



**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
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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	Clariant Sasol Catalysts (Pty) Ltd
CONTACT PERSON	Priyesh Matabal
NAME	
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E-MAIL ADDRESS	Priyesh.matabal@clariant.com
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WASTE FACILITY OR FACILITIES						
SOURCE (S) OF WASTE	Kieselguhr and phosphoric acid mixture which comes from waste byproduct produced under controlled conditions in the factory during the manufacturing process					
WASTE TO BE BENEFICIATED	Can be used as a raw material in the manufacture of agricultural fertiliser CalSiPhoS P16 for the agriculture industry to enhance soil fertility in the growing of all types of crops					
GPS CO-ORDINATES AT CORNERS OF WASTE GENERATING FACILITY OR FACILITIES	LATITUDE	LONGITUDE				
	26	48	34	27	51	33
	26	48	39	27	51	40
	26	48	41	27	51	32
	26	48	44	27	51	36
BENEFICIAL USE/S	Fertiliser					

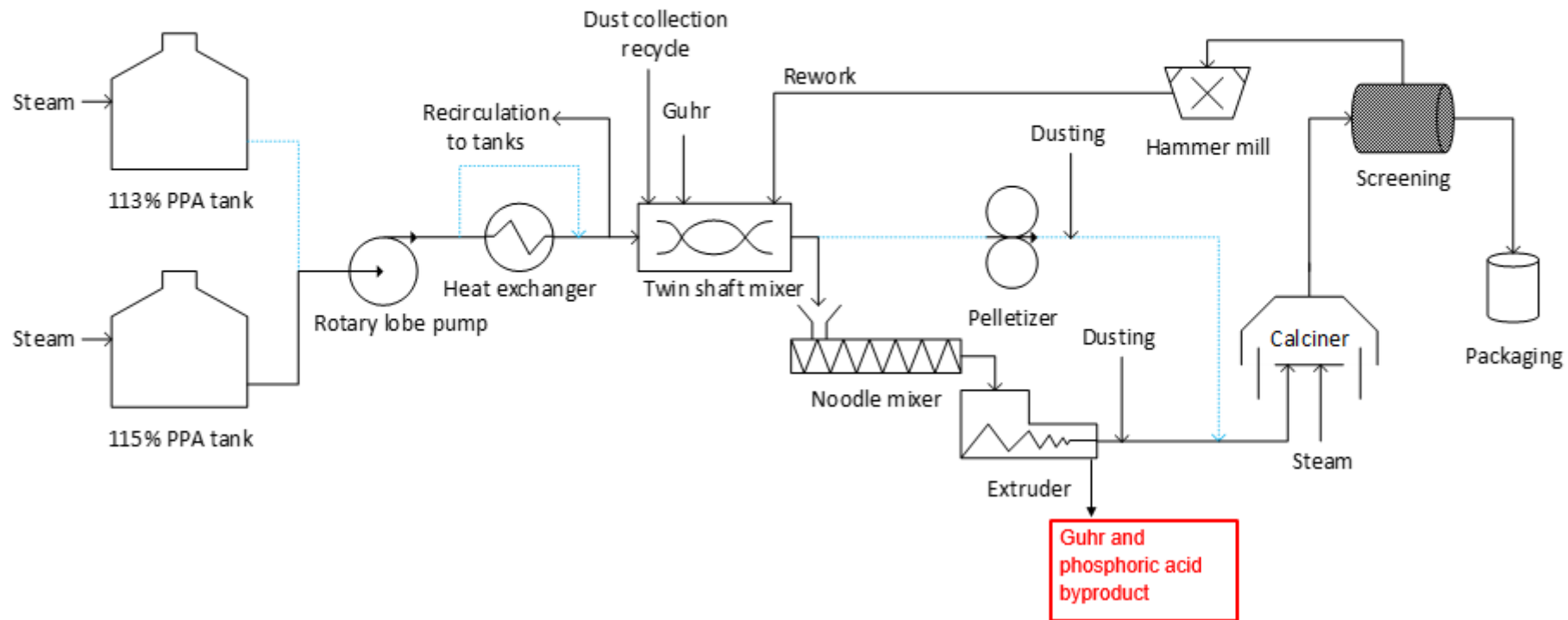
WASTE GENERATING PROCESS		
MSDS ATTACHED IF HAZARDOUS	YES x	NO
WASTE GENERATING FACILITY	HAZARDOUS x	GENERAL

RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
Collecting the waste byproduct from the extruder	Spillages during bagging	Spillages are solid and fall onto concrete surface of factory floor which is bunded. Spillages swept up at shift end and bagged. Operators trained on procedure SOP WM 001 (Annexure 6)	Shift leaders at Clariant
Collecting the waste byproduct from the extruder	According to the Clariant SDS for the waste byproduct Annexure 7 (Kieselguhr and phosphoric acid mixture) the major risk is contact with the eyes	<ol style="list-style-type: none"> 1. Operators issued with safety glasses 2. Operators trained on chemical hazards 3. Eye wash bottles located throughout the plant 	Clariant production operators
Storage of waste byproduct on generator's side	Spillages flowing to storm water system	The waste byproduct is stored in double lined sealed waterproof bags on a hard surface within a bunded area. Any spillages should they occur will remain within the bunded area and will be immediately cleaned up and re-bagged	Logistics operator at Clariant
Transport of waste byproduct in sealed waterproof bags in enclosed panel van truck to Global Phosphate, Osizweni Community Centre Evander & Embalenhle Road, Embalenhle, 2285,150 km by road	Truck involved in a major accident resulting in spillage. Potential eutrophication only if accident occurs near a water course. There is only 1 water course between Clariant and Global Phosphates (fertiliser manufacturer)	<ol style="list-style-type: none"> 1. Truck is inspected before it leaves Clariant site 2. Truck driver is a licensed transporter 3. Truck driver must have an emergency procedure (see Annexure 9) 4. All drivers are trained on spill control 	Logistics operator at Clariant Transporter from Global Phosphate
Receipt and storage of waste byproduct on fertiliser	Spillages flowing to storm water system	Waste byproduct is stored in a closed building under roof on hard concrete surface in double lined sealed waterproof bags in bunded area	Global Phosphate logistics personnel

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
maunfacturer's (Global Phosphate) side			
Usage of CalSiPhoS P16 as a fertiliser	Excessive use of fertiliser during rainy conditions resulting in overflow into water systems with potential of eutrophication	<p>Safety data sheet in terms of SANS 10234 (Annexure 2) for CalsiPhos P16 stipulates usage of product under supervision of a qualified agronomist (expert in soil management and crop production).</p> <p>If the instruction of the agronomist is followed then this will ensure that the intended beneficial use of the excluded waste will be managed in such a way as to ensure that the intended beneficial use will not result in significant adverse effects to the environment.</p>	Agronomist from end user
Recording of waste byproduct (Kieselguhr and phosphoric acid mixture)	Unrecorded amounts of waste byproduct leaving the site	<p>Waste control sheet which contains the ffg information:</p> <ul style="list-style-type: none"> • Date generated • Waste category • Mass of waste • Bag number of waste • Storage location • Date waste removed • Removal agency <p>See Annexure 4 attached from Jan 2022 to date All waste by-product is distributed to one user namely Global Phosphates.</p>	Production Support officer at Clariant

Process Flow



I, PRIYESH MATABAL (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:

PRIYESH MATABAL

Name of Applicant:

QESH MANAGER

Designation

24 APRIL 2023

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.