



Permit No. SA 2790
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HEALTH UNIT
Community & Emergency Services

South Area 3 Environmental Health, 81 Flower Road,
Clairwood, Durban, 4052
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SCHEDULED ACTIVITIES PERMIT

In terms of Section 5.1 of the Scheduled Activities Bylaw
for eThekweni Municipality


**AFRICAN DRUM WORLD (PTY) LTD t/a
ANCHOR PAIL AND DRUM RECONDITIONERS**

Is hereby authorised to undertake the under mentioned trade, business, occupation or calling, issued in accordance with the specified conditions relative to this permit.


1. Premises : 24 Manchester Street, Jacobs, Durban.
2. Company Registration No. : 2005/005286/07
3. Registered Description : ERF 991 of Wentworth
4. Nature of Trade/Occupation : Drum reconditioning, Spray-painting, Engineering Works.
5. Period of validity : 5 years
6. Expiry date : 30th September 2027
7. Particulars of main raw materials : Used metal & plastic drums/containers, water, caustic, solvents, paints.
8. Processes to be carried out : - Incineration plant: Shot blasting & incineration.
- Open top factory: Chiming; repair; leak testing; spray- painting; curing.
- Flowbin factory: High pressure washing; leak detection & repair.
- Closed top factory: Draining; washing; de-denting; grinding; shot blasting & painting.
9. Product of such processes : Reconditioned metal & plastic drums / containers.
10. Particulars of plant : Heavy and light presses, bending brakes, guillotines, welding units, spray booths, metal pre-treatment tanks, dryer tanks, 22,5^{m3} LPG vessel.

NOTE:

1. This certificate must be displayed in a prominent place within the premises at all times.
2. This permission will not relieve you of any obligation to comply with any other law, regulation or authorisations.
3. This permit may be suspended or withdrawn if the terms hereof are not complied with.
4. This permit will cease to be in effect on change of ownership or name of the permit holder.
5. The Municipality may call on you to conduct specialist studies, provide information, report or documentation in connection with the activities undertaken in terms of this Permit at any time should a need arise.


J. Kaloo
Authorised Official




S. Hansraj
Manager: Environmental Health
South Sub-District 3

PERMIT CONDITIONS
SCHEDULED ACTIVITIES BYLAW

A. GENERAL CONDITIONS

1. Non-compliance with the requirements of this permit constitutes an offence. This permit may be suspended or withdrawn or legal action may be instituted against the permit holder if the conditions specified herein are not complied with.
2. The site is to be constructed, operated and managed in accordance with relevant National, Provincial and Municipal Legislation and any authorisations or special consent issued in terms thereof.
3. No building, plant or works used by a permit holder shall be materially extended, altered or added to and no changes in process, procedures or significant production increases/throughputs that will significantly alter impacts may be undertaken without the prior approval of the permitting authority. This permit will cease to be of effect on change of ownership or name of the permit holder.
4. No gases, liquids, odours, vapours, dust, smoke, particulates, glare, noise or vibration shall be emitted which in the opinion of the permitting authority could cause a significant environmental impact, health risk or significant nuisance to the general public or employees of the licensee.
5. Where adverse health, environmental impacts or nuisance are created, urgent corrective measures must be taken to contain or minimize the impacts through operational or engineering interventions. Remediation, if required shall be carried out to the satisfaction of the permitting authority and/or any other authorized governmental agencies.
6. Any incident which has the potential to create significant health, safety or environmental risk must be reported immediately to all relevant authorities.
7. The Permitting authority reserves the right to set and amend the permit conditions, emission limit values or standards after consultation with the permit holder and taking into consideration information submitted, what is technically achievable, and justifiable on health and environmental grounds.
8. The permit holder is required to maintain an Environmental Management System (EMS) which gives effect to the principle of continuous improvement. The EMS must include as a minimum:

ITEM	ACTION
8.1	Identify and quantify potential for environmental impacts
8.2	Prioritize the identified impacts
8.3	Identify appropriate preventative and corrective actions
8.4	Develop responsive management controls, systems and procedures
8.5	Identify improvement projects to be added to an Environmental Improvement Programme.

