawn mowing wastes etc

Dry Garbage : Paper, Plastic, Bottles, etc. &

Sludge from Sewage Treatment Plant (STP)

The solid waste generated in the premises is estimated to be about 1,050 kg/day. Out of 1,050 kg, 630 kg is biodegradable waste & 420 kg is inorganic wastes. Further the biodegradable wastes will be segregated and will be processed in an Organic Waste Converter and the inorganic wastes such as plastic materials, glass & metal wastes will be handed over to the BBMP authorized waste recyclers.

The sludge from the STP is estimated to be about 18 kg/day and will be used as manure for gardening purpose after taking it through filter press.

The various mitigation measures to be adopted during collection and disposal of wastes are as follows:

- ▲ It is preferable that the container and bins used for collection of waste should be of closed type so that the waste is not exposed and thus the possibility of spreading of disease through flies and mosquitoes will be minimized.
- ▲ Collection system should be properly supervised so that quick and regular removal of waste from the dustbin is practiced.
- ▲ The biodegradable wastes will be processed in an Organic Waste Converter and non-biodegradable wastes such as plastic materials, glass & metal wastes are handed over to the BBMP authorized waste recyclers; E-Wastes & Hazardous waste will be collected separately & it will be handed over to KSPCB authorized waste recyclers for further processing.

10.3.5 LANDSCAPE DEVELOPMENT

Vegetation is the natural extension of the soil ecosystem on a site. It can provide summer shade, wind protection, and a low-maintenance landscape that is adapted to the local environment. Unfortunately, the common practice is to remove the existing landscape cover and replacing it with a generic, water and maintenance-intensive lawn.

Following approach will be adopted for vegetation and ground management.

It is planned to include an ecologically knowledgeable landscape architect as an integral member of the design team.

Preservation of existing vegetation, especially native plants, will possibly be incorporated. Fencing of property will be avoided wherever possible to make landscape available to community thereby increasing the project integration.

- ▲ Decrease paving and monoculture lawns.
- ▲ Avoid replacing mature trees with young seedlings.
- ▲ Protect existing plants during construction. Delineate the “drip line” around trees and demark or fence off areas to avoid damage.
- ▲ Contain heavy equipment and stockpiling areas to pre-defined areas.
- ▲ Design new plantings as diverse communities of species adapt well to the site. Plant native species of varying ages. Select vegetation that attracts wildlife.
- ▲ Avoid invasive species and monocultures (same species, same age).

10.3.6 STORM WATER MANAGEMENT

As the project location is blessed with fairly good rainfall, it is planned to collect the storm water at different gradients of the location. There will be rainfall runoff from building roof-tops, roads and pavements and landscape area. Necessary provision will be made to collect the quantity of rainfall runoff during the most rainy day of the season. Necessary recharge pits within the site have been envisaged. A garland drains with RCC precast perforated cover will be provided around the periphery of property. The details of the rain water harvesting facilities are interpreted in the earlier section.

10.3.7 HEALTH, RISK AND DISASTER MANAGEMENT

Public health and safety

Since all the construction related activities shall be confined to the project site, minimal health related impacts are envisaged within the project influenced area during the construction stage.

At the project site on an average of 100 persons will be engaged, who face direct exposure to dust and noise generated from the construction activity. This is likely to cause health related effects such as asthma, bronchitis etc. and hearing impairments respectively.

To minimize these anticipated impacts, the following suitable actions are taken:

- ▲ Use of water sprinklers to prevent dust from being air borne.
- ▲ Providing suitable Personal Protective Equipments (PPEs) like mouth mask with filters, nose mask, helmets, goggles etc.

- ▲ Arranging periodic health check-up camps for the labourers.
- ▲ Provision of safety belts.
- ▲ Facility of an onsite medical treatment and transport in case of injury.
- ▲ Employing a safety engineer.

Due to operation of the proposed project, there will be enhancement in public health and safety due to:

- ▲ Regular visit of the resident medical officer to take care of the first aid and primary medication in case of emergency for employees and labourers.
- ▲ Availability of First aid kit with primary medicines in the medical center.
- ▲ Display of action plan and preparedness measures during emergency situations.

