



Prism Ref: 21803 Coega Tankfarm

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Title	Name	Surnam e	Capacity	Organisatio n/ Affiliation	Interest	Comments	Responses			
Orga	Organs of State (Environmental Liaison Committee)									
Mr	Dayalan	Govende r	Regional Manager	DEDEAT	Competent Authority	Comments on the ELC Presentation on 22 February 2018: Must indicate if the EIA Application is for Phase 1 only or for future phases / expansion of the tank farm.	This proposal is only for the project description and as per Site Development Plan. (Figure 12) within the FSR.			
Mr	Andries	Struwig	Asst. Director: IEM	DEDEAT	Competent Authority	May 2018: 2.1 Description of project - Discrepancy between presentation and DSR. The Final Scoping Report (FSR) to be clear and concise in description of various components of the project with specific reference to what BTG will be responsible for. The status of the agreements in place between BTG and OTGC and BTG and TNPA with regard to responsibility for infrastructure and pipelines construction and operation within the harbour and outside the harbour up to the battery limit to be stated in the FSR. Detailed comment regarding the project description from Ms De Klerk of TNPA on Monday 28 May 2018 to be addressed. 2.2 Provide clarity and details as to why an effluent treatment facility is no longer necessary at the tank farm, as it was stated in the DSR that it is planned, but in the ELC presentation that it is no longer required. 2.3 Alternatives - The FSR should clearly explain why a site on CDC land was chosen and not a site on TNPA land where land has been set aside for tank farm infrastructure. Availability of bulk services also an issue. 2.4 From presentation impression was created that emphasis is being placed on issues being addressed in EMPr. Should be noted that impacts to be assessed in the EIR with appropriate management / mitigation measures being proposed that would find its way into the EMPr. 2.5 Specialist / technical studies to be undertaken. The presentation did not include Air Quality Specialist study, but it is included in Plan of Study for EIA. A detailed water and waste management study to be included in the EIR. Should consider waste water or contaminated storm water, as well as an integrated water use study (inclusive of a water balance) should be included in the EIR. The FSR to reflect inclusion of this. No mention of marine related studies being taken into account, inclusive of oil spill contingencies, although project will be reliant on product delivered through the Ngqura Harbour via sea. Serious shortcoming / oversight. Expected that such a study will be included in the EIR.	 3.5 Noted and addressed in the FSR. 3.7 Noted and included within the FSR. 3.8 This paragraph was corrected in the FSR as per comments. 3.9 The data regarding wind has been updated within the FSR. Up to date, local data will be sourced from the local TNPA and CDC air quality monitoring stations and will be included in the EIA report and the AQIA report. 3.10 Confirmation of all services to be provided to BTG site, will be provided during the EIA Phase. 3.12 Noted. 3.14 Noted and included in the FSR and will be addressed in the EIR. 3.15 Noted and included in the FSR. 3.16 This application is for the BTG tank farm site and the pipeline up to the battery limit indicated in Figure 14 of the FSR. 3.21 This map was replaced by the map in Figure 14 within the FSR, with pipeline route and environmental and other attributes included. 3.23 Noted and included in the FSR. 3.25 Noted. This is clarified within the FSR. It should be noted that an internal system is being referred to, which will not be connected to the municipal sewer system. 3.26 Noted. 3.27 Noted, this was addressed in the FSR. 3.28 Noted and addressed within the FSR. 3.29 Noted and addressed within the FSR, no treatment, only handling of effluent as per description within the FSR. 3.31 Noted. This will be addressed in the EIA phase and was included in the alternatives in Section 6.2. 			

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						meant by handling and should clarify at what stage it will be known what type of waste storage facilities (inclusive of capacity) will be required. 3.7 Section 2.10 must also reference Major Hazardous Installation Regulations. 3.8 Section 2.12.2: This paragraph was corrected in the FSR as per comments. 3.9 Weather data should be sourced from CDC or TNPA who has their own weather stations in the Coega area and not the meteoblue website, which seems to differ from other reports submitted to the Department. This should be addressed in the FSR. 3.10 The availability of services to be confirmed and actual dates to be provided when services will be available and other infrastructure that will be required that depends on a third party i.e. OTGC and TNPA. 3.12 Job opportunities and boost to the economy should be quantified in the EIR./FSR. 3.14 The closest Important Bird Area is the Damara Tern Breeding site in close proximity to the site within the coastal dune belt immediately east of the Nggura harbour and not the Algoa Bay Islands IBA. This should be indicated in the FSR and addressed in the EIR. 3.15 The FSR should state that Algoa Bay Islands are statutory protected areas and should also refer to the proposed Marine Protected Area east of the Nggura Harbour. 3.16 Section 3: It is noted that this section does not contain a description of the marine environment/system. 3.21 Figure 15: The map does not have a legend and it is notable that the map lacks detail with regard to the pipeline route and environmental and other attributes that should be included. 3.23 Safety distances to be indicated instead of just referencing the relevant SANS. 3.25 Oily water sewer system to be clarified and whether it will be connected to the municipal sewer system to be clarified and whether it will be connected to the municipal sewer system provided it meets the effluent discharge standards. 3.28 Sciton 4.3.8.5 of the DSR states that loading areas and wash bays will be assessed/addressed in the waste study mentioned in 2.5	

