PROJECT DONE ON BEHALF OF SAVANNAH ENVIRONMENTAL (PTY) LTD

QUANTITATIVE RISK ASSESSMENT OF THE PROPOSED 320 MW RMPP POWER PLANT AT RICHARDS BAY, KWAZULU NATAL

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Mike Oberholzer is a professional engineer, holds a Bachelor of Science in Chemical Engineering and is an approved signatory for MHI risk assessments, thereby meeting the competency requirements of SANAS for assessment of the risks of hazardous components, including fires, explosions and toxic releases.

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EXECUTIVE SUMMARY

1 INTRODUCTION

The 320 MW Risk Mitigation Power Plant (hereinafter referred to as 320 MW RMPP) proposes to develop an Emergency Risk Mitigation Power Plant (RMPP) and associated infrastructures, with a generating capacity of up to 320 MW RMPP. The Project site is located in Alton core industrial area adjacent to Richards Bay Industrial Development Zone (IDZ), situated approximately 8 km south west of Richards Bay centre, which falls within the jurisdiction of the City of uMhlathuze Local Municipality and the King Cetshwayo District Municipality in the KwaZulu-Natal Province.

The facility will have an installed generating capacity of up to 320 MW, to operate with liquified petroleum gas (LPG), and will convert to utilising natural gas once this is available in Richards Bay.

The 320 MW RMPP has submitted the 320 MW RMPP as part of a hybrid project incorporating renewable energy capacity in response to the Department of Energy's (DoE) Risk Mitigation Independent Power Producer (IPP) Procurement Program (2020).

The main infrastructure associated with the facility includes the following:

Expanded Plant Main Components	Description
Gas Turbine	Five gas turbines comprising with a total of 320 MW capacity will be installed, the manufacturer to be confirmed on finalization of preferred bidder.
	Exhaust from each gas turbine will be discharged to the atmosphere at a high level via a 20 m exhaust stack at the outlet of the gas turbine. The exhausts emissions composition will be monitored continuously via Continuous Emissions Monitoring System ("CEMS").
Closed Cooling Water System	A closed cooling water system will be provided to supply cooling water to the various plant equipment.
	The compressed air system will consist of instrument air and service air. The compressed air is generated in a centralized compressor station which supplies the two different air qualities. The instrument air is filtered and dried and the service air is just filtered.
LPG Storage and delivery	LPG will be delivered to site via road tankers from the Richard's Bay ports import facility. The LPG will be unloaded via 4 gantries, stored under pressure in up to 13 bullets with a total capacity of 10,000 m ³ .
LPG Conditioning system	LPG will be vaporized by reheating it immediately prior to delivery into the gas turbines via an onsite pipeline. The LPG will be heated by a boiler operated on LPG.

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Buildings	In addition to the main equipment, the site will have a water treatment plant building, fire protection pumphouse, workshop building, warehouse, common administrative offices and control building, and guard house.
Battery and emergency diesel generator	The primary purpose of the BESS will be to bridge the start-up time of the 320 MW RMPP, where the gas turbines are off and ancillary service dispatch instructions are received from Eskom. To enable the 320 MW RMPP to respond immediately with the ancillary services to Eskom, the batteries will provide power to the grid during the 4 min lag period it takes for the gas turbines to start-up. The diesel generator will be used as back up in the event of an emergency.
Plant Electrical System	The gas turbines will be connected to step-up transformers via a generator circuit breaker and isolated phase bus ducts (one separate system for each).
Distributed Control System	A plant distributed control system to provide common human machine interface for the operator in the control room. This will be located within the office building.
Power Evacuation and Transmission	Power will be evacuated via new 132 kV substation on site. Underground transmission lines will be constructed, connecting the project to the unutilised 132 kV distribution lines located approximately 1,8 km to the south of the site, commonly referred to as the Bayside transmission lines. This is part of a separate basic assessment environmental application.
Demineralisation Water Treatment Plant	Clarified water supplied by Malthuze Water will be further treated by filtration and reverse osmosis treatment to produced Demineralized
Water storage	water suitable for use by the 320 MW RMPP plant equipment. Clarified water as well as demineralized water will be stored on site in steel tanks. The water storage will also be available for emergency firefighting water.
Zero Liquid Discharge Vaporisation and Crystallisation System	Zero liquid discharge (" ZLD ") designed to eliminate any process effluent discharge from site. Main source of effluent is the demineralized water treatment plant brine, this effluent will be directed to ZLD where it will undergo forced evaporation and crystalized. Solid salts and minerals will be produced and disposed of by licensed waste contractor.
Stormwater management System	Clean rainwater will be collected from the site and discharged back to the surrounding environment. An attenuation basin will be designed to ensure flows do not exceed maximum predevelopment rainwater runoff rates to the surrounding environment.
Oily water and separator	Rainwater runoff on potentially oil contaminated areas will be directed to an oily water separator prior to discharge. Oily water collected in the separator will be removed from the site for disposal by a third-party service provider in terms of South African legislation.
Fire protection system	Fire Protection System is provided to ensure that all equipment, instrumentation, human, and properties inside and around the Plant and ancillaries surrounding possess equipment to fight a fire incident. It consists of fire water pumping system, deluge system and CO ₂ system.

