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MORGAN CEMENT INTERNATIONAL PTY LTD



ENVIRONMENTAL MANAGEMENT MANUAL

MANUAL**ENVIRONMENTAL MANAGEMENT
MANUAL****PK-EM-0200**

Process Owner: Senior Manager - NSW

Status: Approved

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1. INTRODUCTION

Morgan Cement is part of the Cement and Lime Division of Adbri, a leading Australian integrated construction materials and lime producing group of companies.

The Morgan Cement – Port Kembla site is a cement grinding facility that supplies a range of bulk cement products into the New South Wales building, construction, and infrastructure markets, through our joint venture partner, Independent Cement and Lime.

In addition to the permanent employees at the site, MCI employ a significant contractor workforce which provides an economic contribution to the local community.

This Environmental Management Manual has been prepared for use by Morgan Cement International – Port Kembla Site Operations.

The Environmental Management Manual aims to address the need for environmental safeguards and the adoption of environmentally sensitive work practices during work on Morgan Cement International sites. It is the primary source document for all environmental protection issues related to the site and provide the facility direction in the implementation and monitoring of these environmental requirements.

2. DEFINITIONS

Environment:

Surroundings in which Morgan Cement International operates, including air water, land natural resources, flora, fauna, habitats, ecosystems, biodiversity, humans, (including human artifacts, culturally significant sites and social aspects) and their interaction. The environment in this context extends from within a site to the global system.

EPA:

Environment Protection Authority

Hazard:

The intrinsic potential for an agent, activity, or process to lead to an incident

Immediately:

prompt and without delay

Incident:

Any event caused by Morgan Cement International operations and activities that caused or may have caused adverse impact on any part of the environment, including breaches of environmental regulations. Incidents can be either of a "one off" (acute) or continuous (chronic) nature.

Material Harm to the Environment:

For the purpose of the legislation harm to the environment is material if:

It involves actual or potential harm to the health and safety of human beings or to ecosystems that is not trivial, or

It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as prescribed by the regulations, and

Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate or make good harm to the environment

N/A:

Not Applicable

Non-Conformance:

A situation which does not conform to the requirements of policies, standards or systems such as may be identified during audits and reviews. Also includes incidents.

Reporting Conditions

R1 Annual return documents:

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:

- a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
- b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:

- a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
- b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

- R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').
- R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.
- R1.7 Within the Annual Return, the Statements of Compliance must be certified, and the Monitoring and Complaints Summary must be signed by:
- the licence holder; or
 - by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

- R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.
- R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

- R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
- where this licence applies to premises, an event has occurred at the premises; or
 - where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.
- R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.
- R3.3 The request may require a report which includes any or all of the following information:
- the cause, time and duration of the event.
 - the type, volume and concentration of every pollutant discharged as a result of the event.
 - the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event.
 - the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort.

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- e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants.
- f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

Risk:

Likelihood of an impact on people, the environment, property or a combination of these.

SDS:

Safety Data Sheet

3. EPA LICENCE INFORMATION

The Port Kembla site operates under an Environment Protection Licence issued by the NSW EPA under Section 55 of the Protection of the Environment Operations Act 1997.

A copy of the EP Licence 12643 is contained in Appendix 1

A summary of the license is provided below:

Licence No: 12643

Licence Holder: Morgan Cement International Pty Ltd.

Type of Licence: Scheduled Activity – Premises Based

Activities to which Licence Applies:

Scheduled Activity – Cement or lime works

Fee Based Activity – cement or lime handling – 500,000 – 2,000,000t produced

Monitoring Requirements:

Type of Discharge Point	Description of Location
Discharge to Air	No.1 Mill dust collector stack.
Discharge to Air	No.2 Mill dust collector stack.
Discharge to Air	No.3 Mill dust collector stack.
Discharge to Air	Slag Dryer exhaust stack

4. RESPONSIBILITY AND AUTHORITY

All Morgan Cement International employees have the responsibility to ensure that services provided to our customers are carried out in such a way as to minimise the effect and impact on the environment.

A proactive approach to all environmental issues is encouraged from all employees.

The following employees have essential responsibility and authority with regard to the implementation, ongoing maintenance and achievement of the Environmental Management Plan.

