



forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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

	(For official use only)
File Reference Number:	12/9/11
NEAS Reference Number:	
Date Received:	

Risk Assessment for an application for exclusion of waste stream or portion of waste stream in terms of the National Environmental Management: Waste Act, 2008(Act No.59 of 2008), as amended.

Kindly note that:

1. This form is current as of 01 April 2021. It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority.
2. The information must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.
3. Incomplete forms (including information as required in the application form may be returned to the applicant for revision and the inclusion of additional information.
4. Unless protected by law, all information filled in on this application will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this application on request, during any stage of the application process.

BACKGROUND INFORMATION	
APPLICANT	SA Steel Mills (Pty) Ltd
CONTACT PERSON	
NAME	Ms Fatima Rawjee
ADDRESS	Old Kookfontein Farm, Main Kookfontein Road, Meyerton
E-MAIL ADDRESS	fatima@sasteelmill.co.za
TELEPHONE	016 362 6045
CELL PHONE	072 667 8508

WASTE FACILITY OR FACILITIES							
SOURCE (S) OF WASTE	By-products/ wastes generated from the secondary steel making processes at the steel plant located at Portions 75 and 76 of the Farm Kookfontein 545 IQ. Oil is burned to power the reheating furnaces. The used oil will be re-refined/ processed for re-use.						
WASTE TO BE BENEFICIATED	Used oil						
GPS CO-ORDINATES AT CORNERS OF WASTE GENERATING FACILITY OR FACILITIES	LATITUDE			LONGITUDE			
	1	26°	34'	15.38"	27°	59'	16.92"
	2	26°	33'	52.01"	27°	59'	36.00"
	3	26°	34'	03.52"	27°	59'	49.65"
	4	26°	34'	15.23"	27°	59'	54.56"
	5	26°	34'	23.20"	27°	59'	53.10"
	6	26°	34'	23.15"	27°	59'	47.45"
	7	26°	34'	18.31"	27°	59'	36.39"
	8	26°	34'	19.72"	27°	59'	26.68"
	9	26°	34'	18.10"	27°	59'	20.93"
BENEFICIAL USE/S	Used Oil: Re-refined into lubricants, processed into fuel oils, and used as raw materials for the refining and petrochemical industries.						

WASTE GENERATING PROCESS		
MSDS ATTACHED IF HAZARDOUS	YES	NO
WASTE GENERATING FACILITY	HAZARDOUS	GENERAL

RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
Steel making processes including, but not limited to: <ul style="list-style-type: none"> • Steel scrap delivery and sorting. • Melting of the steel scrap in the furnaces. • Casting of the steel billets. • Reheating the billets (when needed). • Rolling the billets to form end products; and • Sorting and dispatching the end products. 	The processes and associated activities (vehicle movement) are noisy and could impact on the surrounding properties.	<ul style="list-style-type: none"> • The proponent must implement a line of communication where complaints could be lodged/registered, and all complaints received must be addressed as expeditiously as possible. 	SASM (SA Steel Mills) Management SHEQ Officer
	The processes involve many health and safety risks and hazards to the workers and employees at the plant.	<ul style="list-style-type: none"> • Noise zones must be identified and clearly marked. • All employees and visitors entering the site must be provided suitable hearing protection which must be worn continuously whilst in the noise zones. • All SHEQ requirements must be considered and adhered to by all employees and contractors at all times. • Borehole water must not be used for water consumption. • An emergency plan must be implemented which: <ul style="list-style-type: none"> ○ Addresses all possible emergency situations that could arise at the plant. ○ Includes relevant training of staff e.g., firefighting and first aid training. ○ Establishes evacuation plans that are clearly communicated to 	SASM Management SHEQ Officer Trained emergency team/ personnel

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
		<p>all staff members and visualised across the plant.</p> <ul style="list-style-type: none"> ○ Establishes drills that must be conducted regularly and properly recorded. ○ Is reviewed annually and updated/ amended where required. <ul style="list-style-type: none"> ● All hazardous substances used in the processes undertaken or generated from the processes on the site must be properly stored and handled as per the Material Safety Data Sheets (MSDS). Hard copies of which must be maintained on site. 	
Storage of steel scrap	The improper storage of steel scrap could result in stormwater pollution and subsequently pollution of natural water resources or municipal systems as well as soil pollution.	<ul style="list-style-type: none"> ● A Waste Management Plan (WMP) must be established that includes: <ul style="list-style-type: none"> ○ A monitoring system that effectively monitors and records all scrap steel delivered to site and all by-products and wastes removed from the site. 	SASM Management SHEQ Officer Cleaning and maintenance team/ personnel
Storage of waste/ by-products	The improper storage of waste/ by-products generated from the processes could result in the pollution of natural resources including soil, surface water and ground water.	<ul style="list-style-type: none"> ○ Staff training to ensure that all staff members are aware of the proper waste handling and storage procedures. ○ Waste handling and storage measures applicable to each waste type and as per the MSDS's where relevant. ○ Inspection and maintenance measures. 	