Since off-site incidents may result due to hazards of some of the chemical components to be stored on, produced at or delivered to site, RISCOM (PTY) LTD was commissioned to conduct a quantitative risk assessment (QRA), the impacts onto surrounding properties and communities as part of an environmental impact assessment (EIA).

1.1 Terms of Reference

The main aim of the investigation was to quantify the risks to employees, neighbours and the public with regard to the proposed 320 MW RMPP facility at Richards Bay.

This risk assessment was conducted in accordance with the MHI regulations and can be used as notification for the facility. The scope of the risk assessment included:

- 1. Development of accidental spill and fire scenarios for the facility;
- 2. Using generic failure rate data (for tanks, pumps, valves, flanges, pipework, gantry, couplings and so forth), determination of the probability of each accident scenario;
- 3. For each incident developed in Step 2, determination of consequences (such as thermal radiation, domino effects, toxic-cloud formation and so forth);
- 4. For scenarios with off-site consequences (greater than 1% fatality off-site), calculation of maximum individual risk (MIR), taking into account all generic failure rates, initiating events (such as ignition), meteorological conditions and lethality.

1.2 Purpose and Main Activities

The main activity of the power plant would be the generation of mid-merit power supply to the South African electricity grid. The fuel used to generate power would be LPG, that will be delivered to site by truck.

1.3 Main Hazards Due to Substance and Process

The main hazards that would occur with a loss of containment of hazardous components at the proposed 320 MW RMPP facility in Richards Bay include exposure to:

- Thermal radiation from fires;
- Overpressure from explosions.

2 ENVIRONMENT

The 320 MW RMPP will be located on Portion 1 and Remainder of Erf 1854 in the Alton core industrial area in Richards Bay, as shown in Figure 2-1, approximately 3.5 km from the Richards Bay CBD and 3 km from the Richards bay Harbour.

Richards Bay is the most north-easterly port of South Africa, located approximately 160 km northeast of Durban and 465 km southwest of Maputo. The harbour is a deep-sea port which, by virtue of its sheer proximity, provides easy access to markets and is suitable for the importation of LPG from large ships.



Figure 2-1: Location of the proposed 320 MW RMPP facility in Richards Bay

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3 PROCESS DESCRIPTION

3.1 Site

The proposed 320 MW RMPP facility in Richards Bay is to consist of bulk LPG storage vessels, offices, workshops and five gas turbines, as shown in Figure 3-1.

The site will be accessed from Kraft Link, as well as the inlet and exit in Kalbelkring Street for the LPG road tankers to offload the LPG at the offloading gantry.

The facility will consist of bulk LPG storage vessels, a boiler, a series of gas turbines, admin buildings, control rooms, warehouse and workshop facilities, staff facilities, a guard house, oil tanks, dangerous goods (hydraulic fluid, diesel, lubricant) tanks and sludge tanks, water storage tank(s) or reservoir, LPG storage tank(s) and LPG vaporisation facilities, battery storage, backup diesel generator, a facility substation, and ancillary infrastructure.

