

CHAPTER 5:

ISSUES AND RESPONSES TRAIL

FINAL SCOPING REPORT

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CHAPTER 5: ISSUES AND RESPONSES TRAIL

5.1 Identification of Issues

An important element of the Scoping process is to evaluate the issues raised through the Scoping interactions with authorities, the public, the specialists on the EIA team and the project proponent. In accordance with the philosophy of Integrated Environmental Management, it is important to focus the EIA on the key issues.

To assist in the identification of key issues, a decision-making process is applied to the issues raised, based on the following criteria (Refer to Figure 5.1: Page 5-4):

1. Whether or not the issue falls within the scope and responsibility of the Bulk Liquid and Handling Facility EIA process;
2. Whether or not sufficient information is available to respond to the issue raised without further specialist investigation.

Issues were sourced by the EIA team from the following Scoping interactions:

- **Newspaper Advertisements** – In order to inform the public of the proposed project and invite members of the public to register as I&APs, and to inform the EIA consultant about specific issues or interests in the proposed project, the project and EIA process was advertised in one Provincial and one Regional newspaper. Newspaper advertisements were again placed in one Provincial and one Regional newspaper notifying I&APs of the availability of the Draft Scoping Report for review.
- **Focus Group Meetings** - held between the Public Participation Consultant and key I&AP groups.
- **Public Meeting** – held on the 23 February 2012, to which all I&APs on the database were invited. Notice of the Public Meeting was also advertised in one Provincial and one Regional newspaper.
- **Telephone** – issues raised by I&APs during telephonic consultations.
- **Letters and faxes** – issues sent to PPC via fax or posted correspondence.
- **Email** – issues sent to PPC via email correspondence.
- **Comment Form** – issues submitted to PPC via the Comment Form that was provided as follows: at focus group meetings; at the public meeting; with Letter 1 and the BID mailed to I&APs; and with Letter 2 mailed to I&APs, notifying them of the review period for the Draft Scoping Report, which included an Executive Summary of the report.

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The Appendices of the Final Scoping Report contain the supporting meetings notes and detailed correspondence received. Comments received that are not relevant to or form part of this EIA process have not been included in the Issues and Responses Trails below, the detailed comments received are included in Appendix H and the notes from meetings held are included in Appendix I. Section 5.2 below provides a summary of the comments received from I&APs prior to the review of the Draft Scoping Report. Section 5.3 outlines the issues raised during the review of the Draft Scoping Report. The issues raised have been grouped in categories, prior to the release of the Draft Scoping Report and during the review of the Draft Scoping Report, as illustrated in Table 5.1 below.

Table 5.1: Categories of Issues raised prior to the release of the Draft Scoping Report and during the review of the Draft Scoping Report

Category	Number of Issues raised prior to the release of the Draft Scoping Report	Number of Issues raised during the review of the Draft Scoping Report
1. Potential Impacts on Vegetation, Fauna and Avifauna	7	2
2. Potential Marine Impacts	5	1
3. Potential Air Quality Impacts	3	17
4. Potential Visual Impacts	1	0
5. Potential Accidents and Spill Impacts	15	8
6. Potential Traffic and Access Impacts	5	0
7. Potential Socio-Economic Impacts	10	3
8. Bulk Services Infrastructure	3	6
9. Project Scope and Assessment of Alternatives	16	2
10. Project Detail	12	4
11. EIA and Public Participation	24	15
12. General and Project Motivation	4	5

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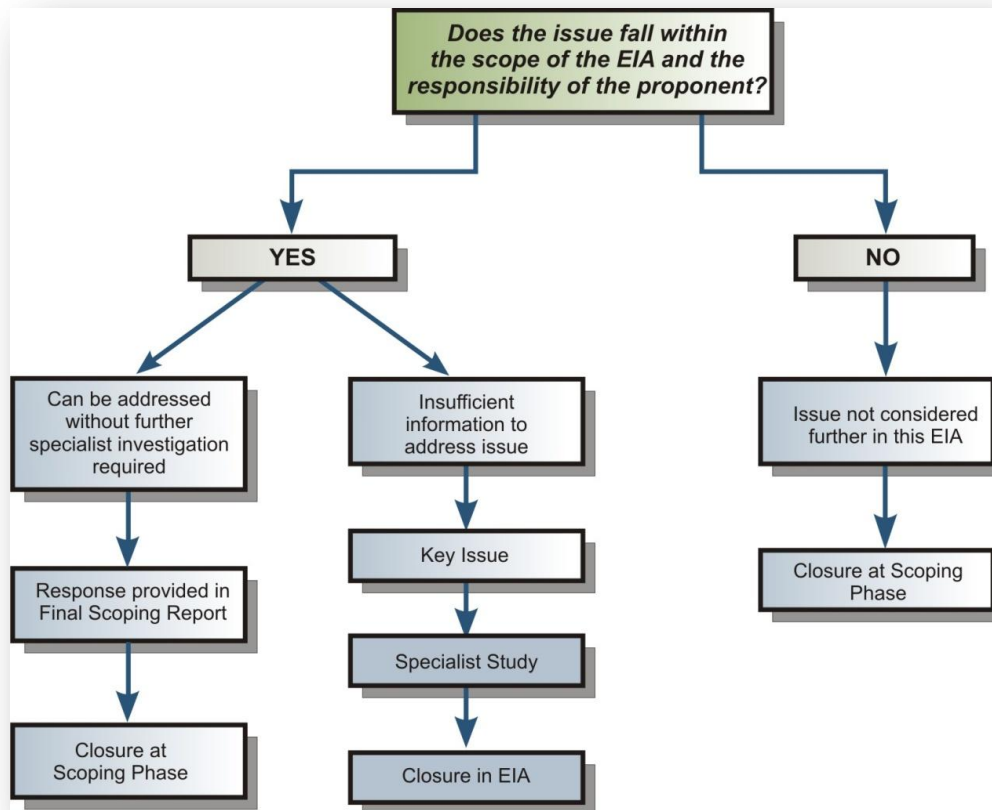


Figure 5.1: Decision-making framework for identification of key issues for the EIA

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5.2 Issues and Responses Trail (Prior to the release of the Draft Scoping Report)

The tables below summarize issues raised prior to the release of the Draft Scoping Report for I&AP review, together with a response from the EIA team. A synthesis of issues to be addressed in the Specialist Studies is provided in the Plan of Study for EIA (Chapter 6). The results of the Specialist Studies will be made available to I&APs for comment as part of the Draft EIA Report.

1. POTENTIAL IMPACTS ON VEGETATION AND FAUNA INCLUDING AVIFAUNA

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.1	<i>The pipelines should not extend into the open space management area (eastern routing option) unless it is to be placed within a registered servitude.</i>	Ane Oosthuizen, SANParks	17Oct2011, Focus Group Meeting	Comment noted. Pipeline routing options have been identified from both the existing Berth B100 and the proposed A-series Berths as part of the future Port of Ngqura expansion plans. Consideration of not extending into the open space management area will be factored into final pipeline routing decision. If the open space area is traversed, then strict rehabilitation measures will be implemented in order to maintain viable ecological corridors through the Open Space.
1.2	<i>I was not aware that the Eastern Cape Biodiversity Conservation Plan identifies the area as a critical biodiversity area. If this is indeed correct, I would like formal notification that this is in fact the case and an indication whether or not it is in fact a systematic biodiversity plan or what the status of that plan is in terms of NEMA.</i>	Graham Taylor, Coega Development Corporation	30Sep2011, email	Comment noted. The Terrestrial Ecology Study will investigate this further.
1.3	<i>The Port & CDC initial & subsequent EIAs require the mesic succulent thicket on the Eastern bank of the</i>	Paul Martin, Individual	14Oct2011, email	Pipeline routing options have been identified from both the existing Berth B100 and the proposed A-series Berths as part

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>Coega River to be retained and included in the OSMP system. The management guidelines for core open space are no development as it also fits into the NMBMs Bioregional Plan (i.e. offsets are required if there is any loss of core OSMP area). All alternatives for the pipeline need to be investigated (e.g. along the N2, least sensitive crossing of OSMP area if this is really necessary, etc).</i>			of the future Port of Ngqura expansion plans. Consideration of not extending into the open space management area will be factored into final pipeline routing decision. If the open space area is traversed, then strict rehabilitation measures will be implemented in order to maintain viable ecological corridors through the Open Space.
1.4	<i>Any loss of saltpan habitat or disturbance needs to be assessed. I have been doing bi-annual waterbird counts on the saltpans. The overall information has been lodged with the National Co-ordinated Waterbird Count database but I also have the counts by individual saltpan – meaning that the most important sections of the saltpan for waterbirds are known. Several bird species regularly breed on the saltpans (I have the details) – breeding locations and seasons need to be included in the assessment if any construction / disturbance is planned in the saltpans.</i>	Paul Martin, Individual	14Oct2011, email	Comment noted. If any development is proposed in the saltpans, the impacts to birds will be discussed with Dr Paul Martin and recommendations to minimize habitat disturbance will be factored into the EIA reports.
1.5	<i>The updated open space management plan includes a potential pipeline servitude east of the Coega River.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. This potential pipeline servitude will be considered.
1.6	<i>Disturbance to the open space management areas must be kept to a minimum. Construction corridors within the opens space areas must be clearly demarcated and disturbance should not extend beyond</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. Recommendations for protecting the open space areas, as well as demarcating construction corridors during the construction phase will be incorporated into the project EMP where applicable.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>what is needed for construction.</i>			
1.7	<i>The positive factor of locating the tank farm in proximity to thicket is that thicket is not fire prone in the way that fynbos is and therefore the risk of a fire as a result of the vegetation is lower.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted.

