

APPENDIX 3: AUTHORITY CORRESPONDENCE

Appendix 3.1: GDARD Acceptance of the Scoping Report

Appendix 3.2: DWS Correspondence

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Appendix 3.1: GDARD Acceptance of the Scoping Report



Reference: Gaut: 002/18-19/0001
Enquiries: Xoliswa Bobelo
Telephone: 011 240 3391
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SLR Consulting (South Africa) (Pty) Ltd
P.O. Box 1596
Cramerview
2060

Attention: Matthew Hemming
Tel No: 011 467 0945
Email: mhemming@slrconsulting.com

Dear Sir,

FINAL SCOPING REPORT ACCEPTED: THE PROPOSED GLASS BOTTLE MANUFACTURING PLANT ON PORTION 1 OF PORTION 238 (A PORTION OF PORTION OF 149), EMFULENI LOCAL MUNICIPALITY

The Final Scoping Report regarding the above-mentioned development received by the Department on 28 September 2018 has been accepted. You may accordingly proceed with undertaking the EIA in accordance with the tasks that are outlined in the Plan of Study.

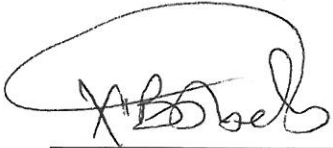
Notwithstanding the above, your attention is drawn to the following requirements that must be addressed in the draft Environmental Impact Assessment Report (EIAR):

- 1) The EIAR must comply with Regulation 23 of the Environmental Impact Regulations (EIAR), 2014 as amended.
- 2) All planned specialist studies must be undertaken by qualified specialist and must comply with GDARD Requirements for Biodiversity Assessments and signed off by specialist registered with South African Council for Natural Scientific Professions (SACNAPS).
- 3) All maps must be in colour, have a legend and be to correct scale.
- 4) The proposed plant falls within a sensitive area as per C-Plan Version 3.3. The Department has noted that this application for Environmental Authorisation is still on the scoping stage. However, all mitigation measures to lessen damage to sensitive environment especially to wetland crossings must be clearly stated in the draft EIAR. Furthermore, the site has an area which looks like a river, or wetland, there are wetland plants in the river therefore, investigations need to be conducted to ascertain the stream that was observed on site.
- 5) The proposed project requires an Atmospheric Emission License (AEL) from Sedibeng District Municipality and the application must be made with the municipality.
- 6) The source where the cullet will come from must be specified on the EIAR.
- 7) The relevant municipality must be notified regarding the project if they are to be responsible for the collection of general waste generated on site during construction and operational phase, or if the waste will be deposited on their landfill site.
- 8) A Waste Management Plan (WMP) must be developed and attached to the EIR report and must indicate how waste will be able handled during construction and operational phase for both hazardous (chemicals, fuels) and general (which includes broken glasses, builder's rubbles) wastes generated.
- 9) The development need to assess the impacts this development will have on the people living across the road as well as develop buffers for the residents living near the plant.

- 10) A detailed storm water management plan for this development must be compiled and approved by the local authority before incorporating such plan into the EIAR.
- 11) Comments for service delivery from municipality which include electricity, water, sewage, storm water and traffic impact must be included in the Draft EIAR.
- 12) Alternatives which consider the use of sustainable development means which involve the use of solar geyser, rainfall harvesting etc. must be part of the Draft EIAR to be submitted.
- 13) The final scoping report covers the property/locality alternative, design alternatives and the no-go alternative that must still be included in the Draft EIAR.
- 14) The report must contain a layout plan overlain with sensitivity map and such map must be created in accordance with GDARD Minimum Requirements for Biodiversity Assessments.

If you have any queries concerning this issue, please feel free to contact the relevant official at the number given above.