The permit holder must decide on tools and techniques that are appropriate for the nature of its permitted activities. All items must be clearly documented and kept on site and be available for inspection by this department. All items shall be reviewed, improved and updated annually to achieve continuous improvement.

9. This permit will cease to be of effect on change of ownership or name of the permit holder or cessation of operations and the permit authority shall be duly advised of any such changes.
10. An annual performance review meeting shall be held with the permitting authority. The permit may be revoked if significant under-performance is noted.
11. On cessation of operations, the Permitting authority is to be notified and decommissioning of the site and associated plant must be conducted in terms of a rehabilitation plan submitted to and approved by various relevant government agencies.
12. The Permit holder indemnifies the permitting authority from any claim, loss or damage arising from the permit holder's operations in relation to this permit.
13. The Permit holder is obliged to ensure that any contractors/ sub-contractors act in compliance with the relevant terms of this permit and should there be any contravention by such sub-contractors, then the permit holder would be held accountable.
14. The Permit holder must adhere to the duty of care obligations as set out in Section 28 of the National Environmental Management Act 107 of 1998 and failure to comply therewith constitutes a breach.

B. SPECIFIC REQUIREMENTS:

1. DETAILS RELATING TO PRODUCTION, CHEMICALS AND RAW MATERIALS:

1.1 Site Register of all Substances Used

A site register of all chemical products and their quantities shall be maintained and be available upon request. The common trade names and chemical names as well as a reference to the Safety Data Sheet for each hazardous substance shall be recorded in the register. The CAS registry number (Chemical Abstract Service) for each substance shall be included in the site register.

1.2 Safety Data Sheets

The permit holder must ensure that a Safety Data Sheet (SDS) is available for each hazardous substance used on site. The Safety Data Sheets must contain information as described in Section 7(1) and 10.3(b) of the Occupational Health and Safety Act and Regulations 85 of 1993 and be available upon request.

1.3 Duty to Evaluate Substances and Use Lower Hazard Substitutes

The permit holder has a duty to evaluate, understand the composition of and have an awareness of the dangers of harmful effects on the internal and external environment caused by chemicals and raw materials used, or products manufactured. This should include knowledge of the biodegradability, toxicity, bio-accumulation and sensitizing properties of each substance.

Substitution with alternative substances posing less risk of environmental impact or side effects shall be considered for chemicals and raw materials whose properties and application in the

process could lead to environmental hazard. In such cases, the permit holder shall select these alternatives so long as this can be done without any undue expense or inconvenience. The permit holder is not permitted to use a more hazardous substance in the place of a less hazardous substance.

2. **OCCUPATIONAL HEALTH AND SAFETY:**

2.1 A full Occupational Health and Safety Programme must be maintained in terms of the Occupational Health and Safety Act and Regulations. In this regard the programme must contain the following as a basic minimum:

(a) **Risk Assessment**

An Occupational Hygiene Risk Assessment must be conducted to identify all potential stressors arising in or from the workplace.

(b) **Quantification of Stressors**

All stressors identified in the Risk Assessment above which may be at levels of concern are to be quantified by an approved inspection authority (AIA) or results of such quantification verified by an AIA.

(c) **Control**

The company is to document (with time frames) control strategies for any stressor or condition identified above as being at levels of concern.

(d) **Training**

All employees exposed to workplace hazards/stresses must be adequately and comprehensively informed and trained as per the requirements of the Occupational Health and Safety Act.

(e) **Re-Evaluation**

Stressors and training needs are to be re-evaluated on a periodic basis as determined by the Occupational Health and Safety Act.