2. POTENTIAL MARINE IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
2.1	<i>Our concern is the type and number of vessels that are coming into the port and potential spills. The Port of Ngqura has sufficient equipment to deal with spills that occur within the Port but they do not have sufficient equipment to deal with spills that may occur outside the Port. Thus an increase in shipping traffic will result in an increase in potential spills. The Port of Ngqura does not have capacity to deal with ocean based spills.</i>	Ane Oosthuizen, SANParks	17Oct2011, Focus Group Meeting	In general, the vessels coming into the Port of Ngqura will have on-board spill contingency measures in place. OTGC's responsibility only includes Tier 1 spills. OTGC is not responsible for spills within the bay itself. The South African Maritime Safety Authority (SAMSA) and DEA are responsible to provide capacity to deal with spillages within the bay. An Oil Spill Contingency Plan Review Specialist Study has been commissioned for this project, which will include an assessment of the risk associated with spills as a result of the increased ship traffic. However, it must be noted that the tanker vessels that are currently calling at the Port Elizabeth Harbour for use of the tank farm, will be diverted to the Port of Ngqura. Therefore, there will be no significant increase in tankers entering the port, particularly during the initial phase. The Oil Spill Contingency Plan for the Diaz Zone, the coastline in the vicinity of the Port of Ngqura, has been recently updated and will be considered as part of this project as well.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
2.2	<i>We need to protect the marine environment especially the Penguins in the area.</i>	Kiki Dyimi, SANCO Region	30 Sep2011, Focus Group Meeting	Comment noted. The Marine Ecology Specialist Study in the EIA will address this issue. Recommendations will be included in the EMP where applicable.
2.3	<i>A cautious approach should be adopted to the project which will not have negative impacts on marine life and penguins as a result of the storage. At the moment the area identified for the project is environmentally friendly and SANCO would not like to see negative impacts on the marine environment.</i>	Kiki Dyimi, SANCO Region	20Oct011, fax	Comment noted. The Marine Ecology Specialist Study in the EIA will address this issue. Recommendations will be included in the EMP where applicable.
2.4	<i>The SA Environmental Observation Network (SAEON) in Grahamstown has accumulated some good baseline data on the marine ecology around the Port of Ngqura, as well as water and weather conditions which may impact on the safety of ships in the Port. This should be used in the risk assessment for shipping.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. This will be taken into consideration during the Marine Ecology Specialist Study.
2.5	<i>By establishing the tank farm at Coega you are merely transferring the current problem being experienced at the PE Harbor to the Port of Ngqura. The location of the current tank farm does not impact on the penguin population in the Bay but the establishment of the tank farm at the Port of Ngqura will increase the risk to penguins in the bay. The oil berm in the PE harbour has been there for approximately 3 years.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. The Marine Ecology Specialist Study in the EIA will address this issue. Several spill contingency measures have been proposed for the project, such as bunding within the tank farm and the gantries, as described in Chapter 2 of this report. The tank farm and gantries will have oil spill bunds to contain all possible spills. In addition, fire protection measures have been proposed in the event of spills taking place. Further to this, the tanks and bunds will undergo regular, stringent maintenance. It is in OTGC's best interest to maintain the Bulk Liquid Storage and Handling Facility in good order in order to comply with the 20-year lease agreement with the landowner, TNPA. Therefore, all efforts will be made to limit the possibility

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				of spills and concomitant contamination of the surrounding environment. Furthermore, it is important to note that the EIA being undertaken for this proposed Bulk Liquid Storage and Handling Facility is completely independent to and does not form part of the EIA that is currently underway for the proposed decommissioning of the tank farm at the Port Elizabeth Harbour. The impacts associated with the Port Elizabeth Harbour tank farm are not assessed or included in the EIA for this project.

3. POTENTIAL AIR QUALITY IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
3.1	<i>Will venting be built into the project design? OTGC must monitor their project and any emissions and/ or fugitive gasses.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Venting will be incorporated into the design of the storage tanks. The storage tanks will be constructed according to the API 650 standard. This refers to storage tanks that are free venting at atmospheric pressure. The storage tanks containing volatile substances such as petrol will be fitted with internal floating roofs with a rim and seal. These internal floating roof systems are 95 % efficient in terms of vapour loss. This system will limit and control the release of vapour from the storage tanks into the atmosphere. These efficiencies are in line with internationally accepted standards, as well as the latest technology in the industry for tank farm installations of this nature. This issue will also be assessed in the Air Quality Assessment Specialist Study.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
3.2	<i>CDC has 11 years of baseline air quality information which they can make available to the project.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted with thanks. The Air Quality Specialist will obtain this information from the CDC.
3.3.	<i>The Air Quality specialist assessment must identify and model all potential pollutants and related this back to CDC's "air bubble" that they have established for the IDZ. The study must take into account cumulative impacts, and consider existing industries within the zone and their impacts together with that which will be emitted by OTGC.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	The Air Quality Assessment Specialist Study in the EIA will address these aspects.

4. POTENTIAL VISUAL IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
4.1	<i>The site is on top of a hill, what size storage tanks are proposed? The visual impact assessment should assess any potential impacts from Addo Park as well as the islands.</i>	Ane Oosthuizen, SANParks	17Oct2011, Focus Group Meeting	A Visual Impact Assessment has not been proposed for this project, as it occurs within the Coega IDZ, an area that has been designated for industrial activity. Furthermore, a portion of Zone 8 has been designated for bulk liquid storage and handling by the original EIAs undertaken for the Port of Ngqura in 2001. Therefore, the tank farm will be constructed in an area designated for such industrial activities and land uses, thereby negating the need for a comprehensive Visual Impact Assessment. The tanks contain diameters ranging between 14 m and 45 m, and heights ranging between 14 m and 18 m which should not present a significant landscape

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				change in relation to other industrial facilities which will be sited in the IDZ. The location is in a valley and will not be visible from the islands nor from Addo Park.

5. POTENTIAL ACCIDENTS AND SPILL IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
5.1	<i>Monitoring protocols are required and comprehensive action plans backed by adequate capacity to prevent and treat any leaks or spills. Full transparency is required to ensure that problems are not hidden away.</i>	Paul Martin, Individual	14Oct2011, email	Comment noted. As explained in Chapter 2 of this report, the tank farm will be equipped with bunding in order to contain all possible spillages. This will also be addressed in the Oil Spill Contingency Plan Review Specialist Study which will be carried out in the EIA Phase.
5.2	<i>The IDZ currently has inadequate emergency response (esp fire) capacity to deal with the risks associated with a tank farm – this will need to be rectified.</i>	Paul Martin, Individual	14Oct2011, email	Comment noted. Chapter 2 of this report details the fire fighting equipment and protection measures that will be used for the project. This will also be addressed in the Risk Assessment Specialist Study which will be carried out in the EIA Phase. As indicated in Chapter 2, an ERAP will be compiled for the proposed project in order to account for incidents within the tank farm. This will eventually tie into the ERAP for the port. Furthermore, the construction and operation will be guided by norms and updated regulations in terms of fire protection, including the recommendations of Buncefield, where applicable.
5.3	<i>The project will be considered a MHI, which will potentially affect a greater area than just the tank farm footprint, and this needs to be considered by the</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. The need for a full MHI has already been identified. This can only be completed once the final design and specifications for the tank farm are concluded. Therefore,

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>specialist studies. The buncefield line should be indicated in order to assess the greater area that may be affected by the project.</i>			a full MHI assessment will be conducted subsequent to the EIA, but prior to construction, to address this issue, and this information will be made available key stakeholders such as the CDC.
5.4	<i>If the loading gantries are on CDC land and there is a spill, CDC will need to consider their impact and response.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	The road tanker loading gantry will be situated on the tank farm site, on land owned by TNPA, as illustrated in the site layout plan in Chapter 2.
5.5	<i>Monitoring of potential oil spillages is encouraged.</i>	Kiki Dyimi, SANCO Region	30 Sep2011, Focus Group Meeting	Comment noted. Recommendations for monitoring potential oil spills will be incorporated into the project EMP where applicable.
5.6	<i>We support the development but recommend that the specialist studies look at safety measures for the operational phase of the development.</i>	Mongameli Peter, SA NGO Coalition	12Oct2011, Focus Group Meeting	Comment noted. This will be covered in the Risk Assessment carried out during the EIA Phase. Additionally, OTGC will operate and abide by its Global Health, Safety, Security and Environmental Policy to ensure safety is paramount to the proposed project.
5.7	<i>Will this not be a hazardous facility?</i>	Mongameli Peter, SA NGO Coalition	12Oct2011, Focus Group Meeting	Dangerous goods will be stored at the Bulk Liquid Storage and Handling Facility, hence an EIA was necessitated as the proposed activity triggered amongst others, Listed Activity 3 of Government Notice R 545 of 18 June 2010. The EIA process will identify all impacts that will be generated as a result of this proposed project, as well as include recommendations and mitigation measures. The need for a full MHI has already been identified. This can only be completed once the final design and specifications for the tank farm are concluded. Therefore, a full MHI assessment will be conducted subsequent to the EIA (but prior to construction) to address

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				this issue, and this information will be made available to key stakeholders.
5.8	<i>Will there be monitoring to ensure that there are no accidents or dangers that could be caused by potential spillages.</i>	Patricia Ndovu, ANC Nelson Mandela Region	13 Oct2011, Focus Group Meeting	The Risk Assessment Specialist Study in the EIA will address this issue. In addition, the OTGC Health, Safety, Security and Environment Policy will be followed during all phases of the development. Recommendations for monitoring potential oil spills will be incorporated into the project EMP and operational procedures, where applicable.
5.9	<i>There is a need to monitor the safety of the workers during construction and during the operational phase of the project</i>	Phumzile Nodongwe, NUMSA Regional Chairperson	19 October 2011, Focus Group Meeting	The OTGC Health, Safety, Security and Environment Policy, as well as the TNPA/CDC's Health and Safety requirements, will be followed during all phases of the development. Local and international legislation will also be taken into account.
5.10	<i>The mock military exercise which was recently undertaken in the Port of Ngqura included the simulation of the management and control of an oil spill and some very good lessons came out of the process. The lessons learnt should be sourced from Transnet or CDC and should be considered in the review of the oil spill contingency plan specialist assessment.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. This will be considered in the Oil Spill Contingency Plan Review Specialist Study which will be undertaken during the EIA phase.
5.11	<i>The fire that occurred at the Durban tank farm in 2010 also included some valuable lessons in the management of such incidences; these lessons should also be reviewed and be incorporated into the risk assessment.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. This will be considered in the Risk Assessment Specialist Study which will be undertaken during the EIA phase.
5.12	<i>The Port of Ngqura currently does not have the</i>	Morgan Griffiths,	27Oct2011,	In general, the vessels coming into the Port of Ngqura will

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>capacity to deal with the increase risk of an oil spill that will come with the project due to increased shipping. This must be addressed and systems must be put in place to deal with the increase in risk that will come as a result of the project. Sufficient capacity must be in place to manage and contain any spills. The risk will increase and the subsequent management capacity has to be increased to respond to such incidences.</i>	Wildlife & Environment Society EP Region	Focus Group Meeting	have on-board spill contingency measures in place. In terms of spills, OTGC's responsibility only includes Tier 1 spills on site. OTGC is not responsible for spills within the bay itself. SAMSA and DEA are responsible to provide capacity to deal with spillages within the bay. An Oil Spill Contingency Plan Review Specialist Study has been commissioned for this project, which will include an assessment of the risk associated with spills as a result of the increased ship traffic. However, it must be noted that the tanker vessels that are currently calling at the Port Elizabeth Harbour for use of the tank farm, will be diverted to the Port of Ngqura. Therefore, there will be no significant increase in tankers entering the port, particularly during the initial phase. The Oil Spill Contingency Plan for the Diaz Zone, the coastline in the vicinity of the Port of Ngqura, has been recently updated and will be considered as part of this project.
5.13	<i>The fire risk assessment must assess the risks separately for the port, pipelines and for the tank farm and indicate the sphere of potential influence for each. The plan must further assess the current and required capacity to manage such fires. There has to be a clear plan to indicate who is responsible for the management of such incidences and the capacity required.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. The Risk Assessment Specialist Study will address this aspect. Furthermore, the construction and operation will be guided by norms and updated regulations in terms of fire protection, including the recommendations of Buncefield, where applicable.
5.14	<i>The biggest issue is to construct a facility that will ensure there is no potential pollution to soil or water. The project description should indicate what systems will be in place to monitor and detect any leaks. There</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	The Project Description, Chapter 2 of this report, clearly indicates the systems that will be established to monitor and detect spills. Each tank will be constructed on an impermeable base and the tank subdivisions will contain

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>must be a clear indication of the type of bunding will be put in place to manage spill incidences.</i>			proper bunding to adhere to SANS 10089. The bund walls will have the ability to contain the full capacity of the largest tank (100 %), including 100 mm freeboard.
5.15	<i>Where is the tank in relation to the wind turbines proposed for the IDZ? The wind turbines are fire prone and could present a risk to the tank farm?</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	The Electrawinds, Innowinds and Universal Wind Energy Projects are dispersed within a number of zones in the IDZ. The proposed Bulk Liquid Storage and Handling Facility is located in Zone 8 of the IDZ, which is the southern-most zone, is believed to be sufficiently away from the wind turbines and therefore the risk of fires should be negated. Additionally, it will be recommended that CDC, as custodians of the IDZ, incorporate the tank farm into the fire management plan for the entire IDZ taking cognisance of the fire risk from the wind turbines in relation to the tank farm.

