



**Oyu Tolgoi LLC**

Health, Safety and Environment

Non-Mineral Waste Management Plan

<b>Non-Mineral Waste Management Plan</b>		
Effective Date: 01.09.2013	Document Number: OT-10-E7-PLN-0001	Rev: 1

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## 1 INTRODUCTION

### 1.1 Document Number

This document is the Non-Mineral Waste Management Plan for the Oyu Tolgoi (OT) Project. The document reference number for this Management Plan is OT-10-E7-PLN-0001.

### 1.2 Purpose

The purpose of this Management Plan is to:

- define the scope of the Management Plan and set out applicable management interfaces;
- define roles and responsibilities;
- outline the applicable Project Standards relevant to this Management Plan;
- define Project commitments, mitigation measures, operational procedures and guidance relevant to this Management Plan;
- define monitoring and reporting procedures, including Key Performance Indicators;
- define training requirements; and
- set out references for supporting materials and information.

### 1.3 Application

The requirements set out in this Management Plan apply to all OT operations including contractors.

This Management Plan is based on the Rio Tinto Environment E7 Standard *Non-Mineral Waste Management*, revised December 2008. Any subsequent changes to the Rio Tinto *Non-Mineral Waste Management Standard* may result in the changes to this OT Management Plan. In addition this Management Plan will be reviewed on a two year period to determine whether any changes or updates are required to the plan unless a more frequent update is required to reflect changing project design or procedures.

### 1.4 Commencement

This Management Plan applies from 1 January 2013.

### 1.5 Authority and Management

The OT Executive Committee approved this Management Plan on 1<sup>st</sup> September 2013.

The OT General Manager Health, Safety and Environment (HSE) is the custodian of this Management Plan. Any requests for changes to this Management Plan must be addressed to this person and will be subjected to the appropriate review and approval processes as outlined in the Management of Change (MOC) procedure.

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## 2 SCOPE

### 2.1 Scope of this Management Plan

This Management Plan covers all OT operations including contractor activities.

Implementation of this Plan by contractors is addressed in the Contractor Management Framework (OT-07-PLN-0001).

#### **Definition of Non-Mineral Waste**

For the purposes of this Plan, non-mineral waste is defined as:

*...including, but not limited to, used oil, antifreeze, greases, batteries, solvents, coolants, spent reagents and paints, tyres, contaminated soils and debris, solid sewage residues, construction debris, and any other waste materials from processing, maintenance and medical facilities, canteens, offices, workshops, laboratories and gardens, including off-specification raw materials (other than ore) used in processes. Non-mineral wastes do not include residues directly derived from the mining or processing of rock and unconsolidated sediments.*

### 2.2 Overlaps with other Management Plans

This Management Plan is part of the overall suite of Operations Management Plans developed for the OT Project and as described in the Environmental and Social Management Plan (ESMP) Framework (OT-10-PLN-0003).

This Management Plan has overlaps and cross-linkages to a number of other Management Plans, including:

- the Hazardous Materials Management Plan (OT-10-E5-PLN-0001), particularly in relation to the management of hazardous waste materials;
- the Mineral Waste Management Pan (OT-10-E8-PLN-0001), particularly in relation to the monitoring of potential contamination;
- the Water Resources Management Plan (OT-10-E10-PLN-0001), particularly in relation to the monitoring of potential contamination; and
- the Atmospheric Emissions Management Plan (OT-10-E2-PLN-0001), particularly in relation to the management and monitoring of emissions from the hazardous waste incinerator, located at the Waste Management Centre.

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### 3 ROLES AND RESPONSIBILITIES

#### 3.1 Key Roles and Responsibilities for Management Plan Implementation

Principal roles and responsibilities for the implementation of this Plan are outlined below.