(f) **Surveillance**

- A medical/biological monitoring protocol must be devised in conjunction with an Occupational Medical Practitioner.
- All medical records/summary reports are to be maintained by responsible officials and be available for inspection to the Permitting Authority upon request.
- This Department shall be informed as soon as is reasonably practical of any adverse health impact or trend which is identified by the Occupational Health programme.

2.2 **Control of Health Risks**

2.2.1 Pre-planned emergency procedures to be implemented in the event of transportation accidents, spillages or any other onsite disaster situations.

2.2.2 All mixing/blending and decanting of solvents and paints to be conducted in well ventilated areas and where necessary suitable mechanical extraction of vapours must be provided.

- 2.2.3 Suitable and adequate warning signs of the presence of hazardous chemical substances must be conspicuously displayed in all areas where such chemicals are to be stored and handled.
- 2.2.4 All hazardous chemicals including drums, receptacles used for storage of chemicals to be stored in such a manner so as to prevent any unauthorized access thereto.
- 2.2.5 Security measures to be implemented to prevent unauthorized persons gaining access to the site.
- 2.2.6 Any vessel which contains hazardous chemical substances must be clearly labelled with regard to the contents thereof and safety precautions necessary when handling and using hazardous chemical substances.
- 2.2.7 Any required welding / grinding operations to be carried out in well ventilated areas and be suitably screened off from other employees and public.
- 2.2.8 All spray painting and coating activities must be carried out within the confines of the spray cabinets/booths. All fume extraction systems and any other artificial extraction and ventilation systems located within the process areas of the plant are to be kept under a strict documented inspection and maintenance schedule. Such maintenance schedule shall be kept up to date and be available to the permitting authority on request.
- 2.2.9 The permit holder is to ensure that any proposed work to be carried out by contractors in operational areas within the plant, is permitted only when *clearance to work permits* have been obtained in terms of the company's standard operating procedures and protocols.
- 2.2.10 The permit holder must ensure that effective measures are implemented on a continuous basis to eliminate/control flies, rodents, other insects or vermin at the company premises.
- 2.2.11 Sound pressure levels in all work areas are to be in accordance with SANS Code of Practice 10083:2013. Where levels exceed 85 dB (A) over an 8-hour shift, then:
- Noise zones must be demarcated.
 - Warning signs indicating such zones must be posted.
 - Approved hearing protection must be provided and used in such zones.
 - Audiometric testing of affected staff must be conducted on an annual basis and this Department immediately informed of all incidents of noise induced hearing loss.

It is recommended that the above requirements be implemented with hearing conservation education programmes.

2.3 Personal Protective Equipment:

- 2.3.1 Employees involved with cleaning operations, maintenance, repairs, production processes to be provided with personal protective clothing and equipment appropriate to their work task / duty.
- 2.3.2 Approved respiratory protective equipment, which is capable of controlling the exposure to below the occupational exposure limit to be worn by all employees exposed to hazardous chemical substances.
- 2.3.3 Respiratory protective equipment is to be maintained in a clean condition and efficient working order at all times.
- 2.3.4 Separate containers or storage facilities must be provided for personal protective equipment when not in use.

2.4 Training and Education:

2.4.1 All employees exposed to workplace hazards/stresses must be adequately and comprehensively informed and trained with regard to:

- the potential sources of exposure;
- the potential risks to health caused by exposure;
- the precautions to be taken by employees to protect themselves against the health risks associated with the exposure;
- the necessity of correct use, maintenance and potential of personal protective equipment and clothing;
- the importance of good housekeeping and personal hygiene;
- the safe working procedures regarding the handling, storage and labelling of hazardous substances products; and
- procedures to be followed in the event of any emergency situation.

2.4.2 The permit holder is required to keep a record of all training both practical and theoretical given to an employee.

3. ENVIRONMENTAL CONTROL/PERFORMANCE:

3.1 General:

3.1.1 Operations on the premises must at all times be conducted in such a manner, that no health and safety risks, nuisance or unacceptable environmental impacts occur.

