

	<p align="center">Work Instruction</p>	<p align="center">Group Capital</p>
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Compiled by	QA, Interface & Governance Review	Functional Responsibility	Authorized by
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Date: 03/07/2025	Date: 07/07/2025	Date: 07/07/2025	Date: 2025/07/10

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1. Introduction

Medupi Power Station produces sewage from both the contractors and project operational areas. The sewage from the toilets goes to the Sewage Treatment Plant operated under Medupi Generations. This Sewage Management Plan covers the processes that must be followed by both contractors and staff in terms of sewage management on site.

2. Supporting Clauses

2.1 Scope

This document describes the approach by which portable sanitary toilets and sewage shall be managed on the Medupi construction site. This requires active involvement of both the Team Medupi and its Contractors.

2.1.1 Purpose

The purpose of the Medupi Sewage Management Plan is to outline critical elements of managing sewage by Medupi Construction Project teams. The Project aims to avoid/minimise sewage spillages that can negatively affect human health and the environment.

2.1.2 Applicability

This Plan shall apply to Medupi Power Station Project.

2.1.3 Effective date

This Plan shall be effective from date of approval.

2.2 Normative/Informative References

Parties using this Plan shall apply the latest edition/revision of the documents listed in the following paragraphs.

2.2.1 Normative

- [1] 348-31313 Medupi Power Station Water Use Licence and Amendments
- [2] National Environmental Management Act (Act No. 107 of 1998) as amended
- [3] Regulation. 634 of Waste Classification and Management Regulations
- [4] 348-681011 The Environmental Management Plan for the Medupi Coal-fired Power Station in the Lephalale Area, Limpopo Province – The Construction Phase
- [5] National Road Traffic Act (Act No, 85 of 1993)
- [6] National Water Act (Act No, 36 of 1998)
- [7] National Environmental Management: Waste Act (Act No.59 of 2008)

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[8] Occupational Health and Safety Act (Act No. 85 of 1993) and Construction Regulations as amended

[9] Hazardous Chemicals Substance Act (Act No.15 of 1973)

[10] 12/12/20/695 Record of Decision for the Medupi Project

2.2.2 Informative

[11] 348-653867 Development and Change of Medupi QMS Documents

[12] 348-961711 Project Execution Plan

[13] 348-883808 Document Management Procedure

[14] 348-717865 Procedure for the Handling of Environmental Non-conformities and Corrective Action

[15] 348-693723 Environmental Incident Management

[16] 348-884625 Site Allocation, Water Supply and Sewage Connection Approval Form

[17] 348-10115765 Spill Assessment Form

[18] ISO 14001: Environmental Management Systems Requirements with Guidance for use

[19] ISO 9001: Quality Management Systems - Requirements

[20] 348-885850 Excavation Permit Allocation Procedure

[21] 348-22367 Medupi Power Station Waste Management Work Instruction

2.3 Definitions

Term	Explanation
Contractor	An employer who performs construction work, including principal contractors and subcontractors for the Project. Contracted companies are specifically viewed as employers, as per the OHS Act.
Environment	The surrounding in which humans exist that is made up of: <ul style="list-style-type: none"> i the earth’s land, water and atmosphere, ii micro-organisms, plant and animal life, iii any part or combination of (i) and (ii) and the interrelationship among and between them, and the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well being
General authorisation	An authorization to use water without a licence, provided that the water use is within certain limits and complies with conditions set out in the Gazetted General Authorisation. This authorization requires a registration with the Department prior to exercising the water use(s).
Grey water	Is generally accepted as being wastewater generated from hand basins, showers, baths and kitchen basins.
Hazardous waste	Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the Environment.

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Term	Explanation
Pollution	The introduction of contaminants into the natural environment that cause adverse change.
Portable sanitary toilets	Means portable chemical toilet, urinal and hand wash facilities used onsite.
Sewage	Waste water emanating from toilets, kitchens, bathrooms which can contain faeces, urine and washing water containing soap.
Sewage Treatment Plant	A plant designed to treat or remove contaminants from sewage.

