



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

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

<b>APPLICANT</b>	BADER SA (Pty)Ltd
<b>SOURCE (S) OF WASTE</b>	Leather manufacturing – Boiler steam generation
<b>WASTE TO BE BENEFICIATED</b>	Boiler Ash
<b>BENEFICIAL USE/S</b>	<p>Boiler Ash will be used as raw material in cement brick manufacturing.</p> <p>The re-use of Boiler Ash will have a beneficial impact on the environment by reducing the stress placed on landfills.</p> <p>Boiler Ash will be used as raw material in cement brick manufacturing by both Cemblocks (Pty)Ltd and Madibelo (Pty)Ltd. Cemblocks (Pty)Ltd is an established enterprise that has been producing for more than 30 years. Their clients include but are not limited to: Builders warehouse, Build it, Kgetlengriver Local municipality, Madibeng local municipality, Rustenburg local municipality, Moses Kotane Local Municipality. Madibelo (Pty)Ltd is a growing local business in Ga-Rankuwa that supplies to the local community and also employs from the local community. Please refer to attached letter from Madibelo (Pty)Ltd</p> <p>The re-use of Boiler ash from Bader SA will divert an average of 22.6 tons of waste from landfill on a Monthly basis.</p> <p>The above mentioned 22.6 Tons of boiler ash will be given to both Cemblocks (Pty)Ltd &amp; Madibelo (Pty)Ltd to use as recycled material in their cement bricks which in turn will lower their production cost and result in a more affordable brick which may in the long run contribute to lower housing cost for the community. Madibelo (Pty)Ltd may also benefit greatly due to lower production cost which may in turn benefit the community through job opportunities and more affordable housing cost for the local community in Ga-Rankuwa as the business grows with the continued support of Bader SA (Pty)Ltd.</p>

<b>MSDS ATTACHED IF HAZARDOUS</b>	<b>YES</b>	<b>NO</b>	
<b>WASTE GENERATING FACILITY</b>	BADER SA (Pty) Ltd		
<b>PHYSICAL ADDRESS</b>	Stand 232		
	3 rd Street		
	Ga-Rankuwa		
<b>GPS CO-ORDINATES OF WASTE GENERATING FACILITY</b> (EG. 60 <sup>0</sup> 29' 30"Latitude ;34 <sup>0</sup> 20'1" Longitude)	4 Corners of Bader SA (waste generating site) 1 25° 33' 38" Latitude; 27° 59' 37" Longitude 2 25° 33' 32" Latitude; 27° 59' 38" Longitude 3 25° 33' 40" Latitude; 27° 59' 39" Longitude 4 25° 33' 35" Latitude; 27° 59' 43" Longitude		
<b>POSTAL ADDRESS</b>	P.O Box 911875		
	Rosslyn		
	0200		
<b>CONTACT PERSON</b>	Marinda de Beer / Heleen Manley		
<b>TELEPHONE</b>	012 797 7100	<b>CELL:</b>	078 803 5829 / 066 132 7375
<b>EMAIL</b>	<a href="mailto:Marinda.debeer@bader-leather.com">Marinda.debeer@bader-leather.com</a> <a href="mailto:Heleen.manley@bader-leather.com">Heleen.manley@bader-leather.com</a>	<b>FAX:</b>	

# RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
Storage	Accidental spillage into the environment	<p>Ash offloaded in the demarcated storage areas</p> <p>Storage banded with walls and hard standing floor with leachate containment</p> <p>Accidental spills cleaned immediately – Spill kit in boiler house with trained spill members (PPE included)</p> <p>Inspections from Boiler house Supervision and HSE team</p>	<p>Generator for storage prior to collection</p> <p>Receiving site for storage after offloading, pending processing</p>
	Leachate from stockpiled material during rainfall	<p>Storage area with hard standing floor</p> <p>Trenches surrounding boiler coal and ash storage area with grids to prevent contaminated water from reaching storm water drains</p> <p>Leachate separated from storm water – identified drains</p>	<p>Generator for storage prior to collection</p> <p>Receiving site for storage after offloading, pending processing</p>
	Windblown ash	<p>Top layer of stockpiled ash kept moist</p> <p>Stockpile managed to reduce standing time</p>	<p>Generator</p> <p>Receiving site</p>
Loading / Offloading	Accidental spills during loading process	<p>Accidental spills or any reasons cleaned immediately and investigated</p>	
	Windblown ash	<p>Top layer of stockpiled ash kept moist</p> <p>Stockpile managed to reduce standing time</p>	<p>Generator</p> <p>Receiving site</p>
	Dust Generation due to moving / handling of ash	<p>Top Layer of Ash kept moist</p> <p>MSDS provided to the Bader SA employees. Bader SA employees trained in Environmental and safety requirements and provided with required PPE. Medical fitness of employees monitored. Bader SA conducts Occupation Hygiene surveys biannually through certified provider.</p>	<p>Generator</p>

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the
Transportation	Dust Generation due to moving / handling of ash	Receiving site implement safety requirements of MSDS to minimize workers exposure to dust	Receiving site
	Air borne ash	Truck loaded correctly with no overflow and covered by Tarp	Generator Receiving site
	Accidental spillage into the environment	Truck loaded correctly with no overflow and covered by Tarp Accidental spills or any reasons cleaned immediately and investigated	Generator Receiving site Generator Receiving site
Manufacturing	Windblown ash	Top layer of stockpiled ash kept moist Stockpile managed to reduce standing time	Generator Receiving site
	Dust Generation due to moving / handling of ash	Trolleys with ash kept moist MSDS provided to the Bader SA employees. Bader SA employees trained in Environmental and safety requirements. Employees provided with required PPE.. Medical fitness of employees monitored. Bader SA conducts Occupation Hygiene surveys biannually through certified provider.	Generator
	Integrity of brick	Receiving site implement safety requirements of MSDS to minimize workers exposure to dust Bricks manufactured in accordance with required specifications. Tested	Receiving site

**MSDS Attached as Annexure 1**

**DECLARATION**

I, **M de Beer** hereby declare that I have read the completed a 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) Marinda de Beer.  
Designation SHEQ Manager  
Signature M de Beer.  
Date 24 August 2020 Place Ga-Rankuwa

**FOR OFFICE USE ONLY**

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