Yours faithfully



Ms. X. Bobelo
Control Environmental Officer: Impact Management

Date: 15/10/2018

APPENDIX 3: AUTHORITY CORRESPONDENCE

Appendix 3.2: DWS Correspondence



PROPOSED LEEUWKUIL PROJECTS:
 PROJECT JORDAN & GLASS BOTTLE MANUFACTURING PLANT
 WATER USE AUTHORISATION PROCESS

NOTES FROM THE MEETING WITH THE DEPARTMENT OF WATER AND SANITATION (DWS)

DATE	4 October 2018
VENUE:	DWS offices, Pretoria
SLR COMPANY:	SLR Consulting (South Africa) (Pty) Ltd (SLR)
PROJECT NUMBER:	720.19124.00001 and 720.19124.00005
PURPOSE:	The purpose of the meeting was to discuss: <ul style="list-style-type: none"> • the applicability of General Authorisations to the Glass Bottle Manufacturing Plant; and • the applicability of General Authorisations to Project Jordan.
ATTENDANCE:	Attendees included: <ul style="list-style-type: none"> • Helen Mathedimosa (HM) – DWS Licensing officer • Andrew Mbedzi (AB) – DWS Case officer • Gary Lloyd (GL) – External Project Manager for SAB • Genevieve Boys (GB) – SCIP Civil Engineer • Alex Pheiffer (AP) – Environmental Assessment Practitioner (SLR) • Matthew Hemming (MH) – Environmental Assessment Practitioner (SLR)

1. OPEN AND INTRODUCTION

Genevieve Boyes (GB) from SCIP Engineering Group [Pty] Ltd (SCIP) opened the meeting, welcomed attendees and outlined the purpose of the meeting. A map showing the location of the two proposed project sites was shown.

All attendees introduced themselves and their role in the project and process.

2. GLASS BOTTLE MANUFACTURING PLANT DISCUSSION & KEY OUTCOMES

Matthew Hemming (MH) of SLR, the Environmental Assessment Practitioners appointed by SAB, provided an introduction to the Glass Bottle Manufacturing Plant and the potential water uses. MH indicated that a freshwater resource verification study had been undertaken and no natural wetlands were identified within 500 m of the site. Thus development of the site would not trigger a water use in terms of section c and i of the NWA.

Below are the main discussion points from the meeting.

2.1. Domestic sewer

- As the municipal run Leeuwkuil Water Care Works cannot guarantee capacity for domestic sewerage, the project has elected to develop a project-specific sewage package plant.
- The design volume for the plant is estimated at 180kl/day.

- The plant would be designed to treat to the DWS approved discharge standard as in the Leeuwkuil WULA.
- Options for management of the treated effluent arising from the plant include discharge to the environment and/or irrigation to land.
- The discharge would be via a pipeline into the existing storm water channel along the R59. It still needs to be determined if the municipality (or GauTrans) own this infrastructure and if they would grant permission for the discharge.
- Once in the storm water channel the water would drain under the R28 road and into the unnamed Vaal tributary.
- The GA for discharge of treated sewage (**GN 665** of 6 September 2013) is applicable to wastewater (not a complex industrial wastewater) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA. It should thus be applicable in this case.
- Irrigation, to the remainder of the property, is proposed as an alternative to the discharge (in case the municipality doesn't allow it, or the GA is not applicable).
- The GA for irrigation of treated sewage (**GN 665** of 6 September 2013) is applicable to domestic and biodegradable industrial wastewater (as defined) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA. It should thus be applicable in this case.

The DWS case officers indicated that the GA would likely be applicable. The appropriate manner to confirm this would be to lodge an application on the online WULA system (with all relevant information such as design capacities, qualities etc.). Formal review of the application by the DWS would provide confirmation if the GA's are applicable or if a licence application would be required.

The DWS case officers were not certain if application for two water uses (i.e. discharge and irrigation) for the same volume of water would be permitted. MH indicated that this was preferable in order to ensure a solution.

MH indicated that to SLR's knowledge, GN 665 lapsed on 6 September 2018. Were the case officers aware of any extension to the GA validity? The DWS case officers were not, but indicated that they would make enquiries.

2.2. Bulk water supply

- Bulk water was originally to be sourced from the municipality from a pipeline on the site boundary. Due to security of supply and pressure concerns it has been decided to install a dedicated supply pipeline.
- The proposed pipeline (likely 250 mm diameter) would connect to Rand Water at the same point as the existing pipeline and follow the same route.
- The pipeline is likely to have to cross the Vaal Tributary at two locations. These would both be where there are existing road reserves and bridges. The pipeline would be pinned to the bridge.
- It is understood that such river crossings are likely to constitute water uses in terms of section c and i of the NWA as there could be risks to the regulated area of a watercourse.

