

585503: The proposed 80 000 tonne per annum TiO2 Pigment Plant in the Richard's Bay Industrial Development Zone, KwaZulu Natal Project Comments and Response Report

Interested and Affected Parties		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Consultation Status (consensus dispute, not finalised, etc)
AFFECTED PARTIES					
Interested and Affected Parties	X				
John Pakwe KwaZulu-Natal Amafa and Research Institute Heritage Officer	X	12 July 2022	<p>Dear Ndomupe Masawi,</p> <p>This email is an acknowledgement of receipt of the Draft Scoping Report for the Proposed Richard's Bay Industrial Development Zone on behalf of the late Mrs Bernadet Pawandiwa.</p> <p>Kindly note that we are no longer taking email or posted applications as at 1 April 2022. The applicant is advised to upload all application documents onto the SAHRIS facility (www.sahris.sahra.org.za) for consideration by the Heritage Officers Committee.</p>	Noted, an online application has been undertaken and the case officer is Khanyi Zondi	Finalized
Interested and Affected Parties	X				
Ms. K Naidoo Department of Water and Sanitation	X	11 August 2022	Reference is made to the Draft Scoping Report (DSR) for the proposed for the proposed 80 000 tonne per annum TiO2 Pigment Plant in the Richard's Bay Industrial Development Zone received by the Department of Water and Sanitation (Department). This Department has the following comments which must be addressed and	Noted	Finalized

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		<p>responses form part of the subsequent environmental assessment process.</p> <p>1. The following information presented in the DSR is noted and has reference:</p> <p>A. It is noted that the application is for a proposed pigment plant which will produce 80 000 tons per annum titanium dioxide (TiO₂) pigment, situated within the Richards Bay Industrial Development Zone (RBIDZ).</p>		
		<p>B. The scope of the project also includes the following process units:</p> <ul style="list-style-type: none"> i. a sulfur-burning sulfuric acid plant (also supplying steam to the main TiO₂ plant); ii. a water demineralisation plant; iii. a compressed air plant for plant air and instrument air; iv. vacuum generation plant; v. a lime slaking plant; vi. water cooling plant(s); and vii. steam boiler(s). 	Noted	Finalized
		<p>C. It is indicated in the Executive summary that SRK Consulting (SA) (Pty) Ltd has been appointed by the Applicant to conduct both the Environmental Authorisation (EA) and Water Use Licence (WUL) application processes</p>	Noted	Finalized
		<p>D. It is indicated in the Executive summary that the following Specialist studies, amongst others will be undertaken during the impact assessment phase — Wetland Assessment; Aquatic Assessment; Terrestrial Biodiversity Assessment; Geohydrology Assessment;</p>	Noted	Finalized

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		Hydropedology Study; Traffic Impact Assessment; Hydrology Study and Stormwater Management Plan.		
		E. Page 16 states Operation of the plant will be 24 hours per day, 365 days per year.	Noted	Finalized
		F. Water supply as indicated on Pages 25 and 26, state the following: i. Water from the external supply point will be piped into storage reservoirs on site, with sufficient capacity for 2 days' supply to the site. A pump station installed at the reservoirs will distribute water to off-take points on the site. ii. Cooling water will either be from process water or filtered sea water. Sources of water supply to the site are currently under investigation. iii. Demineralized water will be produced on-site. iv. High pressure and low-pressure steam as heat source will be piped from the sulfuric acid plant and an on-site boiler plant.	Noted	Finalized
		G. Waste and wastewater as indicated on Pages 27 to 31, state the following: i. Effluent collection reservoirs with 2 days' worth of storage capacity will be constructed on site — that will serve to homogenise the effluent before discharge. A pump station at the reservoirs will pump the effluent into the discharge line. ii. Effluent collection reservoirs with 2 days' worth of storage capacity will be constructed on site — that will serve to homogenise the effluent before	Noted	Finalized

