



**Guidelines on classification and transfer of waste (scrap)
to the MG-33 warehouse in Polski Koncern Naftowy ORLEN S.A.**

The purpose of these guidelines is to establish rules on the classification and the transfer of waste to the MG-33 Warehouse in conformity with applicable regulations on materials management and environmental protection, waste management, as well as to safeguard the economic interests of PKN ORLEN S.A.

I. Types of waste

The MG-33 Warehouse may be used for storing only those wastes which are listed in the Integrated Permit and Decisions issued for PKN ORLEN S.A. on production of hazardous waste and other than hazardous waste beyond IPPC installations, and especially the following waste:

1. Steel scrap (referred to as non-alloy steel scrap):
 - a) W1 feedstock scrap – scrap suitable for direct smelting.

This type of scrap includes metal objects with thickness of 6 mm or more, with none of their 3 dimensions exceeding 120 cm,
 - b) Heavy scrap N7 – before smelting, it is required to cut it into shorter pieces, but with thickness of 6 mm and more, except for wire and wire products, and tubes with wall thickness of less than 6 mm (maximum dimensions making it possible to load and carry by wheeled transport – length of up to 10m, weight of up to 5 tonnes), elements may be covered with galvanic coatings,
 - c) Light scrap N1/N10 – scrap with thickness of less than 6 mm (in the form of sheets, strips, small structural components, tubes and wires – with a maximum of up to 10 m in length, up to 5 tonnes in weight), elements may be covered with galvanic coatings,
 - d) Scrap chips – fine scrap in the form of clustered chips or loose chips,
 - e) Feedstock and non-feedstock cast iron scrap – scrap whose size, form and chemical composition make it possible to directly use it for smelting cast iron in foundries,
 - f) Scrap mixed metals – a mixture of several metals or metal with non-metallic elements.

2. Non-ferrous metal scrap:
 - Aluminium (alloys, sheets/plates, chips),
 - Zinc,
 - Copper (alloys),
 - Brass (alloys and chips),
 - Bronze (alloys and chips),
 - Lead.
3. Alloy steel and titanium scrap – scrap containing one or more alloy elements.
4. Scrap cables containing one of the chemical elements:
 - aluminium cables,
 - copper cables,
 - mixed metals cables.
5. Scrap contaminated cables – cables intended for disposal due to contamination with petroleum derivatives.

The table below provides a list of categories of waste:

Hazardous waste			
Item no.	Code and type of waste (in accordance with the applicable regulation on the waste catalogue)		Type and class of scrap
	Code	Type – catalogue name	
1	15 01 10*	Packaging containing residues of dangerous substances or contaminated by them	Glass packaging – sample bottles Metal packaging – drums 200l Plastic packaging – drums 200l Pallet-containers 1000l contaminated with dangerous substances
2	16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	Computer screens, TVs
3	16 06 01*	Lead batteries	Lead batteries
4	16 06 02*	Ni-Cd batteries	Ni-Cd batteries
5	17 04 09*	Metal waste contaminated with dangerous substances	Scrap metal contaminated with tar, mazut and other dangerous substances
5	17 04 10*	Cables containing crude oil, coal tar and other dangerous substances	Cables containing crude oil, coal tar and other dangerous substances

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entered into the National Court Register kept by the District Court, the 14th Commercial Division in Warsaw, under KRS number 0000028860,

NIP [Tax ID. No.]: 774 00 01 454, share capital / paid-up capital: PLN 534,636,326.25.

Other than hazardous waste			
Item No.	Code and type of waste (in accordance with the applicable regulation on the waste catalogue)		Kind of waste
	Code	Type – catalogue name	
1	12 01 01	Ferrous metal filings and turnings	Chips: - steel - acid-resistant
2	12 01 03	Non-ferrous metal filings and turnings	Chips: - brass - bronze - aluminium
3	15 01 02	Plastic packaging	Packaging: - 200-litre drums - 1 000-litre containers
4	15 01 03	Wooden packaging	Pallets, boxes, etc.
5	15 01 05	Multi-material packaging	Pallet-containers 1000l (plastic, wood, aluminium)
6	16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Electronics Electric motors Transformers and discarded electrical equipment
7	17 04 01	Copper, bronze, brass	Copper Bronze Brass
8	17 04 02	Aluminium	Aluminium
9	17 04 03	Lead	Lead
10	17 04 04	Zinc	Zinc
11	17 04 05	Iron and steel	<u>Steel scrap:</u> - N1-N10 - N7 - W1 - Cast iron - Exchangers <u>Alloy steels containing:</u> - Group 1 – Cr \geq 10.5%, other: max. 3% - Group 2 – Cr \geq 15% and 3% \leq Ni < 15% - Group 3 – Cr \geq 15% and 15% \leq Ni < 22% - Group 4 – Cr \geq 15% and 22% \leq Ni < 30% - Group 5 – Cr \geq 15% and 30% \leq Ni < 40% - Group 6 – Cr \geq 15% and Ni \geq 40% - Alloy scrap contaminated by furnace impurities (carbon contamination) - Scrap from steel-alloy exchange systems Cr \geq 15% and Ni < 15% - Titanium and its alloys
12	17 04 07	Mixed metals	Mixed metals
13	17 04 11	Cables other than those mentioned in 17 04 10*	Cables: - aluminium - copper - mixed metals
14	20 01 38	Wood other than that mentioned in 20 01 37	Small wooden elements