Risk and Disaster Management Plan

Disaster is an unexpected event due sudden failure of the system, external threats, internal disturbances, earth quakes, fire and accidents. Thus an appropriate management plan shall be incorporated.

Precautions

- ▲ Once the likelihood of a disaster is suspected, preventive actions should be undertaken by the project in-charge.
- ▲ Conditional maintenance of equipments, materials, and expertise for use during emergency.
- ▲ The electrical systems shall be provided with automatic circuit breakers activated by over current.
- ▲ Fire extinguishers are provided at pre-notified locations inside the buildings.
- ▲ Proper escape routes are planned and displayed in the public domain.
- ▲ Selected representatives are given proper training to guide other inhabitants during fire accidents.
- ▲ Periodic awareness programme and mock drills are conducted for the employees on their roles during emergency situations.

Important telephone numbers such as of police authorities; fire department and hospitals etc. are made available for use during emergency situations.

10.3.8 EMP IMPLEMENTATION SCHEDULE

Phased according to the priority, the implementation schedule is presented in below table.

Table 10.7: Implementation Schedule for EMP

| Sl. No. | Recommendations | Requirement |
|---------|----------------------------------|--|
| 1. | Air pollution control measures | Before commissioning of the project. |
| 2. | Water pollution control measures | Before commissioning of the project. |
| 3. | Noise control measures | Along with the commissioning of the project. |
| 4. | Solid waste management | During commissioning of the project. |
| 5. | Green belt development | Stage-wise implementation. |

The responsibility of EMP implementation lies with the project promoter for a period of 2 years. Once the project is established, the EMP responsibility will be properly handed over with clearly defined procedures and guidelines.

10.3.9 ENVIRONMENTAL MONITORING ROUTINES

A comprehensive monitoring programme is suggested in the below table:

Table 10.8: Monitoring Schedule for Environmental Parameters

| Sl. No. | Particulars | Monitoring frequency | Duration of monitoring | Important parameters for monitoring |
|------------|--|----------------------|------------------------|--|
| I. | Air Quality | | | |
| 1. | Ambient Air monitoring | | | |
| | Project premises | Once in 3 months | 24 hourly sample | PM _{2.5} , PM ₁₀ , SO ₂ , NO ₂ |
| 2. | Stack Monitoring | Once in 3 months | Grab | SO ₂ , SPM, NO ₂ , HC, CO |
| II | Water and Wastewater Quality | | | |
| 1. | Water Quality | | | |
| i. | Ground water at two locations (up-gradient and down-gradient) of treated effluent discharge area/ land | Once in 3 months | Grab | As per KSPCB requirements |
| 2. | Waste water quality | | | |
| i. | Inlet to STP | Daily | Composite | - |
| ii. | Treated effluent prior to discharge | Daily | Composite | As per KSPCB urban reuse standards |
| III | Soil Quality | | | |
| 1. | Within project premises at 1 location on effluent discharging area / land | Once in 3 months | Composite Sample | As per KSPCB requirements |
| 2. | Ecological preservation and up-gradation | Seasonal | Visual observations | Survival rate |
| IV | Noise Monitoring | | | |
| 1. | Project premises | Once in 3 months | Day and Night | As per KSPCB requirements |

10.4 ENVIRONMENTAL LEGISLATIONS

There are many Environmental Acts & Rules which are formulated by the Ministry of Environment, Forest & Climate Change (MoEFCC) for prevention of Environmental squalor and are to be complied by the Industry. All the regulations are not applicable to all. The Acts and Rules which are to be constantly perused and followed by the Industry are enumerated in the following section.