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						report to have been completed at this stage to inform the development. It is not explained what an outline scheme report actually is. The Need and Desirability section fails to explain the need for a further tank farm in the IDZ whereas there is already a tank farm planned within the Ngquru Port Precinct. It should be indicated whether BTG will be in competition with OTGC or complimentary thereto. This aspect to be properly explained and addressed. 3.36 Public Participation – SANP have been omitted from the list of potential I&Aps, yet they are a major stakeholder in the region. I&AP list in Appendix 2 not complete.	
						3.37 Chapter 8 – Plan of Study. Paragraph 8.4 on page 81 states an EMPr will be compiled as a site-specific mitigation measure for all medium to high (significant) impacts. The understanding is that an EMPr in itself is not a mitigation measure but a management tool to address all environmental issues / aspects during construction and / or operation. Furthermore, an EMPr should address all environmental issues / aspects regardless of the level of significance. It must also be noted that it will be expected that a construction specific EMPr and a separate operation specific EMPr to be developed for inclusion in the EIR	
Mr	Lyndon	Mardon	Provincial Air Quality Officer	DEDEAT	Competent Authority	No comments received to date	
Ms	Funanani	Ditinti	Coastal Pollution Management Division	DEA: Ocean & Coast	Commenting Authority	No comments received to date	
Mrs	Nitasha	Baijnath- Pillay	Coastal Pollution Management Division	DEA: Ocean & Coast	Commenting Authority	No comments received to date	
Mr	Reuben	Molale	Coastal Pollution Management Division	DEA: Ocean & Coast	Commenting Authority	No comments received to date	
Mr	Wayne	Hector	Deputy Director: Strategic Infrastructure Development	DEA	Commenting Authority	Comments at the ELC Meeting on 22 February The EIA must describe both site alternatives, despite the one site not being feasible. Must ensure leakage abatement for the fuel pipelines. What will be done regarding loss of biodiversity? The scoping report must include a detailed explanation of why there are not site alterantives.	There is no site alternative at present. Noted and included in Section 6.2 of the FSR.
Mrs	Pumeza	Skepe	Environmental Impact Management	DEA	Commenting Authority	Comments at the ELC Meeting on 22 February What will happen with treated waste water?	This will be assessed during the EIA phase and addressed in the Scoping Report. No water will be treated on site. Contaminated water will only be directed to an oil-water separator, whereafter oil and oily water will be pumped to a Slops Tank. Water will be tested to conform with NMBM sewer discharge standards, before being discharged to the municipal sewer system.

