



DEPARTMENT OF AGRICULTURE, CONSERVATION AND ENVIRONMENT

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FAX COVER SHEET

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Re:	PLAN OF STUDY FOR THE PROPOSED SECONDARY MATERIALS CO-PROCESSING PROGRAMME FOR PPC CEMENT AT HERCULES CEMENT MANUFACTURING PLANT DASPOORT FARM 319 JR, PORTION 304, REMAINING EXTENT OF PORTIONS 122, 153, 190 & 111, TSHWANE: GAUT 002/05-06/1596		



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Reference: Gaut 002/05-06/1596
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Environmental Business Strategies
P.O.Box 862
Parklands
2121

Fax: 086 673 3177
Att: Gerda Bothma

Dear Madam

RE: PLAN OF STUDY FOR THE PROPOSED SECONDARY MATERIALS CO-PROCESSING PROGRAMME FOR PPC CEMENT AT HERCULES CEMENT MANUFACTURING PLANT DASPOORT FARM 319JR, PORTION 304, REMAINING EXTENT OF PORTIONS 122, 153, 190 & 111 PRETORIA: GAUT 002/05-06/1596

Your application for authorisation in terms of the requirements of the Environmental Impact Assessment (EIA) Regulations: Regulations No. 1182 and No. 1183 of the Environment Conservation Act (Act No. 73 of 1989, Sections 21, 22 & 26) for the above-mentioned project has reference.

The proposed process is regarded as Scheduled Process No. 39, as defined in the Second Schedule to the Atmospheric Pollution Prevention Act, 1965 (Act No. 45 of 1965). The operation of a Scheduled Process is identified as listed activity 9 in Government Notice No. R. 1182 (as amended), promulgated in terms of Section 21 of the Act.

Section 22 of the Act specifies that no person shall undertake an activity identified in terms of Section 21 of the Act, or cause such an activity to be undertaken except by virtue of a written authorisation issued by the Minister or by a competent authority or a local authority or an officer.

This Department, GDACE, is the competent authority with regards to the implementation of Sections 21, 22 and 26 of the Environment Conservation Act.

To date, the following document in support of the application has been reviewed:

1. A Plan of Study for Scoping, dated November 2005.
2. A Declaration of Interest by Consultant dated 18/10/2005.
3. An Application Form 27/10/2005.

Following the review of the above document, the Department herewith approves the Plan of Study for Scoping for the above project, subject to a review of the time frames. In order for the Department to consider authorisation of the proposed project, the following procedure must be followed:

1. A Pre-Application checklist must be fully completed and submitted to this Department (obtainable at <http://www.gdacc.gpg.gov.za/html/PDF/Impact/prc-app.pdf>).
2. You may now proceed with the Scoping Report as defined in Regulation 6 of GN R.1183 of 5 September 1997, as amended.

Please ensure that the following issues are addressed in the Scoping Report to be submitted.

2.1 Public Participation

- In addition to the onsite notice, the proposed project and its operation must be advertised in a local newspaper. An advertising guideline is available from this Department on request.
- Proof of notification of immediate neighbours, residents associations, relevant government departments, and active CBO's and NGO's in the area must be provided.
- Proof of media adverts in local and regional newspapers, must be submitted. This must give the names of the newspapers as well as the dates on which the adverts were placed.
- The focus of the public participation process must be to register potential I&AP's, to illicit comments and to raise issues/concerns for further investigation in the Specialist Studies, and not merely to inform and await objections. Advertising and consultation with I&AP's must indicate this focus.
- The advertising and consultation with I&AP's must achieve the following:
 - a. Define a "registered I&AP", and indicate how one would become a "registered I&AP".
 - b. Inform I&AP's of what they are entitled to as "registered I&AP's". For example, that they will be notified of the availability of any documentation relevant to this project, they will be informed of any decisions made by the Department etc.
 - c. I&AP's must be informed of their role in the process i.e. to raise concerns that need to be addressed and make any comments during the scoping process.
 - d. The locations at which documentation will be made available for public review must be indicated and advertised.

Please note that written comments from relevant Government Departments are also required. For example, the Chief Air Pollution Control Officer (CAPCO) of the Department of Environmental Affairs and Tourism (DEAT) is mandated to register all scheduled processes in terms of Atmospheric Pollution Prevention Act (Act No. 45 of 1965) (APPA), and must therefore also be provided with documents for comment. The Department of Water Affairs and Forestry (DWAF) must also receive documents to comment on.

2.2 Other Additional Information Required

A) General

- a. Please note that EIA applications are site specific, hence separate applications need to be made for other sites. This application is specific to the Hercules Plant, Pretoria West site only.