**Table 1: Key Roles and Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
OT General Manager HSE	<ul style="list-style-type: none"> <li>Overall responsibility for Plan scope and implementation.</li> <li>Ensuring Project compliance with the Project Standards and other requirements set out in this Plan.</li> </ul>
OT Manager Environment	<ul style="list-style-type: none"> <li>Overall responsibility for the implementation of this Management Plan.</li> <li>Operational management control at the landfarm and for recycling activities in the Waste Management Centre.</li> <li>Provide technical support to OT Departmental Managers and Principal Contractors to ensure compliance with the Waste Management Plan and related Procedures.</li> <li>Prepare quarterly and annual environmental reports including details on waste performance.</li> <li>Collate waste inventory data for all disposed and recycled wastes.</li> <li>Ensure Plan is available to all OT employees and Principal Contractors.</li> <li>Undertake periodic audits and inspections of OT Department and Principal Contractor workplaces against the requirements of this Management Plan and related Procedures.</li> <li>Report all hazards, non-conformances and incidents.</li> </ul>
OT Infrastructure Department	<ul style="list-style-type: none"> <li>Operational management control at the Waste Management Center, including non-hazardous waste landfill and hazardous waste incinerator.</li> </ul>
Other OT Department and Principal Contractor Managers	<ul style="list-style-type: none"> <li>Ensure that relevant activities are undertaken in accordance with this Management Plan and related Procedures.</li> <li>Ensure that department personnel are fully trained in waste management practices, particularly when working with hazardous materials.</li> <li>Ensure incident investigations are undertaken and reported.</li> </ul>
Workplace HSE Supervisors / Superintendents	<ul style="list-style-type: none"> <li>Conduct routine work area inspections to ensure relevant activities are in accordance with this Management Plan and related Procedures.</li> <li>Ensure that all waste data is properly recorded and reported.</li> <li>Report all hazards, non-conformances and incidents.</li> </ul>

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### 3.2 Key Interfaces

Key interfaces in the implementation of this Management Plan (i.e. roles with responsibility for delivering elements of this Management Plan) include:

- Infrastructure Department and Workplace Area Managers, particularly in relation to the collection of wastes from workplace areas and the transfer of wastes to the WMC.
- Infrastructure Department and Environmental Department, particularly in relation to the collection of related waste collection data and recycling activities, the landfill and its incinerator in the WMC.
- All Operational Departments and Principal Contractors in relation to the adequate and effective collection, including segregation, of wastes in workplace areas.

## 4 PROJECT STANDARDS

Applicable Standards must be complied with for all Project activities (the “Project Standards”). Project Standards comprise:

- applicable Mongolian Laws and National Standards;
- DEIA requirements;
- other commitments to and requirements of Mongolian Government authorities;
- applicable Lender standards and guidelines;
- applicable Rio Tinto standards; and
- other industry guidelines with which OT has committed to comply.

### 4.1 Applicable Mongolian Laws and National Standards

Mongolian Laws and national standards concerning waste management are as follows:

- The Mongolian Law on Waste, 2012 which regulates the collection, transportation, storage, reuse and disposal of waste(s). Waste is classified as a) household waste and b) dangerous waste (harmful to human and animal health and environment). Hazardous waste must be disposed of in designated central waste facilities in accordance with prescribed techniques and/or technologies. Under this law waste recycling and reprocessing is encouraged. Citizen and business entities conducting activities such as recycling and the re-use of wastes have the right to own the end product. The *Aimag*/Capital city Governor oversees waste management which is undertaken by licensed organisations.
- Law on Hazardous and Toxic Chemicals, 2006 (amended in 2011) which addresses the import, export, transportation, storage, use, and control of toxic chemicals. It imposes measures to prevent the impact of toxic and hazardous substances on human health and the environment.
- Law on Sanitation, 1998 (amended in 2011) which sets forth the obligations and responsibilities of citizens and business entities on soil sanitation, waste disposal, sewage facilities, water holes and lavatories as well as the disposal of hospital waste, radioactive and toxic chemicals.