- However, the GA for section c and i water uses (GN 509 of August 2017) provides for authorisation of activities with a low risk to the riparian habitat.

The DWS case officers indicated that provided a risk assessment (undertaken in terms of GN 509) indicated a 'low risk', the pipeline crossings of the watercourse would be generally authorised. This would be confirmed once an on-line application had been made.

3. PROJECT JORDAN - DISCUSSION & KEY OUTCOMES

Alex Pheiffer (AP) of SLR, the Environmental Assessment Practitioners appointed by SAB for Project Jordan provided details on the project and the potential water uses. Below are the main discussion points from the meeting.

3.1. Domestic sewer

- As the municipal run Leeuwkuil Water Care Works cannot guarantee capacity for domestic sewerage, the project has elected to develop a project-specific sewage package plant.
- The design volume for the plant is estimated at 2,5kl/day.
- The plant would be designed to treat to the DWS approved discharge standard as in the Leeuwkuil WULA.
- Options for management of the treated effluent arising from the plant include discharge to the environment and/or irrigation to land.
- The discharge would be via a pipeline into the existing storm water channel along the R59. It still needs to be determined if the municipality (or GauTrans) own this infrastructure and if they would grant permission for the discharge.
- Once in the storm water channel the water would drain under the R28 road and into the unnamed Vaal tributary.
- The GA for discharge of treated sewage (**GN 665** of 6 September 2013) is applicable to wastewater (not a complex industrial wastewater) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA. It should thus be applicable in this case.
- Irrigation, to the remainder of the property, is proposed as an alternative to the discharge (in case the municipality doesn't allow it, or the GA is not applicable).
- The GA for irrigation of treated sewage (**GN 665** of 6 September 2013) is applicable to domestic and biodegradable industrial wastewater (as defined) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA. It should thus be applicable in this case.

The DWS case officers indicated that the GA would likely be applicable. The appropriate manner to confirm this would be to lodge an application on the online WULA system (with all relevant information such as design capacities, qualities etc.). Formal review of the application by the DWS would provide confirmation if the GA's are applicable or if a licence application would be required.

3.2. Industrial effluent

- Production process at Project Jordan (Maize Wet Mill) would be water intensive and will result in large volumes of biodegradable industrial waste water.

- As the municipal run Leeuwkuil Water Care Works cannot guarantee capacity treatment, the project will develop an industrial waste water treatment plant.
- The design volume for the plant is estimated at 5652kl/day.
- The plant would be designed to treat to the DWS approved discharge standard as in the Leeuwkuil WULA.
- The primary option for management of the treated biodegradable industrial waste water arising from the plant is discharge to the environment.
- The discharge would be via a pipeline into the existing storm water channel along the R59. It still needs to be determined if the municipality (or GauTrans) own this infrastructure and if they would grant permission for the discharge.
- Once in the storm water channel the water would drain under the R28 road and into the unnamed Vaal tributary.
- Irrigation, to the remainder of the property, is proposed as an alternative to the discharge (in case the municipality doesn't allow it, or the GA is not applicable).
- The GA for discharge of treated wastewater (**GN 665** of 6 September 2013) is applicable to wastewater (not a complex industrial wastewater) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA.
- The GA for irrigation of treated sewage (**GN 665** of 6 September 2013) is applicable to domestic and biodegradable industrial wastewater (as defined) at rates of less than 2000 m³/day, subject to compliance with wastewater limit values set out in the GA.

Thus while the GA (GN 665) is potentially applicable (where the discharge meets the requirements), the DWS case officers indicated that the GA could only be applied for waste water up to 2000m³/day. Any discharge/irrigation in excess of 2000m³/day could not be undertaken in terms of the GA.

Various discussions were held around the potential alternative uses of the treated waste water (in excess of 2000m³/day). This included options for:

- re-use (generally not possible due to quality requirements),
- irrigation (limited by available land),
- evaporation (would require large dams), and
- alternative uses (donation to municipality of agricultural schemes).

The discussions concluded that the projects' water management options would, due to the large volumes of water, most likely require a Water Use Licence. The appropriate manner to confirm this would be to lodge an application on the online system (with all design capacities, qualities etc.). Formal review of the application by the DWS would provide confirmation if the GA's are applicable or if a licence application would be required.