2.4 Abbreviations

Abbreviation	Explanation
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EMS	Environmental Management System
ECO	Environmental Control Officer
EMP	Environmental Management Plan
SDS	Safety Data Sheet
RoD	Record of Decision
STP	Sewage Treatment Plant
TM	Team Medupi
WUL	Water Use License

2.5 Roles and Responsibilities

a) Responsible

Those who do the work to achieve the task. There is at least one role with a type of participation, although others can be delegated to assist in the work required.

b) Accountable (also approver or final approving authority)

The one ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. In other words, an accountable must sign off (approve) work that responsible provides. There **must** be only one accountable specified for each task or deliverable.

c) Consulted (sometimes counsel)

Those whose opinions are sought, typically subject matter experts; and with whom there is two-way communication.

d) Informed

Those who are kept up to date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

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Table 1: RACI Matrix

Process Step/ Activity	TM General Manager	TM Construction Manager	TM departmental Manager	TM Contracts Manager	TM Construction Site Support	TM SHE Manager	Environmental Practitioners	Principal Contractors	ECO
Ensure that the requirements of this Sewage Management Plan are implemented.	I	I	C,I	R,I	C,I	A	R	R	I,C

2.6 Related/Supporting Documents

See 2.2 of this Plan.

3. Document Content

3.1 Process Map / Flowchart

Not compiled.

3.2 General

The Medupi Construction Project has set up various sewage/sanitary management facilities that consists of portable chemical toilets, urinals and hand wash facilities, conservancy tanks, permanent toilets, sewage lines and a sewage treatment plant which is operational.

TM and the Principal Contractor shall provide sufficient sanitary facilities for the number of staff employed on site.

TM and Principal Contractors are responsible for ensuring that appointed sewage/sanitary management contractor conforms to all relevant health, safety and environmental requirements.

Portable sanitary facilities shall not be placed in low-lying areas and must be secured to prevent being knocked off or blown over.

Clean and maintained sanitary facilities shall be provided for workers at a ratio of 1:30 in accordance with Regulation 30 of the Construction Regulations and subsequent amendments.

Ablution facilities must be supplied with toilet paper as well as a hand wash facility with hand wash soap.

Sanitary waste bins are to be provided for female toilets. Sanitary waste (e.g. used sanitary pads, tampons, etc.) must be handled as hazardous waste and be disposed of at a licensed hazardous landfill site or treatment facilities as per the Waste Management Work Instruction (348-22367).

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The users of toilet facilities may not dispose any foreign objects such as sanitary pads, rags, construction material and litter inside the toilet sinks.

Contractors must develop and submit the layout plan showing location of their sanitary facilities within their areas of responsibility to the TM Environmental Department. The plan must be updated regularly to take account of movement of the workforce as construction progresses.

3.3 Portable chemical ablution facilities

3.3.1 Establishment

Portable chemical toilets should only be considered for places where access to the sewage network is not possible or where minimal staff is working in remote areas.

Portable chemical toilets should only be considered for places where access to the sewage network is not possible or where minimal staff is working in remote areas.

Portable toilets shall be positioned at such places or spaces as to ensure that it is within easy reach of employees and sewage collection trucks.

In some instances, urinals may also be provided.

They must be positioned on stable, level ground and away from any water courses (including storm water drains).

Portable toilets must be anchored to the ground to prevent them from falling.

An identification tag must be posted on all portable sanitary facilities and must include details of the responsible contact person of the principal contractor, and which must be linked with the site layout plan as required by the Medupi EMP (Section 4.8.1).

3.3.2 Servicing and Maintenance

Portable sanitary facility must be cleaned and emptied regularly to prevent the possibility of overflowing and disease. Care must be taken to prevent spillages from occurring, where spillages do occur; they must be reported and rectified immediately as per the Incident Management procedure (348-693723).

Portable sanitary facilities shall be inspected regularly to ensure proper functioning and hygiene.

