



National Department of Environmental Affairs, Department of Rural Development and Agrarian Reform & SRK Consulting

Minutes for the Meeting: Application Requirements – Incinerator Installations

Held: DEA, Proteria 23/01/2017 at 10:00

Distribution:	Mr Derrick Makhubele (DN)	DEA
	Mr Edward Oupa Mahosi (EM)	DEA
	Dr Vincent Gololo (VG)	DEA
	Dr George Akol (GA)	DRDAR
	Mr Leon Coetzee (LC)	DRDAR
	Dr Gabriel Mutero (GM)	Grahamstown State Veterinary Clinic
	Dr Alan Fisher (AF)	Queenstown State Veterinary Clinic
	Dr Eddie Snyman (ES)	Middelburg State Veterinary Clinic
	Rob Gardiner (RG)	SRK
	Karissa Nel (KN)	SRK

Action

1 Present

Please refer to the attached Attendance Register.

2 Welcome

DM welcomed all present at the meeting and a round of introductions was done.

3 Introduction & Background

A general discussion was held regarding the background to the project with input from GA, LC and KN. A short summary follows:

- The Department of Rural Development and Agrarian Reform (DRDAR) aims to replace incinerators at three Veterinary Laboratories: Middelburg, Queenstown & Grahamstown.
- The incinerators were installed between 1975 and 1980. Waste disposed of involves mainly organic waste (animal carcasses and organs) from the laboratories and some private suppliers as well as minimal general office waste. Incinerators are used once a week, sometimes more, depending on the volumes of waste.
- DRDAR appointed SRK Consulting to conduct the Atmospheric Emission Licences (AEL) Applications and associated processes for the three facilities. The AEL is required to install the new incinerators and to obtain SANAS accreditation.
- Project alternatives considered were not deemed viable, e.g. incineration at other facilities (no nearby facilities available) & alternative technologies (alkaline hydrolysis).
- During original consultation with authorities and stakeholders in March 2016, Mr Lyndon Mardon stated that a Section 22 A process

needs to be followed for each incinerator due to the facilities having no previous authorisations in terms of the National Environmental Management: Air Quality Act (Act No. 39 of 2004).

- A legal review was conducted in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), as amended, as well as the National Environmental Management: Waste Act (NEM:WA) (Act 59 of 2008), as amended, and submitted to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT).
- SRK Consulting assisted DRDAR with obtaining quotations for incinerators with and without abatement equipment that would meet the Minimum Emission Standards. Quotations vary dramatically with the costs for an incinerator with abatement equipment being a minimum of R 5,200,000.

4 Summary of the Discussion on Process and Requirements

- DM stated that the Competent Authority for the AEL application process for all the facilities will be National DEA since the waste applicable in the process is regarded as hazardous waste.
- VG noted that documentation should be provided on the DRDAR letterhead as the discussions are with the DRDAR.
- VG noted that the sizing of the incinerators and abatement equipment is critical. The current quotations for abatement equipment are probably for off-the-shelf models and not those specifically designed for the purposes for the required incinerators. He believes that more affordable option will be available if equipment is used that is specific to the incinerator and Minimum Emission Standard requirements.
- Consensus was reached that the incinerators are regarded as existing plant and that the Minimum Emission Standards for existing plant are applicable until April 2020.
- LC suggested that DRDAR install incinerators without abatement equipment assuming that they will meet the Minimum Emission Standards for existing plants. The design and installation of abatement equipment will then be planned as a second phase of this project before 2020.
- DM enquired whether a Waste Management License is required in terms of NEM:WA. SRK Consulting is to contact Mr Lucas Mahlangu to obtain clarification on the matter.

SRK/
DRDAR

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5 Process/ Way Forward

The following tasks summarises the immediate way forward:

- SRK Consulting is to contact Mr Lucas Mahlangu to obtain clarification regarding whether a Waste Management License is required.
- Atmospheric Emission License applications can be submitted on SAAELIP as the start of the Section 22 A process.
- Air Quality Impact Assessment will be required as part of this process.

SRK

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Minutes taken by: Karissa Nel

SRK Consulting - Certified Electronic Signature


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