Senior Manager - NSW

- Ensures compliance with all environmental legislation
- Ensures environmental events are investigated and reported
- Sets monitors and achieves environmental objectives
- Ensures that all staff direct and indirect have been trained suitably in environmental matters.
- Ensures that all Environmental Management actions and monitoring is carried out
- Ensures all scheduled audits are conducted and that work practices and standards are maintained
- Ensures appropriate health screening is conducted for relevant employees
- Reports all significant environmental issues to the EPA

Environmental Officer

- Is the custodian of the EMP and ensures its effective distribution and implementation.
- Is Morgan Cement International's first point of contact with day to regulatory bodies
- Ensures environmental monitoring is carried out correctly
- Is responsible for reporting environmental issues internally and to the relevant regulatory bodies.
- Ensures environmental incidents are reported, investigated and followed up
- Responsible for the site environment audit program
- Ensures all efforts are made to comply with the site's environment company standards

Supervisor

- Ensures all operations are conducted in accordance with work instructions and environmental requirements.
- Undertake all duties in the appropriate manner in respect of environmental requirements.
- To observe Morgan Cement International's environmental policy and understand how their activities effect the environment.
- To immediately correct or bring to the attention of Morgan Cement International's Management any condition that would affect the environment.

Employees

- Undertake all duties in the appropriate manner in respect of environmental requirements.
- To observe Morgan Cement International's Environmental Policy and understand how their activities effect the environment.
- To immediately correct and bring to the attention of a Supervisor or Management any condition that would affect the environment.

5. ASPECTS AND IMPACTS

The Senior Manager - NSW is responsible for annual review and maintenance of the environmental aspects and impacts register. A register of specific pollution related hazards, pre-emptive actions /controls, assessment of likelihood and consequence is incorporated in the Pollution Incident Response Management Plan.

Environmental aspects and impacts may be identified, through the following processes.

- Hazard, near miss and incident Investigations
- Risk Assessments (task based (JSEA, SWMS), plant, equipment, materials, processes)
- Plant and process change modifications, trials
- Community Complaints
- Nonconformance / corrective action review
- Audits (internal and external)
- Legislation (new and changes to existing)

Environmental aspects and impacts are rated for significance using the following risk assessment matrix and tools and recorded in the sites Environmental Aspects and Impacts Register.

RISK ASSESSMENT MATRIX (to determine risk priority)					
Consequences	Likelihood				
	Rare	Unlikely	Possible	Probable	Very Likely
Negligible	1	2	4	7	11
Minor	3	5	8	12	16
Serious	6	9	13	17	20
Significant	10	14	18	21	23
Catastrophic	15	19	22	24	25

Rating	Description
Very Likely	It is almost certain that the consequence will occur. Common or frequent occurrence.
Probable	The consequence is likely to occur. It is known to occur, or not surprised as it has happened' several times.
Possible	The consequence could occur sometime or 'I've heard of it happening'.
Unlikely	The consequence is not likely to occur. There is confidence that it will not occur although it is conceivable.
Rare	The consequence may only occur in exceptional circumstances or 'the probability is close to zero'.

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Health & Safety	Negligible	Minor	Serious	Significant	Catastrophic
	<p>Minor Injuries requiring First Aid Treatment</p> <p>No ongoing health effects.</p> <p>Near Miss with the potential consequence for the injuries above.</p>	<p>Single or multiple injuries requiring medical treatment No ongoing health effects.</p> <p>Near Miss with the potential consequence for the injuries above.</p>	<p>Single or multiple injuries requiring hospitalisation and incurred a loss of more than one full shift.</p> <p>Near Miss with the potential consequence for the injuries above.</p>	<p>Single severe injury causing irreversible permanent disability or impairment or single fatality.</p> <p>Near Miss with the potential consequence for the injuries above.</p>	<p>Incident with short- or long-term effects causing multiple fatalities.</p> <p>Near Miss with the potential consequence for the injuries above.</p>
Cost	Less than \$10K	\$10K – 50K	\$50K – \$150K	\$150K – \$1M	Greater than \$1M
Environment	<p>Minor incident with minimal or no lasting effects</p> <p>Onsite uncontrolled release immediately contained.</p> <p>Clean-up completed within 12 hours.</p> <p>Less than a 5-litre spill</p>	<p>Incident with minor effects on the environment.</p> <p>Onsite uncontrolled release not immediately contained or minor off-site release.</p> <p>Clean-up completed within 72 hours.</p> <p>10 to 20 litre spills</p>	<p>Incident with medium term effects on the environment.</p> <p>Offsite uncontrolled release with an effect on the environment for one year.</p>	<p>Incident with serious environmental effects</p> <p>Offsite uncontrolled release not contained causing up-to 10 years impact duration</p>	<p>Catastrophic incident with impairment of the ecosystem function.</p> <p>Significant and identifiable risk to humans animals and plant species</p>
Community	<p>Low level incident</p> <p>Public concern restricted to one local complaint</p>	<p>Minor- medium impact issue Public concern with a small local group</p> <p>Potential for local media attentions</p>	<p>Medium impact issue Ongoing public concern with a local group or community Involvement of non-government organisation</p> <p>Local media</p>	<p>Serious social incident</p> <p>Ongoing local and/or state issue Involvement of government department/s and non-government organisations.</p> <p>National Media</p>	<p>Very Serious Incident</p> <p>Ongoing state or national issue Involvement of federal government department/s and non-government organisations.</p> <p>National media</p>
Legal	Prosecution unlikely	Short term involvement of regulator	Medium term involvement of regulator and potential for prosecution.	Serious breach fine or prosecution likely. Licence potentially effected.	Major breach Significant fine or litigation likely. Licence to operate threatened

6. GREEN AND GOLDEN BELL FROG MANAGEMENT

The Green and Gold Bell Frog, also known as the Green Bell Frog, is found predominantly in New South Wales coastal regions extending to East Gippsland in Victoria.