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15	20 03 07	Large-size waste	Furniture
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II. Delivering scrap to a warehouse

Scrap materials to be stored in the MG-33 Warehouse shall be classified, cleaned and segregated by type in such a way as not to obstruct unloading (according to the classification provided in Chapter I of these guidelines), based on the proofs of materials management (return to warehouse) issued in accordance with the Instructions on current assets applied by PKN ORLEN S.A. (taking account of differences in documentation arising from origin of scrap, e.g. scrap from liquidation of fixed assets) issued separately for each type of scrap, e.g. steel scrap, cast iron scrap. If alloy steel is delivered to the MG-33 Warehouse, in addition to return document, it is required to provide a document confirming the performance of sample testing (e.g. one component of a pipeline, one component of an apparatus, etc.) and analysis of chemical composition to classify scrap to one of the groups of alloy steels defined below. Samples are selected by a head of an organisational unit where waste is produced.

Tests of chemical composition of alloy steel can be carried out only by an entity authorised to this type of actions. In PKN ORLEN S.A., the authorised entity is the Team for Material Tests (UNB).

The organisational unit/entity carrying out tests is obliged to indicate one of the aforementioned groups of alloy steels presented in the table above as a result of the tests on a document confirming the performance of the tests.

Non-ferrous metal scrap permanently combined with other metals, e.g. tubular inserts for heat exchange apparatuses consisting, e.g., of copper or brass tubes and steel tube sheets, baffles and spacer rods, should be subjected to the process of dismantling the effect of which will result in the separation of complex groups of scrap, and then, it shall be transferred to the MG-33 Warehouse based on proofs of return issued separately for steel scrap and non-ferrous metal scrap.

This rule does not apply to the warehousing of electric motors, generators, welding machines, which are classified as one type of scrap and transformers.

The scrap transferred to the MG-33 Warehouse should be in a form that facilitates its movement and loading onto means of transport – a single component should measure a maximum of 10 m in length and 5T in weight.

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Chips, file dust and small-sized non-ferrous metal residues should be collected in containers; each type of metal should be stored separately.

The MG-33 Warehouse has the right to refuse to receive scrap containing significant impurities (e.g. earth, sand, concrete), since in this case, in accordance with PN-85/H-15000, non-metallic impurities should not exceed 2% of the weight of a batch of scrap delivered, which was not subjected to segregation and classification, or for which the required documents are completed incorrectly or have not been prepared. In such cases, the transport of scrap shall be sent back to the manager of the organisational unit where the scrap was produced, along with information on failure to ensure and comply with the rules on scrap segregation and transfer to the MG-33 Warehouse and with the guidelines on the proper preparation of scrap transport.

If necessary, a member of the MG-33 Warehouse staff shall participate in an inspection of the site where renovation and demolition works are being carried out, and will help to determine how scrap material should be prepared for transferring it to the warehouse in the classes of scrap given in the relevant tables.

III. Rules on safe transport of scrap and unloading in the MG-33 Warehouse

Transport and unloading of scrap being non-homogeneous goods with very sharp edges, of large size, matted and mixed, endanger safety of staff members both in a place of its production and unloading in the MG-33 Warehouse.

In order to eliminate work safety dangers, the following rules are introduced:

1. Large quantities of "heavy" scrap, e.g. steel, cast iron, feedstock, aluminium, acid-resistant, should be delivered by cars with a self-unloading function – dump trucks,
2. With regard to small quantities of "light" scrap, transport by delivery vans and manual unloading are acceptable,
3. Scrap of exchangers, motors and transformers should be delivered by means of transport making it possible to unload by means of a crane or scrap gripping device – e.g. by means of low-chassis sets, tow trucks, long load trailers,
4. Long scrap (pipelines), provided that use of a self-unloading car is impossible, should be delivered by vehicles making it possible to unload by means of a crane or scrap gripping device,
5. Scrap of batteries should be delivered in containers preventing leakage of electrolyte, and unloading should be performed in safety glasses and gloves,

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6. Scrap of cables should be delivered by vehicles making it possible to unload manually or by means of a scrap gripping device,
7. Other waste, such as furniture, containers, electronics, delivered by different vehicles should be unloaded only manually,
8. Scrap transported from a place of production to the MG-33 Warehouse should be loaded in a way making it possible to unload efficiently and safely, and should be safeguarded from movement, e.g., with strips, high broadsides, etc.,
9. While staying in the territory of the MG-33 Warehouse, each staff member shall be obliged to:
 - a) comply with the binding regulations and guidelines of the MG-33 Warehouse Coordinator,
 - b) take special precautions and keep safe distance from working unloading equipment,
 - c) comply with OHS provisions,
 - d) wear appropriate clothes and use appropriate personal protective equipment (helmet, glasses, thick gloves, etc.).

IV. Working times

The MG-33 Warehouse receives scrap on weekdays from 7.15 a.m. to 2.30 p.m.