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- Government Resolution #135 of 2002 which addresses the procedures of the classification, collection, packaging, transportation, treatment, storage, and disposal of the Hazardous Waste.
- Joint Order #A-320/305 of Minister of Nature, Environment and Tourism<sup>1</sup> and Minister of Health of 2011 which address the procedures of the disposal of medical wastes.
- Minister's Order # 404 of 2006 of Ministry of Nature, Environment and Tourism which address the procedure of the disposal, landfill of the individual and business entity and landfill and disposal of the waste.

#### **4.2 DEIA requirements**

There are no specific requirements in DEIAs submitted for the OT project directly related to waste management. Waste management and monitoring requirements set out in Environmental Protection Plans and Environmental Monitoring Plans which accompany DEIAs have been incorporated into this Management Plan

#### **4.3 Other Commitments to and Requirements of Mongolian Government Authorities**

The key document setting out commitments to a requirement of Mongolian Government authorities is the Investment Agreement (dated 6 October 2009) for the OT project. Chapter Six (Environment) Articles 6.4, 6.9 and 6.10, are considered to be generally applicable to waste management at OT:

- The Investor shall meet all costs for each year of implementing an environmental protection plan ("EPP") and environmental monitoring and analysis programme, in connection with implementation of the OT Project and shall provide to the State central administrative authority in charge of environment a report, prepared by a certified, independent, professional firm, on addressing the Investor's implementation of the measures specified in the EPP every 3 (three) years.
- The Investor shall submit annually a report detailing its comprehensive environmental monitoring and analysis programme associated with Core Operations to the State central administrative authority in charge of environment.
- If any material adverse impact on air, water, soil, animals, plants and subsoil is found by the environmental monitoring and analysis programme, the Investor shall take necessary measures to eliminate such material adverse impact at the Investor's expense.

No requirements of the Investment Agreement refer specifically to non-mineral waste management.

#### **4.4 Applicable International Standards and Guidelines**

The following international good practice guidance and legislation have been taken into account:

- IFC EHS Guidelines for Mining, 2007;
- IFC General EHS Guidelines, 2007;
- IFC Performance Standard 3 - Pollution Prevention and Abatement (2006); and
- EBRD Performance Requirements (particularly PR1: Environmental and Social Appraisal and Management and PR3: Pollution Prevention and Abatement).

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<sup>1</sup> Ministry of Environment and Green Development, since August 2012



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Waste management facilities and practices at the OT site have also been designed to comply with EU and international waste management standards including:

- EU Directive 99/31/EC, 1999 (on the landfilling of waste);
- EU Directive 2000/76/EC of 4 December 2000 (on the incineration of waste);
- WHO Safe Healthcare Waste Management: Policy Paper and fact sheet No 281, (Health-care waste management);
- Convention on the Control of Trans-boundary Movements of Hazardous Wastes and their Disposal (the Basel Convention, ratified by Mongolia in 1997); and
- US EPA standards CFR 258 (Criteria for Municipal Solid Waste Landfills) Specific requirements in relation to incineration and landfill are provided below.

#### **4.5 Applicable Rio Tinto standards**

The primary Rio Tinto Standard that applies to non-mineral waste management is *E7 – Non Mineral Waste Management, 2008*.

Other relevant Rio Tinto standards and guidance include:

- E2 Air quality control standard;
- E5 Hazardous materials and contamination control standard;
- E8 Mineral waste management standard; and
- E9 Land use stewardship standard.

#### **4.6 General Approach to Waste Management**

The intent of this Management Plan is to ensure the effective management of non-mineral waste at OT by the minimisation of waste generation and ensuring the safe handling, treatment and disposal of generated wastes. This is achieved through the implementation of the waste management hierarchy:

- waste reduction and avoidance at source;
- waste segregation at point of generation;
- waste recycling; followed by
- waste storage, treatment and disposal to international standards.

Waste reduction and avoidance is primarily achieved through selection of suppliers that provide operational consumables and materials with minimal packaging needs and careful stock management to ensure goods are utilised before their expiry date.

Waste recycling is realised through engagement with the local community and the use of assessed and appropriately licenced recycling Contractors.