6. POTENTIAL TRAFFIC AND ACCESS IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
6.1	<i>CDC will be involved with the planning for access and services into the tank farm area, as access will be through our Zones 7 and 10.</i>	Andrea Von Holdt, Coega Development Corporation	29Sep2011, email	Comment noted.
6.2	<i>No Provincial Roads are affected.</i>	Marius Keyser, Dept of Roads and Public Works	27Sep2011, fax	This I&AP has requested that they are removed from the project database and the database will be amended accordingly.
6.3	<i>Are separate TIA's for projects really needed? The IDZ takes into account traffic to be created by the IDZ.</i>	Andrea von Holdt, Coega	24Oct2011, Focus Group	Comment noted. The need for a Traffic Impact Assessment Specialist Study was identified and suggested by TNPA during

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>There is an integrated master plan for the area east of the Coega River which can be provided.</i>	Development Corporation	Meeting	the Environmental Liaison Committee Meeting held in May 2011.
6.4	<i>There was a traffic master plan that has been undertaken for the entire IDZ which takes into account a certain number of vehicles per hectare, does the project not take this information into account.</i>	Willie Olivier, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. OTGC will ascertain if TNPA took the Traffic Master Plan into account during their planning. If not, this information will be acquired and incorporated into the Traffic Impact Assessment Specialist Study that will be carried out during the EIA Phase.
6.5	<i>What will be the impact on traffic and transportation of fuel by trucks on the road, will it not cause accidents on the road?</i>	Cll. Frans, Secretary, Motherwell Councillor's Forum	17 October 2011, Focus Group Meeting	The Traffic Impact Assessment Specialist Study in the EIA phase will address this issue.

7. POTENTIAL SOCIO ECONOMIC IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
7.1	<i>The relocation of the tank farm is required not only to unlock the economic and growth potential at the PE Port but also in order to ensure the security of storage of fuel supplies.</i>	Dean Biddulph, Councillor NMBM	17Oct2011, Telephonic Consultation	Comment noted.
7.2	<i>Job creation must form an important part of this project; it needs to be taken down to the lowest level without compromising quality.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.
7.3	<i>I see that there is no socio-economic assessment study planned for this project. Job creation needs to</i>	Andrea von Holdt, Coega	24Oct2011, Focus Group Meeting	OTGC will engage with the CDC to identify opportunities for suitable job creation as part of this project.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>form and important part of this project. The CDC can provide information on job creation.</i>	Development Corporation		
7.4	<i>There are endorsements of zone labour agreements between Transnet and CDC, and these must be implemented for this project. It must become a condition of the environmental authorisation. CDC can provide this information to the CSIR as part of the project description.</i>	Duncan Grenville, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. The CDC Zone Labour Agreement will be taken into consideration as part of the job creation component of this project.
7.5	<i>While we support job creation we need to ensure the environment is protected.</i>	Kiki Dyimi, SANCO Region	30Sep2011, Focus Group Meeting	Comment noted with thanks.
7.6	<i>Will there be any economic benefits as a result of this project besides during the construction phase.</i>	Mlamli Tsotsi, COPE Region	11Oct2011, Focus Group Meeting	The main economic benefit of the proposed project, besides during the construction phase, includes the security of fuel supply to oil companies or customers of the tank farm, which will improve and supplement the South African economy, particularly considering that the tank farm at the Port Elizabeth Harbour is expected to be decommissioned. The proposed project will also create added spin-offs such as breaking bulk, making bulk and blending operations, which will also enhance the South African economy. In addition, the proposed development provides the opportunity not only to store bulk liquids, but to also export bulk liquids. Furthermore, the proposed operation of the Bulk Liquid Storage and Handling Facility will unlock the development potential at the existing tank farm site in the Port Elizabeth Harbour once it has been decommissioned, thereby increasing the economic potential for the NMBM.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
7.7	<i>How many job opportunities for unskilled labour will be created by this project as there is high level of unemployment in the area?</i>	Cllr Kwitsana, Ward 56 Ikamvelihle, IDZ Boundary	12Oct2011, Focus Group Meeting	Chapter 2 of this report details the employment opportunities that will be created during the construction and operation phase of the project. The employment opportunities created during the construction phase of this project will include unskilled and skilled labour. For the operation phase, it is expected that employment opportunities will be mainly skilled. Skilled labour will be necessary for the operation of the Bulk Liquid Storage and Handling Facility; however spin off activities will need additional labour.
7.8	<i>Will there be any form of training provided for unskilled labour as the project will require certain types of skill to operate the facility?</i>	Cllr Kwitsana, Ward 56 Ikamvelihle, IDZ Boundary	12 Oct2011, Focus Group Meeting	OTGC will aim to comply with the CDC Zone Labour Agreement in terms of the training, skills transfer and development.
7.9	<i>How many jobs will be created in the area as a result of the project?</i>	Patricia Ndovu, ANC Nelson Mandela Region	13Oct2011, Focus Grop Meeting	Chapter 2 of this report details the employment opportunities that will be created during the construction and operation phase of the project. It is estimated that during the construction phase, between approximately 400 and 1600 employment opportunities will be created.
7.10	<i>The next presentation should outline a programme for community development, skills development related to bulk storage and job creation related to the project.</i>	Kiki Dyimi, SANCO Region	20Oct011, fax	Comment noted.

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8. BULK SERVICES INFRASTRUCTURE

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
8.1	<i>You cannot look at the tank farm in isolation to the greater IDZ. In the case of an upset incident water will be required for fire fighting purposes, which will have to come from the return effluent system from Fish Water Flats, but Fish Water Flats first needs to be upgraded, and the return effluent system constructed.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. Water supply to the tank farm will be supplied by TNPA, as stipulated in the BOOT agreement. It is anticipated that TNPA will consider the water master plan for the IDZ to provide the water required for the tank farm. It is important to note that the impact of an incident on the municipal water supply will be minimal as there will be sufficient water stored on site to exceed the SANS 10089 requirements. Municipal water be used for replenishing purposes only. OTGC will also investigate rain water harvesting to fill the fire water reservoir. It is also anticipated that return effluent water from the IDZ will be utilised for fire-fighting purposes. While SANS 10089 calls for 1 hour water capacity for a worst case fire scenario, OTGC is aiming to have 2 hours water capacity on site in terms of fire management strategy.
8.2	<i>The project description needs to show the greater IDZ and how the tank farm project is linked into the IDZ, in terms of services and roads.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	As described in Chapter 2 of this report, the Bulk Liquid Storage and Handling Facility will be linked to the adjacent road and accessed via the N2 on the eastern side through the IDZ. TNPA will provide the necessary and associated infrastructure to the tank farm, as stipulated in the BOOT agreement.
8.3	<i>The project description and mapping needs to show links into planned infrastructure for the area, which is part of the master plan for the IDZ. A master plan is available for the area east of the Coega River; CDC is</i>	Willie Olivier, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>responsible for providing services up to the boundary of the site, subject to funding by DTI and cross sharing with Transnet.</i>			

9. PROJECT SCOPE AND ASSESSMENT OF ALTERNATIVES

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
9.1	<i>One may need to go back to the original EIA for the IDZ to check if that was the specific site identified for the tank farm. DEDEAT will want reasons as to why this site has been selected and if other sites are not being assessed or considered this will need to be clearly motivated. I am not sure if the original EIA gives clear reasoning as to why this site was identified for the tank farm or if considered what the best site within the IDZ is for a tank farm. Other possible locations for the tank farm are the eastern reclamation works and west of the Coega River.</i>	Paul Martin, Individual	17Oct2011, Telephonic Consultation	The EIA for the Port of Ngqura carried out in 2001 pointed out an area for a tank farm or bulk liquid storage. This designated area is located within Zone 8 of the IDZ. TNPA then selected a 20 hectare portion of land within this larger area designated for bulk liquid storage for the proposed project. Therefore, essentially the proposed tank farm is surrounded by a larger area in Zone 8 that is designated for future storage and handling of bulk liquids. Additionally, other sites were considered outside the IDZ but these were deemed unfeasible due to the need to site the tank farm in close proximity to the Port of Ngqura.
9.2	<i>If this is the only site being assessed then clear reasoning for this should be provided. You will need to be aware of the challenges that you will face with regards to the routing and possible alternative routing/s for the pipelines, as according to the current layout they will cross the Coega River and its floodplain. The crossing of the Coega River will require a water use licence from the Department of</i>	Paul Martin, Individual	17Oct2011, Telephonic Consultation	Comment noted. Chapter 4 of this report details the consideration of the project alternatives. Pipeline routings from the existing Berth B100 and the future A-series Berths to the tank farm have been proposed. The pipeline routing from Berth B100 to the tank farm crosses the Coega River. However, the pipelines will cross the Coega River in an above-ground manner, by means of a causeway provided by TNPA. The pipeline routing from the future A-series Berths to the

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>Water Affairs.</i>			tank farm does not traverse the Coega River.
9.3	<i>While the location of the tank farm has been “fixed” since the early days of the Coega IDZ, this is not necessarily the optimum place for a tank farm and the EIA should explore the merits of alternative locations.</i>	Paul Martin, Individual	14Oct2011, email	The EIA for the Port of Ngqura carried out in 2001 pointed out an area for a tank farm or bulk liquid storage. This designated area is located within Zone 8 of the IDZ. TNPA then selected a 20 hectare portion of land within this larger area designated for bulk liquid storage for the proposed project. Therefore, essentially the proposed tank farm is surrounded by a larger area in Zone 8 that is designated for future storage and handling of bulk liquids. Additionally, other sites were considered outside the IDZ but these were deemed unfeasible due to the need to site the tank farm in close proximity to the Port of Ngqura.
9.4	<i>SANParks do not have a problem with the location of the tank farm.</i>	Ane Oosthuizen, SANParks	17Oct2011, Focus Group Meeting	Comment noted.
9.5	<i>Crossing of the Coega River (western routing) is the preferred option. SANParks does not support any further impacts on the open space management system.</i>	Ane Oosthuizen, SANParks	17Oct2011, Focus Group Meeting	Comment noted.
9.6	<i>The pipeline connection(s) to the Port need careful assessment and all alternatives need to be investigated, particularly as a crossing of thicket within the OSMP on the eastern bank of the Coega River is being discussed as well as a crossing of the Coega River floodplain.</i>	Paul Martin, Individual	14Oct2011, email	Pipeline routing options have been put forward from both the existing Berth B100 and the proposed A-series Berths to the tank farm site. The pipeline routing from the tank farm to Berth B100 will result in a crossing of the Coega River. The impacts resulting from the transfer of infrastructure from the existing Berth B100 to the future A-series Berths will also be assessed in this EIA. It is important to add that TNPA will undertake a separate EIA for the construction of new A-series