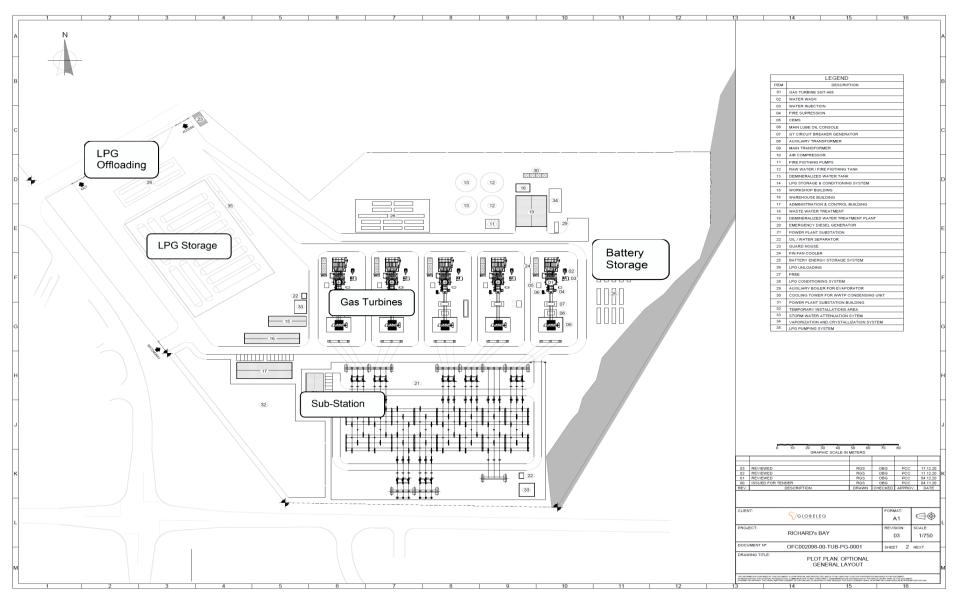


Figure 3-1: Site layout

3.2 Process Description

The simplified process description is provided in Figure 3-2, whereby LPG would be used to generate 320 MW electricity using open cycle gas turbines (OCGT).

LPG will be delivered to site via road tankers and offloaded into LPG storage tanks of maximum capacity 10 000 m³. The LPG will be vapourised in water baths, after which the gas will be directed to the gas turbines to generate electricity. It is expected that the turbines will operate at a maximum of 16.5 hours per day and will not be required if the grid demand can be met by the renewable facilities.

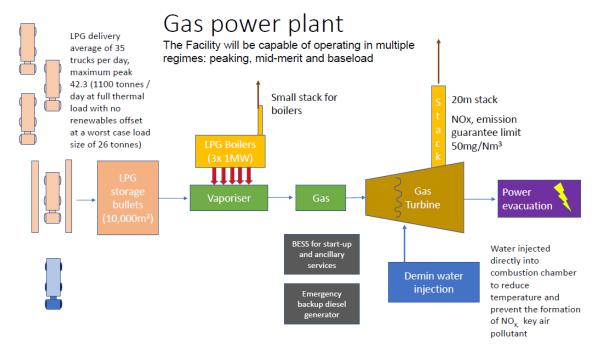


Figure 3-2: Simplified process flow diagram

3.3 LPG Installation

Road tankers, with a maximum capacity of 26 t, will deliver LPG to site and offload at a five-bay gantry. It is estimated that approximately 35 road tankers will be required per day.

LPG from the road tankers will be pumped into the 13 LPG storage tanks, each having a capacity of 385 tonne (770 m³). The LPG tanks will be compliant with the requirements of the South African National standard SANS 10087:3. The position of the tanks and associated equipment, is indicated in Figure 3-1.

The LPG from the storage tanks would pass through water bath vaporisers, operating at about 75°C that would heat the LPG from the storage temperature and convert the liquefied gas into vapour.