Waste treatment and disposal occurs at a dedicated on-site Waste Management Centre with engineered and approved non-hazardous waste landfill and hazardous waste incinerator.

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## 5 MANAGEMENT CONTROLS

This Management Plan is also supported by the following Procedures, which provide more details on specific aspects of the day-to-day waste management activities at OT:

- General Waste Collection and Transfer Procedure (OT-10-E7-PRC-0002), related to waste collection and transfer management practices at OT workplaces.
- Waste Management Center (WMC) Operating Procedure (OT-10-E7-PRC-0001), related to non-hazardous solid waste disposal, hazardous waste incineration and recycling operating practices at the waste management center.

Other Procedures may be developed, as required, to support this Non-Mineral Waste Management Plan.

The key management controls for the Project's non-mineral waste are summarised below.

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Table 2: Key Management Controls

ID	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
WM01	Waste Hierarchy	<p>The principles of the waste management hierarchy will be considered during implementation of this Waste Management Plan and related Procedures, in the following order of preference.</p> <p>a) waste avoidance and reduction at source;</p> <p>b) waste re-use and recycling; and</p> <p>c) waste storage, treatment and/or disposal.</p>	<ul style="list-style-type: none"> <li>Operational Departments</li> <li>Principal Contractors</li> </ul>	<ul style="list-style-type: none"> <li>General Waste Collection and Transfer Procedure</li> <li>Workplace inspections</li> </ul>
WM02	Waste Classification	<p>All wastes will be classified according to the following criteria and based on internationally accepted regulations, guidelines, definitions and methodologies:</p> <p>a) mineral waste;</p> <p>b) non-hazardous waste (including domestic waste and inert waste);</p> <p>c) hazardous waste (including medical waste); and</p> <p>d) wastewater (refer to Water Management Plan).</p>	<ul style="list-style-type: none"> <li>Operational Departments</li> <li>Principal Contractors</li> </ul>	<ul style="list-style-type: none"> <li>General Waste Collection and Transfer Procedure</li> <li>Workplace inspections</li> </ul>
WM03	Waste Segregation and Storage	<p>Wastes will be segregated at source (generation) and will be securely contained and monitored pending further treatment, transportation or disposal.</p>	<ul style="list-style-type: none"> <li>Principal Contractors</li> <li>Operational Departments</li> </ul>	<ul style="list-style-type: none"> <li>General Waste Collection and Transfer Procedure</li> <li>Workplace inspections</li> </ul>
WM04	Community Waste Recycling	<p>Consultation will be undertaken with the community regarding the potential to recycle or reuse products such as wood, tyres, scrap metal, and cardboard.</p> <p>Access to OT’s community yard where recycling materials are available is controlled through a registry at KB office. Community members taking</p>	<ul style="list-style-type: none"> <li>RDSP Department</li> <li>HSE Department</li> </ul>	<ul style="list-style-type: none"> <li>Community meeting minutes</li> <li>Quarterly and Annual Environmental</li> </ul>