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
		<ul style="list-style-type: none"> • No waste/ by-products must be stored on bare ground. • The areas for both the scrap metal storage and the waste storage must be constructed with a concrete surface bed or other approved materials. This material as constructed must create an impervious surface to prevent the penetration of the surface water into the sub surface ground water. • The waste storage area must be covered. • The scrap and waste storage areas must be protected by means of a 300mm minimum height bund wall. The entrance to these areas must not be on the low side of the site and should be positioned so as not to allow the ingress or egress of stormwater runoff from the storage areas. • Sufficient and appropriate containers must be provided according to the waste type and quantities. • Waste must not be allowed to exceed the capacity of the storage containers and storage areas. • Waste must be placed separately in designated and clearly marked containers. 	

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		<ul style="list-style-type: none"> • The storage areas must be well ventilated and easily accessible to waste removal vehicles. • By-products too large to be stored in containers e.g., Randoms and Misrolls must be stored in a structured manner on a concreted and covered area. • The waste storage area should be cleaned out at least weekly but should not be allowed to go uncleared for longer than a month. • Areas around the storage areas must be maintained so that they are clean, neat and in good sanitary condition at all times. • Stormwater that has collected inside the bund wall must be removed to the sewer system after each rain event. • The paved roadways around the scrap metal storage and the waste storage areas must be shaped and graded so that surface stormwater does not enter into these areas. 	
Disposal or removal of waste/ by-products from the site	The improper disposal or removal of waste/ by-products generated from the processes could result in the pollution of natural resources including soil, surface water and ground water.	<ul style="list-style-type: none"> • No waste may be dumped, buried or burned on the property. • All waste for final disposal must be removed by a licensed waste contractor and disposed of at an authorized permitted waste/landfill site. • Certificates of safe disposal must be issued by the waste contractor to the 	SASM Management SHEQ Officer Cleaning and maintenance team/ personnel

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
		<p>proponent and records maintained on the site.</p> <ul style="list-style-type: none"> • Waste must be collected by the waste contractor using the appropriate equipment. • Waste must be removed in suitable sealed and covered containers and securely transported to the waste disposal facility/ landfill site. • To minimize uncontrolled dumping of Hazardous Wastes, consignors and transporters must comply with the SABS Codes of Practice on Transportation of Dangerous Goods and National Roads Traffic Regulations – Dangerous Goods Regulations (Chapter 8). Materials offered for transport must be honestly described, suitably contained and labeled by the employees of SA Steel Mills (Pty) Ltd. 	
Use of groundwater for the processes in the plant	The depletion of natural resources through the unauthorized use of groundwater and the risk of sinkhole formation.	<ul style="list-style-type: none"> • Should any borehole on site be used it must be registered with the Department of Water and Sanitation (DWS). • Should the amount of water to be abstracted exceed the allowance in the latest General Authorisation (GA)/ latest update to the GA/ extension to the latest GA in terms of the taking and storing of water and in terms of the National Water Act 1998 (Act No. 36 of 1998), then the relevant process 	SASM Management SHEQ Officer

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		<p>must be followed to obtain the necessary Water Use License (WUL) from the DWS.</p> <ul style="list-style-type: none"> • If a WUL is required and subsequently obtained, then all conditions of the WUL must be adhered to. • The landowner/ proponent must ensure that the water is used responsibly and that drawdown of the water table does not result due to water usage. Excessive drawdown could result in sinkholes or subsidences developing. • It is recommended that the existing boreholes on the property be tested by a geohydrologist with a view to establishing the safe pumping rates that may be employed. • Drawdown of the water table should be limited to 3m below the historic ground water level. • If boreholes are not to be used, then pumps must be removed and sealed. 	
Storage and handling of fuel, hazardous substances and hazardous waste.	Improper management relating to the use of hazardous substances/ hazardous waste could result in pollution.	<ul style="list-style-type: none"> • The transport, handling and storage of hazardous substances must comply with all the provisions of the Hazardous Substances Act, 1973 (Act No. 15 of 1973), associated regulations as well as SANS 10228 and SANS 10089 codes. • The migration of leachate or spillage into the ground and groundwater regime around all storage areas must 	SASM Management SHEQ Officer