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				Berths. Consideration of not extending into the open space management area will be factored into final pipeline routing decision.
9.7	<i>Coega River Floodplain crossing: The future development of the Port needs to be taken into account. Do not overlook an alternative which is to re-route the Coega River into the centre of the valley (it has already been diverted from its original position by the salt company). Filling the current channel of the Coega River would provide space for the pipeline to run along the eastern edge of the floodplain. When the port is extended, space will in any case be required for a quay wall, laydown area, services and possibly a rail line along the eastern side of the future port. Cutting into the Eastern Bank of the Coega River (part of the OSMP area) should be avoided.</i>	Paul Martin, Individual	14Oct2011, email	Pipeline routing options have been put forward from both the existing Berth B100 and the proposed A-series Berths to the tank farm site, which takes into account the future development of the Port of Ngqura. TNPA will undertake a separate EIA for the construction of the new A-series Berths. No decision has currently been made with regards to the preferred option. Consideration of not extending into the open space management area and optimizing the location within the Coega area will be factored into final pipeline routing decision.
9.8	<i>The decommissioning of the tank farm at the PE Harbour and the commissioning of the tank farm in the IDZ are integrally linked, you cannot commence the decommissioning of the PE tank farm without commissioning the tank farm in the IDZ.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. Phase 1 of the proposed project will correspond with the capacity of the tank farm in the Port Elizabeth Harbour. It is anticipated that the proposed project will be commissioned prior to the decommissioning of the tank farm in the Port Elizabeth Harbour. It is important to note that the EIA for this proposed OTGC Bulk Liquid Storage and Handling Facility is completely separate from and independent to the EIA being carried out for the decommissioning of the tank farm at the Port Elizabeth Harbour. The impacts generated from the decommissioning of the Port Elizabeth Harbour tank farm is not covered in this

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				EIA.
9.9	<i>The original EIA's did consider the most suitable site for a tank farm. An area beyond the N2 is not considered feasible due to pumping distances and visual impacts. The site identified is a fairly low point, which is needed for pumping of the product from the harbour to the tank farm.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.
9.10	<i>Should the pipelines cross the Coega River how will these be above ground or below ground? A crossing of the Coega River is not preferred as in the event of a flood and damage to any of the pipelines all of the product will eventuate in the Port. CDC has access to the 1:100 year floodline for the Coega River and can provide this information.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. It is anticipated that the pipelines will cross the Coega River in an above-ground manner. A causeway to facilitate the routing of the pipeline across the Coega River will be constructed. OTGC intends to maintain all of the pipelines above-ground.
9.11	<i>The EIA should consider and assess locating the gantries in the IDZ to avoid going through Port Control. You are estimating 80 trucks per day, which is approximately 8 trucks per hour.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	The road tanker loading gantry will be located within the tank farm site, on TNPA land. It is beneficial to position the road tanker loading gantry as close to the storage tanks as possible. Based on this, it will not be feasible to position the gantry within the IDZ. The road tankers will not travel via Port Control, as these are expected to access the tank farm site off the N2 towards the eastern side of the site, on CDC land. Note that TNPA will be constructing an additional Port entrance on the Eastern side of the port. There will therefore be port control, but essentially dedicated for the fuel storage facility. This is no different to the present facility in Port Elizabeth.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
9.12	<i>Phyto energy, located in the IDZ intends to export product and would need piping and storage facilities. Does the project take into account the potential needs of Phyto Energy? Should project Mthombo proceed (PetroSA), they would also need piping and storage facilities. Does the project scope take this into account? If it does not, what is the potential for expansion? Should the project not take these needs into account, what is the potential for expansion of the tank farm in the future? If there is no available area to expand the tank farm, in order to accommodate these projects, then perhaps the site identified is not the most suitable site.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	The proposed project does take into account the needs of Phyto Energy and PetroSA. As a storage company, OTGC makes efforts to accommodate all possible clients especially considering that refineries are concentrating on their core activity and relying on third parties for storage of both unprocessed and processed products. Based on this, OTGC are able to serve the needs of and support Phyto Energy and PetroSA if warranted. OTGC can provide tankage, storage, pipeline and berth facilities requirements to the abovementioned companies. It must be mentioned that the proposed OTGC Bulk Liquid Storage and Handling Facility is completely independent to and is not a pre-requisite for the proposed PetroSA refinery. Therefore, OTGC can provide a service to PetroSA if required. In terms of the area available, it is evident that that the land around the 20 hectares occupied for the proposed OTGC Bulk Liquid Storage and Handling Facility is available for expansion and has been allocated for bulk liquid storage.
9.13	<i>Does the proposed pipeline crossing of the Coega River take into account the future expansion of the Port up the Coega River?</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	The future development of the Port of Ngqura has been taken into consideration during the planning of the pipeline routing. Pipeline routings have been proposed from the existing Berth B100, as well as the proposed A-series Berths. These pipeline options contain longer and shorter lengths in order to incorporate the future expansion plans. It is important to note that TNPA will conduct a separate EIA for the construction of the new A-series Berths. However, the impacts associated with the potential transfer from Berth B100 to the A-series Berths will be assessed in this EIA.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
9.14	<i>The site was considered in the original IDZ EIA's, and was selected as it does not contain completely sensitive vegetation and it also allows for a buffer around the footprint of the site.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.
9.15	<i>The updated open space management plan includes a potential pipeline servitude east of the Coega River. A crossing of the Coega River should not be the preferred option merely to avoid impacts on the open space.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. The pipelines will cross the Coega River in an above-ground manner, thereby limiting large-scale disturbance of the river banks and riparian vegetation.
9.16	<i>If PetroSA established in the IDZ would they use these pipelines or would additional pipelines be required. Does the project take into account the piping and storage needs of PetroSA?</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	As a storage company, OTGC makes efforts to accommodate all possible clients especially considering that refineries are concentrating on their core activity and relying on third parties for storage of both unprocessed and processed products. Based on this, OTGC are able to serve the needs of and support PetroSA if warranted. Phase 2 of the tank farm could possibly include capacity to meet the requirements of PetroSA. However, the proposed OTGC Bulk Liquid Storage and Handling Facility is completely independent to and is not a pre-requisite for the proposed PetroSA refinery. Therefore, OTGC can provide a service to PetroSA if required.

10. PROJECT DETAIL

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
10.1	<i>Our Rules for licensing allow that the applicant only needs to prove that the EIA process has commenced</i>	Martin Untied, National Energy	18Oct2011, email	Comment noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>and the licence will be conditional to the final outcome of the EIA process.</i>	Regulator of SA		
10.2	<i>How will a "PE Port debacle" be avoided over the lifetime of the tank farm? Will there be regular replacement of tanks before they become too old and start leaking?</i>	Paul Martin, Individual	14Oct2011, email	OTGC has a 20 year agreement with TNPA which stipulates that OTGC must hand over a 'well maintained operational terminal' to TNPA at the end of their concession. As a result, complying with standards is considered very important for OTGC. Therefore, it is in the best interest of OTGC to keep the Bulk Liquid Storage and Handling Facility in good condition and working order. OTGC are expected to provide TNPA with a maintenance programme detailing the progress in terms of the maintenance. During the concession TNPA will also monitor the maintenance being carried out by OTGC. For OTGC, tank storage is a core business and economic livelihood, and unlike Oil Majors, OTGC has a vested interest in the maintenance and up-keep of the tank farm and its associated infrastructure, which is completely different to the current situation at the Port Elizabeth Harbour Tank Farm.
10.3	<i>I thought the construction of a truck loading gantry with the 9 loading bays was a separate contract? Where will this be, logically it should be in the IDZ?</i>	Peter Inman, Coega Development Corporation	29Sep2011, Email	The construction of a road tanker loading gantry is included within the scope of work for the proposed Bulk Liquid Storage and Handling Facility. This gantry will be located within the proposed tank farm site, on land owned by TNPA. It is extremely favourable to position the road tanker loading gantry as close to the storage tanks as possible.
10.4	<i>What will be stored in the 400 000m³ of tankage in Phase 2?</i>	Peter Inman, Coega Development Corporation	29Sep2011, Email	It is anticipated that gasoline and gasoil will be stored in Phase 2 of the proposed project.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
10.5	<i>How many pipes are proposed and what size pipes?</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	A maximum of eight pipelines are proposed for both phases of the project, as explained in Chapter 2 of this report. The pipelines are anticipated to vary between 12 inches and 28 inches in diameter.
10.6	<i>There is an opportunity to develop the first green accredited and green star rated tank farm, and this should be considered in the EIA process.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	OTGC are not aware of a 'green star' ranking for oil terminals. As a company, OTGC has a strong environmental commitment and considers themselves as highly environmentally responsible. OTGC take proactive measures such as energy saving measures, as well as compliance with, and surpassing local requirements.
10.7	<i>Is there a possibility for the facility to become green star rated?</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	OTGC are not aware of a 'green star' ranking for oil terminals. As a company, OTGC has a strong environmental commitment and considers themselves as highly environmentally responsible. OTGC take proactive measures such as energy saving measures, as well as compliance with, and surpassing local requirements.
10.8	<i>Will the pipes be above ground or below ground?</i>	Willie Olivier, Coega Development Corporation	24Oct2011, Focus Group Meeting	OTGC aims to construct all pipelines above-ground. However, should the need arise for underground pipelines, these be achieved with at least 1 m cover.
10.9	<i>Where will the truck loading gantries be located? It would be ideal to have the gantries in one location to avoid double handling. The gantries should be on port authority land as this will be easier to manage potential spills.</i>	Willie Olivier, Coega Development Corporation	24Oct2011, Focus Group Meeting	The road tanker loading gantry will be located within the proposed tank farm site, on land owned by TNPA. It is necessary to position the road tanker loading gantry as close to the storage tanks as possible.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
10.10	<i>The PE tank farm lease at the PE Port ends in the first quarter of 2014, thus the IDZ tank farm needs to be commissioned at the end of 2013. Commissioning includes providing roads and services to the tank farm, which is the responsibility of the CDC.</i>	Willie Olivier, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted. The provision of service infrastructure is part of the TNPA responsibility as part of its agreement with OTGC. It is therefore anticipated that TNPA will work closely with CDC to finalize the service infrastructure needs for this project.
10.11	<i>The project description needs to indicate a very clear maintenance and repair programme. One needs to ensure that best practise is applied for the lifetime of the project. It is not good enough to start off with the best standards if these do not evolve and improve over the lifespan of the project.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. Within their agreement with TNPA, OTGC are expected to handover a fully functional and well maintained tank farm to TNPA once the 20-year lease expires. In addition, OTGC are expected to submit maintenance programmes to TNPA.
10.12	<i>The project needs a dedicated SHEQ Department which should report to the Coega EMC.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted. Chapter 2 of this report includes the information pertaining to the management departments for the operation phase of the project, including the Health, Safety, Security and Environment Policy department.

