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1. Introduction

Eskom Peaking Operating Unit requires the appointment of a waste management service provider for a contractual period of five (5) years to undertake the classification, collection, transportation, recycling, treatment, and disposal of both general (domestic) and hazardous waste streams at the following power stations:

- Ingula Pumped Storage Scheme, Besters, Ladysmith, KwaZulu-Natal
- Drakensberg Pumped Storage Scheme, Bergville, KwaZulu-Natal.

2. Supporting Clauses

2.1 Scope

2.1.1 Purpose

The purpose of this Scope of Work is to define the requirements for appointing a registered, accredited and qualified waste management service provider for the classification, collection, transportation, recycling, treatment, and disposal of both general and hazardous waste streams for Ingula Pumped Storage Scheme and Drakensberg Pumped Storage Scheme.

2.1.2 Applicability

This scope of work will apply to Ingula Pumped Storage Scheme & Drakensberg Pumped Storage Scheme.

2.1.3 Effective date

This document will be effective from date of signature.

2.2 Normative/Informative References

Parties using this document shall apply the most recent edition of the documents listed in the following paragraphs.

2.2.1 Normative

[1] ISO 9001 Quality Management Systems

[2] Eskom's Procurement and Supply Chain Management Procedure (32-1034)

[3] Eskom Health Care Risk Waste Management Standard (240-115842952)

[4] Environmental Incident Management Procedure (240-133087117)

[5] Eskom Safety, Health, Environment and Quality (SHEQ) Policy (32-727)

[6] Peaking Integrated Waste Management Plan (167A-7578)

[7] Eskom Waste Management Standard (32-245)

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[8] Ingula Work Instruction: Waste Management (364-685556)

[9] Ingula Hydrocarbon Spillage and Waste Oil Management (364-685555)

2.2.2 Informative

[10] National Environmental Management Act (NEMA) 107 of 1998

[11] National Environmental Management: Waste Amendment Act 26 of 2014

[12] Minimum Requirements for the Handling, Classification, and Disposal of Hazardous Waste, Department of Water Affairs and Forestry (DWAF), version 2 of 1998

[13] National Norms and Standards for the Storage of Waste: GNR 926, 29 November 2013

[14] National Norms and Standards for Disposal of Waste to a Landfill: GNR 636, 23 August 2013

[15]

[16] National Waste Information Regulations: GNR 625, 13 August 2012

[17] Waste Classification and Management Regulations: GNR 634, 23 August 2013

[18] National Waste Management Strategy (NWMS) of 2020: GNR 56, 28 January 2021

[19] National Environmental Management: Waste Act (NEMWA) 59 of 2008

[20] SANS Codes for Transportation of Hazardous Waste – 10228 to 10234, 10206, and 10265, at a minimum

[21] SANS ISO 14001 Environmental Management System: Requirements with Guidance for Use

2.3 Definitions

For the purpose of this Waste Management Scope of Work, the following terms shall apply:

Definition	Explanation
Authorised Waste Disposal Facility	A legally permitted facility that receives, treats, processes, recycles, or disposes of waste in accordance with NEM:WA and applicable municipal by-laws.
Bund / Bunded Area	An impervious, contained structure designed to hold liquids and prevent contamination of soil and water resources in case of spills or equipment failure.
Contractor	The appointed Waste Management Service Provider responsible for executing the waste handling, decanting, storage, transportation, and disposal activities under this Scope of Work.
Decanting	The controlled transfer of liquid waste, including used oil or contaminated fluids, from one container to another using approved equipment and techniques to prevent spillage and cross-contamination.