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ID	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
		part are given the same safety training as OT staff (comprising site induction, general induction, TRACK and JHA training courses) and are provided with appropriate PPE. Community Relations staff provide supervision and manage access and vehicle movements in the pickup area. In accordance with the LDP, this area will be rehabilitated on cessation of its use.		Reports
WM05	Contractor Waste Recycling	Subject to assessment of Contractors (HSE standards, equipment and transportation) and facilities, recyclable wastes may be transferred to facilities operated by licensed recycling Contractors.	<ul style="list-style-type: none"> <li>HSE Department</li> </ul>	<ul style="list-style-type: none"> <li>General Waste Collection and Transfer Procedure</li> <li>Recycling facility assessments</li> </ul>
WM06	Off-Site Waste Disposal or Treatment	Wastes will not be sent off-site for disposal or treatment other than for recycling by licensed recycling Contractors, until such time as licensed waste disposal facilities that meet the requirements of the Project are established in Mongolia.	<ul style="list-style-type: none"> <li>Principal Contractors</li> <li>Operational Departments</li> </ul>	<ul style="list-style-type: none"> <li>General Waste Collection and Transfer Procedure</li> <li>Workplace inspections</li> </ul>
WM07	Non-Hazardous Waste Disposal	Disposal of non-hazardous waste will only be carried out in the WMC, which is an engineered and approved landfill in accordance with applicable local laws and regulations and to US EPA CFR 258 requirements. All wastes disposed of in the interim (construction phase) landfill will be transferred to the permanent engineered landfill. An assessment of potential contamination at the interim landfill will be conducted and a plan will be developed and implemented to remediate any contamination which poses a material risk to human health or the environment.	<ul style="list-style-type: none"> <li>Infrastructure Department</li> </ul>	<ul style="list-style-type: none"> <li>WMC Engineering Design</li> <li>WMC Operating Procedure</li> </ul>
WM08	Hazardous Waste Incineration	Treatment of hazardous wastes through incineration will only occur in an engineered and approved hazardous waste incinerator, in conformance with the EU Directive on the Incineration of Waste (2000/76/EC). In	<ul style="list-style-type: none"> <li>Infrastructure Department</li> </ul>	<ul style="list-style-type: none"> <li>WMC Engineering Design</li> </ul>

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ID	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
		particular, the temperature of the gas resulting from the incineration process must be continuously measured and must be raised to at least 850°C for at least 2 seconds.		<ul style="list-style-type: none"> <li>WMC Operating Procedure</li> </ul>
WM09	Untreatable Hazardous Wastes	All hazardous wastes for which there is not an engineered and approved treatment or disposal method available will be properly stored on site until a treatment and/or disposal route becomes available.	<ul style="list-style-type: none"> <li>Infrastructure Department</li> </ul>	<ul style="list-style-type: none"> <li>WMC Operating Procedure</li> <li>Hazardous Materials Management Procedure</li> </ul>
WM10	Waste Inventory	An inventory, by location, will be maintained of wastes generated (quantity per year and cumulative total), wastes sent for off-site recycling, wastes subject to hazardous waste treatment, wastes subject to non-hazardous waste disposal and unrecyclable hazardous wastes stored.	<ul style="list-style-type: none"> <li>HSE Department</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and Annual Environmental Reports</li> </ul>
WM11	Waste Disposal	The open burning of solid waste (non-hazardous or hazardous) is prohibited.	<ul style="list-style-type: none"> <li>HSE Department</li> </ul>	<ul style="list-style-type: none"> <li>WMC Operating Procedure</li> </ul>
WM12	Hazardous Spill Materials	Spill materials and contaminated soils will be classified according to the same criteria as described in WM02. Soils that can be treated successfully by landfarming (e.g. those contaminated with light hydrocarbons) will be transferred to the dedicated landfarming area as per the Landfarm Operating Procedure (OT-10-E7-PCR-0003). Soils which cannot be treated by landfarming or any other feasible treatment (e.g. those contaminated by heavy hydrocarbons or chemicals) will be stored as stated in WM09.	<ul style="list-style-type: none"> <li>Infrastructure Department</li> </ul>	<ul style="list-style-type: none"> <li>Landfarm Operating Procedure</li> <li>General Waste Collection and Transfer Procedure</li> <li>Waste Management Centre Operating Procedure</li> <li>Hazardous Materials Management Plan</li> </ul>

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## 6 IMPLEMENTATION SCHEDULE

### 6.1 Review and Revision of this Management Plan

This Management Plan will be reviewed every two years or more frequently when operational or environmental conditions so dictate. Review and revision of this Management Plan will be the responsibility of OT General Manager HSE who is custodian of this Plan.

If material changes to operating procedures are required (as identified through the Management of Change procedure contained within the OT HSE Management System), this Management Plan may be updated on an “as required” basis.

Any revisions to this Management Plan will be uploaded to the OT Portal to ensure that all OT staff have access to the latest version of this Management Plan.

## 7 MONITORING

### 7.1 Overview of Monitoring Requirements

The Monitoring measures that are to be implemented during the operations phase to assess compliance with Project Standards (see *Section 4: Project Standards*) are described in the section.