11. EIA AND PUBLIC PARTICIPATION

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
11.1	<i>Both positive and negative impacts should be considered. Issue has a very negative connotation, but we are stuck with that. One should not just focus on concerns as positive aspects could also be identified.</i>	Peter Inman, Coega Development Corporation	29Sep2011, Email	Comment noted.
11.2	<i>The BID notes the application will go to DEDEA, is it</i>	Peter Inman,	29Sep2011,	Comment noted. CSIR will update the name of the provincial

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>now not DEDEAT?</i>	Coega Development Corporation	Email	department on its database.
11.3	<i>The CDC qualifies as a key stakeholder for a one on one meeting during the Scoping Process of the EIA?</i>	Peter Inman, Coega Development Corporation	29Sep2011, Email	Comment noted. Focus group meetings were held for the CDC during the initial public participation phase.
11.4	<i>The new site needs to take into account any potentially negative impacts on the environment and manage these impacts in a sustainable and sensitive manner.</i>	Dean Biddulph, Councillor NMBM	17Oct2011, Telephonic Consultation	Comment noted. This will be covered during the EIA process. Recommendations for mitigating negative environmental impacts will be incorporated into the project EMP where applicable.
11.5	<i>The covering letter for the BID refers to 520 000 m³ storage capacity and the BID refers to 600 000 m³.</i>	Andrea Von Holdt, Coega Development Corporation	29Sep2011, email	The capacity provided in the BID was an estimate provided during the initial design considerations for the project. However, as explained in Chapter 2 of this report, the total storage capacity of the tank farm has now increased to 790 000 m ³ . This change occurred as a result of the final applicable standards that the project would need to adhere to and this has now been confirmed.
11.6	<i>Please confirm the EIA application for Phase 1 of 200 000m³ storage, but on land of 20ha. Reference ELC minutes of May 2011 – DEDEAT recommended assessing the full capacity and area.</i>	Andrea Von Holdt, Coega Development Corporation	29Sep2011, email	The capacity provided in the BID and at the ELC of May 2011 was an estimate provided to CSIR during the initial design considerations/specifications for the proposed project. However, as explained in Chapter 2 of this report, the total storage capacity of the tank farm has now increased to 790 000 m ³ . This change occurred as a result of the final applicable standards that the project would need to adhere to and this has now been confirmed.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
11.7	<i>Regarding the electrical substations contained in the map in the BID, we note that only the Grassridge substation is shown on the map, however, there are many other substations in the IDZ, including the large Dedisa substation.</i>	Andrea Von Holdt, Coega Development Corporation	7Oct2011, email	Comment noted.
11.8	<i>The red square depicting the boundary of the proposed tank farm on the map in the BID appears to be smaller than the area to be taken up by the tank farm. Check scaling of map in this regard.</i>	Andrea Von Holdt, Coega Development Corporation	7Oct2011, email	Comment noted.
11.9	<i>There has been a request from the CDC that draft reports, especially mapping, be reviewed by the CDC prior to being released to the public for comment/review. The reason for the request is so that any information that may be irregular or not depict the current situation at Coega, be corrected before distribution in the public domain. We would appreciate it if this request could be put forward to the applicant.</i>	Andrea Von Holdt, Coega Development Corporation	7Oct2011, email	Comment noted.
11.10	<i>Comments on the BID</i> <i>Mapping provided does not fairly reflect as built infrastructure and a recent aerial photo would be more appropriate.</i> <i>There is a spelling mistake on the legend for the Tank farm site</i> <i>The Port boundary is not reflected</i> <i>I cannot see the electrical substations</i>	Graham Taylor, Coega Development Corporation	30Sep2011, email	Comments noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>It is not a sewage works at Marine Growers</i>			
11.11	<i>We have a land quarry situated in the Coega IDZ.</i>	Desmond Eales, Glendore Sand	11Oct2011, fax	This comment is noted, this I&AP has been registered on the project I&AP database.
11.12	<i>Comments submitted on the BID: The locality plan should ideally have coordinates so that the tank farm footprint is fixed to guide specialist studies. Access roads and services from Zone / 10 should be indicated as to inform the uninformed / in other words the cumulative footprint. Also the open space needs to be indicated, Zone 7 / 10 storm water channels etc.</i>	Johann Brink, Coega Development Corporation	29Sept2011, email	Comment noted.
11.13	<i>Quantity does not match the technical values elsewhere in the BID.</i>	Johann Brink, Coega Development Corporation	29Sept2011, email	The capacity provided in the BID was an estimate provided during the initial design considerations for the project. However, as explained in Chapter 2 of this report, the total storage capacity of the tank farm has now increased to 790 000 m ³ . This change occurred as a result of the final applicable standards that the project would need to adhere to and this has now been confirmed.
11.14	<i>A MHIRA should be completed before construction commences - RoD condition. Remember that these road tankers will travel through Zone 7 / 10 with their nasty liquid, so we need to have input in the MHIRA etc Given the volume and type of hazardous stuff, the no development zone might affect the development in Zone 7/10 - referred to as the red</i>	Johann Brink, Coega Development Corporation	29Sept2011, email	A full MHI assessment will be conducted subsequent to the EIA, but prior to construction, to address this issue and key stakeholders such as the CDC will be engaged at that stage.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>zone</i>			
11.15	<i>Given the size of the land to be disturbed and the inherently deep foundations of the tanks, it could be expected that a large volume of spoil material will be generated - construction waste material. I would suggest that provision for this spoil material be investigated as to where it will be spoiled.</i>	Johann Brink, Coega Development Corporation	29Sept2011, email	Comment noted. The site is sloped and will therefore be terraced. In this case most of the soil will be removed from one area and used in another area, thereby balancing the cut and fill. It appears that the material generated from the cut is suitable for fill and little will be disposed of.
11.16	<i>Please can you include me on the database as we will be right next to the proposed Facility and it appears the pipelines will run all around our pans.</i>	John Drinkwater, Cerebos	27Sep2011, email	This comment is noted, this I&AP has been registered on the project I&AP database.
11.17	<i>The National Energy Regulator (NERSA) is a regulatory authority established as a juristic person in terms of Section 3 of the National Energy Regulator Act, 2004 (Act No. 40 of 2004). NERSA's mandate is to regulate the electricity, piped-gas and petroleum pipelines industries in terms of the Electricity Regulation Act, 2006 (Act No. 4 of 2006), Gas Act, 2001 (Act No. 48 of 2001) and Petroleum Pipelines Act, 2003 (Act No. 60 of 2003) and the Petroleum Pipelines Levies Act, 2004 (Act No. 28 of 2004).</i> <i>In terms of the Petroleum Pipelines Act, 2003 (Act No. 60 of 2003) ('the Act'), NERSA has to issue a licence for construction activities falling within its</i>	Martin Untied, National Energy Regulator of SA	18Oct2011, email	Comment noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>mandate. Oiltanking Grindrod Calulo (Pty) Ltd ('OTGC') submitted an application to construct petroleum loading and storage facilities in the Port of Ngqura in terms of the Act. NERSA does not have specific issues with regard to the project and the associated Environmental Impact Assessment process. However, an EIA Record of Decision (RoD) from the relevant authority is one of the requirements in the Rules made by NERSA in terms of the Act, for licensing such a construction activity. NERSA therefore try to gather as much as possible information as part of its decision making process. If the licence is granted by the Energy Regulator, it will be conditional to submitting a final EIA RoD to NERSA prior to commencement of construction activities.</i>			
11.18	<i>Is there any indication as to how long the EIA process is expected to last and when the approval could be granted for work to commence?</i>	Mani Govindasami, Easigas	20Oct2011, email	The EIA process is anticipated to be completed in late 2012.
11.19	<i>The CSIR must consult with the CDC, especially with regards to mapping for all future documentation as this will show links into existing infrastructure planned for the area.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.
11.20	<i>The current mapping is misleading and does not show the full development footprint.</i>	Peter Inman, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
11.21	<i>There is a lot of information lacking in the BID document, especially the mapping, which reflects on the CDC and the ultimate operation of the tank farm.</i>	Andrea von Holdt, Coega Development Corporation	24Oct2011, Focus Group Meeting	Comment noted.
11.22	<i>On the release of the Draft Report we will study the report and make further comments.</i>	Phumzile Nodongwe, NUMSA Regional Chairperson	19 October 2011, Focus Group Meeting	Comment noted.
11.23	<i>The port authority boundary should be indicated on mapping.</i>	Morgan Griffiths, Wildlife & Environment Society EP Region	27Oct2011, Focus Group Meeting	Comment noted.

12. GENERAL AND PROJECT MOTIVATION

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
12.1	<i>I fully support the Environmental Assessment process for the new tank farm at Coega as it will ultimately unlock the developmental potential at the existing port to allow for much needed economic growth and the development of the long awaited waterfront.</i>	Dean Biddulph, Councillor NMBM	17Oct2011, Telephonic Consultation	Comment noted.
12.2	<i>The existing tank farm at the PE Port is considered a hazardous installation and needs to be relocated. Given the developmental nature and strategic economic importance of the existing site, it is not</i>	Dean Biddulph, Councillor NMBM	17Oct2011, Telephonic Consultation	Comment noted.

Environmental Impact Assessment for the proposed Bulk Liquid Storage and Handling Facility in Zone 8 of the Coega IDZ:

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>feasible to consider using the current site to install new tanks for the storage of fuel as this will not allow for the planned development of this area.</i>			
12.3	<i>Easigas is a potential customer and user of the OTGC facility at Coega.</i>	Mani Govindasami, Easigas	14Oct2011, Email and Comment form	Comment noted.
12.4	<i>Cope supports the development.</i>	Mlamli Tsotsi, COPE Region	11 October 2011, Focus Group Meeting	Comment noted.

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5.3 Issues and Responses Trail (Draft Scoping Report Review)

The tables below summarize the issues raised during the review of the Draft Scoping Report, together with a response from the EIA team. Copies of the comments received are included in Appendix H and I of this report. A synthesis of issues to be addressed in the Specialist Studies is provided in the Plan of Study for EIA (Chapter 6). The results of the Specialist Studies will be made available to I&APs for comment as part of the Draft EIA Report.