Portable sanitary facilities not in proper working condition shall be replaced with a good working unit. All records pertaining to inspections and defects must be kept in file by responsible principal contractor.

Ablution blocks consisting of groups of portable facilities must be adequately screened to afford the necessary privacy.

The type and volume of chemicals to be used must be specified in the method statements to be approved by TM Environmental Department.

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3.3.3 Disposal

Sewage collected from portable toilets must be disposed of on site at a point allocated by TM, which will be connected to the sewage network. No sewage will be allowed to be disposed of offsite, provided permission is sought from TM Environment in writing.

3.4 Sewage Treatment Plant

The Medupi Sewage Treatment Plant (STP) is authorised by the Department of Water and Sanitation. Operation of the plant must ensure compliance with the relevant Medupi Authorisations and statutory legal requirements. The operating manuals are kept with the appointed contractor at the STP.

Dried sewage sludge from the plant will be temporarily placed inside the clearly labelled designated hazardous waste skips enroute to a licensed hazardous waste landfill site for final disposal.

3.5 Sewage lines

3.5.1 Team Medupi

TM must ensure that the sewage lines and manholes of the main reticulation network in their areas of responsibility are protected to ensure that the mobile plant does not drive over them.

Any damaged manholes must be replaced, and manholes should be always covered to prevent foreign objects (e.g. silt, litter) falling inside.

TM must keep an updated version of the sewage network design drawing on file. Any design flaws must be communicated with Engineering Department for rectification.

The appointed Construction Site Support Service contractor must inspect manholes and sewage line to ensure proper functioning of the system.

3.5.2 Contractors

Contractors must ensure that the sewage lines and manholes (incl. breather pipes) in their areas of responsibility (work and laydown areas) are protected to ensure that the mobile plant does not drive over them.

Contractors who wish to connect to the main sewage line must fill in and submit application to TM Construction Site Support Service Department for approval. Unauthorised connections to sewage line are not allowed onsite and will be dealt with through contractual mechanisms for non-compliance to the requirements.

3.5.3 Connections to the sewage networks must be done by a qualified plumber.

The contractors must prior to performing excavation activities, submit excavation 348-885850 permits forms to TM construction team for approval as per Excavation Permit Application Procedure (348-885850). Contractors must report any damage to manholes or the main sewage network lines to the Team Medupi Safety Department and TM Construction Site Support Service Department.

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Where damage to manholes is discovered within areas of contractor responsibility/control, the incident will be allocated to that contractor.

3.6 Spill Prevention, Control and Reporting

Sewage spillages will be prevented by adhering to this plan as well as contractors approved sanitary/sewage operational plans/procedures.

Awareness about sewage management must be conducted by TM (for the Project Management team) and principal contractors.

In the event of a sewage spill:

- If the contaminated area is accessible to the workforce, the area must immediately be clearly marked or cordoned off to restrict access.
- Immediately contain and/or divert the flow to the nearest sewage line or collect with a vacuum/pump truck or sewage spill clean-up equipment. For large spills it may be necessary to construct a temporary berm of earth (soil) or suitable material to minimise extent of pollution.
- Contractors must report all sewage spillages as per Medupi Environmental Incident Procedure (348-693723).
- Before cleaning up the sewage spillage the contractor must complete the Spill Assessment form (348-10115765) to determine the significance of the spill as well as the recommended actions below. There are four (4) classifications of significance which will require the following clean-up response:
 - **Insignificant**
 - ❖ Clean all visible solids (contaminated objects) and surfaces immediately
 - ❖ The affected area should be disinfected using approved disinfectants (e.g. chlorine, lime). The disinfectant selected must be capable of inactivating potential pathogenic microorganisms and must be
 - **Minor**
 - ❖ Clean all visible solids (contaminated objects) and surfaces immediately
 - ❖ The affected area should be disinfected using approved disinfectants (e.g. chlorine, lime). The disinfectant selected must be capable of inactivating potential pathogenic microorganisms and must be used or applied by experienced people or supervised by an experienced person.
 - **Moderate**
 - ❖ Clean all visible solids (contaminated objects) and surfaces immediately
 - ❖ The affected area should be disinfected using approved disinfectants (e.g. Chlorine, lime). The disinfectant selected must be capable of inactivating potential pathogenic microorganisms and must be used or applied by experienced people or supervised by an experienced person.
 - ❖ Sampling may be required if in the reasonable opinion of the ECO or Team Medupi Environmental Department to determine the efficacy of disinfection.
 - ❖ The parameters to be analysed will be determined by TM in consultation with the ECO.
 - **Major**