They have been identified as a vulnerable species that exist in approximately 50 sub-regions across New South Wales. They have dwindled in numbers substantially since the 1960's due to loss of habitat.

The species was first discovered at the Morgan Cement site in 2001 and with the help of environmental consultants, Morgan Cement created a new habitat to accommodate these vulnerable and delicate frogs. This new habitat consists of two clay lined frog ponds with natural vegetation provided and maintained by a horticulturalist that is ideal for these frogs.

Four sub populations of Green and Gold Bell Frogs have been discovered in the vicinity of the Morgan Cement's Port Kembla site. The Morgan Cement International Green and Gold Bell Frogs Management Plan has three main objectives:

- To maintain the four existing Green and Gold Bell Frogs sub-populations
- To increase the population of Green and Gold Bell Frogs at Port Kembla
- To further connect the four Green and Gold Bell Frogs sub-populations so that their numbers are encouraged to propagate.

Morgan Cement supports the Green and Gold Bell Frogs Plan to meet these objectives so that we continue to enjoy these delightful little creatures that are key to our food chain and environment. Morgan Cement financially supports qualified scientists to care for the Green and Gold Bell Frogs habitat which involves testing for toxins, minimising natural and introduced predators.

The site is committed to the long term success of this project, and have established a Green and Golden Bell Frog Management Plan, "Plan of Management, Green and Golden Bell Frog" by , C. Wade April 2013, so that the Green and Gold Bell Frog are able to continue to thrive in our plant and in surrounding habitats,

Key components of the plan are as follows:

Main objectives:

- To maintain the four existing GGBF sub – populations
- To increase the population of GGBF's at Port Kembla
- To further connect the four GGBF sub – populations

Management of ponds and area:

- The two ponds should be maintained to retain approximately 80% open water
- Pond ends to be covered in emergent tall rush to provide cover
- Line of potted water plants along the length of the main pond

- Expedient removal of weeds (not with pesticides or herbicides)
- Periodic draining of ponds during wintertime
- Minimum water levels of 50%
- Grass mowing by a “GGBF educated” horticulturalist
- Any significant predator populations (feral cats, foxes, and rabbits) will be managed
- The habitat is to have limited controlled human access

A person with a scientific license will conduct Green and Golden Bell Frog (GGBF) monitoring, and an annual monitoring report will be completed.

7. ENVIRONMENTAL MONITORING

Legislative requirements

The specific requirements for the publication of monitoring results are set out in section 66(6) of the POEO Act. In summary, this provision requires that:

- licensees who undertake monitoring as a result of a licence condition publish monitoring data that relates to pollution within 14 days of obtaining the data
- licensees who maintain a website make the monitoring data available in a prominent position on the website
- licensees who do not maintain a website provide a copy of the monitoring data to any person who requests a copy of the data at no charge
- the data must be published in accordance with requirements issued in writing by the EPA.

There is a penalty for not publishing the results of monitoring in accordance with section 66(6). The legislation also includes a penalty for making available false or misleading results in accordance with section 66(7).

Monitoring Requirements

Morgan Cement International is required to continuously monitor total solid particle emissions from the dust collector stacks on the site's 3 mills, as well as the slag dryer. These emissions are monitored by a particulate emissions monitoring system and the results are calculated and graphed.

MCI is required to conduct annual stack testing, to ensure compliance with EPL limits, and report these to the EPA.

Publishing Monitoring Results

Morgan Cement International (MCI) is required to publish the annual stack emissions test reports on a public website and does this on MCI's community website

<https://www.morgancementcommunity.com.au/>.

[MCI also makes hard copies of these reports available to the public if requested.](#)

Air quality assessment

An air quality assessment was undertaken as a requirement when site operations were upgraded. The assessment, "Morgan Cement International (MCI) Upgrade Project – Air Quality Assessment", undertaken by Pacific Environment, dated 30 Jan 2018, shows the MCI Port Kembla operation complies with all air quality requirements.

8. MANAGEMENT OF ENVIRONMENTAL EVENTS

Environmental Events are defined as follows:

An environmental event or incident is any event caused by Morgan Cement International operations and activities that caused or may have caused adverse impact on any part of the environment, including breaches of environmental regulations. Incidents can be either of a “one off” (acute) or continuous (chronic) nature.

