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WASTE MANAGEMENT PLAN (NON HAZARDOUS WASTE)

2	22/04/2015	Response LSP's Comments	ERM	See attachment of reviewer's signature	
1	25/02/2015	Response LSP's Comments	ERM	See attachment of reviewer's signature	
0	14/01/2015	Issue For Review	ERM	See attachment of reviewer's signature	
REV.	DATE (dd/mm/yyyy)	DESCRIPTION	PREPARED	CHECKED	APPROVED


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ATTCHMENT OF REVIEWER'S SIGNATURE

NO	Name	Position	Signature
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2	Le Duy Dong	HSE Manager	
3	Kitti Phadungchiwit	Manager of Package A	
4	Somsak Sombatboriboon	Manager of Package BCD	
5	Wason Srisupap	Manager of Package E	
6	Nisit Jintawong	Manager of Package F & H	
7	Amnat Pheerawat	Manager of Package G	
8	Saran Janjira	Project Engineer	
9	Jittinun Dokmaithes	Project Engineer	
10	Pacharavalee Thipdech	Project Engineer	
11	Nampon Arttaweeporn	Project Engineer	
12	Unchalee Mulalee	Project Engineer	
13	Nukool Phiwtaeng	Project Engineer	
14	Siridao Techapermphon	Project Engineer	
15	Jirapol Kosolwadhana	HR Director	
16	Pham Hung Thinh	CSR Manager	
17	Huynh Tan Khiem	Project Engineer	
18	Pham Hong Phuong	Overall Project Coordinator	

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REVISION LOG

Rev.	Date (dd/mm/yyyy)	Revised Detail			
		Item	Page	Article	Description
0	14/01/2015	All	All	All	Issue For
1	25/02/2015	All	All	All	Response LSP's Comments
2	22/04/2015	All	All	All	Response LSP's Comments
3	18/08/2016	All	All	All	Project changes for review

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ACRONYMS


ASP	Air Separation Plant
BOC	Balance of Complex
CTU	Central Utility Plant
EHS	Environmental, Health and Safety
ESIA	Environmental and Social Impact Assessment
HDPE	High Density Polyethylene
HSE	Health, Safety and Environment
HSSE	Health, Safety, Security and Environment
IFC	International Finance Corporation
LLDPE LSP	Linear Low Density Polyethylene
MOIT	Long Son Petrochemicals
MONRE	Ministry of Industry and Trade
MP	Ministry of Natural Resources and Environment
	Management Plan
PP	Polypropylene
QCVN	National Technical Regulation
TSP	Total Suspended Particles

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DISCLAIMER

It is upon the Contractor to solicit, acquire and comply with all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder.

The Contractor hereby agrees and acknowledges that the Employer makes no representation or warranty, express or implied, regarding the accuracy or completeness of any or all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder. THE EMPLOYER HEREBY EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ALL RESPECTS, and the Contractor agrees that neither the Employer nor any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) shall have any liability to the Contractor or any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) in any way relating to those information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder or the Contractor's or its affiliate(s)', director(s)', officer(s)', employee(s)', consultant(s)', professional advisor(s)', and duly authorised representative(s)' reliance thereupon and/or use thereof.

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

The purpose of this Waste Management Plan (MP) (Non Hazardous Waste) is to set out *[insert contractor name here]* approach to manage and mitigate the residual impacts of non-hazardous waste that they have control over, as identified in Chapter 16 of the project's Environmental and Social Impact Assessment (ESIA) and the Long Son Petrochemical's (LSP) Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

It should be noted the information in this Waste MP (Non Hazardous Waste) is based on relevant regulations, guidelines and standards at the time of writing of the ESIA dated 2016. Should the contractor's activities change or new regulations, guidelines or standards apply the contractor will review, amend and resubmit this Waste MP (Non Hazardous Waste) to LSP.