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Mrs	Andrea	Shirley	Environmental Project Manager	CDC	Landowner and State Owned Company	1. The DSR refers to a slops treatment facility should refer to a slops handling facility as it was stated at the ELC meeting of 24th May 2018 that slops will not be treated on site. Include detailed description of what the slops handling facility will entail. 2. The DSR refers to seawater discharge being a water use ito the NWA. Sewater discharge is not dealt with by DWS, but by DEA Ocean and Coast, by way of a Coastal Water Discharge Permit. 3. Section 2.5 - The DSR refer to permits for the removal of protected tree species and plant species that have been forwarded to the EAP on 22 May 2018 by CDC. 4. Recommend to contact Sue Alcock of EnviroServe (EnviroServ operates the Aloes Hazardous Waste Management Facility in PE) to obtain confirmation of capacity to receive hazardous waste to be generated from the slops handling facility, will need to state volumes. 5. Section 3.1 Climate: It is preferable to use information from the CDC weather sation in the IDZ, even for comparative purposes. 6. Section 3.5.1: The Aquaculture Development Zone will be south-east and east of the BTG site and sand mining to the south-east. 7. Indicate how many jobs are anticipated during the construction and operational phases of the project. 8. Section 3.10.1.4 - Reference to IBA's. There are three important bird areas of international importance in the region, which contain habitat for a species of conservation concern and/or are endemic to a region and/or where the habitat is under threat, nameley: 1. Alexandria Coastal Belt, Algoa Bay Islands and Swartkops Estuary. Information on the Damara tern was also provided for inclusion in the Final Scoping Report. 9. Section 4.3.1.1 : Clarity on the Berth allocated by Transnet for the off-loading of fuels to be provided and who's (BTG or OTGC) it will be. Require agreement with Transnet regarding serbvitude use, berth use and pipeline alignment within the servitude. Agreements and linkages to be clear. 10. Section 4.3.1.1 : Requirement of stationary pumps on the jetty - will this	spelling, grammar, reference errors and other general comments. These have all been addressed and / or corrected within the Final Scoping Report. 1. Noted and addressed in the FSR. 2. Noted and corrected / addressed in the FSR. 3. Noted and included in the FSR. 4. Noted. Will further be addressed during the EIA Phase. 5. Noted. 6. Noted and included in the FSR. 7. Noted and included in the FSR. 8. Included in the FSR. 9. Noted and addressed in the FSR. 10. This has been removed from the FSR. This application is only for the BTG tank farm infrastructure and operations and the pipeline up to the battery limit indicated on Figure 14 within the FSR. 11. See response in point 10 above. 12. Map was amended and replaced with map in Figure 14 of the FSR. 13. Noted and indicated in FSR. 14. Provided in FSR. 15. Clarity provided in FSR. 16. Noted. The Air Quality Specialist will confirm whether a fuel burning license is required during the EIA Phase. 17. Noted and addressed in the FSR. 18. Noted, will be indicated during the EIA Phase. 19. The pond is not a requirement and has been removed from the SDP (refer to Figure 12 of the FSR). 20. Noted, will be addressed in the EIR. 21. Noted. 22. Noted, will be addressed in the EMP. 23. The outline scheme report will be available during the EIA phase. 24. No, it cannot, not the meaning of the sentence. 25. BTG will then proceed to apply for relevant approvals and construct the required infrastructure. 26. Noted. 27. Noted. Clarified within the FSR. 28. Noted. Isa Fincluded in Appendix 2.1 of the FSR. 29. Yes, this will form part of the engineering studies as indicated within the FSR.

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						indicate the responsibilities of OTGC, BTG and Transnet. 13. Final scoping report to indicate that effluent treatment plant is not required. 14. Section 4.3.2: SANS safety distances to be provided. 15. Provide clarity on oily water sewer. Is oily water sewer connected to municipal sewer, if so explain system design to separate oily water to ensure NMBM sewer discharge standards are met. 16. Section 4.3.4: Boiler: Fuel Burning Applicance License to be obtained from NMBM for the boiler and registered with the DoL. 17. Section 4.3.4: Boiler: Fuel Burning Applicance License to be obtained from NMBM for the boiler and registered with the DoL. 17. Section 4.3.4: Process water to be disposed of into the sewer and not the stormwater system. Only clean stormwater is allowed to be discharged into the stormwater systems. 18. Section 4.3.9: Indicate source of fire water storage. 19. Section 4.3.1: Indicate correct size and capacity of pond. 20. Section 4.4.1.1: Security: Indicate details of wall to be constructed, consider CDC's Architectural Guidelines. 21. Section 4.4.1.1: Sanitation: The EMP to provide detail on number of toilets, and number of construction personnel and security staff. 22. Section 4.5: Excavation and Earthworks: Indicate in EIA and EMP how and where excavated material will be stockpiled and/or disposed of. Volumes of material, management of stockpiles to be addressed and indicate which existing dams are being referred to. 23. Indicate when Outline Scheme Report will be available. 24. Table 9: Can it be stated at his point in the EIA, that all impacts arising out of this development will be mitigated to low levels? 25. Section 6.2: Indicate alternative/contingency plan if OTGC does not go ahead as per planned schedule,. 26. Section 6.2: Layout alternatives. The EIA and EMP to provide more detail on the rescue and relocation of animal species found on site. 27. Section 6.2.3: Technology alternatives: reference to waste water treatment plant, provide clarity as it was mentioned in ELC that	