Environmental events include but are not limited to:

- Infringement of the Morgan Cement International environmental standards.
- Release of an environmentally hazardous substance(s), such as a large product spillage
- An Environmental Protection Authority inspection where it is indicated verbally that a noncompliant condition exists
- Discovery of an actual or suspected site contamination
- Verbal or written notification from any customers indicating noncompliance with environmental requirements of contractual arrangements
- Third party complaints or concerns with Morgan Cement International operations or processes
- Environmental incident near miss

Pollution Incident Response Management Plan (PIRMP)

A Pollution Incident Response Management Plan (PIRMP) is a mandatory legislative requirement.

The PIRMP is to provide details:

- To minimise and control the risk of a pollution incident by identifying key risks and planned actions to minimise and manage those risks
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Environment Operations Act 1997 (the POEO Act) (including Fire and Rescue NSW, Wollongong City Council, NSW Ministry of Health, Work Cover NSW,) and persons outside the operations who may be affected by the impacts of a pollution incident
- Identifying training requirements and persons responsible for implementation, and testing for accuracy, currency and suitability

Environmental Event Reporting

If an environmental event/incident:

- *Breaches or is likely to Breach the site's Environment Protection Licence*
- *Causes actual or likely risk of material harm to the environment,*

Immediately:

- *Implement the PIRMP,*
- *Inform the Senior Manager - NSW on 0242 765 001*

Reporting:

- *These events are to be reported to the Appropriate Regulatory Authority as soon as possible.*

The Senior Manager - NSW is authorized to make this notification

All environmental events are to be recorded in the company's incident reporting system, Cintellate. Cintellate is used to record safety and environmental hazards and incidents (including near miss, property damage, fire, vehicle, injury/illness), community and quality complaints.

As much information is to be gathered as soon as practical, to enable effective review, and implementation of corrective and preventative action.

9. POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

A pollution incident response management plan has been developed for the site.

The PIRMP includes the following information:

- Definition of Pollution, Pollution Incident and Requirement to Report Pollution
- Roles and responsibilities of persons for
 - Emergency planning and preparedness
 - Coordinating responses and actions during and after an incident
- Inventory of pollutants (chemicals and materials) detailing storage and quantity
- Register of hazards and assessment of the likelihood of an impact from an environmental incident
- Controls in place to minimize potential impacts
- Emergency response plans for specific incidents
- Site maps
 - Location and storage of emergency equipment
 - spill kits,
 - firefighting equipment
 - safety showers, first aid locations
 - evacuation areas
 - Storm water drains
 - Pathways for offsite contamination
- Training requirements
- Plan Review including testing of effectiveness of planned arrangements

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11. ENVIRONMENTAL PERFORMANCE AUDITING AND REVIEW

Environmental Auditing

Morgan Cement International's environmental auditing program is designed to provide a clear and appropriate understanding of environmental performance. The auditing program is designed to cover each area of Morgan Cement International's operations and processes. The audit program requires an audit to be carried out annually.

Environmental Performance Review

Morgan Cement International's environmental review is conducted at regular management meetings.

Environmental performance including the review of audit results, events/incidents, progress of identified corrective and preventive actions, monitoring activities, complaints, and identified improvement opportunities are reviewed at these meetings.

Pollution Incident Reporting Management Plan (PIRMP) Review

The purpose of the review is to ensure that the planned actions, training, resources and controls are relevant for the activities and possible pollutants on site. The review could be done in the form of an audit.

The PIRMP and associated documents are to be reviewed:

- Every 12 months, including testing of the plan
- Within 1 month any pollution incident, including testing of the plan
- When modifications are made to plant, equipment and process
- When legislation, license changes are made

Routine testing of the plan will be conducted annually, and within 1 month of any pollution incident, and can be completed through the following methods:

- Simulated environmental emergency, or
- Desktop simulations

Details of the PIRMP testing are to be recorded, including date of testing, names of all employees involved, along with an assessment of the plan. The plan tests are to be recorded on a plan review and test form included in (Appendix 2) of the PIRMP

12. TRAINING REQUIREMENTS

All employees & permanent on-site contractors will be inducted and will receive training that includes the following:

- The contents of the Environmental Management Manual
- The contents of the Pollution Incident Response Management Plan
 - The objective of the training is to ensure all persons on site have the knowledge on what to do in the case of a pollution causing event on site including.
 - The roles and responsibilities of site staff in relation to the Pollution Incident Response Management Plan and who should be contacted during and after an environmental incident
 - Spill response procedures
 - Spill kit use
- General environmental awareness
- Hazardous materials awareness

Training will be conducted at 3 yearly intervals and records of training will be kept in the personnel files of the individuals trained and recorded in the Morgan Cement Training Matrix.

Training Records will be kept in employees' files.