In the event that monitoring identified non-conformance with Project Standards, these will be investigated and appropriate corrective actions identified (see Element 14 Non-conformance incident and action management of the OT HSE MS).

### 7.2 Key Performance Indicators

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of this management plan.

**Table 3: Key Performance Indicators – Waste Management**

ID	KPI	Target	Monitoring measure
WM-KPI 01	Number of Reported Waste Incidents	Minimise and continued improvement in number of reported non-compliances with this Plan.	Number of reported waste related incidents per year
WM-KPI 02	Volume of Waste Generated and Sent to the WMC	Minimise total volume of waste generated and continued improvement.	Monthly volume of non-hazardous waste per person
WM-KPI 02	Percentage of Waste Materials Recycled	Minimise disposal to landfill and continued improvement.	Percentage recovery of recyclable materials (e.g. plastic)
WM-KPI 04	Number of Community	Minimise and continued	Number of reported waste

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ID	KPI	Target	Monitoring measure
	Complaints	improvement in number of waste related community complaints.  Target = zero	related community complaints per year (as recorded in the Grievance management system maintained by CRSD).
WM-KPI 05	Instance of Off-Site Contamination Identified	Maintain initial baseline groundwater conditions around WMC and interim landfill.  Target = zero materials exceedences of baseline groundwater condition, allowing for natural variability (e.g. exceedences of Mongolian regulatory requirements, or Project Standards).	Monitoring and analysis of groundwater from monitoring well at WMC, in accordance with the Water Monitoring Plan.  The Water Monitoring Plan will also define what changes in baseline conditions would initiate further investigation and potentially mitigation action.
WM-KPI 06	Groundwater parameter Levels at Interim Landfill	Post-closure groundwater conditions around interim landfill restored to initial conditions.  Target = No sustained change in water quality observed in monitoring bores for all Suite 1 parameters over three or more measurement periods relative to relevant regional groundwater quality monitoring data (see Section 6.3 of the Water Monitoring Plan for further information).	Monitoring and analysis of groundwater – Suite 1 parameter set - from monitoring well down gradient of interim landfill, in accordance with Water Monitoring Plan.  <i>Information Note:</i>  <i>The monitoring well has not yet been drilled (June 2013) - this will be completed as part of the 2013 drilling programme. The well will be drilled to an appropriate depth (c. 50m) to confirm that no groundwater is present.</i>

### 7.3 Key Monitoring Activities

The monitoring measures that are to be implemented during the Operational Phase to ensure compliance with the Project Standards (see *Section 4*) are described in *Table 4* below. In the event that any monitoring results identify a non-conformance with the Project Standards, these will be recorded as incidents, investigated and corrective actions identified (see the ESMP Framework for further details).

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**Table 4: Monitoring Measures – Waste Management**

ID	Topic/Aspects	Parameters	Methods	Periodicity	Location	Comments
WMM1	Waste Inventory	Quantity and type of waste per year (including cumulative total)	An inventory, by location, will be maintained of wastes generated, wastes sent for off-site recycling, wastes subject to hazardous waste treatment, wastes subject to non-hazardous waste disposal and unrecyclable hazardous wastes stored.	Quarterly	NA	OT Environment Department
WMM2	Workplace Inspections	n/a	Routine inspections of general housekeeping will be carried out by area HSE superintendents / supervisors.	Routinely	All main workplaces	-
WMM3	Subject Matter Expert Inspections	n/a	Routine inspections will be carried out by HSE Department Subject Matter Experts using an Environmental Inspection Checklist.  Any incidents will be reported to the incident management system.	Monthly	All main workplaces	-
WMM4	Third Party Verification Assessments	n/a	OT will periodically audit any third party Contractor and facilities used for wastes sent off-site for recycling. Audit frequencies shall be defined during the contractor engagement process on a case-by-case basis.	Upon an award of contract and periodically thereafter.	3 <sup>rd</sup> party waste contractor facilities	-
WMM5	Environmental	Methane	OT will monitor methane levels in	Annually	WMC and interim	As part of Water