[Note to contractor: If your onsite activities are not associated with non-hazardous waste, you do not need to complete this template but you will need to provide justification that non- hazard wastes will not be generated]

1.2 PROJECT OVERVIEW

The Long Son Petrochemicals Complex Project is located in Hamlet 2 and Rach Gia Hamlet, Long Son Commune, Vung Tau City, Ba Ria – Vung Tau Province, Vietnam. The Complex is spread over 464 ha, including area for its future expansion. The Project will be comprised of two (2) main components:

1) The Petrochemical Plant, which consists of the following plants and units:

- Main Production Plants
 - Olefins Plant
 - High Density Polyethylene (HDPE) Plant
 - Linear Low Density Polyethylene (LLDPE) Plant
 - Polypropylene (PP) Plant
- Supporting Units
 - Central Utility Plant (CTU) (contains a Steam Generation Unit and Water Plant)
 - Tank Farm
 - Common Infrastructure

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2) The Seaport, which consists of the following components:

- Hydrocarbon Jetty - to transfer feedstock and product for the Petrochemical Plant
- Construction Jetty - to import construction materials, including heavy lift modules.

The total land area that will be acquired for the Project is 464 ha, consisting of 398 ha for the Complex, and 66 ha for the specific port. In addition, there is a total water surface area of 194 ha that will be acquired for the seaport.

1.3 NON HAZARDOUS WASTE SOURCES

Non-hazardous waste will be generated during construction activities. Waste classification should be in accordance with MOIT and MONRE Decision No. 23/2006/QD-BTNMT of the List of Hazardous Waste. The potential sources of non-hazardous wastes are as follows:

- Domestic solid waste;
- Insulation scrap (non-hazardous);
- Plastic scrap;
- Scrap Metal- Iron, Aluminum, cable-drums, cable-scrap, packaging waste-wood;
- Rust sludge from pipe cleaning;
- Glass;
- Paper waste;
- Demolition waste (concrete waste);
- Demolition waste of existing houses and infrastructures previously located in the project land; and
- Dredging material (from seaport) as detailed in the Dredging Management Plan (ref: LSP-1S01-0020).

The construction schedule for the activities that will generate non-hazardous waste is shown in Annex A.

[Note to contractor: Contractor to insert Gantt chart of construction schedule in Microsoft Project Office format in Annex A, which should include a breakdown of the tasks that give rise to the generation of non-hazardous waste, as noted above]

1.4 APPLICABLE STANDARDS

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The applicable non-hazardous waste standard during construction is the Law of Environment Protection 2005. As specified in Section 1.3 waste classification should be in accordance with MOIT and MONRE Decision No. 23/2006/QD-BTNMT of the List of Hazardous Waste.

2 ROLES AND RESPONSIBILITIES

2.1 INTRODUCTION

Having an appropriate organisational structure in place, with all people having defined roles and responsibilities, is essential to ensuring the overall success of this Waste MP (Non Hazardous Waste). This section provides details of LSP's and the contractor's organisational structure with regards to onsite delivery of the LSP project, and the various roles and responsibilities of those people in relation to delivering the clients EHS expectations, including meeting the requirements of the Construction Health, Safety and Environment Management Plan.

2.2 LSP CONSTRUCTION HSSE TEAM

LSP's health, safety, security and environmental (HSSE) team will lead the management of HSSE issues concerned with hazardous waste. The LSP organisational chart to implement the requirements of this Waste MP (Non Hazardous Waste) is shown in the figure below. The specific roles and responsibilities are shown in Chapter 5 of the LSP Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).