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Environmental Manager (EM)	The senior Eskom environmental authority providing oversight, governance, and assurance for environmental compliance across IPSS and DPSS operations.
Environmental Officer (EO)	The authorised Eskom official responsible for monitoring environmental compliance and ensuring that waste management activities at IPSS and DPSS adhere to regulatory and site requirements.
General Waste	Non-hazardous waste that does not pose immediate or long-term risk to the environment or human health, including domestic waste, packaging materials, and non-contaminated plastics or metals.
Hazardous Waste	Waste that contains organic or inorganic elements or compounds that may pose risks to human health or the environment due to their toxic, flammable, corrosive, reactive, or infectious characteristics.
Manifest / Waste Manifest Document	A legally required document that tracks the movement of waste from its point of generation to its final disposal or recycling destination, ensuring cradle-to-grave accountability.
Plant Manager	The Eskom operational manager responsible for ensuring waste management activities align with safe plant operations and do not disrupt generation or maintenance activities.
Scope of Work (SOW)	This document detailing the responsibilities, requirements, deliverables, and performance expectations for waste management activities at IPSS and DPSS.
Secondary Containment	An engineered barrier such as a bund, drip tray, or containment structure designed to capture leaks and prevent waste from entering the environment.
Spill / Environmental Incident	Any unintended release or loss of waste, used oil, hazardous substances, or contaminated materials that may cause harm to the environment, equipment, or personnel.
Used Oil	Any petroleum-based or synthetic oil that has become unsuitable for its original purpose due to impurities, loss of properties, or contamination.
Waste	Any substance, material, or object that is unwanted, rejected, discarded, abandoned, or disposed of, whether of commercial value or not, as defined under the National Environmental Management: Waste Act (NEM:WA).
Waste Storage Area	A designated location within the power station, approved by the Environmental Officer, for temporary holding of waste prior to treatment, recycling, transportation, or disposal.
Waste Transporter	A licensed individual or organisation authorised to move hazardous or general waste from the power station to an approved disposal or recycling facility using compliant vehicles.

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2.4 Abbreviations

Abbreviation	Explanation
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
DPSS	Drakensberg Pumped Storage Scheme
EMS	Environmental Management System
HCRW	Health Care Risk Waste
IPSS	Ingula Pumped Storage Scheme
NEMA	National Environmental Management Act
NEMA: WA	National Environmental Management: Waste Act
SABS	South African Bureau of Standards
SANS	South African National Standards
SDS	Safety Data Sheet
SHEQ	Safety, Health, Environment & Quality
SOS	Scope of Service
SOW	Scope of Work
SP	Service Provider
WEEE	Waste Electrical and Electronic Equipment

2.5 Roles and Responsibilities

Role	Responsibilities
Plant Manager	Provide overall oversight of waste management contract execution, coordinate with Environmental Officers, Plant Managers, and the contractor, ensure schedules align with operational needs of the pumped-storage schemes, review contractor performance, reports, and compliance evidence, facilitate permits, access control, and planning for maintenance-related waste activities.
Environmental Manager	Provide strategic oversight and governance for all environmental compliance at IPSS & DPSS, ensure site environmental programs align with NEM:WA, NEMA, ISO 14001, and Eskom environmental policies, review and approve monthly waste reports, manifests, and disposal certificates, oversee environmental risk assessments and mitigation planning for waste activities, support and lead environmental audits, regulatory inspections, and assurance processes, escalate non-compliances and environmental incidents to senior management and ensure closure of corrective actions.
Contract/Service Manager	Manage the waste management contract in accordance with contractual terms, conditions, and applicable legislation. Serve as the primary point of contact between the Client and the Service Provider on all contractual matters. Ensure that all contractual

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	obligations, deliverables, and timelines are clearly understood and adhered to by all parties.
Environmental Officer	Monitor daily waste management operations and ensure compliant handling, segregation, labelling, and storage, inspect temporary waste storage areas, bunds, used-oil collection points, and decanting areas, verify all documentation (manifests, disposal certificates, recycling evidence), report environmental incidents and facilitate corrective and preventive actions, conduct site inductions and awareness for contractor personnel, maintain internal environmental performance records for IPSS & DPSS.

2.6 Process for Monitoring

The appointed Service Provider shall implement a monitoring process to track progress and ensure timely completion of all tasks required.

3. Scope of Work

The work covered includes waste management services for collection, removal and disposal of General and Hazardous Waste from Ingula Pumped Storage Scheme and Drakensberg Pumped Storage Scheme.