1. POTENTIAL IMPACTS ON VEGETATION AND FAUNA INCLUDING AVIFAUNA

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.1	<i>An enquiry should be made of CDC (Andrea) with regards to the status of the approval of the Coega Open Space Management Plan (OSMP). If the proposed development is in line with the recommendations of the latest version of the OSMP the NMBM has no objections.</i>	Kithi Ngesi, NMBM Environment	12Mar2012, Focus Group Meeting	The Terrestrial Ecology Specialist Study will investigate the Coega Open Space Management Plan (OSMP). The specialist undertaking the Terrestrial Ecology Study will contact the CDC to obtain clarification on the status of the approved version of the Coega OSMP, and ensure that the recommendations of this version are incorporated into the study.
1.2	<i>With regards to the terrestrial flora and fauna, we would like the construction process to avoid biologically sensitive areas i.e. dunes and coastal birds breeding grounds.</i>	Aphiwe Bewana, SANParks, Marine Intern	2Mar2012, email	The Terrestrial Ecology Study will investigate this further, and provide appropriate measures and recommendations where applicable, for inclusion in the EMP, to mitigate any possible impacts on biologically sensitive areas.

2. POTENTIAL MARINE IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
2.1	<i>SANParks notes plans by Transnet National Ports Authority (TNPA) to establish a bulk liquid storage</i>	Aphiwe Bewana, SANParks, Marine	2Mar2012,	The Oil Spill Contingency Plan Review Specialist Study will investigate the risk of the proposed project on the marine

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>and handling facility in zone 8. As noted previously SANParks does not have problems with location of the tank farm, but we have serious concerns with type and quantity of vessels transporting petroleum liquids and potential spills thereafter. Our concerns emanate from our observed lack of capacity and equipment required to deal with spills, especially spills occurring outside the port. We would therefore like the proposed specialist study on oil spill contingency plan review to include the risk posed by the bulk storage and handling facility, especially in marine environment and the status of response equipment.</i>	Intern	email	environment in terms of the capacity and equipment available in the Port of Ngqura to deal with potential spillages within the Port itself. The Marine Ecology Specialist Study will assess the risk of possible spills to the marine environment in the Port of Ngqura as a result of the proposed project. In general, the vessels coming into the Port of Ngqura will have on-board spill contingency measures in place. OTGC is responsible for Tier 1 spills only, and not for spills within the bay itself. The South African Maritime Safety Authority (SAMSA) and DEA are responsible to provide capacity to deal with spillages within the bay.

3. POTENTIAL AIR QUALITY IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
3.1	<i>The licensing authority for the AEL is the NMBM. On what standards is the CDC air quality bubble based. The air bubble established by the CDC is possibly outdated and needs to be reviewed and updated in line with current SA legislation governing air quality.</i>	Kobus Slabbert, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	The Air Quality Unit of the Nelson Mandela Bay Municipality (designated Licensing Authority) was notified on 7 February 2012 of the intention to submit an Atmospheric Emissions Licence (AEL) Application for the proposed project. A case officer, as well as Reference Number: 19/2/9/1/2/L014-2.2, has been assigned to the project application. Chapter 4 of this report details the AEL Application process undertaken thus far. With regards to the Air Quality Standards; since the promulgation of the South African National Ambient Air

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				Quality Standards on 24 December 2009, the CDC is obliged to follow and abide by these standards. For example, a local authority, such as a municipality, has the ability to draw up air quality specifications that pertain specifically to their region or domain. This process would, however, require a rigorous public consultation component. Considering that the CDC is not a local authority, they are required to abide by the National Ambient Air Quality Standards.
3.2	<i>The radius for the air dispersion modeling is indicated in the application form (5km's) and should be done in accordance with this requirement.</i>	Kobus Slabbert, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	Dispersion Modelling will be carried out as part of the Air Quality Specialist Study in order to predict the future ambient air quality. The specifications relating to the actual modelling procedure, such as the radius, will be followed in line with the requirements stipulated in the AEL Application Form.
3.3	<i>The Air Quality Assessment must consider and assess dust that will be generated during the construction phase and how this will be managed.</i>	Kobus Slabbert, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	The Air Quality Specialist Study will include a qualitative assessment of the potential generation of dust during the construction phase of the proposed project. Management and mitigation measures to control the dust emissions will be included in the EMP where applicable.
3.4	<i>The air quality specialist assessment must identify and assess all volatile organic compounds, not just a few.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	In terms of VOCs, the South African National Ambient Air Quality Standards promulgated on 24 December 2009 contains ambient air quality standards for benzene only. However, the Air Quality Specialist Study will also include an assessment of toluene, ethyl benzene and xylene.
3.5	<i>The air quality specialist assessment should take into account the proposed amendments to the Section 21 listed activities, which are proposed to be adopted before the end of 2012. The study should model based</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	In line with the proposed Project EIA Schedule (Inserted in Chapter 4 of this document), the Final EIA Report, which will include the Final Air Quality Specialist Study, is scheduled to be submitted to the Competent Authority (DEDEAT) by

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>on the proposed amendments.</i>			October 2012. This indicates that the Air Quality Specialist Study will be completed by this time and will thus be carried out with the use of the Listed Activities and Associated Minimum Emission Standards promulgated on 1 April 2010 in Government Notice R248. The proposed amendments to the aforementioned Listed Activities are currently being reviewed by government and are not in the public domain. Based on this, it is difficult to consider these proposed amendments at this stage. These amendments may, however, be considered in the Air Quality Specialist Study if they become enforced as legislation prior to the submission of the Final EIA Report only.
3.6	<i>Dust must be controlled during construction to limit the impacts onto tenants in the IDZ.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	Comment noted. The Air Quality Specialist Study to be carried out during the EIA Phase will address this issue. Mitigation measures will be included in the EMP, where applicable.
3.7	<i>The Air quality assessment report must outline any proposed monitoring mechanisms.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	Comment noted. As part of the Air Quality Specialist Study, monitoring recommendations will be suggested in the EMP, where applicable.
3.8	<i>The report must describe how the emissions will be controlled, that is, outline the abatement measures for all sources of pollutants. Each source must be quantified and the mitigation measures outlined in the report.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	Comment noted. The identification of emission sources and the compilation of an Emissions Inventory will be carried out as part of the Air Quality Specialist Study. Mitigation measures and recommendations for the control and abatement of the emissions and pollutants will be included in the EMP, where applicable.
3.9	<i>Will there be any vapour recovery or flaring, if yes, the report must outline this.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	As highlighted in Chapter 2, the installation of a Vapour Recovery Unit has been proposed at the Road Tanker Loading Gantry. No flaring will take place on site. This will be

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				addressed in the Air Quality Specialist Study.
3.10	<i>The NMBM may require in-house monitoring of the facility.</i>	Templeton Titima, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	Comment noted.
3.11	<i>In order to accurately model the air quality impacts the assessment will need to identify all point sources of potential pollution, provide detailed information on the tank design, loading options and proposed air quality management mechanisms proposed for the project.</i>	Patrick Nodwele, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	The Air Quality Specialist Study to be carried out during the EIA Phase will model the air quality impacts and will identify area sources only as the proposed facility will not generate any point sources. Mitigation measures and air quality management mechanisms will be included in the EMP, where applicable.
3.12	<i>Will there be emissions associated with the pipeline route, loading and unloading of the product? If there is, these emissions must be modelled and assessed in the air quality study.</i>	Patrick Nodwele, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	As described in Chapters 2 and 4, emissions are anticipated to be released during the loading process. It is anticipated that the pipelines will be a closed system, with the material in the pipeline being transferred from the berth to the tank farm with the use of a "pig launcher and receiver". Additional information will be provided in the Draft and Final EIA Reports regarding possible emissions from the pipelines. Dispersion Modelling will be carried out as part of the Air Quality Specialist Study in order to predict the future ambient air quality. In addition, the potential emissions as a result of the proposed project will be assessed in the Air Quality Specialist Study.
3.13	<i>The air quality study must indicate the emission factors used in the modeling.</i>	Patrick Nodwele, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	The USEPA approved TANKS emission model will be used to estimate emissions from all storage tanks. The model will be used to determine ground level concentrations of pollutants such as benzene, toluene, ethyl benzene and xylene downwind of the proposed site. Emission factors are built into the model. The Air Quality Specialist Study will indicate and describe the

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				methodology and factors used in the modelling.
3.14	<i>There are proposed amendments to section 21 listed activities, carbon black.</i>	Patrick Nodwele, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	The Final EIA Report, including the Air Quality Specialist Study, is scheduled to be submitted to DEDEAT by October 2012. Currently, the Air Quality Specialist Study will take into consideration the Listed Activities and Associated Minimum Emission Standards promulgated on 1 April 2010 in Government Notice R248. The proposed amendments to the aforementioned Listed Activities may, however, be considered in the Air Quality Specialist Study if they become enforced as legislation prior to the submission of the Final EIA Report to DEDEAT only.
3.15	<i>Do the CDC modeling stations measure volatile organic compounds?</i>	Patrick Nodwele, NMBM Air Quality Sub Directorate	23Mar2012, Focus Group Meeting	As described in Chapter 3 of this report, currently three stations, located at the Saltworks, Amsterdamplein, and Motherwell, have been established to monitor nitrous oxides, sulphur dioxide and standard meteorological variables (such as temperature, relative humidity, wind speed, and wind direction). In addition, the monitoring stations at Motherwell measures ozone and particulate matter (< 10 microns), with the remaining two stations measuring the total suspended particulates. As part of the data acquisition process for the Air Quality Specialist Study, the CDC will be contacted, and enquiries will be made to determine if Volatile Organic Compounds (VOCs) are measured at the measuring stations within the Coega IDZ.
3.16	<i>It appears that all the tanks storing the product are covered, what emissions are anticipated being released from the tanks. Is there any venting off the</i>	John Drinkwater, Cerebos	22Feb2012, Public Meeting	At this stage, the exact emissions from the storage tanks have not been identified, as this will be investigated and finalised during the Air Quality Specialist Study. However, research

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>pipeline route?</i>			indicates that VOCs are mainly emitted during tank breathing and during loading and offloading operations. On the other hand, the pipelines are anticipated to be a closed system, and a “pig launcher and receiver” will be utilised to assist the transfer of the material in the pipeline from the berth to the tank farm. Furthermore, as described in Chapter 2, a Vapour Recovery Unit has been proposed for installation at the Road Tanker Loading Gantry. In addition, the storage tanks containing volatile substances such as petrol will be equipped with internal floating roofs to reduce vapour loss.
3.17	<i>There must be strict emission controls in place at the facility.</i>	Mlamli Tsotsi, COPE Region	5Mar2012, Focus Group Meeting	Comment noted. The Air Quality Specialist Study will provide recommendations for controlling emissions. Mitigation measures will be provided in the EMP, where applicable.