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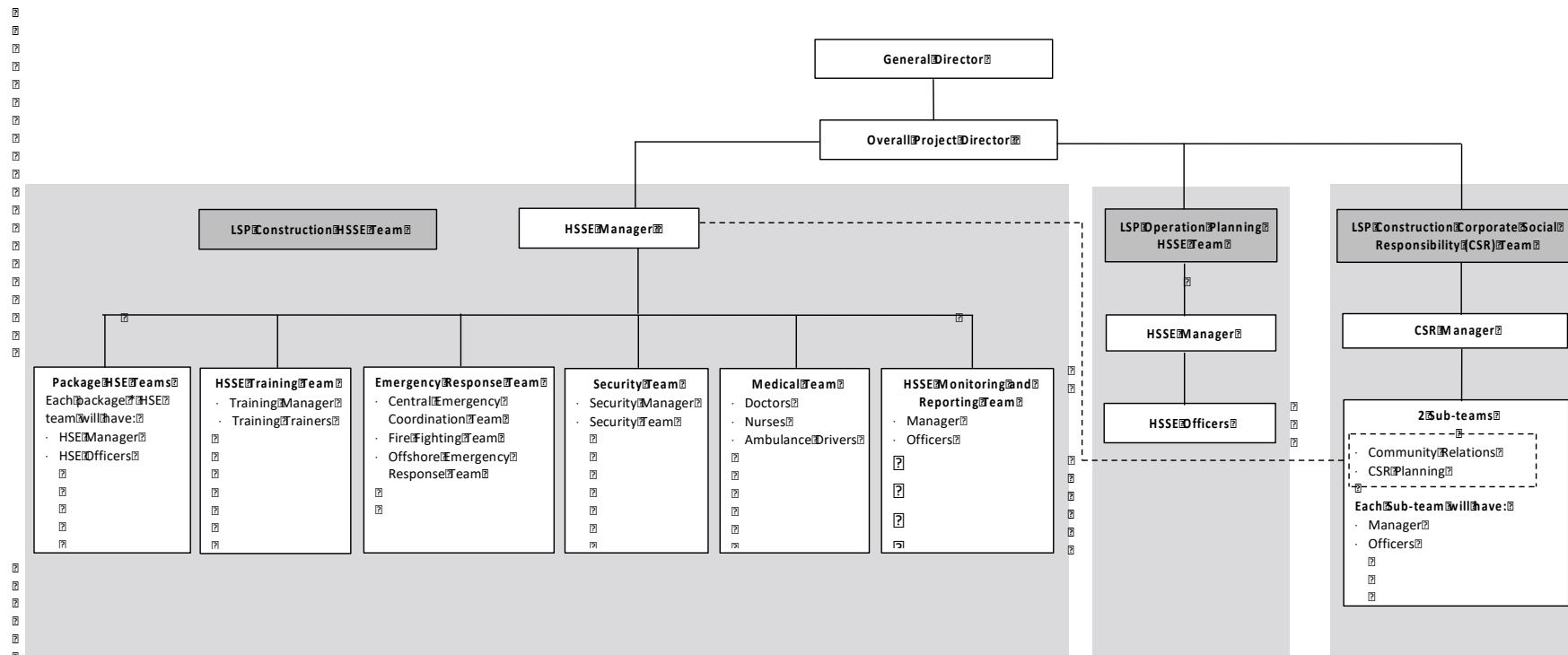
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Note:

Package A: Defines Plant, Tank Farm, Complex Interconnecting Pipelines/pipeline racks, Land development in tank farm area, Onsite facilities in hydrocarbon jetties, Complex Wastewater treatment unit and HP Flare/LP Flare system

Package B: C/D: Polyolefins Plant (HDPE/PP/LLDPE)

Package C: Sea Port (excluding Onsite in the Hydrocarbon jetties and construction Jetty which are under the scope of the Contractor Package A and Package B respectively)

Package D: Central Utility Plant (including steam generation unit and Water Plant)

Package E: Common Infrastructure in the Complex (including Administration Building, Laboratory Building, Canteen building, Emergency Center, First Aid Center and Polyolefins Product Warehouse)

Package F: Complex Road (including Drainage, Street Lighting, CCTV, Green Area, Onsite for construction Jetty, Complex truck scale, and Downfill system)

Package G: Land development work in the whole complex except tank farm area

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2.3 CONTRACTORS HSSE TEAM

The contractors HSSE team has established this Waste MP (Non Hazardous Waste) in accordance with the applicable standards. The contractors HSSE team will manage their contractors and suppliers in accordance with this Waste MP (Non Hazardous Waste) and liaise with the appropriate personnel within LSP's HSSE to ensure compliance with the overall aims of LSP's Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

The contractors onsite organisational chart to implement the requirements of this Waste MP (Non Hazardous Waste) is shown in the figure below.

[Note to contractor: Contractor to insert organizational chart for onsite team].