The waste management service shall include, but not be limited to, the following:

- Provision of transport and labour for all waste management activities
- Provision of hazmat labour for the decanting of hazardous waste
- Provision of waste skips,
- Placement of skips and drums at designated locations on site, with removal undertaken as required or upon request.
- The frequency for collection, removal and disposal will vary from site to site, but may not exceed 90 days for Hazardous waste, 60 days for healthcare risk (medical) waste and for general waste as and when required.
- All skips shall be in good condition (not corroded), sealed at the base, fitted with lids, and clearly labelled. The skips for general waste and for hazardous must be labelled accordingly.
- Provision of clearly labelled rums / containers for specific hazardous waste streams (e.g. silica gel, WEEE, mixed batteries)
- Supply and replacement of lamp box/fluorescent tube recycling box and designated plastic liners for fluorescent tubes
- Removal and disposal of sewage sludge,
- Provision and use of appropriate personal protective equipment (PPE)
- Waste classification in line with Waste Classification and Management Regulations GN R. 634 of 23 August 2013, as amended by GN R. 1352 of 7 December 2017

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- Possession of all relevant permits and authorisations for the transportation and disposal of both hazardous and general waste at licensed waste management facilities.
- Additional documentation must be provided by the contractor to identify type and quantities, including but not limited to Safe Disposal Certificate, Waste Manifest and Waste Declaration Forms, required for Eskom, Peaking Stations Waste Reporting requirements and as proof of legal compliance.
- The fixed need for the service required will be rendered as specified per site for this service. The additional / hazardous waste service would be by prior arrangement, where the employer issues an instruction/task order for the specific removal.
- Classification of wastes: classification, profiling and Safety Data Sheet (SDS) generation for waste streams generated at the Ingula and Drakensberg Pumped Storage Schemes as and when required, as and when required.

Types of waste for removal:

General Wast General waste shall include, but is not limited to, the following:

Waste Type	**Category**	**Required Service**
Domestic/Office Waste	General	Collection and disposal
Construction Rubble	General	Collection and disposal

Hazardous Waste:

Hazardous waste shall include, but is not limited to, the following:

Waste Type	**Category**	**Required Service**
Fluorescent Tubes	Hazardous	Collection, safe storage, recycling/disposal at licensed facility
E-waste (WEEE)	Hazardous	Collection and recycling via a licensed recycler
Health Care Risk Waste	Hazardous	Collection and disposal (i.e. incineration)
Oily Rags	Hazardous	Collection and disposal
Fuel Filters	Hazardous	Collection and disposal
Oil Filters	Hazardous	Collection, draining, recycling/disposal
Air Filters	Hazardous	Collection and disposal
Tyres	Hazardous / Special	Collection and recycling via approved recycler
Fabric Filters	Hazardous	Collection and disposal
Used Mixed Batteries	Hazardous	Collection and recycling via licensed facility
Paint Tins (contaminated)	Hazardous	Collection and disposal
Chemical Containers (contaminated)	Hazardous	Collection and disposal

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Expired Chemicals and Paints	Hazardous	Collection and disposal at a licensed hazardous facility
Used Silica Gel	Hazardous	Collection, treatment and disposal
Spill Clean-up Absorbents	Hazardous	Collection and disposal
Waste Grease/Oil	Hazardous	Collection and disposal
Fibreglass Dust	Hazardous	Collection and disposal
Sewage Sludge	General / Hazardous	Collection and disposal
Contaminated PPE	Hazardous	Collection and disposal

3.1 Peaking Operating Unit Waste Management Requirements Per Station

The waste management service shall include the rental of suitable storage facilities (e.g. waste skips, drums, and containers) for the collection, removal, and authorised disposal of waste at the nearest licensed/permitted waste facility. This includes both general (domestic) and hazardous waste streams. The skips and containers shall be permanently placed at designated locations on site and removed as required or upon request.

The collection frequency for disposal may vary from time to time. Removal would be by prior arrangement, if the contractor is in possession of a valid task order/instruction for the specific removal. A regular service for the collection, removal, and disposal of general/domestic waste will be required.

3.1.1 Drakensberg Pumped Storage Scheme Power Station

Special containers are required for recyclables which include used printer cartridges, paper and cardboard boxes, plastic, cans and bottles. A Hazardous waste collection, removal and disposal service and rental services will be required to the specific needs of the site.