AP and GL indicated that the project aimed to avoid a water use licensing (WULA) process as the time periods associated with a WULA did not fit within the timing of the project's financial decisions. The DWS case officers indicated that WULA time periods were not always slow and that a WULA could be decided faster than the scheduled 300 days. SLR stated that while possible, there are many examples of WULA taking well in excess of the 300 days.

AP stated that the project team would have to more fully investigate the water management options to determine if a feasible alternative, not requiring a WULA could be identified. Otherwise a WULA would have to be made.

3.3. Bulk water supply

- As the project has high potable water demands a dedicated bulk water is required.
- The proposed pipeline (likely 250 mm diameter) would connect to Rand Water at the Botha Street connection and follow the same route as an existing pipeline.
- The pipeline is likely to have to cross the Vaal Tributary at two locations. These would both be where there are existing road reserves and bridges. The pipeline would be pinned to the bridge.
- It is understood that such river crossings are likely to constitute water uses in terms of section c and i of the NWA as there could be risks to the regulated area of a watercourse.
- However, the GA for section c and i water uses (GN 509 of August 2017) provides for authorisation of activities with a low risk to the riparian habitat.

The DWS case officers indicated that provided a risk assessment (undertaken in terms of GN 509) indicated a 'low risk', the pipeline crossings of the watercourse would be generally authorised. This would be confirmed once an on-line application had been made.

4. CLOSE

Attendees were thanked for their input and for making the time to attend the meeting. The meeting was closed.

APPENDIX 1: ATTENDANCE REGISTER



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

Leewkuil Pre Consultation Meeting

Date: 04 September 2018

Time: 10:00

Venue: DWS Office –Diphororo Boardroom

No	Name	Company	E-mail address	Contact numbers	Signature
1.	Hellen Mathedimosa	DWS: Gauteng Region, IE	mathedimosah@dwa.gov.za	Tel. no.: 012 392 1350 Cell no.: 082 819 1246	
2.	Andrew Mbedzi	DWS: WUA- GPO	mbedzia@dws.gov.za	Tel. no.: 012-392-1479 Cell no.: 073-485-3497	
3.	Guy Lloyd	J- Maynard.	guy.lloyd@j-maynard.com	Tel. no.: Cell no.: 0822212263	
4.	Genevieve Boyes	SLIP	genevieve@slip.co.za	Tel. no.: 011 886 1025 Cell no.: 011 316 9336	
5.	Matthew Hemming	SLR	mhemming@slrconsulting	Tel. no.: Cell no.: 082 940 8274	
6.	Alex Pfeiffer	SLR	apfeiffer@slrconsulting.com	Tel. no.: 011 4670945 Cell no.: 083 269 7545	
7.				Tel. no.: Cell no.:	
8.				Tel. no.: Cell no.:	
9.				Tel. no.: Cell no.:	

APPENDIX 3: AUTHORITY CORRESPONDENCE

Appendix 3.3: AEL Correspondence

Matthew Hemming

From: Michael Nemangaya <MichaelN@sedibeng.gov.za>
Sent: 17 October 2018 08:33 AM
To: Matthew Hemming
Subject: Re: SAB's Glass Bottle Manufacturing Plant

Good day Matthew

The development is noted

With kind regards

Michael Nemangaya
Manager: Air Quality
Environment & Clean Energy
Sedibeng District Municipality
Michaeln@Sedibeng.gov.za
Tell :016 450 3233

>>> Matthew Hemming <mhemming@slrconsulting.com> 10/15/2018 11:11 AM >>>
Good morning Michael

This email serves to provide an update on progress with the EIA process for SAB's Glass Bottle Manufacturing Plant.

The Final Scoping Report has been accepted by the GDARD, who granted permission for the project to proceed to the EIA phase (11 October 2018). SLR is currently busy with compilation of the Environmental Impact Assessment Report. The work undertaken for the EIA included an Air Quality Impact Assessment report by Airshed.

In the course of the current phase of the project, an application form for an ATMOSPHERIC EMISSION LICENCE will be submitted to the SEDIBENG DISTRICT MUNICIPALITY.

It is my understanding that a hand-delivered application is preferred. Please advise how many copies you would like (hard vs electronic)?

Kind regards



Matthew Hemming
African ESIA Technical Discipline Manager

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