



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

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

<b>APPLICANT</b>	Mthembu Paper Mill (Pty) Ltd		
<b>SOURCE(S) OF WASTE STREAM</b>	Pulp and paper manufacturing process		
<b>WASTE TO BE BENEFICIATED</b>	Sludge from recycled paper pulping process		
<b>BENEFICIAL USE/S</b>	Agricultural use (compost)		
	Landfill cover material		
	Bricks making		
	Land use		
	Egg boxes /cartons manufacturing		
	Source of Fuel (combustion/incineration)		
<b>MSDS ATTACHED IF HAZARDOUS</b>	<b>YES</b>	<b>NO</b>	<b>Non hazardous</b>
<b>WASTE GENERATING FACILITY</b>	Mthembu Paper Mill		
<b>PHYSICAL ADDRESS OF FACILITY</b>	Mthembu Paper Mill Pty Ltd 154 Aberdare Drive Phoenix Industrial Park Durban 4068		
<b>GPS CO-ORDINATES OF WASTE GENERATING FACILITY</b>	S29° 43' 7.331". E30° 59' 15.28"		
<b>POSTAL ADDRESS</b>	P.O.Box 60879, Phoenix, Durban North, 4080		
<b>CONTACT PERSON</b>	Sharlon Govender		
<b>TELEPHONE</b>	031 828 5650	<b>CELL</b>	
<b>E-MAIL</b>	<a href="mailto:sharlon.govender@mthembupaper.co.za">sharlon.govender@mthembupaper.co.za</a>	<b>FAX</b>	031 500 9480



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

**RISK MANAGEMENT PLAN**

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to do it)
<b>1. Sludge /Compost Storage and Transportation</b>	<b>Potential release into soil and waterways due to spills</b>	<ul style="list-style-type: none"> <li>○ Sludge/compost stockpiled in the demarcated designated storage area.</li> <li>○ Storage area bunded with hard standing floor and leachate containment.</li> <li>○ Accidental spillage immediately cleaned up.</li> <li>○ Conduct routine inspections of the storage area for integrity of structure</li> </ul>	Generator Receiving site
	<b>Potential release and leaching from stockpiled material into the ground water sediments and bio-accumulation in aquatic life</b>	<ul style="list-style-type: none"> <li>○ Storage area bunded with hard standing floor surface and leachate containment.</li> <li>○ Leachate separated from storm water.</li> <li>○ Dirty water appropriately disposed of.</li> <li>○ Storage area audited on routine basis to check integrity of structures.</li> <li>○ Undertake surface and groundwater quality monitoring on routine basis, incl. storm-water</li> </ul>	Generator Receiving site
	<b>Potential dust emanation to ambient air</b>	<ul style="list-style-type: none"> <li>○ Top layer of stockpiled material to be kept moist to prevent wind dispersion</li> <li>○ Stockpile size managed to reduce standing time</li> <li>○ Truck correctly loaded with no overfilling</li> </ul>	Generator Receiving site





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Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to do it)
		<ul style="list-style-type: none"> <li>○ Accidental spills cleaned up immediately</li> <li>○ Material transported by permitted carrier</li> </ul>	
<p><b>2. The use of sludge in bricks manufacturing facility</b></p>	<p><b>Ecological hazards: Potential release to soil, surface water, leaching into the ground water sediments and bio-accumulation in aquatic life</b></p>	<ul style="list-style-type: none"> <li>○ Mixing occurs in a formal, bunded area with hard standing floor surface and leachate containment</li> <li>○ Accidental spills cleaned up immediately</li> <li>○ Ensure the facility is secured and sufficiently fenced to prevent unauthorized public entry. Poster with facility name and contact details to be displayed on site entrance</li> <li>○ Undertake routine site inspections /environmental audits</li> <li>○ Ensure waste manifest records are in order</li> </ul>	<p>Generator Receiving site</p>
	<p><b>Dust emanation to ambient air during mixing process: Potential health hazards associated with dust inhalation, and dermal contact.</b></p>	<ul style="list-style-type: none"> <li>○ Top layer of stockpiled material to be kept moist</li> <li>○ Bricks making operations not conducted during windy conditions</li> <li>○ Materials Safety Datasheets (MSDS) provided to the receiving site who is trained on safety requirements</li> <li>○ Receiving site implements safety requirements of MSDS to minimise exposure to dust and</li> </ul>	<p>Generator Receiving site</p>





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		<ul style="list-style-type: none"> <li>other hazards associated with the material</li> <li>○ Accidental spills cleaned up immediately</li> </ul>	
<b>3. Sludge Composting Facility</b>	<b>Potential ecological impacts associated with the release to waterways, leaching into ground water sediments and bio-accumulation in aquatic life</b>	<ul style="list-style-type: none"> <li>○ Ensure the facility is secured and sufficiently fenced to prevent unauthorized public entry. Poster with facility name and contact details to be displayed on site entrance</li> <li>○ Undertake surface and groundwater quality monitoring on routine basis</li> <li>○ Undertake routine site inspections /environmental audits by an independent environmental consultant</li> <li>○ Ensure waste manifest records are in order</li> <li>○ Ensure the storm-water management plan is effectively implemented</li> </ul>	Receiving site
<b>4. Use as Landfill cover material/Land Use</b>	<b>Dust emanation to ambient air: Potential health hazards associated with dermal contact and dust inhalation</b>	<ul style="list-style-type: none"> <li>○ Top layer of stockpiled material to be kept moist to prevent wind dispersion</li> <li>○ Stockpile size managed to reduce standing time</li> </ul>	Receiving site
		MSDS provided to the receiving site who is trained on safety requirements	Generator Receiving site





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Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to do it)
		<p>Receiving sites implement safety requirements of MSDS to minimise exposure to dust</p>	<p>Generator Receiving site</p>
	<p><b>Potential leaching to surface water, ground water and bio-accumulation in aquatic life</b></p>	<ul style="list-style-type: none"> <li>○ Landfill lined in accordance with the minimum requirements for GMB<sup>+</sup> liner to prevent seepage into the groundwater sediments.</li> <li>○ Leachate runoff collected in wastewater containment facilities for treatment</li> <li>○ Leachate separated from storm water</li> <li>○ Undertake surface and groundwater quality monitoring on routine basis</li> </ul>	<p>Receiving site</p>
<p><b>5. Use of sludge for combustion/incineration process</b></p>	<p><b>Air Quality impact associated with the use of the combustion / incinerator</b></p>	<ul style="list-style-type: none"> <li>○ Undertake air quality monitoring – Incineration stack emission testing</li> <li>○ Installing scrubbers to improve the quality of air emissions</li> <li>○ The combustion appliance needs to comply with all the statutory requirements nationally / local</li> </ul>	<p>Generator Receiving site</p>





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### DECLARATION

I, Sharlon Govender hereby declare that I have read the completed the 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) Sharlon Govender

Designation Acting General Manager

Signature 

Date 03/02/2021 Place Durban

<b>FOR OFFICE USE ONLY</b>			

Date Received			
Decision Taken	Authorised	Not Authorised (provide reasons)	
Reference Number			