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		<p>be prevented. The storage areas for hazardous substances and hazardous waste therefore requires roofing, an adequate bunding and a firm waterproof base that is protected from the ingress of storm water from the surrounding areas. It must also have an effective drainage system to a waterproof spillage collection area, where any spillage can be recovered or suitably treated. This area must be clearly demarcated and should not be accessible to unauthorized persons.</p> <ul style="list-style-type: none"> • All hazardous waste must be stored in clearly marked and appropriately sealed containers (preferably the containers the material was supplied in). • Hazardous waste must be controlled so that they are not stored on site for 90 days or more before sending it to an applicable site for disposal. The following are the minimum quantities of waste not allowed to be stored on site for 90 days or more: <ul style="list-style-type: none"> ○ Hazard Rating 1 = 10 kgs ○ Hazard Rating 2 = 100 kgs ○ Hazard Rating 3 = 1000 kgs • Hazard Rating 4 = 10 000 kgs • No hazardous wastes such as empty containers, cleaning materials, etc. are to be left around the site. All hazardous waste must be correctly 	

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		<p>stored at the designated area for proper disposal.</p> <ul style="list-style-type: none"> • A Spill Contingency Plan must be compiled and implemented in case of leakages or spillages which are not detected and then lead to the contamination of underground water. • Spill kits must be readily available and sufficiently stocked at all times. • If a hydrocarbon spillage occurs these should be cleaned using SUNSORB (or similar product) and the contaminated soils/ materials removed from site and disposed of at an appropriate registered landfill site. • All spilled hazardous substances must be contained in impermeable containers for removal to a licensed hazardous waste site, (this includes contaminated soils, and drenched spill kit material), with chain of custody documentation supplied as proof of end recipient. • Surface drainage on hard surfaces should be channeled and visually monitored on a regular basis to ensure that there is no release of potentially contaminated water. If contamination is suspected, quality tests must be conducted for confirmation of contamination and on-site treatment must be done immediately. 	

Activity	Risk Description	Action(s) to minimise/ manage the risk	Responsibility (Who is responsible to carry out the action)
	Risk of fires or other emergency situations associated with the possible improper storage and handling of fuel and other hazardous substances.	<ul style="list-style-type: none"> • Hazardous waste must not be mixed with other wastes of a different nature or composition. • All hazardous substances used in the processes undertaken or generated from the processes on the site must be properly stored and handled as per the Material Safety Data Sheets (MSDS). Hard copies of which must be maintained on site. 	SASM Management SHEQ Officer
Effluent discharge	Improper management or discharge of effluent (which does not meet DWS and municipal standards) could contaminate soil and water resources.	<ul style="list-style-type: none"> • No effluent must be released into the stormwater system unless it conforms to the standards of the municipality and the DWS. • It is recommended that bi-annual groundwater sampling and testing be conducted to monitor groundwater quality. 	SASM Management SHEQ Officer
Waste management and storage	Improper waste management and housekeeping could have a negative impact on the aesthetics of the area and could be an eye-sore to the surrounding community.	<ul style="list-style-type: none"> • A high standard of housekeeping practices and general maintenance must be upheld at all times. • The WMP to be established must be adhered to. 	SASM Management SHEQ Officer Cleaning and maintenance team/ personnel
Air emissions from the various furnaces and coal gasifier		<ul style="list-style-type: none"> • An effective air pollution control system must be implemented as per the required process design specifications. This could be a scrubber system on the re-heat process and a cooler, a spark arrestor and a bag filter system for the induction and electric arc furnaces. • The site must be paved, and effective traffic flow must be maintained. 	SASM Management SHEQ Officer

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		<ul style="list-style-type: none"> • The plant must comply with the minimum emission standards for secondary steel making and combustion installations as set out by the National Environmental Management: Air Quality Act (ACT 39 of 2004): List of Activities – GN 893 of 22 November 2013. • An Atmospheric Emissions License (AEL) must be obtained from the Sedibeng District Municipality prior to commencement of the operations and all measures required by the AEL must be adhered to and maintained. 	

I, FATIMA RAWJEE (the Applicant) hereby declare that I have read the completed Risk Management Plan 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).



Signature of the applicant¹/ Signature on behalf of the applicant:

SA STEEL MILLS (PTY) LTD

Name of Applicant:

GENERAL MANAGER: CORPORATE MANAGEMENT SERVICES

Designation

31/05/2021

Date:

¹ If the applicant is a juristic person, a signature on behalf of the applicant is required as well as proof of such authority.