4. POTENTIAL ACCIDENT AND SPILL IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
4.1	<i>Perhaps the concerns that were highlighted in the Green Scorpions’ report on the existing tank farm facility at the Port Elizabeth harbour should be consulted.</i>	Schalk Potgieter, NMBM Planning	12Mar2012, Focus Group Meeting	Efforts will be made to acquire the report compiled by the Compliance and Enforcement Directorate relating to the Tank Farm at the Port Elizabeth Harbour.
4.2	<i>Where will you get your water from for fire fighting in the case of an emergency?</i>	John Drinkwater, Cerebos	22Feb2012, Public Meeting	As described in Chapter 2 of this report, a water reservoir will be provided on site with a sufficient water storage capacity for fire-fighting purposes. Municipal water will be utilized for replenishing purposes only. In addition, it is anticipated that Return Effluent from the Coega IDZ may potentially be utilized

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				for fire-fighting purposes.
4.3	<i>There must be strict monitoring of potential spills.</i>	Mlamli Tsotsi, COPE Region	5Mar2012, Focus Group Meeting	Comment noted. Chapter 2 of this report highlights the bunding that has been proposed at the tank farm site in order to comply with or exceed the requirements of the most recent SANS specifications (particularly SANS 10089) with a view to minimize any risk associated with product spills into the environment. It is anticipated that the bund walls will be composed of reinforced concrete, and it is expected to be able to retain 100% of the largest tank capacity within the main bund area, as well as 100 mm of freeboard. Monitoring requirements for potential spills will be addressed and provided in the Oil Spill Contingency Plan Review Specialist Study.
4.4	<i>The project must apply best practice in monitoring the standards for the development, mainly for safety procedures.</i>	Cllr Frans, Secretary, Motherwell Councillors Forum	7Mar2012, Focus Group Meeting	The tank farm will be designed in line with the requirements of the SANS specifications (SANS 10087 and SANS 10089). In addition, the Oiltanking Health, Safety, Security and Environmental Policy will be followed as an integral part of the daily operations of the tank farm. OTGC will ensure that best practice is applied for the overall efficient and safe operation of the proposed facility.
4.5	<i>Storage tanks have failed in the past for a number of reasons. Some with catastrophic consequences, such as loss of life, large scale pollution and damage to property. Typically failure modes of the tank specifically include: side-seam failure, bottom-seam failure an total collapse. Tanks can fail individually or in combination (domino effect). Various design and</i>	George Gerber, Uhambiso Consult	6Mar2012, Email & comment form	Comment noted. Chapter 2 of this report highlights the bunding that has been proposed at the tank farm site in order to comply with or exceed the requirements of the most recent SANS specifications (particularly SANS 10089) with a view to minimize any risk associated with spills into the environment. It is anticipated that the bund walls will be composed of reinforced concrete, and it is expected to be able to retain

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p><i>mitigation measures have been investigated and implemented to limit the volume of fluid that would escape the bund following a tank failure. Important parameters that determine the volume of escaped fluid include: than tank height ration, as well as the tank height to bund distance ratio.</i></p> <p><i>Considering the potential impact that a single or multiple failure can have on human safety and the environment I would like to know:</i></p> <ul style="list-style-type: none"> <i>Whether an overtopping impact study will be performed for the tank farm</i> <i>What mitigation measures will be implemented to limit overtopping of the bunds.</i> 			<p>100% of the largest tank capacity within the main bund area, as well as 100 mm of freeboard. Stringent compliance with, and exceeding the requirements of, the approved SANS specifications throughout the operational phase of the project, will ensure that suitable measures are implemented in terms of the bunding requirements and that best practice is met. Based on this, an overtopping study has not been proposed for the tank farm. Monitoring for the possibility of spills and tank overfilling has been described in Chapter 2 of this report. Measures will be put in place to monitor and prevent tank overfilling. It is planned that the storage tanks will be equipped with a high accuracy Radar tank gauging (RTG) system, which will ensure that signals are generated in order to derive the low low, low, operating, high and high high levels in the tank. Apart from the RTG system, the tank will also be equipped with an independent High Level Alarm, to serve as a “back-up” in the event that the RTG system is not functioning. The RTG system will control the amount of liquid being stored in each tank, which will thereby limit the likelihood of overfilling. Furthermore, the independent High Level Alarm will be linked to the motorized valve of the tank, which will close automatically in case the alarm is actuated.</p>
4.6	<p><i>A Spill Contingency or Emergency Response Plan must be drawn up and should include the following actions to take into account in the event of a spill:</i></p> <ul style="list-style-type: none"> <i>Stop the source of the spill</i> <i>Contain the spill</i> <i>All significant spill must be reported to this</i> 	Marisa Bloem, Dept of Water Affairs	15Mar2012, letter	<p>Comment noted with thanks. In compliance with the Oiltanking Health, Safety, Security and Environment Policy, an Emergency Response Action Plan will be compiled prior to the commissioning of the proposed project. These actions will be included in the plan, as well as the EMP, for consideration during a spill.</p>

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p><i>Department and other relevant authorities</i></p> <ul style="list-style-type: none"> • <i>Remove the spilled produced for treatment or authorised disposal</i> • <i>Determine if there is any soil, groundwater or other environmental impact</i> • <i>If necessary, remedial action must be taken in consultation with this Department and incidents must be documented.</i> 			
4.7	<p><i>The specialist studies need to take into account the proximity of the project to Cerebos, which deals with the beginning stage of a food stuff. Our main concern is how a spillage may impact on the salt pans.</i></p>	John Drinkwater, Cerebos	22Feb2012, Public meeting	The specialist studies will take into account the proximity of the Cerebos Salt Pans to the proposed project. The Terrestrial Ecology Specialist Study will include an assessment of potential spillages on the Salt Pan Habitat. If required, focus group meetings may be arranged with Cerebos during the EIA Phase to provide information on the specialist studies.
4.8	<p><i>It appears that no assessment of the impacts/risks associated with an increase in petrochemical tanker traffic into the Bay and in particular the Port of Ngqura is being considered? As an absolute minimum capacity (equipment, trained staff, etc) to deal with an oil spill at sea in the Bay needs to be greatly improved. At present DEA Oceans & Coast personnel and equipment are all based in Cape Town. E.g. there are no containment booms suitable for use at sea in PE and no skimmers or similar equipment to extract oil from the surface of the open sea. There is no workable plan to protect St Croix in the event of an oil spill. The updated Coastal Oil Spill Contingency Plan for the Dias</i></p>	Paul Martin, Private	30March2012, email	An insignificant increase in shipping traffic is envisaged as the traffic currently calling at the Port Elizabeth Harbour for use of the tank farm will be diverted to the tank farm at the Port of Ngqura once it becomes operational. The vessels delivering the product for offloading at the Port of Ngqura are understood to have on-board spill contingency plans to deal with spills in the bay. The Port of Ngqura has an Oil Spill Contingency Plan to deal with spills in the Port itself and OTGC is responsible for Tier 1 spills only. The Oil Spill Contingency Plan Review will investigate the equipment and capacity that is currently available at the Port of Ngqura and what is still required to meet with operational standards.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>Region does not provide much practical guidance in this regard (it assumes that the DEA on scene controller will co-ordinate everything).</i>			

5. POTENTIAL SOCIO ECONOMIC IMPACTS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
5.1	<i>The IDZ should have socio economic impact studies information that can be consulted for this assessment process.</i>	Kithi Ngesi, NMBM Environment	12Mar2012, Focus Group Meeting	Comment noted. The CDC will be consulted in order to identify opportunities for suitable job creation as part of this project.
5.2	<i>Has a socio-economic specialist been appointed to address the social and economic issues that have been raised by I&APs?</i>	Schalk Potgieter, NMBM Planning	12Mar2012, Focus Group Meeting	A Socio-Economic Specialist Study has not been commissioned for this project as the CDC Zone Labour Agreement is in place and it will be taken into consideration as part of the job creation component of this project.
5.3	<i>We welcome job creation in the area.</i>	Cllr Nkosiyapantsi, Chairperson, Motherwell Environmental Forum	5Mar2012, Focus Group Meeting	Comment noted.

6. BULK SERVICES INFRASTRUCTURE

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
6.1	<i>Has the applicant liaised with the CDC with regards to</i>	Richard Fyvie,	12Mar2012,	In line with the requirements of SANS 10089, it is anticipated

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>the use of the Fishwater Flats' return effluent?</i>	Jeffares and Greene	Focus Group Meeting	that water will be supplied and replenished from a municipal supply. A water reservoir will be provided on site with a sufficient water storage capacity to ensure that municipal water will be utilized for replenishing purposes only. In addition, it is anticipated that Return Effluent from the IDZ may potentially be utilized for fire-fighting purposes.
6.2	<i>Will the development make use of municipal water and electricity?</i>	Nkosinathi Jikeka, SACP District	15Mar2012, Focus Group Meeting	TNPA will supply electricity and water to the tank farm as stipulated in the BOOT agreement.
6.3	<i>The handling of waste water and specifically the discharge points of the first flush system and oily water system needs to be clarified.</i>	Jessica Courtoreille, PetroSA, Environmental Leader	2Mar2012, email	<p>The Draft and Final EIA Reports will provide more information and clarification on the waste water handling and oily water system. The Integrated Water Management Study will also investigate this issue, and the findings of which will be incorporated into the Draft and Final EIA Reports. The spill containment process is briefly described below:</p> <ul style="list-style-type: none"> ▪ The storage tanks will be constructed within bunded areas. The bund floors will be sealed to prevent the stored products from seeping into the ground. The bunded areas will contain about 100 % of the volume of the largest tank in the bund, including 100 mm freeboard. ▪ The road tanker loading gantry will be a concreted area that will be drained into an interceptor and separator which will contain the contents of a full road tanker. ▪ The road network will drain into a first flush basin before going to stormwater. <p>Essentially all areas that are potentially contaminated are</p>

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				contained and drained through a separator system that has a cyclonic system to extract the hydrocarbons from the water before the 'cleaned' water is allowed to be discharged into the stormwater system. Most of the bunded areas are valved so that a conscious decision is made to release the clean water to prevent a spill from being released from the site.
6.4	<i>The handling and discharge of fire water needs to be clarified.</i>	Jessica Courtoreille, PetroSA, Environmental Leader	2Mar2012, email	The Draft and Final EIA Reports will provide more information and clarification on the handling and discharge of fire water. The Integrated Water Management Study will also investigate this issue in detail, and the findings of which will be incorporated into the Draft and Final EIA Reports.
6.5	<i>Should chemical toilet facilities be used during the construction phase of the project, such facilities must be properly monitored on a daily basis and their content must be safely disposed of at the nearest wastewater treatment works and proof of this must be made available on request.</i>	Marisa Bloem, Dept of Water Affairs	15Mar2012, letter	Comment noted with thanks. This will be incorporated into the EMP.
6.6	<i>The sewage disposal option for the operational phase is not yet finalised and must be furnished in the EIA Report to be submitted to this department.</i>	Marisa Bloem, Dept of Water Affairs	15Mar2012, letter	The Draft and Final EIA Reports will provide more information concerning the sewage disposal system for the operational phase of the project. These reports will be submitted to the Department of Water Affairs during the review periods provided during the EIA Phase. The Integrated Water Management Study will investigate this aspect in detail, and the findings of which will be incorporated into the Draft and Final EIA Reports.