Based on these types of waste provided, the contractor is required to supply the following at Drakensberg Pumped Storage:

- 4 x 6 m^3 general waste skip **with a lid or 1 x** 24 m^2 general waste skip - (negotiated monthly rental applies)
- 2 x 6 m^3 red hazardous skip **with a lid** - (negotiated monthly rental applies)
- 1 x container for hazardous medical waste
- 1 x container for hazardous medical waste (sharps)
- 1 x container for Green Pharmaceutical waste
- 2 x 210L Drum for hazardous waste (grease, oils and solvents) (fitted with secure, leak-proof lids to prevent spillage and vapour release; In good condition, free from corrosion, leaks, or structural defects; Clearly labelled according to the contents)
- 4 x 210L Drum for Silica Gel (fitted with secure, leak-proof lids to prevent spillage and vapour release; In good condition, free from corrosion, leaks, or structural defects; Clearly labelled according to the contents)
- 1 x 8 Foot box for fluorescent tubes
- Waste Electrical and Electronic Equipment (E-waste) container

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- Used Mixed Batteries container (Rigid, non-conductive, and leak-resistant, suitable for storing mixed battery types (e.g. alkaline); Clearly labelled: “Hazardous Waste - Mixed Batteries”)
- Supply and delivery of 240L labelled wheelie bins: Green, Red & Yellow, quantities to be determined as and when required.
- Safe handling, collection, transportation, and disposal of used oil and used oil sludge
- Ad hoc / call service steel boxes for recycling of fluorescent tubes,
- Waste classification
- Ad hoc / call services for hazmat labour costs per hour for the decanting of hazardous waste

Item nr	Description	Unit	Expected Quantity	Removal Frequency * based on average / sufficient quantity for cost effectiveness
1	**General (Domestic) Waste**			
1.1	4 x 6 m^3 general waste bin (monthly rental and transport, disposal and replacement)	M^3	4 per month	Ad hoc / call service Weekly (Depending on how many weeks per month)
2	**Hazardous Waste**			
2.1	2 x 6 m^3 skip for oil tins, paint tins, oily rags, contaminated PPE and any other hazardous waste types generated	M^3	1 per month	Ad hoc / call service 2 x every month
2.2	50 L container with bin liners for removal and disposal - Medical Waste, Supply replacement container	L (litres)	6 x Annually	Ad hoc / call service 2 monthly
2.3	1 L container for removal and disposal - Medical Waste (sharps), Supply replacement container	L (litres)	6 x Annually	Ad hoc / call service 2 monthly
2.4	1 L container for removal and disposal - Medical Waste (green pharmaceutical waste	L (litres)	6 x Annually	Ad hoc / call service 2 monthly

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2.5	6x 8-foot boxes with specialized plastic liners for the safe store and disposal of fluorescent tubes and e-waste	EA	4 x Annually	Ad hoc / call service 4 monthly or Annually
2.6	2 x 210L Drum for grease, oil, solvents	EA	4 x Annually	Ad hoc / call service 3 monthly or Annually
2.7	4 x 210L Drum for Silica Gel	EA	4 x Annually	Ad hoc / call service 3 monthly or Annually
2.8	Hazmat Labour	(H) Hour	As and when required	Ad hoc / call service

3.1.2 Ingula Pumped Storage Scheme Power Station

Specialized containers are required for recyclables which include used printer cartridges, paper and cardboard boxes, plastic, cans and bottles. A Hazardous waste collection, removal and disposal service and rental services will be required to the specific needs of the site.

Based on these types of waste provided, the contractor is required to supply the following at Ingula Pumped Storage:

- 2 x 6 m^3 labelled general waste skip **with a lid or 1 x** 12 m^3 general waste skip - (negotiated monthly rental applies)
- 2 x 6 m^3 labelled red hazardous skip **with a lid** - (negotiated monthly rental applies)
- 1 x container for hazardous medical waste
- 1 x container for hazardous medical waste (sharps)
- 2 x 210L Drum for hazardous waste (grease, oils and solvents) (fitted with secure, leak-proof lids to prevent spillage and vapour release; In good condition, free from corrosion, leaks, or structural defects; Clearly labelled according to the contents)
- 4 x 210L Drum for Silica Gel fitted with secure, leak-proof lids to prevent spillage and vapour release; In good condition, free from corrosion, leaks, or structural defects; Clearly labelled according to the contents)
- Waste Electrical and Electronic Equipment (E-waste) container
- Used Mixed Batteries container
- 8 Foot box for fluorescent tubes
- Supply and delivery of 240L labelled wheelie bins: Green, Red & Yellow, quantities to be determined as and when required.
- Safe handling, collection, transportation, and disposal of used oil and used oil sludge.