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Mr	Graham	Taylor	Spatial Development Manager	CDC	Landowner and Commenting Authority	No comments received to date	
Ms	Renee	de Klerk	Environmental Manager	TCP	Commenting Authority	February 2018: 1. There is a designated tank farm in the IDZ. How does this proposed Bay Terminals Tank Farm fit in with the existing tank farm? 2. The pipeline routing must be addressed and how the pipelines will reach the proposed site in Zone 7. How will the pipelines be located within the servitude? These issues must be addressed with TNPA. 3. Consider conducting a traffic impact assessment. 4. Construction and operational dates must be clarified. Comments on ELC Presentation and associated drawings/layouts 24 May 2018: a. Information presented at the ELC not aligned with DSR. No indication in DSR of agreement between BTG and OTGC regarding sharing/use of equipment and infrastructure from port boundary. DSR creates impression that BTG will operate within Port and that infrastructure and equipment will be constructed within the port. b. The layout plan with pipeline routing options provided at the ELC is not accurate according to authorised pipeline reserves within Zone 8 and the Port. Again not aligned with DSR. Clarity required. c. The final scoping must distinguish clearly between equipment, infrastructure and structures that will be provided by BTG, OTGC and Transnet. Roles and responsibilities between the various parties must be clearly defined. Must be reference to existing environmental authorisations associated with the project of which two were issued to Transnet for supporting infrastructure and one to OTGC's tank farm. Some of conditions of these EAs may become relevant to BTG. BTG must be aware of their liabilities, if any. d. BTG project schedule to take into consideration the fact that the new Port entrance facility, roads and pipeline reserves have not yet been constructed. e. Outcomes of HAZOP and other risk assessments must be included. f. Methodology of linking of BTG pipeline and OTGC pipeline to be clearly specified. Comments on Draft Scoping Report - Project Description & Environmental Impacts: a. Consistency with terminology required e.g. Liquid Bulk Berth and not Berth Jet	4. Construction and operation will commence as soon as all approvals have been received and according to agreements and availability of services. This will be provided during the EIA phase. Comments on ELC Presentation and associated drawings/layouts 24 May 2018: a. Noted. This has been clarified within the FSR. b. Noted this has been clarified within the FSR. This application is only for the BTG Tank Farm infrastructure and the pipeline from the BTG boundary to the battery limit indicated on Figure 14 within the FSR. Please refer to Appendix 6 of the FSR for the status of negotiations with OTGC to provide services within the port up to the battery limit indicated on Figure 14 of the FSR. c. Noted this has been clarified within Section 4.3 of the FSR. d. Noted. e. Noted within the FSR and will be included within the EIA phase. f. Noted. This will be provided within the EIR. Comments on Draft Scoping Report - Project Description & Environmental Impacts: a. Noted and addressed in the FSR. b. Noted. Detail provided in the FSR, further detail to be provided within the EIR. c. Noted. This is included in Section 4.3.17. d. Noted. More detail provided in the FSR in section 4.3.17 and more detail to be provided in the EIR. e. No infrastructure will be provided or constructed by BTG within the Port and location. This will be conducted by third party (OTGC). Refer to Appendix 6. f. See comment above. This will be the responsibility of the service provider (OTGC). g. See comment above. This will be the responsibility of the service provider (OTGC). h. BTG's responsibility in terms of oil spill response will start from the battery limit up until the BTG site boundary. i. Noted. It is estimated that not more than 4 additional vessels will call at the port monthly. Cumulative impacts will be considered during the EIA phase. k. This will be the responsibility of the service provider (OTGC). This application is for the BTG Tank Farm only and for the pipelines up to the battery limit indicated in Figure 14 of the FSR.