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3.4 Summary of Bulk Materials to be Stored on Site

A summary of bulk materials that can give hazardous effects that are to be stored on site, is given in Table 3-1.

Table 3-1: Summary of hazardous components to be stored on site

No.	Component	CAS No.	Inventory
1	LPG (propane)	74-98-6	10, 000 m ³
2	Diesel	68334-30-5	50 m ³

4 METHODOLOGY

The first step in any risk assessment is to identify all hazards. The merit of including a hazard for further investigation is then determined by how significant it is, normally by using a cut-off or threshold value.

Once a hazard has been identified, it is necessary to assess it in terms of the risk it presents to the employees and the neighbouring community. In principle, both probability and consequence should be considered, but there are occasions where, if either the probability or the consequence can be shown to be sufficiently low or sufficiently high, decisions can be made based on just one factor.

During the hazard identification component of the report, the following considerations are taken into account:

- Chemical identities;
- Location of on-site installations that use, produce, process, transport or store hazardous components;
- Type and design of containers, vessels or pipelines;
- Quantity of material that could be involved in an airborne release;
- Nature of the hazard most likely to accompany hazardous materials spills or releases, e.g., airborne toxic vapours or mists, fires or explosions, large quantities to be stored and certain handling conditions of processed components.

The evaluation methodology assumes that the facility will perform as designed in the absence of unintended events such as component and material failures of equipment, human errors, external events and process unknowns.

SANS 1461 (2018) is based on RIVM (2009) for process plants. The latter standards describe the minimum scenarios to be included in the assessment, as well as the assumptions to be used. As full compliance of SANS 1461 (2018) cannot be achieved within the NEMA legislative framework, general compliance of the aforementioned standards at this stage would be applicable and briefly described in the sections below. This general compliance assessment constitutes a quantitative risk assessment (QRA).

The QRA process is summarised with the following steps:

- 1. Identification of components that are flammable, toxic, reactive or corrosive and that have potential to result in a major incident from fires, explosions or toxic releases;
- Development of accidental loss of containment (LOC) scenarios for equipment containing hazardous components (including release rate, location and orientation of release);
- 3. For each incident developed in Step 2, determination of consequences (such as thermal radiation, domino effects, toxic-cloud formation and so forth);
- 4. For scenarios with off-site consequences (greater than 1% fatality off-site), calculation of maximum individual risk (MIR), taking into account all generic failure rates, initiating events (such as ignition), meteorological conditions and lethality.

Scenarios included in this QRA have impacts external to the establishment. The 1% fatality from acute affects (thermal radiation, blast overpressure and toxic exposure) is determined as the endpoint (RIVM 2009). Thus, a scenario producing a fatality of less than 1% at the establishment boundary under worst-case meteorological conditions would be excluded from the QRA.

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5 CONCLUSIONS

Risk calculations are not precise. Accuracy of predictions is determined by the quality of base data and expert judgements.

This risk assessment included the consequences of fires and explosions at the 320 MW RMPP facility in Richards Bay. A number of well-known sources of incident data were consulted and applied to determine the likelihood of an incident to occur.

This risk assessment was performed with the assumption that the site would be maintained to an acceptable level and that all statutory regulations would be applied. It was also assumed that the detailed engineering designs would be done by competent people, and would be correctly specified for the intended duty. For example, it was assumed that tank wall thicknesses have been correctly calculated, that vents have been sized for emergency conditions, that instrumentation and electrical components comply with the specified electrical area classification, that material of construction is compatible with the products, etc.

It is the responsibility of the owners and their contractors to ensure that all engineering designs would have been completed by competent persons, and that all pieces of equipment would have been installed correctly. All designs should be in full compliance with (but not limited to) the Occupational Health and Safety Act 85 of 1993 and its regulations, the National Buildings Regulations and the Buildings Standards Act 107 of 1977 as well as local bylaws.

A number of incident scenarios were simulated, taking into account the prevailing meteorological conditions, and described in the report.

