



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

### RISK MANAGEMENT PLAN IN TERMS OF REGULATION 10 OF WASTE EXCLUSION REGULATIONS

<b>APPLICANT</b>	Sasol South Africa (Ltd)		
<b>SOURCE(S) OF WASTE</b>	Sasolburg Operations		
<b>WASTE TO BE BENEFICIATED</b>	VCM PACT filter cake		
<b>BENEFICIAL USE/S</b>	VCM PACT filter cake may be beneficially utilised in the carbon and Alternative Fuels & Resources (AFR) sectors. Its uses may include but are not limited to:  (a) Replacement material substitute for specialised carbon products (b) AFR		
<b>SDS ATTACHED IF HAZARDOUS</b>	<b>YES X</b>	<b>NO</b>	
<b>WASTE GENERATING FACILITY</b>	Sasolburg Operations		
<b>PHYSICAL ADDRESS</b>	Bergius Road, Sasolburg, 1947		
<b>GPS CO-ORDINATES OF WASTE GENERATING FACILITY (e.g. 60° 29' 30" Latitude; 34° 20' 15" Longitude)</b>	VCM plant, Midlands site 26°49'40.35"S: 27°52'20.88"E 26°49'43.04"S: 27°52'17.10"E 26°49'49.75"S: 27°52'23.58"E 26°49'42.99"S: 27°52'25.73"E 26°49'43.83"S: 27°52'51.71"E (centre point)		
<b>POSTAL ADDRESS</b>	P.O. Box 1 Sasolburg 1947		

<b>CONTACT PERSON</b>	JP Steenkamp (Sasolburg Operations (SO): Senior Manager VCM & PVC)		
<b>TELEPHONE</b>	+27 16 920 2687	<b>CELL:</b>	+27 82 896 3295
<b>EMAIL</b>	<a href="mailto:jacobus.steenkamp@sasol.com">jacobus.steenkamp@sasol.com</a>	<b>FAX:</b>	-

# RISK MANAGEMENT PLAN

Beneficial use of fine soot in the carbon and AFR sectors (Replacement material substitute for specialised carbon products & AFR.)

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to do it)
1. Loading of VCM PACT filter cake onto trucks	Loss of containment of VCM PACT filter cake	<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Dust management during loading of VCM PACT filter cake through wetting of VCM PACT filter cake</li> <li>Stop loading of VCM PACT filter cake during extreme wind conditions</li> </ul>	<ul style="list-style-type: none"> <li>VCM PACT filter cake generator i.e. Sasolburg Operations</li> </ul>
		<b>Corrective mitigation measure</b> <ul style="list-style-type: none"> <li>Wearing of relevant PPE (dust mask and eye protection) during VCM PACT filter cake loading</li> </ul>	<ul style="list-style-type: none"> <li>VCM PACT filter cake generator employees</li> <li>VCM PACT filter cake transporter employees</li> </ul>
2. Transportation of VCM PACT filter cake	Loss of containment of VCM PACT filter cake	<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Dust management during transportation of VCM PACT filter cake through covering of trucks)</li> </ul>	<ul style="list-style-type: none"> <li>VCM PACT filter cake transporters</li> </ul>
		<b>Corrective mitigation measure</b> <ul style="list-style-type: none"> <li>None</li> </ul>	
		<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Compliance with the Road Traffic Act;</li> <li>Sasol Transport Policy and Procedures;</li> <li>Access to fine soot limited to customers and transporters that have commercial contracts with Sasol.</li> </ul> <b>Corrective mitigation measure</b> <ul style="list-style-type: none"> <li>Implementation of the Emergency response plan;</li> <li>Use of Safety Data Sheet (SDS) with hazard classification which is provided to all customers and transporters.</li> </ul>	
3. Off-loading of VCM PACT filter cake	Loss of containment of VCM PACT filter cake	<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Dust management during loading of VCM PACT filter cake through wetting of VCM PACT filter cake</li> <li>Stop off-loading of VCM PACT filter cake during extreme wind conditions</li> </ul> <b>Corrective mitigation measure</b> <ul style="list-style-type: none"> <li>Wearing of relevant PPE (dust mask and eye protection) during VCM PACT filter cake off-loading</li> </ul>	<ul style="list-style-type: none"> <li>VCM PACT filter cake transporters</li> <li>VCM PACT filter cake users</li> </ul>
4. Storage of VCM PACT filter cake	Loss of containment of VCM PACT filter cake	<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Dust management during loading of VCM PACT filter cake through wetting of VCM PACT filter cake</li> <li>Avoid loading of VCM PACT filter cake during extreme wind conditions</li> </ul>	<ul style="list-style-type: none"> <li>VCM PACT filter cake users</li> </ul>
		<b>Corrective mitigation measure</b> <ul style="list-style-type: none"> <li>Wearing of relevant PPE (dust mask and eye protection) when working in VCM PACT filter cake storage area</li> </ul>	
		<b>Preventative mitigation measure</b> <ul style="list-style-type: none"> <li>Storage area designed to prevent rainfall run-off from carrying VCM PACT filter cake away</li> <li>Discourage excessive storage of fine soot - Facilities storing more than a 100 m<sup>3</sup> of fine soot at a time, should have a firm impermeable surface on which to place the fine soot and a system to collect and store run-off arising from the fine soot storage facility.</li> </ul> <b>Corrective mitigation measure</b>	