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7. PROJECT SCOPE AND ASSESSMENT OF ALTERNATIVES

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
7.1	<i>What is the relationship in terms of connectivity between the proposed Tank Farm and the future development of an oil refinery? In other words, will this facility be able to accommodate PetroSA (oil refinery)?</i>	Schalk Potgieter, NMBM Planning	12Mar2012, Focus Group Meeting	The proposed project does take into account the needs of PetroSA. As a storage company, OTGC makes efforts to accommodate all possible clients especially considering that refineries are concentrating on their core activity and relying on third parties for storage of both unprocessed and processed products. Based on this, OTGC are able to serve the needs of and support PetroSA if warranted. OTGC can provide tankage, storage, pipeline and berth facilities requirements to the abovementioned company. It must be mentioned that the proposed OTGC Bulk Liquid Storage and Handling Facility is completely independent to and is not a pre-requisite for the proposed PetroSA refinery. Therefore, OTGC can provide a service to PetroSA if required.
7.2	<i>Will the proposed pipeline (associated with the Bulk liquid handling and storage facility) fall within the proposed marine pipeline servitude?</i>	Jill Miller, NMBM Environment	12Mar2012, Focus Group Meeting	The pipelines proposed for the Bulk Liquid Storage and Handling Facility falls within Zone 8 of the Coega IDZ. The proposed Marine Servitude and Pipelines project covers a number of zones in the Coega IDZ, and is being run separately to this EIA currently underway for the OTGC Tank Farm.

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8. PROJECT DETAIL

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
8.1	<i>What are the normal materials that will be used to construct the pipeline?</i>	John Drinkwater, Cerebos	22Feb2012, Public Meeting	The pipelines will be mainly constructed of steel (carbon steel).
8.2	<i>It must be noted that in one of the diagrams that the pipelines go's directly through the salt works. How is the pipeline kept clean and clear?</i>	John Drinkwater, Cerebos	22Feb2012, Public Meeting	The pipelines will be designed as a closed system. A "pig launcher and receiver" will be used to assist the transfer of material in the pipeline from the berth to the tank farm.
8.3	<i>What is the timeline for the project?</i>	Michael Botha, DTM	22Feb2012, Public Meeting	The construction schedule for the proposed project is expected to be 22 months.
8.4	<i>Ch 5, Issues & Responses Trail p5-23 Section 10.2: I consider a handover of the tank farm to TNPA after 20 years a fatal flaw. What is the anticipated lifespan of the tanks? The tanks, however well maintained prior to this period, will be getting old after 20 yrs and it is only after 20 yrs that leakage risks are likely to start. TNPA is not an experienced tank farm operator - the ageing tanks may not be adequately maintained and will probably not be decommissioned before they start to give problems. This project must be a cradle to grave project - the operator (e.g. OTGC) must be held responsible for maintenance for the lifetime of the tanks and then be responsible for decommissioning and removal of the tanks and there must be a due diligence of the area before it is either handed back to Transnet or a new operator comes in to erect replacement tanks. Given this scenario, the 20yr contract with OTGC may need to be longer, or they</i>	Paul Martin, Private	30March2012, email	TNPA issued a Request for Proposal for the construction and operation of a Bulk Liquid Storage and Handling Facility in the Port of Ngqura. OTGC are in the process of signing an agreement with TNPA to Build, Own, Operate and Transfer the facility for a 20 year period. This agreement covers this issue. The tank farm and all structures/connections between the tank farm and the berth will remain the property of OTGC (the Operator) for the duration of the agreement. At the end of the agreement period, all assets will transfer to TNPA. Within this agreement, OTGC will be required to strictly adhere to a stringent and frequent maintenance plan. The design, operation and maintenance of the facility will strictly comply with the requirements of international and SANS specifications within this 20 year lease period. It is anticipated that compliance with these specifications will continue once the 20 year lease period expires in order to avoid any contamination and tank failure. At the end of the lease period, OTGC will be responsible to rehabilitate the land as stipulated within the

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p><i>must remove everything after 20 yrs and undertake a due diligence to prove there has been no contamination.</i></p> <p><i>In reality I would expect a scenario whereby tanks are erected, decommissioned, a due diligence undertaken and then replacement tanks erected, on a regular basis, before the end of the lifespan of the tanks and before problems start to arise.</i></p>			agreement. This will serve as due diligence before the site is handed over to TNPA.

9. EIA AND PUBLIC PARTICIPATION

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
9.1	<i>Which Department (National or Provincial) is the decision-making authority for the EIA process for the proposed project?</i>	Jill Miller, NMBM Environment	12Mar2012, Focus Group Meeting	The Provincial Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) is the decision-making authority for the EIA for the proposed project.
9.2	<i>Has a groundwater/geohydrological specialist been appointed to assess potential impacts to groundwater of the proposed development?</i>	Richard Fyvie, Jeffares and Greene	12Mar2012, Focus Group Meeting	A Groundwater/Geohydrological Specialist has not been appointed at this stage for assessing the potential groundwater impacts. The Client will initially conduct a Geotechnical Survey for the proposed project as part of the engineering design requirements. Once this survey has been completed, the need for a further Groundwater/Geohydrological Study will be assessed and determined.
9.3	<i>The facility must comply with the legal standards for noise for the area during construction and during the</i>	Templeton Titima, NMBM Air Quality	23Mar2012, Focus Group	Comment noted. The legal standards for noise will be investigated and complied with for the construction and

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>operational phase.</i>	Sub Directorate	Meeting	operational phases of the project.
9.4	<i>Will you be calling further public meetings when the specialist studies are available?</i>	Michael Botha, DTM	22Feb2012, Public Meeting	A public meeting will be held during the review of the Draft EIA Report, which will include the findings of the specialist studies undertaken for the project.
9.5	<i>Have you consulted with the Sundays River and Bluewater Bay Ratepayers on the project? The results of the Air Quality specialist report will determine if these communities need to be specifically consulted.</i>	Michael Botha, DTM	22Feb2012, Public Meeting	The Sundays River and Bluewater Bay Ratepayers have not been directly consulted on the project. The public consultation process has focused on the more directly affected communities, that is, Motherwell and Wells Estate.
9.6	<i>We are happy with the process so far and will study the specialist reports when they are made available and make comments.</i>	<i>Cllr Nkosiyapantsi, Chairperson, Motherwell Environmental Forum</i>	5Mar2012, Focus Group Meeting	Comment noted.
9.7	<i>We will wait for the specialist reports and engage further on their findings. We are happy with the development so far.</i>	<i>Mongameli Peter, SANGOCO Region</i>	12Mar2012, Focus Group Meeting	Comment noted.
9.8	<i>We welcome the specialist studies which will provide answers on what species there are on the site, the impacts on these species and how the impacts will be managed.</i>	<i>Nkosinathi Jikeka, SACP District</i>	15Mar2012, Focus Group Meeting	Comment noted. Review periods will be provided during the review of the Draft and Final EIA Reports, which will include the findings of the Specialist Studies.
9.10	<i>We recommend that a civil society workshop for the Motherwell and Wells Estate areas be held to engage these communities on the results of the specialist reports so that further comments can be made.</i>	<i>Nkosinathi Jikeka, SACP District</i>	15Mar2012, Focus Group Meeting	Focus Group Meetings will be held during the review of the Draft EIA Report, these meetings will focus on the Motherwell and Wells Estate area as the most directly affected community.
9.11	<i>As SANParks we would like to see the data of the</i>	Aphiwe Bewana,	2Mar2012,	As part of the Integrated Water Management Specialist Study,

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>continued monitoring programme of surface water and groundwater of the Coega River by the CDC to be used as part of the impact assessment for the oil tank EIA.</i>	SANParks, Marine Intern	email	the CDC will be contacted to obtain information relating to the surface water and groundwater monitoring programme for the Coega River. The findings of this study will be incorporated into the Draft and Final EIA Reports if applicable.
9.12	<i>In addition we would also like the liquid storage providers OTGC or TNPA to include more typical physical and chemical parameters which can detect traces of petroleum liquids in water.</i>	Aphiwe Bewana, SANParks, Marine Intern	2Mar2012, email	Chapter 3 of this report highlights the details of the CDC groundwater and surface water quality monitoring programme. Research indicates that the physical parameters (such as pH, turbidity, conductivity, hardness, dissolved oxygen, colour and total dissolved solids), and typical chemical and organic parameters are monitored as part of this programme. The requirement for regular monitoring of groundwater, surface water and nearshore seawater in the Coega IDZ was stipulated as a condition in the CDC's Record of Decision. At this stage, it is unclear if OTGC will be responsible for including more typical parameters to detect traces of petroleum in the water in the CDC monitoring programme. OTGC will, however, carry out routine and regular groundwater monitoring on site in order to monitor the groundwater conditions and to ascertain levels of contamination.
9.13	<i>The proposed routing of pipelines and infrastructure layout as per Figure 2.2 should incorporate information from Figures 3.1 and Figure 3.2 to demonstrate implications of development.</i>	Jessica Courtoreille, PetroSA, Environmental Leader	2Mar2012, email	The Terrestrial Ecology Specialist Study will investigate the implications of the proposed pipeline routings on the Open Space Management Plan. The findings of this study will be incorporated into the Draft and Final EIA Reports. With regards to the Figure 3.1 of the report, the pipeline only intersects with Zone 8 of the Coega IDZ in the Port of Ngqura.
9.14	<i>You are also required to inform the Provincial Air</i>	TempletonTitima,	8Feb2012,	Mr. Lyndon Mardon, the Provincial Air Quality Officer, has

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>Quality Officer about the application, he is Mr Lyndon Mardon.</i>	NMBM Air Quality	email	been informed of the intention to submit an AEL Application for the proposed project. A letter detailing the proposed project and the need for an AEL Application, as well as a copy of the Draft Scoping Report, was provided to him. In addition, his details were included on the I&AP Database (Appendix D).
9.15	<i>Soil erosion must be controlled, pre construction, during construction and post construction. The responsibility lies with the developer and/or applicant to ensure that soil erosion measures are in place.</i>	Marisa Bloem, Dept of Water Affairs	15Mar2012, letter	Comment noted with thanks. These recommendations, together with appropriate soil erosion measures, will be included in the EMP.

10. GENERAL AND PROJECT MOTIVATION

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
10.1	<i>There is a severe shortage of jet fuel in the region, if the project proceeds; it will provide a supply of jet fuel for the region.</i>	Michael Botha, DTM	22Feb2012, Public Meeting	Comment noted with thanks.
10.2	<i>It appears that the IDZ will become an SEZ, Sector Economic Zone, to try and support local business and industry.</i>	Michael Botha, DTM	22Feb2012, Public Meeting	Comment noted.
10.3	<i>We support the development as long as it will take into account the natural environment and social environment in boosting the economy and promoting sustainable development.</i>	Kiki Dyimi, SANCO Region	27Feb2012, Focus Group Meeting	Comment noted. The EIA process that is currently underway will take into account the impacts of the proposed project on the biophysical and socio-economic environment.
10.4	<i>We support the development and encourage job creation in our region.</i>	Mlamli Tsotsi, COPE Region	5Mar2012, Focus Group	Comment noted.

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NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
			Meeting	
10.5	<i>Appreciate the balance between the natural environment and job creation but this must not negatively impact on the natural environment by destroying natural beauty as government seeks to open up opportunities for investments.</i>	<i>Nkosinathi Jikeka, SACP District</i>	15Mar2012, Focus Group Meeting	Comment noted. The EIA process that is currently underway will take into account the impacts of the proposed project on the biophysical and socio-economic environment. This will ensure that any potential negative impacts are mitigated.