Table 10.9: Particulars of Environmental Legislations

| YEAR OF ENACTMENT | LEGISLATION |
|--------------------------|---|
| 1974 | The Water (Prevention and Control of Pollution) Act. |
| 1975 | The Water (Prevention and Control of Pollution) Rules. |
| 1977 | The Water (Prevention and Control of Pollution) Cess Act. |
| 1978 | The Water (Prevention and Control of Pollution)Cess Rules. |
| 1988 | The Water (Prevention and Control of Pollution) as amended. |
| 1981 | The Air (Prevention and Control of Pollution) Act. |
| 1987 | The Air (Prevention and Control of Pollution) and as amended. |
| 1986 | The Environment (Protection) Rules. |
| 1991 | The Environment (Protection) Rules (Amended). |

10.4.1 ENVIRONMENT PROTECTION ACT & RULES

Among the various notifications coming under the Environment (Protection) Act, following are the notifications applicable to this project:

Table 10.10: Notifications under Environmental Protection Act & Rules

| YEAR OF NOTIFICATION | RULES |
|-----------------------------|--|
| 1989 | The Hazardous Waste (Management & Handling) Rules |
| 2000 & 2003 | The Hazardous Waste (Management & Handling) Rules (amended) |
| 1992/1993 | Environmental Statement |
| 2000 | Noise Pollution (Regulation & Control) Rules and Amendment Rule 2006 |
| 2000 | Municipal Solid Wastes (Management & Handling) Rules |
| 2002 | D.G. Rules |
| 2008 | The Hazardous Wastes (Management, Handling & Transboundary Movement) Rules |

The Hazardous Waste (Management & Handling) Rules 1989 (latest amendment 2008)

The DG Set Waste/used oil is included in the schedule-1 of list of Hazardous Waste under Serial No.5 which states as under:

- ▲ “Used/spent oil (category No.5.1) generated from industrial operations.
- ▲ Using mineral/synthetic oil as lubricant in hydraulic systems or other applications”.

Used oil defined under Rule 3 (34) means any oil derived from crude oil or mixtures containing synthetic oil including used engine oil, gear oil, hydraulic oil, turbine oil, compressor oil, industrial gear oil, heat transfer oil, transformer oil, spent oil and their tank bottom sludge and suitable for re-refining, if it meets the specifications laid down in Schedule 5, but does not include waste oil.

Responsibility of the occupier and operator of a facility for handling of the wastes is delineated as under:

1. The Occupier and the operator of a facility shall be responsible for proper collection, reception, treatment, storage and disposal of hazardous wastes listed in schedule – 1, 2 and 3 {Rule 4(1)}
2. It shall be the responsibility of the occupier and the operator of a facility, to take all steps to ensure that the wastes listed in schedule 1,2 and 3 are properly handled and disposed of without any adverse effects to the environment {Rule 4(3)}.
3. Hazardous wastes shall be collected, treated, stored and disposed of only in such facilities as may be authorized for this purpose {Rule 5(1)}.
4. Every occupier handling, or a recycler recycling, hazardous wastes shall make application in Form-1 to the Member Secretary, State Pollution Control Board or committee, as the case may be or any Officer designated by the State Pollution Control Board of committee for the grant of authorization for any of the said activities { Rule 5(2) }.
5. The Occupier or operator of a facility shall ensure that the hazardous wastes are packaged, based on the composition in the manner suitable for handling, storage, and transport and the labeling and packaging shall be easily visible and be able to withstand physical conditions and climatic factors {Rule 7(1)}.

6. Packaging, labeling and transport of hazardous wastes shall be in accordance with provisions of the rules made by the Central Government under the Motor Vehicles Act 1988 and other guidelines issued from time to time { Rule 7(2)}.
7. All Hazardous waste containers shall be provided with a general label as given in Form-8 of Hazardous Waste (Management Handling) Rules 1989 as amended thereafter {Rule 7(3)}.
8. The Occupier shall prepare six copies of the manifest in Form 9 comprising of color code indicated below (all six copies to be signed by transporter) {Rule 7(4)}.
9. The Occupier generating hazardous waste and operator of a facility for collection, reception, treatment, transport, storage and disposal of hazardous waste shall maintain records of such operations in Form-3 {Rule 9(1)}.
10. The occupier or an operator of a facility shall send annual reports to the State Pollution Control Board or committee in Form-4 {Rule 9(2)}.
11. Where an accident occurs at the facility or on a hazardous waste site or during transportation of hazardous waste the occupier or Operator of a facility shall report immediately to the State Pollution Control Board or committee about the accident in Form-5 {Rule 10}.
12. No owner or occupier generating non-ferrous metal waste specified in schedule 4 or generating used oil or waste oil of ten tons or more per annum shall sell or auction such non-ferrous metal wastes, used oil or waste oil to a registered re-refiner or recycler, as the case may be, who undertakes to re-refine or recycle the waste within the period of validity of his certificate of registration (Rule 20(1)).