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		<p>discharge. A pump station at the reservoirs will pump the effluent into the discharge line.</p> <ul style="list-style-type: none"> iii. Effluent will be piped from connection points at the various process buildings to the waste acid neutralisation plant where it will be neutralised. iv. Effluent collection reservoirs with 2 days' worth of storage capacity will be constructed on site — that will serve to homogenise the effluent before discharge. A pump station at the reservoirs will pump the effluent into the discharge line. 		
		<p>H. Page 68, states that, "During construction, there will be particulate emissions (dust) related to debris handling, materials transportation, storage, handling, and transfer; and open areas (windblown emissions)"</p>	Noted	Finalized
		<p>I. According to the wetlands delineation undertaken for Richards Bay Industrial Zone (RBIDZ), there are currently three wetlands present on the property. It must be noted that the EA issued for the RBIDZ (Ref 14/12/1613/3/2/665) makes provision for the following:</p> <ul style="list-style-type: none"> i. Wetland Unit A will be conserved and will have a 30m buffer; ii. Wetland Unit B may be partially infilled; and iii. Wetland Unit C may be infilled. 	Noted	Finalized
		<p>1.1 This Department notes the proposed project and looks forward to the comprehensive report as the Plan of Study for the EIA (POSEIA) and the proposed specialist studies identified to be undertaken as part of the legislative mandate.</p>	Noted	Finalized

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		1.2 This Department notes that SRK Consulting (Pty) Ltd, will be undertaking the Water Use Authorisation for the proposed project in line with the possible water uses triggered on-site. This Department welcomes the willingness to comply with Water Use Authorisation process. Should the Applicant require more information on Water Use Authorisation and technical requirements, Ms Zamashenge Hadebe of the Department's Water Use Authorisation Unit can be contacted on 031 336 2700/2767.	Noted	Finalized
		1.3 Item E has reference. Kindly ensure that emergency response and contingency measures are duly considered and form part of the final assessment phase for the proposed project, which will be operating on a 24 hour basis, taking into account planned shuts for maintenance and repairs, electricity power outages, water shortages and spillages of any kind.	Noted, an emergency response plan will be compiled and will form part of the EIA phase of this project	Finalized
		1.4 Item F has reference (Water Supply). 1.4.1 With regard to water supply for both construction and operational phases, the Applicant is the requirements of the NWA could lead to legal action being instituted against the Applicant	Noted	Finalized
		This reply does not grant any exemption from the requirements of any applicable Act, Ordinance, Regulation or Bylaw. Please note that any use of water without prior authorisation is illegal as it is in contravention of the NWA and is punishable by law.	Noted	Finalized

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		Please do not hesitate to contact this office should you have any concerns, comments or queries		
Interested and Affected Parties	X			
Ms. Nokubonga Duma Project Manager: Environmental Planning Department : City Development City of uMhlatuze	X	<p>General</p> <p>Please note the following points pertaining to this application:</p> <ol style="list-style-type: none"> 1. The project area falls within the Richards Bay Industrial Development Zone which obtained an environmental authorization with the reference 14/12/16/3/3/2/665. 2. The project area is located in a critical biodiversity area which consists of freshwater wetlands, grassland, thicket habitat and coastal forest. 	Noted	Finalized
		<p>Cumulative Impacts</p> <ol style="list-style-type: none"> 1. The applicant is requested to analyze the potential cumulative effects of the propose pigment plant in relation to development that are existing and those already under development, and the municipality would like to further engage the Environmental Impact Report with the specialist's report for this application. 2. The specialists report must assess the cumulative impacts particularly on the water resources within the catchment this must include the stormwater management plan for the property and the management of waste water generated on site from the stockpiles of slag. 	Noted, a detailed impact assessment will be undertaken during the EIA phase of this project and will be supported by Specialist studies.	Finalized

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		<ol style="list-style-type: none"> 3. The aquatic/freshwater specialists study must address the effects of TiO2 nanoparticles on the aquatic ecosystems. 4. The applicant must in the specialist studies for the Environmental Impact Assessment include the cumulative impacts on the air quality of the area in relation to the proposed project. 		
		<p>Land Use Management</p> <ol style="list-style-type: none"> 1. The applicant is advised to correct the zoning for IDZ 1F as noxious industry not General Industry. The proposed land use is permissible as a free entry (primary right). 2. It also be noted that Department of Agriculture, Forestry and Fisheries name has changed. 3. The applicant must note that the EIA process and this does not exempt the Applicant/Developer from complying with other relevant legislative framework requirements. 	Noted	Finalized