2.4 DESCRIPTION OF ROLES AND RESPONSIBILITIES

The contractor has committed to providing the necessary human resources to ensure that the organisational structure noted above can work to implement this Waste MP (Non Hazardous Waste) and achieve compliance with all relevant standards. A description of the key roles and their responsibilities are provided in the *Table 2.1*, including the primary communication channel between LSP and contractor HSE teams. Employee contact details for each role associated with this Waste MP (Non Hazardous Waste) are provided in Annex B.

Table 2.1 *EHS Roles and Responsibilities within Contractor's Project Team*

Role	Responsibilities
General Manager (Contractor)	
Senior Site Engineer (Contractor)	
Site Supervisor / Foreman (Contractor)	
Site EHS Officer (Contractor)	
Emergency Response Co-ordinator (Contractor)	
<i>[Other]</i>	
<i>[Other]</i>	

[Note to Contractor: Insert a description of the responsibilities of each role, with regards to the management of EHS and non-hazardous waste. Delete roles that are not appropriate. Include additional roles where required.]

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3 MITIGATION / MANAGEMENT PROCEDURES

The mitigation / management procedures noted in this section provides the approach to managing non-hazardous waste generated during construction. The contractor is committed to implementing the identified mitigation / management procedures in order to not cause exceedance of the applicable non-hazardous waste standards, and to avoid impacts on the local community.

The mitigation / management measures that are relevant to *[insert contractors name here]* onsite activities are shown in *Table 3.1*.

The mitigation / management procedures were identified within the ESIA as being appropriate for the environmental impacts resulting from the anticipated construction activities. Should non-hazardous waste impacts arise from the contractor's activities, following the implementation of the procedures noted in *Table 3.1*, the contractor will review the need for additional measures to be taken and update this Waste MP (Non Hazardous Waste) accordingly.

Note to contractor: Delete mitigation / management measures which are not applicable or outside of your control. Insert the name of the responsible party from Table 2-1 for each mitigation / management measure.

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Table 3.1 **Mitigation / Management Procedures**


Aspect, Potential/ Issue Reference	Mitigation Impact	Mitigation and / or Management Procedures	Contractors Responsibility	Related Plans
Impacts from Non- Hazardous Waste Generation during	1.1	Non-hazardous solid waste generated from the Project will be collected and stored in containers located at the Project site. All waste collected should be managed and disposed of in accordance with the required regulations, including using licensed waste transport and disposal contractors. Where there is a possibility of materials being recycled these are to be segregated from wastes to be sent to disposal sites.		-
	1.2	Every contractor must provide adequate numbers of containers and bins for storage of the generated domestic solid waste at Project's site.		-
	1.3	Containers sufficient for temporary collection of hazardous waste shall be provided at waste disposal points.		-
	1.4	Every contractor must provide adequate temporary storage area for the generated waste at Project's site and demobilize it upon completion of the work in the Project site.		Soil and Groundwater Management Plan (ref: LSP-1S01-0012)
	1.5	Contractor shall employ licensed and reputable waste disposal companies, to handle the non- hazardous solid waste in accordance with applicable laws and regulations.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)

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Aspect, Potential/ Issue Reference	Mitigation Impact	Mitigation and / or Management Procedures	Contractors Responsibility	Related Plans
	1.6	Develop specific requirements to manage, avoid, reduce and reuse waste during the construction phase for all of the wastes identified		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)
	1.7	Education of all workers on site shall be undertaken to avoid, reduce and reuse wastes generated.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014) Worker Training Management Plan (ref: LSP-1S01-0003)
	1.8	Waste disposal facilities shall be sited and signposted throughout the construction site.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)
	1.9	Waste clean-up measures should be undertaken on a fortnightly basis to collect any waste from the construction site. All waste collected should be managed and disposed of in accordance with the required regulations.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)
	1.10	Contractors employed to manage waste should be required to identify ways to avoid, reduce and recycle wastes. Requirements should be outlined in the contractual arrangement with the contractors.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)