5.1 Notifiable Substances

The General Machinery Regulation 8 and its Schedule A on notifiable substances, requires any employer who has a substance equal to or exceeding the quantity listed in the regulation to notify the divisional director. A site is classified as a Major Hazard Installation if it contains one or more notifiable substances, or if the off-site risk is sufficiently high. The latter can only be determined from a quantitative risk assessment.

The notifiable threshold for LPG is listed 25 t in a single vessel. As the proposed installation exceeds the threshold limit, LPG will be classified as a notifiable substance, which would automatically classify the facility a Major Hazard Installation.

5.2 LPG Storage and Associated Equipment

LPG would be received at site by truck and stored in a maximum of $13 \times 800 \text{ m}^3$ storage vessels. The liquefied LPG from the storage vessels would be converted into a vapour phase at the vaporisers, and sent to the gensets as fuel.

Depending on the physical conditions of the LPG, a large release could result in pool fires, jet fires, flash fires and vapour cloud explosions and BLEVEs. All of the aforementioned effects were simulated, with the largest downwind distance occurring from a large release from a LPG vessel, extending up to 1.2 km to the 1% fatality from the point of release and could impact surround areas, but would not reach the occupied residential areas.

The risk of 1x10⁻⁶ fatalities per person per year isopleth found to extend beyond the site boundary, and **that alone qualifies the site as a Major Hazard Installation**. The risk of 1x10⁻⁴ fatalities per person per year, representing intolerable to the general public, was found

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to extend beyond the site boundary. Reducing the risks to acceptable levels was found to be achievable and must be included in the final designs.

5.3 Impacts onto Neighbouring Properties, Residential Areas and MHIs

A large release of LPG could extend to the Alton industrial area and could reach the Mondi site to the west. No residential area or vulnerable institutions would be seriously impacted with the construction and operation of the 320 MW RMPP.

5.4 Major Hazard Installation

This investigation concluded that under the current design conditions, the proposed 320 MW RMPP facility in Richards Bay **would be considered as a Major Hazard Installation** and would require notification in accordance with the MHI regulations.

Kindly note that this study is not intended to replace the Major Hazard Installation risk assessment, which should be completed prior to construction of the terminal once final designs are available.

6 RECOMMENDATIONS

As a result of the risk assessment study conducted for the proposed 320 MW RMPP facility in Richards Bay, a number of events were found to have risks beyond the site boundary. These risks could be mitigated to acceptable levels, as shown in the report.

RISCOM did not find any fatal flaws that would prevent the project proceeding to the detailed engineering phase of the project and would support the project under the following conditions most of which will be detailed in the MHI study:

- Compliance with all statutory requirements, i.e., pressure vessel designs;
- Compliance with applicable SANS codes, i.e., SANS 10087, SANS 10089, SANS 10108, etc.;
- Incorporation of applicable guidelines or equivalent international recognised codes of good design and practice into the designs;
- Completion of a recognised process hazard analysis (such as a HAZOP study, FMEA, etc.) on the proposed facility prior to construction to ensure design and operational hazards have been identified and adequate mitigation put in place;
- Full compliance with IEC 61508 and IEC 61511 (Safety Instrument Systems) standards or equivalent to ensure that adequate protective instrumentation is included in the design and would remain valid for the full life cycle of the tank farm:
 - o Including demonstration from the designer that sufficient and reliable instrumentation would be specified and installed at the facility;
- Preparation and issue of a safety document detailing safety and design features reducing the impacts from fires, explosions and flammable atmospheres to the MHI assessment body at the time of the MHI assessment:
 - Including compliance to statutory laws, applicable codes and standards and world's best practice;
 - Including the listing of statutory and non-statutory inspections, giving frequency of inspections;
 - o Including the auditing of the built facility against the safety document;
 - Noting that codes such as IEC 61511 can be used to achieve these requirements;
- Demonstration by 320 MW RMPP owner or their contractor that the final designs would reduce the risks posed by the installation to the South African requirements as prescribed in SANS 1461 (2018);
- Signature of all terminal designs by a professional engineer registered in South Africa in accordance with the Professional Engineers Act, who takes responsibility for suitable designs;
- Completion of an emergency preparedness and response document for on-site and off-site scenarios prior to initiating the MHI risk assessment (with input from local authorities);
- Any increases to the product list or product inventories must be with the approval of the authorities under NEMA;
- Final acceptance of the facility risks with an MHI risk assessment that must be completed in accordance with the MHI regulations;
 - Basing such a risk assessment on the final design and including engineering mitigation.