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- Ad hoc / call service steel boxes for recycling of fluorescent tubes,
- Waste classification
- Ad hoc / call services for hazmat labour costs per hour for the decanting of hazardous waste

Item nr	Description	Unit	Expected Quantity	Removal Frequency * based on average / sufficient quantity for cost effectiveness
1	**General (Domestic) Waste**			
1.1	2 x 6 m^3 or 1 x 12 m^3 general waste bin (monthly rental and transport, disposal and replacement)	M^3	1 per month	Ad hoc / call service 1 x every month
2	**Hazardous Waste**			
2.1	2 x 6 m^3 skip for oil tins, paint tins, oily rags, contaminated PPE and any other hazardous waste types generated	M^3	1 per month	Ad hoc / call service 2 x every month
2.2	50 L container with bin liners for removal and disposal - Medical Waste, Supply replacement container	L (litres)	4 x Annually	Ad hoc / call service 3 monthly
2.3	1 L container for removal and disposal - Medical Waste (sharps), Supply replacement container	L (litres)	4 x Annually	Ad hoc / call service 3 monthly
2.4	6x 8-foot box for the safe store and disposal of fluorescent tubes and e-waste	EA	2 x Annually	Ad hoc / call service 4 monthly or Annually
2.5	2 x 210L Drum for grease, oil, solvents	EA	4 x Annually	Ad hoc / call service 3 monthly or Annually
2.6	4 x 210L Drum for Silica Gel	EA	4 x Annually	Ad hoc / call service 3 monthly or Annually

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2.7	Hazmat Labour	(H)	As and when required	Ad hoc / call service

3.1.3 Supply and Delivery of 240L Wheelie Bins

The appointed service provider shall supply, brand, and deliver new 240-litre wheelie bins in accordance with the specifications outlined below. All bins must meet Eskom standards, waste management legislation, and industry best practice.

a) Product Specifications

The supplier must provide bins that comply with the following technical requirements:

Capacity: 240 litres

Material: High-density polyethylene (HDPE), UV-stabilised

Construction:

One-piece injection-moulded body

Reinforced lifting comb in accordance with SANS standards

Durable axle and rubber wheels suitable for outdoor terrain

Colours Required:

Green – General/organic waste; **Red –** Hazardous waste; **Yellow –** Recyclable waste (as per site requirement). All colours must be solid, non-fading, and uniform.





b) Branding and Labelling Requirements

Each wheelie bin must be supplied with:

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Eskom-approved stickers (provided by supplier or as per Eskom design), clear, durable labels indicating the waste category. Stickers must be weather-resistant, scratch-resistant, and properly affixed before delivery.



c) Compliance Requirements

All bins must comply with:

- National Environmental Management: Waste Act (Act 59 of 2008),
- SANS 10406 – Standard for mobile waste containers and any Eskom internal waste management guidelines.

3.1.3 Removal of Used Oil and Used Oil Sludge

The appointed service provider shall provide comprehensive services for the safe handling, collection, transportation, and recycling/disposal of used oil and used oil sludge, in full compliance with environmental legislation and Eskom requirements.

a) Service Requirements

The service provider must:

Collect and remove used oil and used oil sludge from designated Eskom sites at intervals determined by operational needs or upon request. Provide all required pump-out equipment, suction hoses, containers, and spill-response tools. Ensure no spillage, leakage, or contamination occurs during collection and transfer. Supply personnel who are trained and certified in handling hazardous waste, specifically hydrocarbons and oily waste. Provide proof of legal disposal through Waste Manifest Documents or Certificates of Safe Disposal.

b) Technical and Compliance Specifications

All activities must comply with:

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- National Environmental Management: Waste Act (Act 59 of 2008)
- National Water Act (Act 36 of 1998)
- SANS 10228 / 10229 – Transport of hazardous goods
- Eskom environmental and waste management procedures

c) Waste Handling and Collection Process

The service provider shall:

Use SABS-approved tankers or vacuum trucks suitable for hydrocarbon waste. Ensure all collection containers and tankers are clean, sealed, and labelled. Conduct on-site volume measurement and provide records for each collection. Remove oil sludge completely and ensure no residue remains in the tanks, separators, or bunded areas. Implement spill prevention measures and provide spill kits during all activities. Immediately report and remediate any incident or environmental contamination at no extra cost to Eskom.

d) Transportation and Disposal Requirements

Transport waste only using licensed hazardous waste carriers. Dispose of used oil and sludge at a licensed hazardous waste treatment or recycling facility. Submit disposal documentation within 48 hours of each collection. Ensure chain-of-custody from collection to final disposal is fully traceable.

e) Health, Safety, and Environmental (HSE) Obligations

The service provider must:

Comply with the Occupational Health and Safety Act (Act 85 of 1993). Ensure all workers use appropriate PPE (e.g., gloves, goggles, chemical suits, boots). Maintain HazMat emergency response procedures on-site. Ensure vehicles carry valid hazardous transport permits and fire-fighting equipment.