Table 10.11: Colour Code for the manifest copies

| Copy number with Colour Code | Purpose |
|-------------------------------------|---|
| Copy 1 (White) | To be forwarded by the occupier to the State Pollution Control Board or Committee. |
| Copy 2 (Yellow) | To be retained by the occupier after taking signature on it from the transporter and rest of the four copies to be carried by the transporter |
| Copy 3 (Pink) | To be retained by the operator of the facility after Signature |
| Copy 4 (Orange) | To be returned to the transporter by the operator of Facility after accepting waste |
| Copy 5 (Green) | To be returned by the operator of the facility to State Pollution Control Board/Committee after treatment and disposal of wastes |
| Copy 6 (blue) | To be returned by the operator of the facility to the occupier after treatment and disposal of wastes. |

ENVIRONMENTAL STATEMENT:

Under rule 14 of the Environmental Protection Rules 1986, every person carrying on an industry, operation or process requiring Consent under Section 25 of Water (Prevention and Control of Pollution) Act, 1974 (6 of 1974) or under Section 21 of the Air (Prevention and Control of Pollution) Act 1981 (14 of 1981) or both or Authorization under the Hazardous Waste (Management & Handling) Rules 1989 issued under the Environment (Protection) Act, 1986 (29 of 1986) shall submit an Environmental Statement Report for the financial year ending the 31st March in Form-V to the concerned State Pollution Control Board on or before 15th Day of September every year.

ENVIRONMENTAL PROTECTION FOR DEVELOPMENT AND PROTECTION OF GROUND WATER:

These rules are applicable for:

- ▲ Extraction of ground water for any use, except for drinking and domestic purpose.
- ▲ Clearance of well constructions.
- ▲ Control on disposal of untreated/ treated urban & Industrial wastes.
- ▲ Pumping of ground water within the limits laid by the Authority.
- ▲ Planning & implementations of project for enhancing recharge of ground water.
- ▲ Reassessment of ground water resources as per the directions of the authority.
- ▲ Sale of ground water.

- ▲ Registration of ground water abstractions structures.
- ▲ Supply of data on demand on the structure, Pumping, and usage of ground water etc.,
- ▲ Change in H.P. of the pump without approval.
- ▲ Clearance of solid & liquid waste disposal sites.
- ▲ Clearance for setting up of ground water based industries.
- ▲ Conservation & artificial recharge of ground water including roof-top runoff harvesting & storm water recharge etc.
- ▲ Degradation of quality of ground water on account of ground water extraction.

The existing users of ground water resources as enumerated above shall obtain permission for the grant of a certificate of registration from Central Ground Water Authority New Delhi.

BUDGETARY ALLOCATION FOR EMP DURING OPERATION

| Sl.No. | EMP Aspect | Cost in Rs |
|-----------------------------|--|--------------------|
| Capital Investment | | In Lakh |
| 1. | Sewage Treatment Plant | 30.0 |
| 2. | Rainwater harvesting facilities | 3.5 |
| 3. | Landscape development | 3.0 |
| 4. | Acoustic & Stacks for DG sets | 6.0 |
| 5. | Organic Waste Converter | 2.0 |
| Total | | 44.5 |
| Operation Investment | | Lakh/ Annum |
| 1. | STP Maintenance | 4.7 |
| 2. | Landscape Maintenance | 5.5 |
| 3. | OWC Maintenance | 2.0 |
| 4. | EMP Cell | 2.0 |
| 5. | Environmental Monitoring-Air, Water, Noise | 1.0 |
| Total | | 15.2 |