Table of Contents

1	INTR	ODUCTION	. 1-1
	1.1 I	Legislation	. 1-3
	1.1.1	National Environmental Management Act (No. 107 of 1998) (NEMA) and its Regulations	. 1-3
	1.1.2		
	1.2	Terms of Reference	
	1.3 I	Purpose and Main Activities	. 1-5
	1.4 I	Main Hazards Due to Substance and Process	. 1-5
	1.5	Software	. 1-6
	1.6	Assumptions and Limitations	. 1-6
2	ENV	RONMENT	. 2-1
	2.1	General Background	. 2-1
	2.2	Meteorology	. 2-2
	2.2.1	Surface Winds	. 2-2
	2.2.2	Precipitation and Relative Humidity	. 2-3
	2.2.3	Temperature	. 2-4
	2.2.4	Atmospheric Stability	. 2-5
	2.2.5	Meteorological Simulation Values	. 2-7
3	PRO	JECT DESCRIPTION	. 3-1
	3.1	Site	. 3-1
	3.2 I	Project Description	. 3-3
	3.3 I	LPG Installation	. 3-3
	3.4	Utilities	. 3-4
	3.4.1	Boiler	
	3.4.2		
	3.4.3		
	3.4.4	, , , , , , ,	
	3.5	Summary of Bulk Materials to be Stored on Site	. 3-6
4		HODOLOGY	
		Hazard Identification	
	4.1.1	Notifiable Substances	
	4.1.2		
	4.1.3		
	4.1.4		
		Physical and Consequence Modelling	
	4.2.1	Fires	
	4.2.2	r	
		Risk Analysis	
	4.3.1	Background	
	4.3.2		
	4.3.3	1 1	
		Risk Criteria	
	4.4.1	Maximum Individual Risk Parameter	4-18

	4.4.2	Acceptable Risks	4-18
	4.4.3	B Land Planning	4-21
	4.4.4	Societal Risk Parameter	4-23
	4.4.5	Scenario Selection	4-23
5	RIS	(ASSESSMENT	5-1
	5.1	LPG Installation	5-1
	5.1.	The Purpose of the Processing Unit	5-1
	5.1.2	Hazardous Components	5-1
	5.1.3	Consequence Modelling	5-2
	5.2	Battery Storage	5-9
	5.2.	Risk Matrix Associated with The BESS Technology Alternatives	5-9
	5.2.2	Consequence Modelling	5-10
	5.3	Diesel Storage and Offloading	5-12
	5.3.	The Purpose of the Processing Unit	5-12
	5.3.2	P. Hazardous Components	5-12
	5.3.3	Consequence Modelling	5-13
	5.4	Combined Site Risk	5-17
	5.4.	Maximum Individual Risk	5-17
	5.4.2	Societal Risk	5-19
6	RIS	TREATMENT/REDUCTION	6-1
	6.1	Risk Ranking	6-1
	6.2	Mitigation	6-5
	6.2.1	Process Hazard Analysis (PHA)	6-5
	6.2.2	2 Ignition Sources	6-5
	6.2.3	Emergency Shut Down System (ESD)	6-5
	6.3	Combined Risk with Mitigation	6-6
7	IMP	ACT ASSESSMENT	7-1
	7.1	Methodology - Cumulative Impacts	7-2
	7.2	Impact Assessment of 320 MW RMPP Thermal Generation Facility at	
		Richards Bay	
	7.2.		
	7.2.2		
	7.2.3		
	7.2.4	r r - r - r	
8	CON	ICLUSIONS	8-1
	8.1	Notifiable Substances	
	8.2	LPG Storage and Associated Equipment	
	8.3	Impacts onto Neighbouring Properties, Residential Areas and Major Haza	
		Installations	
	8.4	Major Hazard Installation	
		Land Planning Restrictions	
9		OMMENDATIONS	
10		ERENCES	
11		REVIATIONS AND ACRONYMS	
12	APP	ENDIX A: DEPARTMENT OF LABOUR CERTIFICATE	12-1