3.1.4 General Decanting Service

The service provider shall perform general decanting services for various liquid waste streams generated across the power station. This includes the safe transfer, handling, measurement, and consolidation of liquid waste from primary containers into approved storage vessels or disposal units. Decanting services shall apply to the following container volume categories, with costs calculated per litre: 500 ml; 1 litre; 2 litres; 5 litres; 10 litres; 20 litres; per .

The service provider must ensure the following:

a) Safe Handling & Transfer

- Perform decanting using appropriate equipment (funnels, pumps, drip trays, secondary containment, etc.).
- Prevent spills, leaks, cross-contamination, and environmental impact.
- Ensure that decanting activities comply with environmental and safety procedures.

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b) Waste Stream Identification

- Verify waste type and compatibility before decanting.
- Label all containers in line with Hazardous Waste Regulations, SHEQ standards, and Waste Management Procedures.

c) Measurement & Documentation

- Record the exact volume decanted per litre category.
- Maintain logs for traceability, waste manifesting, and monthly reporting.
- Provide supporting documentation for environmental compliance audits.

d) Equipment & PPE

- Supply all required PPE (gloves, aprons, goggles, face shields, etc.).
- Use intrinsically safe, non-sparking, and calibrated decanting equipment.
- Ensure that tools and equipment are maintained and inspected regularly.

e) Environmental & Safety Compliance

- Adhere to all relevant legislative and site-specific requirements, including:
  - NEM: Waste Act
  - Hazardous Chemical Agent Regulations
  - SABS and ISO Environmental Standards
  - Environmental Management System (EMS)
- Implement corrective actions in the event of accidental spills or non-conformances.

f) Housekeeping & Area Management

- Clean work areas after decanting.
- Remove contaminated materials for proper disposal.
- Ensure secondary containment is used at all times during handling.

3.1.5 Removal of Used Oil (Ingula PSS & Drakensberg PSS)

The service provider shall conduct the collection, handling, transportation, and disposal/recycling of used oil generated at Ingula Pumped Storage Scheme (PSS) and Drakensberg Pumped Storage Scheme (PSS). All activities must be carried out in accordance with environmental legislation, power station waste management standards, and oil-containing waste handling protocols.

a) Collection and Handling

The service provider must:

- Collect used oil from designated storage tanks, drums, bunded areas, turbine halls, workshops, and maintenance facilities at both Ingula PSS and Drakensberg PSS.
- Use appropriate, leak-proof, calibrated pumps and suction equipment.
- Conduct pre-transfer equipment checks to prevent leaks or failures.

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- Ensure that used oil is not mixed with water, sludge, coolant, solvents, or other waste types unless authorised.
- Secure all collection points and prevent environmental contamination.

b) Storage and Containment

- Ensure temporary storage containers and tankers meet SABS**,** SHEQ**, and** NEM:WA requirements.
- Maintain secondary containment (bunding) during transfer operations.
- Provide spill kits and ensure immediate spill response readiness.
- Keep used-oil transfer areas free of debris, overflows, and contamination.

c) Transportation Requirements

All used oil must be transported:

- In licensed waste transportation vehicles compliant with the National Road Traffic Act and Hazardous Waste Regulations.
- By drivers holding the appropriate hazardous goods permit.
- With correctly displayed hazard signage and placarding.
- Along approved transport routes to an authorised recycling or disposal facility.

The service provider must also ensure:

- No decanting or transfer of used oil occurs outside designated containment areas.
- Vehicles are in good mechanical condition, leak-free, and regularly inspected.

d) Disposal / Recycling Requirements

The service provider shall:

- Dispose of or recycle used oil only at licensed waste facilities, such as:
    - Approved used-oil recyclers
- Provide certificates of safe disposal/recycling per load.
- Ensure cradle-to-grave traceability of all used oil removed from both sites

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