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Aspect, Potential/ Issue Reference	Mitigation Impact	Mitigation and / or Management Procedures	Contractors Responsibility	Related Plans
	1.11	Monitoring of the waste contractor using chain-of-custody documentation for the disposal of wastes shall be undertaken to ensure that the waste is disposed of in an environmentally responsible manner.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)
	1.12	The waste contractor shall report to LSP on an annual basis on any trans-boundary transport of waste.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)
	1.13	Assess the adequacy of the operation of all waste disposal sites utilised by the contractors to ensure that adequate environmental standards and local regulations are being met.		Waste Management Plan (Hazardous Waste) (ref: LSP-1S01-0014)

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4 MONITORING

4.1 LSP HSSE TEAM

A non-hazardous waste monitoring plan has been developed to track the effectiveness of the mitigation measures during construction. Details of LSP's environmental monitoring plan are provided in Chapter 7 of LSP's Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

LSP may request additional monitoring if the monitoring programme records exceedences of the non-hazardous waste standards.

4.2 CONTRACTORS TEAM

In order to assess the effectiveness of the mitigation / management measures and identify the need for further action, the contractors non-hazardous waste monitoring programme outlined in *Table 4.1* will be followed.

Should the monitoring programme note any non-compliances with the MP, corrective action will be taken to ensure the relevant activity returns to compliance in a timely manner and that any corrective action is appropriate and effective. Any corrective actions undertaken must be recorded on the daily report against the relevant activity.

Note to contractor: Delete rows that are not applicable or outside of your control and, in the second column, only include the reference to relevant mitigation / management measures. Insert the name of the responsible party from Table 2-1 for each of the separate monitoring requirements.

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Table 4.1 Monitoring Programme

Aspect Potential Impact/ Issue	Reference of Relevant Mitigation Measure	Sampling Location	Sampling Parameters	Sampling Frequency	Applicable Standards	Responsibility	Reporting
Impacts from Non Hazardous Waste Generation during Construction	1.1, 1.2, 1.3, 1.4, 1.6, 1.8	Non Hazardous waste under contractors control	Visual inspection	Daily	N/A – visual inspection		Daily (refer to Annex C for report example)
	1.5	Non Hazardous waste under contractors control	Appointment of a licensed and reputable waste disposal company	Once	Law of Environment Protection 2005		Maintain contracted documents with non-hazardous waste contractor, including any relevant, licenses
	1.7	Non Hazardous waste under contractors control	Training records as per Worker Training Management Plan (ref: LSP-1S01-003)	Daily	N/A		Training records as per Worker Training Management Plan (ref: LSP-1S01-003)

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Aspect Potential Impact/ Issue	Reference of Relevant Mitigation Measure	Sampling Location	Sampling Parameters	Sampling Frequency	Applicable Standards	Responsibility	Reporting
	1.9, 1.11	Non Hazardous waste under contractors control	Visual inspection of waste collection and review of waste documentation	Fortnightly	Law of Environment Protection 2005		To be included in weekly report (refer to Table 5-1)
	1.10	N/A – contractual arrangement	Preparation of a Waste Management Plan	Waste Management Plan reviewed every 6 months	N/A – methods to avoid, reduce		Waste Management Plan for hazardous and non-hazardous
	1.12	N/A – Review of report	Review of report from waste contractor	Annually			Annual report from waste contractor to be submitted to
	1.13	Contractors waste disposal sites	Visual Inspection	Bi-annually			To be included in weekly report (refer to Table 5-1)

** See Table 3-1 for mitigation measure*

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5 AUDITING AND REPORTING

An Auditing and Reporting Programme is required to ensure that the mitigation / management measures are appropriate in controlling the identified impacts from non-hazardous waste.

5.1 LSP HSSE TEAM

To ensure compliance with the requirements of this Waste MP (Non Hazardous Waste), internal inspections and audits will be undertaken by LSP. The LSP auditing and reporting programme is shown in Chapter 9 of the LSP Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

5.2 CONTRACTORS TEAM

The programme will comprise of the following:

- Internal Audit and Reporting Programme to be undertaken by the contractor's EHS Officer; and
- External Audit and Reporting Programme, to be conducted by the LSP's representative.

The scope of the internal auditing and reporting programme to be undertaken by the contractor is shown in *Table 5.1*.