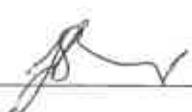
Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to do it)
		<ul style="list-style-type: none"> <li>The use of Safety Data Sheet (SDS) with hazard classification which is provided to all VCM PACT filter cake users.</li> <li>Clean-up plan to be implemented where VCM PACT filter cake is handled.</li> </ul>	
5. Handling of fine soot (i.e. screening, crushing, blending etc.)	Loss of containment of VCM PACT filter cake	<p><b>Preventative mitigation measure</b></p> <ul style="list-style-type: none"> <li>Dust management during loading of VCM PACT filter cake through wetting of VCM PACT filter cake</li> <li>Adherence to production process and product standards and regulations</li> </ul> <p><b>Corrective mitigation measure</b></p> <ul style="list-style-type: none"> <li>Wearing of relevant PPE (dust mask and eye protection) during VCM PACT filter cake handling</li> </ul>	VCM PACT filter cake users
a. Replacement material substitute for specialised carbon products; b. AFR	The point at which VCM PACT filter cake enters the production process of bricks, blocks and cement to the actual products is outside the scope of this risk assessment. The incorporation of VCM PACT filter cake into these existing production processes is matured. The quality of the products from these processes is regulated by relevant standards.		VCM PACT filter cake users
6. Disposal of VCM PACT filter cake and VCM PACT filter cake containing products	Loss of containment of VCM PACT filter cake	<p><b>Preventative mitigation measure</b></p> <ul style="list-style-type: none"> <li>The use of Safety Data Sheet (SDS) where disposal guidance is provided.</li> <li>The use of the National Norms and standard for the assessment of waste for disposal and the Regulations for the classification and management of waste.</li> </ul> <p><b>Corrective mitigation measure</b></p> <ul style="list-style-type: none"> <li>Clean-up plan to be implemented where fine soot is not disposed properly.</li> </ul>	VCM PACT filter cake users
7. Residual VCM PACT filter cake stockpiled after closure, decommissioning or change of ownership of user facility	Loss of containment of VCM PACT filter cake	<p><b>Preventative mitigation measure</b></p> <ul style="list-style-type: none"> <li>Contractual agreement with fine soot customers to include the following clause: <i>"The owner of the facility, including the subsequent owner of the facility will remain responsible for any adverse impacts on the environment and health stemming from stockpiled fine soot, even after operations have ceased."</i></li> </ul> <p><b>Corrective mitigation measure</b></p> <ul style="list-style-type: none"> <li>Land remediation</li> </ul>	VCM PACT filter cake users

**DECLARATION**

I, JP Steenkamp hereby declare that I have read the completed Risk Management form and hereby confirm that the information is to the best of my knowledge true and correct.

Furthermore, I declare that I am fully aware of my responsibilities in terms of the Waste Exclusion Regulations, and that failure to comply with these Regulations may constitute an offence in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008).

Applicant (Full names) JACOBUS PETRUS STEENKAMP  
 Designation Sasolburg Operations (SO): Senior Manager VCM & PVC

Signature   
 Date 16/10/2019 Place SASOLBURG



**FOR OFFICE USE ONLY**

Date Received				
Decision Taken	Authorised		Not authorised (provide reason)	
Reference Number				