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<b>ID</b>	<b>Topic/Aspects</b>	<b>Parameters</b>	<b>Methods</b>	<b>Periodicity</b>	<b>Location</b>	<b>Comments</b>
	Monitoring		the vicinity of the WMC and closed interim landfill		landfill	Monitoring Plan
WMM6	Environmental Monitoring	Groundwater	OT will monitor groundwater in the vicinity of the WMC and closed interim landfill	Annually	WMC and interim landfill	As part of Water Monitoring Plan
WMM7	Environmental Monitoring	Hazardous Waste Incinerator	OT will monitor emissions from the Hazardous Waste Incinerator	Continuous during incinerator operation	Hazardous Waste Incinerator	As part of Air Emissions Monitoring Plan

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## **8 TRAINING**

### **8.1 Overview**

All necessary training is provided as part of induction training (to provide general awareness) and job-specific training as necessary.

### **8.2 Induction Training**

All employees of OT and Contractors working at OT will be provided with general induction, site specific induction and a broad range of health, safety and environmental awareness training, including a specific awareness module on non-mineral waste management.

### **8.3 Job-Specific Training**

All employees working at OT waste management activities shall be subject to routine toolbox training. This will include details on the importance of adequate waste management and the classification and segregation of waste.

Waste haulage contractors will have appropriate training, and transportation will be undertaken in a manner that minimises the potential for inadvertent release of wastes or recyclables en route.

### **8.4 Other Training Requirements**

Additional, specialist training shall be provided to plant operators and key personnel involved in activities which involve the segregation, storage, haulage or treatment of waste.

Landfill and incinerator operators will be trained in waste classification in order to ensure that they have a detailed understanding of which wastes can be recycled, reused or are permitted to be landfilled and incinerated.

When appropriate, competencies in emergency response scenarios must be obtained.

## **9 AUDIT AND REPORTING**

### **9.1 Internal Auditing**

Daily inspections will be carried out by operational area superintendents / supervisors covering a broad range of health, safety and environmental aspects. Routine inspections will additionally be carried out by the HSE Department using an Inspection Checklist.

Any incidents identified during these inspections will be reported to the incident management system (Element 14).

Conformance will be monitored via annual internal audit program in accordance with Element 16 Performance Assessment and auditing. This will be undertaken to assess broad compliance with requirements of HSE management system (including ESIA and management plans).

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All incidents and non-conformances identified during these inspections are reported as per the requirements of the OT HSE Management System as described in the ESMP Framework Document.

## 9.2 External Auditing

Conformance with this plan will be subject to periodic assessment as part of the Rio Tinto HSE Business Conformance Audit programme and by Project Lenders.

## 9.3 Record keeping

Records of audits, inspections and incidents will be managed in accordance with Element 8 Documentation and Document Control and Element 15 Data and Records Management.

Rio Tinto Business Solution shall be used to record Internal and External Audit findings and related actions and Incidents and related investigation and actions.

## 10 DOCUMENT INFORMATION

File Name	Waste Management Operating Management Plan
Description	<Health and Hygiene><Safety><Environment> Management System <Procedure><Guideline><Flowchart><Form>
Original Author(s)	<First Name Surname>, <First Name Surname>
Creation Date	
Approved By	<First Name Surname>, <Position Title>
Approval Date	YYYY.MM.DD
Change Record Number	

Risk Ranking	Assessment Date	Risk Assessor	Review Schedule	Next Review Date
<Low>			3 Yearly	
<Moderate>	YYYY.MM.DD	<First Name Surname>, <Position Title>	2 Yearly	YYYY.MM.DD
<High>			Annually	
<Critical>			Annually	

Revision	Revision Date	Author(s)	Approved by	Revision Notes
1	YYYY.MM.DD	<First Name Surname> Name	<First Name Surname> <Position Title>	<Description of change>
2				
3				