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						h. Indicate roles and responsibilities associated with oil spill response. i. Marine impacts to be included in scoping report. Will the additional tank farm increase vessel traffic. How many vessels are expected to call at the Port annually. Cumulative impacts to be considered. j. Details on construction interface between various projects to be provided. k. Indicate locations of roads to be constructed or extended and provide details (width, length etc.). l. Clarity on LPG vessels required (Section 4.3.6) Equipment and infrastructure required on the Berth for LPG. m. Consider a closed system for stormwater instead of discharge. Can stormwater be re-used? n. Section 4.5 page 59: Excavation and earthworks - please specify construction works within existing dams. o. Include section on construction methodology of the tank farm including earthworks, cut and fill and excess spoil material and how it will be managed.	
Mr	Mpatisi	Pantsi	SHE Manager	TNPA	Commenting Authority	No comments received to date	
Mr	Mandilakhe	Mdodana	Environmental Manager	TNPA	Commenting Authority	Comment at 2nd ELC Meeting on 24 May 2018: 1. Have international standards been considered for the purchase and risk and fire-fighting equipment. 2. Will BTG be constructing a pipeline from the berth? Confirmed in subsequent phone call that agree with comments from Renee de Klerk from TCP as sent on 28 May 2018.	2. The fuel pipeline from the berth to the OTGC site is the responsibility of OTGC; whereas the pipeline from the OTGC site to the BTG site is the
Mr	Godfrey	Murrel	Environmental Manager	NMBM	Commenting Authority	No comments received to date	
Ms	Rosa	Blaauw		NMBM	Commenting Authority	Comments on 1st Draft Scoping Report (DSR): The municipality require more information regarding the footprint of new infrastructure for transportation of water and waste water and the water recycling and effluent tratement plant to confirm that the following listed activities in Listing Notice 1 is triggered by the proposed activity or not: - Activity 9, 10, 25 and 46. The municipality requested that the Competent Authority confirms whether a waste license is required or not, once more information becomes available regarding the water recycling and effluent treatment plant. The municipality requested that the Department of Water and Sanitation (DWS) confirms the requirement of a Water Use License Application for the storage of water in fire tanks. The municipality commented that in terms of the Nelson Manadela Bay Metropolitan Open Space Systems (NMB MOSS) the study area does not fall in areas of conservation concern, except for the ecosystem status, which is vulnerable with Grassridge Bontveld Vegetation type. Spills should be prevented and managed according to appropriate methods. Fire is a major risk of the proposed development and the applicant should consider an emergency spill containment area for contaminated fire runoff water.	The Coega Development Corporation (CDC) is responsible for provision of services to the site and therefore, the transportation of services (water and waste water) is not included in the application. Should an environmental authorisation be required for the transportation of services, the applicant will be CDC. The daily throughput capacity of the water recycling and effluent treatment plant will be less than 2 000 cubic metres and therefore, will not trigger a listed activity. Formal comments on the requirement for a waste license, will be obtained from the Competent Authority. Formal comments on the requirement for a water use license, will be obtained from the DWS. The Environmental Impact Assessment Report and Environmental Management Programme will consider spill management on site. Comments at the 2nd ELC Meeting on 24 May 2018: Confirmed that the activity & site will be an MHI. A NEMA risk assessment will be conducted as part of the EIA phase, which will inform the MHI risk assessment to be conducted prior to construction.
						The Applicant must give effect to Section 28 of NEMA (Duty of Care for the Environment) during all phases of the development.	

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						Comments at the 2nd ELC Meeting on 24 May 2018: The Risk Assessment / Disaster Risk Plan must consider and assess risks to the receiving environment, including mitigation actions.	
Ms	Buyiswa	Deliwe	Air Pollution & Noise Control	NMBM: Air Pollution & Noise Control		Comments at the ELC Meeting on 24 May 2018: Will an air quality immpact assessment (AQIA) be done to quantify the fugitive emissions? Will a vapour recovery unit be installed?	An AQIA will be done. A vapour recovery unit will be included as part of the mitigation of emissions.
Mr	Patrick	Nodwele	Air Pollution & Noise Control	NMBM: Air Pollution & Noise Control	Competent Authority		
Ms	Thandi	Mmacha ka	Water Quality Management	DWS	Commenting Authority	Comments at the ELC Meeting on 24 May 2018: 1. Contaminated stormwater must comply with the NMBM standards and not DWS standards if being discharged to the sewer. 2. Confirm that no WUL is triggered for storage of water.	1. Noted. 2. Noted.
Mr	Vusi	Kubheka	ASD: Mineral Regulation	DMR	Commenting Authority	No comments received to date	
Ms	Bongi	Stofile	Executive Manager: Operations	SAMSA	Commenting Authority	No comments received to date	
Inve	stors in the	Coega Ind	lustrial Developr	ment Zone			
	Nontobeko	Funde	Project Environmental Manager	Grinrod Calulo (Pty)	Investor	No comments received to date	
Addi	tional intere	ested and	affected parties	(due to registr	ation during the, or as a re	sult of the 'Public Participation Process')	
Ms	Roxanne		Regional Content Researcher	Leads 2 Business	Public	No comments received to date	
Ms	Christelle		Environmental Consultant	Habitatlink	Environmental Control Officer for the Coega SEZ and Port of Ngqura	 Note that Figure 13 refers to GDARD and not DEDEAT. Note the pipeline route for OTGC has not been finalised and will be dependent on berth construction. Presumably same applies for BTG? Indicate whether there is sufficient space within the proclaimed pipeline servitude for additional proposed pipelines. Verify water use license requirements for proposed on-site wastewater treatment facility (which presumably will include storage dams) as well as for 	 This application is only for the BTG Tank Farm infrastructure and the pipeline from the BTG boundary to the battery limit indicated on Figure 14 within the FSR. The proclaimed pipeline reserve is 30 m wide, OTGC / thirdparty providing the services to BTG to confirm. DWS confirmed that no WUL required as no wastewater will be treated or stored on the site or be discharged to the stormwater system. Noted. Noted.