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- ❖ Samples of the contamination must be collected immediately for analysis as a baseline to determine efficacy of any treatment applied. These must be analysed as soon as practicably possible by an accredited lab.
- ❖ Clean all visible solids (contaminated objects) and surfaces immediately.
- ❖ The affected area should be disinfected using approved disinfectants (e.g. chlorine, lime). The disinfectant selected must be capable of inactivating potential pathogenic microorganisms and must be used or applied by experienced people or supervised by an experienced person.
- ❖ As far as possible, cleaning should be carried out before the sewage dries out to avoid airborne sewage contaminated dust being dispersed in the air or breathed

4. Process for Monitoring

4.1 Key Performance Areas and Indicators

The following Key Performance Areas / Indicators (KPA's / KPI's) shall be measured, analysed and reported. The Process Owner shall be accountable and assign the responsibility at the frequency as indicated below, documented as part of the QMS measurement, analysis and improvement initiative.

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Table 2: KPAs/KPIs

Key Performance Area	Key Performance Indicator	Target	Measure Frequency	Responsible	Record
Maintenance of portable sanitary facilities.	Servicing, cleaning and emptying of portable sanitary facilities to prevent nuisance and spillages.	Zero (0) complaints regarding state of portable toilets	Daily	TM Construction Site Support Service/ Contractor/ Sanitary Management Contactor.	Servicing records
Proper management waste	Proper disposal of sewage and sanitary waste	100% submission of waste document as part of monthly report	24 hours (collection) and 90 days (disposal)	TM Environmental Department/ Contractors	Waste manifests and safe disposal certificates.
Proper management of sewage line	Inspection of sewage and sanitary waste	Zero sewage incident	Quarterly	Construction Site Support Services	Inspection records
Document control	Retain and store records generated as a result of this document as defined in the Procedure 200-1681 "Control of Records"	100% storage of maintained and retained documented information	As required	TM Medupi Environmental Department	As generated by the procedure
Revision of document	Revision requirements in line with the Medupi Procedures 348-653867 "Development and Change of Medupi QMS Documents" and 348-883808 "Document Control".	100% revision of documents due for review	As required	TM Environmental Department	Newly revised document

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4.2 Document Review and Self-Assessment

4.2.1 Document Self-Assessment

The “Process Owner” identified on the front page of this document along with departmental personnel and the project QMS Engineer shall undertake a “self-check” review of the process defined in this document at regular intervals, commencing from the effective date of this document, to check:

- a) the process / procedure operational integrity
- b) process efficiency
- c) the level of stakeholder knowledge and implementation.

Participants and results of the “self-check” review shall be documented by the Process Owner in the “Self-Assessment Checklist” (**Template No. 348-655890**) included as an Appendix to this document which shall be submitted via SharePoint to Medupi Documentation Department Help Desk or medupiga@eskom.co.za by the Process Owner once completed.

Process Owner shall proceed with any revision requirements in line with Medupi Procedures, **348-653867** “Development and Change of Medupi QMS Documents” and **348-883808** “Document and Record Management”.

4.2.2 Review Period

All EMS documents shall undergo a 3-yearly compulsory review.

4.3 Training Requirements

No project specific training required to implement the process documented in this document beyond normal job function.