13 AP	PENDIX B: SANAS CERTIFICATES	13-1
14 AP	PENDIX C: NOTIFICATION OF MAJOR HAZARD INSTALLATION	14-1
15 AP	PENDIX D: PADHI LAND-PLANNING TABLES	15-1
15.1	Development Type Table 1: People at Work, Parking	15-1
15.2	Development Type Table 2: Developments for Use by the General Public	15-2
15.3	Development Type Table 3: Developments for Use by Vulnerable People	15-6
15.4	Development Type Table 4: Very Large and Sensitive Developments	15-7
16 AP	PENDIX E: MATERIAL SAFETY DATA SHEETS	16-1
16.1	LPG (Propane)	16-1
16.2	Diesel (Dodecane)	16-3

Page xi

List of Figures

Figure 2-1:	Location of the proposed 320 MW RMPP facility in Richards Bay	2-1
Figure 2-2:	Wind analysis for winter and summer variations	2-3
Figure 2-3:	Atmospheric stability as a function of wind direction in Richards Bay	2-5
Figure 2-4:	Representative weather classes for Richards Bay (2013–2020)	2-6
Figure 3-1:	Site layout	3-2
Figure 3-2:	Simplified process flow diagram	3-3
Figure 3-3:	Battery comparison	3-5
Figure 3-4:	Example of a Solid-State battery facility layout	3-6
Figure 4-1:	UK HSE decision-making framework	4-19
Figure 4-2:	Town-planning zones for pipelines	4-21
Figure 4-3:	Town-planning zones	4-22
Figure 4-4:	Airborne vapours from a loss of containment of liquefied gas stored in a pressurised vessel	
Figure 4-5:	Event tree for an instantaneous release of a liquefied flammable gas	
Figure 4-6:	Event tree for a continuous release of a liquefied flammable gas	
Figure 4-7:	Event tree for a continuous release of a flammable gas	4-25
Figure 4-8:	Event tree for a continuous release of a flammable liquid	4-25
Figure 5-1:	The maximum extent to the 1% fatality from a catastrophic failure of a 60 m ³ road tanker	5-3
Figure 5-2:	The maximum extent to the 1% fatality from the loss of containment LPG storage tank over a 10-minute period	5-4
Figure 5-3:	The maximum extent to the 1% fatality from the product pump failure	
Figure 5-4:	The maximum extent to the 1% fatality from a catastrophic failure of a vaporiser	5-6
Figure 5-5:	Thermal radiation from large lithium- ion battery for a single container	5-11
Figure 5-6:	Thermal radiation from large diesel pool fires in the storage area	
Figure 5-7:	Thermal radiation from large diesel pool fires at the road offloading area	
Figure 5-8:	Lethal probability isolines associated with the 320 MW RMPP facility in Richards Bay	
Figure 5-9:	Societal risks for the 320 MW RMPP facility	
Figure 6-1:	Comparison of the 1x10 ⁻⁶ fatalities per person per year isopleth for various site installations	
Figure 6-2:	Comparison of the 1x10 ⁻⁴ fatalities per person per year isopleth for various site installations	6-3
Figure 6-3:	Analysis points	6-4
Figure 6-4:	Combined risks with mitigation	6-6