Note to contractor: In the second column, only include the reference to relevant mitigation / management measures. Ensure the job title for the responsible party is correct for your organisation.

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Table 5.1 Auditing and Reporting Programme

Inspection / Auditing Interval	Reference of Relevant Mitigation Measure*	Responsibility	Scope of Inspection/ Audit	Report Submission/ Record Keeping
Daily Inspection (Internal)	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.8	Contractor's Onsite EHS Officer	Review the submitted daily monitoring reports to assess the compliance status of relevant operations that may give rise to impacts from non-hazardous waste and provide support to identifying appropriate corrective actions and ensuring they are: introduced in a timely manner; appropriate; and effective	Archive Daily Monitoring Report in an orderly manner for external auditing All reports are to be maintained at the project site for as long as the Contractor is working at the site
Weekly Review of Daily Inspection Reports (Internal)	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.11, 1.12, 1.13	Contractor's General Manager	A week report is to be provided to the Contractor's Onsite General Manager, which is to include: the compliance status of relevant operations that may give rise to impacts from non-hazardous waste; identifying any non-compliances that have arisen over the previous weeks monitoring program; detailing the corrective actions that have been taken when a failure has been noted; and noting the appropriateness and effectiveness of any corrective actions	Archive Weekly Report in an orderly manner for external auditing All reports are to be maintained at the project site for as long as the Contractor is working at the site

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Inspection / Auditing Interval	Reference of Relevant Mitigation Measure*	Responsibility	Scope of Inspection/ Audit	Report Submission/ Record Keeping
Biannual Inspection (External)	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.11, 1.12, 1.13	LSP's Representative	LSP's Representative will review the Contractor's onsite activities to assess compliance with the management plan and review all records of the Contractor's internal audit programme to review historic compliance and the use of appropriate corrective actions	<p>A copy of the External Audit Report is to be provided to the contractor for reference and, where necessary, implementation of any identified corrective actions</p> <p>All reports are to be maintained at the project site for as long as the Contractor is working at the site</p>

* See Table 3-1 for mitigation measure.

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ANNEX A – CONSTRUCTION SCHEDULE FOR THE GENERATION OF NON HAZARDOUS WASTE

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[Note to contractor: Contractor to insert Gantt chart of construction schedule in Microsoft Project Office format in Annex A

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ANNEX B – EMPLOYEE CONTACT DETAILS ASSOCIATED WITH MANAGEMENT PLAN

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Role	Responsibilities	Contact Details*
General Manager (Contractor)		<ul style="list-style-type: none"> Mobile Number: Email:
Senior Site Engineer (Contractor)		<ul style="list-style-type: none"> Mobile Number: Email:
Site Supervisor / Foreman (Contractor)		<ul style="list-style-type: none"> Mobile Number: Email:
Site EHS Officer (Contractor)		<ul style="list-style-type: none"> Mobile Number: Email:
Emergency Response Co-ordinator (Contractor)		<ul style="list-style-type: none"> Mobile Number: Email:
[Other]		
[Other]		

*Any change in respect to employees, the contact details will need to amended as soon as the role has been reassigned.

[Note to Contractor: Insert a description of the responsibilities of each role, with regards to the management of EHS and non-hazardous waste. Delete roles that are not appropriate. Include additional roles where required.]

 <u>Long Son Petrochemicals Co., Ltd</u> LSP Doc. No: LSP-1S01-0015	Long Son Petrochemicals Co., Ltd.	
	HSSE Department	Rev. 3
	Waste Management Plan (Non Hazardous Waste)	Annex C

ANNEX C – DAILY REPORTING FORM

CONFIDENTIAL:

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 Long Son Petrochemicals Co., Ltd	Long Son Petrochemicals Co., Ltd.	
	HSSE Department	Rev. 3
	Waste Management Plan (Non Hazardous Waste)	Annex C
LSP Doc. No: LSP-1S01-0015		

[Note to contractor: The below table provides an example of the details to be included on a Daily Reporting Form.]

Date of Observation	Contact Details/Role of Individual Undertaking Waste Monitoring	Details of Observation/Location	Mitigation Action to be Taken	Date Mitigation Action was Implemented