5. Acceptance

This document has been seen and accepted by:

Name	Designation
N. Khuzwayo	Safety, Health and Environmental Manager
L. Ndlovu	Quality Assurance Manager
Z. Shange	General Manager

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6. Revisions

Date	Rev.	Compiler	Remarks
July 2025	05	H Magau	Three yearly reviews including moving to rev 6 template.
May 2022	04	M Boshomane	Three Yearly Review, and transfer to new document template.
July 2017	03	Sakutanya Mamabolo	Revision following External ISO 14001 Audit and aligning to Eskom EMS Requirements.

7. Development Team

The following people were involved in the development of this document:

- N Nengobela
- S Mamabolo
- D Mudzielwana
- H Magau

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Appendix A – Process Self-Assessment Checklist

Discipline: Environmental		Applicable Document No.: 384-22351			Self-Assessment Date: DD / MM /YYYY	
Item No	Ref Section	Self-Assessment Question	Compliant			Comment
			Yes	Part	No	
1	5.2	Did contractors develop and submit a layout plan showing location of sanitary facilities within their areas of responsibility to the TM Environmental Department.				
2	5.2	Who is the appointed sewage and sanitary service provider? (list) Do they conform with the relevant health, safety and environmental requirements (Permits (transport, storage, disposal) and municipal bylaws).				
3	5.4	Are Portable chemical toilets only considered for places where access to the sewage network is not possible or where minimal staffs are working in remote areas?				
4	5.4	Portable sanitary facilities not in proper working condition shall be replaced with a good working unit. Are all records pertaining to inspections and defects kept in file by responsible contractor?				
5	5.4	Is sewage from portable toilet facilities containing chemicals disposed of at a local licensed sewage treatment plant or as agreed with TM Environmental Department?				
6	5.4	Is sewage from portable ablution facilities disposed of on site at a point allocated by TM which will be connected to the sewage network?				
7	5.4	All temporary sewage pipelines installed by the contractor must be forwarded to the engineering Department for inclusion in the plant design.				
8	5.6	Are connections to the sewage networks done by a qualified plumber?				

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9	5.6	Do contractors prior to performing excavation activities, submit excavation permits forms to TM for approval as per Excavation Permit Application Procedure (200-16817)?			
10	5.6	Do contractors report any damage to manholes or the main sewage network lines to the TM Safety Department and TM Construction Site Support Service Department?			
11	5.7	Do contractors report all sewage spillages as per Medupi Environmental Incident Procedure (PPZ 200-10506)?			
12	5.7	Do contractors clean up the sewage spillages as indicated in section 5.7 of this plan and/or contractors plan			
13	5.8	Did Principal Contractors develop an on-site sewage monitoring program which will ensure that both existing and proposed systems are regularly assessed, and all faulty, defective or unhealthy systems are maintained accordingly?			
14	5.9	Are the following records kept by Contractor:			
		<ul style="list-style-type: none"> The MSDS for chemicals used in the portable toilets. 			
		<ul style="list-style-type: none"> Service records for portable sanitary facilities and conservancy tanks. 			
		<ul style="list-style-type: none"> Inspection records for sanitary facilities 			
		<ul style="list-style-type: none"> Safe disposal certificates for sewage and associated waste removal, detailing dates and volumes. 			
		<ul style="list-style-type: none"> Waste removal and disposal records for sanitary waste. 			
		<ul style="list-style-type: none"> Authorisations/Permits of waste facilities utilised for hazardous waste and sewage waste. 			
15	7.2	Does the sanitary management contractor working at Medupi ensure that their staff is trained on the management of sewage and related wastes in line with this Procedure?			

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16	7.2	Do contractors raise awareness amongst their staff on hygiene maintenance and the proper use of ablution facilities?				
17	7.2	Are all training records and toolbox talks, including proof of attendance submitted to TM Environment as part of the monthly report and be kept on file by contractors for auditing purposes?				
Comments:						
Self-Assessment by:	Name:		Position:		Revision Required? (Yes / No)	Planned Revision Date:
Attendees:						

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