3.1.2 Notwithstanding the above, this does not absolve the company from complying with the requirements of any other Governmental Department or National Statute.

3.1.3 An Environmental Management System (EMS) which incorporates the philosophy of continued improvement must be developed and implemented by the company.

3.2 Air Quality:

3.2.1. The permit holder must ensure that measures are in place to minimize any process emissions to the external atmosphere. Effective odour control of volatile organic compound vapours must be undertaken using best practical means during process operations.

3.2.2 The permit holder is required to maintain an Odour Management Plan that will continually assess, mitigate and manage all odour emission sources on site. The plan is to be kept updated and be submitted to the Permitting Authority on an **annual** basis.

3.2.3 The Permit Holder is required to provide an updated emissions inventory by **31st March 2023** and thereafter every permit period or after any significant process change as agreed with the Permitting Authority.

3.2.4 The Permitting Authority reserves the right to request the permit holder to install or apply appropriate measures to reduce any fugitive emissions arising from process activities.

3.3 Complaints Register:

3.3.1 An official complaints register must be maintained by the permit holder for all external complaints received. Furthermore, the permit holder is to investigate and report annually on the total number of complaints logged and attributable to the facility.

4. EMERGENCY RESPONSE AND CONTINGENCY MEASURES:

4.1 Permit Holder's Actions Required in Event of an Incident:

- 4.1.1 Section 30 of the National Environmental Management Act 107 of 1998 (as amended by the National Environmental Management Amendment Act 30 of 2013) defines an incident as “an unexpected sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.”
- 4.1.2 In the event of an incident, Section 30(3) of the National Environmental Management Act requires the Permit Holder forthwith, after knowledge of the incident, to report such incident to the Emergency Call Centre **(031-361 0000)**. Should such incidences pose a significant health risk or nuisance, notification of the incident is to be immediate. The report must include:
- (a) The nature of the incident.
 - (b) Any risks posed by the incident to public health, safety and property.
 - (c) The toxicity of substances released.
 - (d) Any steps that should be taken in order to minimize the effects of the pollution on the public health and the environment.
- Furthermore, the Permit Holder must: -
- (e) Take all reasonable measures to contain and minimize the effects of the incident on the environment, and manage risks to health, safety and property.
 - (f) Undertake clean-up procedures.
 - (g) Remedy the effects of the pollution.
 - (h) Assess the immediate and long-term effects of the incident on the environment and public health.
- 4.1.3 Within 14 days of the incident the permit holder must submit a further detailed report with the following information:
- (a) The nature of the incident,
 - (b) Substances involved, quantities released, toxicity data,
 - (c) Initial measures taken to minimise impacts,
 - (d) Detailed description of causes of the incident,
 - (e) Measures taken and proposed to prevent a recurrence.
- 4.1.4 The permit holder shall formulate and maintain an emergency preparedness plan for any potential emergency situation on site. Such emergency plan is to be kept updated and exercise drills to train staff in response to the plan must be carried out at least on an annual basis.
- 4.1.5 In the event of any incident which has the potential to impact on the surrounding communities, the permit holder is required to present/report its findings in relation to the incident, such feedback must include:
- (a) A written submission,
 - (b) Calculation of impacts/emissions associated with the incident and dispersion modelling of pollutants, where applicable,
 - (c) Interpretation of modelled ground level concentrations in relation to health impacts,
 - (d) Root cause analysis,
 - (e) Mitigatory measures to be implemented to prevent recurrence.

5. INTEGRITY MANAGEMENT:

5.1 In terms of all process equipment and plant, the permit holder is to ensure that a comprehensive integrity management plan is in place.

6. ENVIRONMENTAL NOISE:

6.1 All plant operations and equipment on site must be so run and maintained so that no noise nuisance or disturbance is created to surrounding communities.