- b. A detailed description of the proposed secondary materials co-processing facility that clearly defines:
 - i. What is meant by "Secondary Materials."
 - ii. The process of using secondary materials for the firing of the cement kilns and its flow diagram.
 - iii. The different components of the proposed development and their respective sizes.
 - iv. The quantities and concentrations of contaminants must be included for comprehensive testing of the equipment.
 - v. All timeframes associated with the project, including estimated timeframe for conclusion of the project.
- c. If any waste streams are involved, describe the exact waste streams (liquid, sludge and solid), which will be processed by the facility during the **Performance Testing Period**. The source of the waste, its chemical composition and amount must be provided in the report. Attention must be paid to testing challenge waste streams that represent a broad base of waste material contaminants expected to be used as fuel material by the facility in future.
- d. Interim waste receiving, sampling, storage and rejection procedures must be detailed as well as all off-loading procedures for the waste delivery vehicles entering the site.
- e. A discussion on the potential environmental impacts of the proposed activities on all environmental media, especially air and water quality and also on the socio-economic environment. These impacts must be considered in terms of the nature of the impact, extent, duration, intensity, probability and significance. The ratings applied in terms of extent, probability, duration, intensity and probability must be defined in order to make the interpretation thereof practical and understandable to all I&AP's.
- f. A description of the methods used to identify impacts must be provided as well as a description of how important and detrimental issues were evaluated and prioritised.
- g. The strategy used to address and resolve key issues should also be included on the scoping report.
- h. A Detailed assessment of alternatives, including a discussion of the no-go option must be provided.
- i. A description of all mitigation measures which will be introduced to avoid, reduce and minimise potential environmental impacts. These mitigation measures must be included in the form of an Environmental Management Plan (EMP).
- j. Provision must be made for the legislative, administrative and policy requirements applicable to the undertaking of the proposed activity.
- k. Waste Management Plan for the facility must be in line with National Waste Management Strategy (October 1999).
- l. Energy efficiency considerations must be discussed in the report.
- m. Identify the source and type of waste streams to be used as input material as well as whether the waste would be used as direct fuel or it would be processed before being used as fuel in the cement kilns.

B) Air Quality Management

- a. A detailed description of how the proposed secondary material co-processing facility will achieve compliance with the DEAT emission guidelines for Scheduled Process No. 39.
- b. An in-depth qualitative and quantitative desktop assessment of the types of emissions which are expected from the process, including modelling of emission dispersion must be included

within the report. The cumulative impact of these emissions on the existing ambient air quality in the area must be discussed.

- c Detailed information of air pollution control equipment and its efficiency including any mitigation measures to minimise possible impacts as a result of its shortcomings must be submitted. Furthermore, the intended mitigation measures should make provisions for the new National Environment Management: Air Quality Act, 2004 (Act No. 39 of 2004) which addresses the adverse impacts of emissions into the environment and sets stricter standards for ambient air.
- d Details on the maintenance plan for the air quality control equipment.
- c The potential for fugitive emissions from the process must be discussed (as applicable).

C) Water Management

- a The quantity, quality and source of water to be utilised must be provided within the report.
- b The management of all effluent from the facility must be discussed.
- c A storm water management system for the Plant must be included within the facility's design, especially around material stockpiles etc.

D) Technical Aspects

- a. The report must include an Emergency Response Plan which details how accidents or emergencies will be managed at the facility.
- b. The Scoping Report should indicate how spillages will be managed at the facility.
- c. A plan for the management of any waste material generated at the plant, including industrial waste, domestic waste etc must be included within the report.
- d. The quality (characteristics) of raw materials as well as the potential environmental impacts of these raw materials must be indicated.

E) Occupational Health and Safety

The Department requires a discussion on the Department of Labour's occupational health and safety requirements for the facility and how the facility will meet these requirements. This discussion should, as a minimum, address the following:

- The engineering controls which will be implemented in order to reduce or remove the hazards associated with the process.
- Other controls e.g. workplace or administrative controls, which will be instituted in order to ensure that the relevant Occupational Exposure Limits (OEL) are not exceeded within the facility.
- The provision of appropriate Personal Protective Equipment (PPE).
- An emergency response plan for the proposed premises and installation.

F) Auditing

A proposed audit protocol must be provided and should address issues to be addressed in the first and then subsequent audits. These audits, which will be required as conditions of the authorisation, must include but not be limited to the following issues:

- EMS

- Annual monitoring of emissions.
- Conformance to the requirements of the Occupational Health & Safety Act.
- Compliance with the conditions of the ROD (once issued).

Please note that the list of issues identified is not intended to be an exhaustive list and where other issues are relevant, they should be included in the documentation. Further note that this Department's request for the above information does not guarantee that the project will be authorised. A decision regarding the proposed development will only be made once the final documentation has been submitted and reviewed.

If you have any queries regarding this project please do not hesitate to contact Ms. Omolayo Pemobade of this Department.

Yours faithfully,



Mr. J.D. Nkuna

Deputy Director: Industrial Development Management

Date: 22/03/2006