6.2 The permit holder's local contribution in terms of environmental noise shall not exceed levels as prescribed in SANS Code of Practice 10103:2008.

7. WASTE:

7.1 The permit holder is required to undertake a Waste Study which contains inter-alia, the following:

- (a) Identification of sources of all waste.
- (b) Composition / constituents of each waste stream.
- (c) Anticipated / estimated volumes of each stream.
- (d) Waste classifications of each waste stream as per relevant SANS Code of Practice.
- (e) Methods of handling and storage, both onsite and off-site.
- (f) Identification of opportunities for waste minimization, recycling, re-use of waste, or improved housekeeping.
- (g) Final disposal point of all categories of waste generated.
- (h) Describe system of record keeping for tracking of each waste stream from point of generation to final disposal. Disposal certificates must be available to account for all waste passed to third parties.

The Waste Study described above is to be completed and forwarded to the permitting authority by the **31st August 2023**.

7.2 The permit holder is to ensure that all intermediate waste transporters/contractors are suitably permitted by the eThekweni Municipality and that all waste loading, transfer and transport operations are conducted in such a manner that they do not create any adverse environmental impacts.

9. SPECIFIC REQUIREMENTS OF HEAD: ETHEKWINI MUNICIPALITY - FIRE & EMERGENCY SERVICES:

9.1 The permit holder is required to ensure that all fire safety equipment on site is serviced annually by a competent person.

9.2 The premises and operation is to be maintained and operated in a manner acceptable to the Head: Fire & Emergency Service Unit.

10. SPECIFIC REQUIREMENTS OF THE HEAD: ETHEKWINI MUNICIPALITY - WATER AND SANITATION:

10.1 Operations on the site must be conducted in a manner which will minimize the risk of soil / ground water / aquatic environment contamination.

10.2 Any storm water or water which becomes contaminated must be treated as effluent and be discharged into the approved effluent handling system as directed by the Head: Water and Waste Service Unit.

10.3 The premises/operation is to be maintained and carried out in a manner acceptable to the Head: Water and Sanitation Service Unit.

11. HOUSE KEEPING PROTOCOL:

11.1 Documented programmes must be established and implemented.

12. ANNUAL REPORTING:

12.1 The Annual Report must be completed by submitting information for the year under review in the format described on the standardized form available from the eThekweni Health Department by 31st October each year starting in 2023.



J. Kaloo
Authorised Official



S. Hansraj
Manager: Environmental Health
South Sub-District 3

Date: 07th September 2022



SUMMARY OF ACTION ITEMS:

The permit holder is required to report on the following action items as listed in the permit.

Measure	Timeframe/ Deadline	Permit Condition
<p>1. <u>Environmental Management System:</u></p> <p>1.1 The permit holder is required to maintain an Environmental Management System (EMS) which shall be reviewed, improved and updated.</p>	Annually	Section A 8.
<p>2. <u>Re-evaluation:</u></p> <p>2.1 Stressors and training needs are to be re-evaluated on a periodic basis as determined by the Occupational Health and Safety Act:</p> <ul style="list-style-type: none"> - every two years. - after any change in plant, process, chemical substitutions etc. - major changes in throughput. - after implementation of engineering controls, etc. 	Copies of such re-evaluations are to be submitted to this Dept. as soon as they become available.	Section B: 2.1 (e)
<p>3. <u>Air Quality:</u></p> <p>3.1 The Permit Holder is required to provide an updated Emissions Inventory.</p> <p>3.2 The Permit Holder is required to submit an Odour management Plan.</p>	31 st March 2023 Annually	Section B. 3.2.3 3.2.2
<p>4. <u>Waste:</u></p> <p>4.1 The Permit Holder is required to undertake a Waste Study.</p>	31 st August 2023	Section B. 7.1
<p>5. <u>Annual Reporting:</u></p> <p>5.1 The Annual Report must be completed by submitting information for the year under review.</p>	Annually	Section B 12.1