Page xii

List of Tables

Table 2-1:	Long-term average precipitation and relative humidity for Richards Bay.	2-3
Table 2-2:	Long-term temperature averages for Richards Bay	2-4
Table 2-3:	Classification scheme for atmospheric stability	2-5
Table 2-4:	Representative weather classes	2-6
Table 2-5:	Allocation of observations into six weather classes	2-6
Table 2-6:	Default meteorological values used in simulations, based on local conditions	2-7
Table 3-1:	Summary of hazardous components to be stored on site	3-6
Table 4-1:	Flammable and combustible components to be stored on, produced at or delivered to site	4-4
Table 4-2:	Representative components	4-4
Table 4-3:	Components excluded from the study	
Table 4-4:	Thermal radiation guidelines (BS 5980 of 1990)	4-6
Table 4-5:	Summary of consequences of blast overpressure (Clancey 1972)	4-9
Table 4-6:	Damage caused by overpressure effects of an explosion (Stephens 1970)	4-10
Table 4-7:	Influence of public perception of risk on acceptance of that risk, based on the POST report	4-12
Table 4-8:	Failure frequencies for atmospheric vessels	4-14
Table 4-9:	Failure frequencies for pressure vessels	4-14
Table 4-10:	Failure frequencies for process pipes	4-14
Table 4-11:	Failure frequency for centrifugal pumps and compressors	4-15
Table 4-12:	Failure frequency for reciprocating pumps and compressors	4-15
Table 4-13:	Failure frequencies for loading and offloading arms and hoses	4-15
Table 4-14:	Human failure rates of specific types of tasks (CPR 12E 2005; Red Book)	4-16
Table 4-15:	Probability of direct ignition for stationary installations (RIVM 2009)	
Table 4-16:	Classification of flammable substances	
Table 4-17:	Land-use decision matrix	4-22
Table 5-1:	Scenarios modelled	5-2
Table 5-2:	Maximum distance to 1% fatality from the point of release	5-7
Table 5-3:	Risks and design mitigation measures associated with each battery Technology	5-9
Table 5-4:	Scenarios modelled	
Table 5-5:	Maximum distance to 1% fatality from the point of release	5-16
Table 6-1:	Off-site risk rankings at analysis points	6-3
Table 7-1:	Impact Assessment of LPG Installations	7-3
Table 7-2:	Impact Assessment of Diesel Installations	7-4
Table 7-3:	Impact Assessment of BESS Installations	7-5
Table 7-4:	Cumulative impact of project as a whole	7-6

QUANTITATIVE RISK ASSESSMENT OF THE PROPOSED 320 MW RMPP POWER PLANT AT RICHARDS BAY, KWAZULU NATAL

1 INTRODUCTION

The 320 MW Risk Mitigation Power Plant (hereinafter referred to as 320 MW RMPP) proposes to develop an Emergency Risk Mitigation Power Plant (RMPP) and associated infrastructures, with a generating capacity of up to 320 MW RMPP. The Project site is located in Alton core industrial area adjacent to Richards Bay Industrial Development Zone (IDZ), situated approximately 8 km south west of Richards Bay centre, which falls within the jurisdiction of the City of uMhlathuze Local Municipality and the King Cetshwayo District Municipality in the KwaZulu-Natal Province.

The facility will have an installed generating capacity of up to 320 MW, to operate with liquified petroleum gas (LPG), and will convert to utilising natural gas once this is available in Richards Bay.

The 320 MW RMPP has submitted the 320 MW RMPP as part of a hybrid project incorporating renewable energy capacity in response to the Department of Energy's (DoE) Risk Mitigation Independent Power Producer (IPP) Procurement Program (2020).

The main infrastructure associated with the facility includes the following:

Expanded Plant Main Components	Description
Gas Turbine	Five gas turbines comprising with a total of 320 MW capacity will be installed, the manufacturer to be confirmed on finalization of preferred bidder.
System	Exhaust from each gas turbine will be discharged to the atmosphere at a high level via a 20 m exhaust stack at the outlet of the gas turbine. The exhausts emissions composition will be monitored continuously via Continuous Emissions Monitoring System ("CEMS").
	A closed cooling water system will be provided to supply cooling water to the various plant equipment.
	The compressed air system will consist of instrument air and service air. The compressed air is generated in a centralized compressor station which supplies the two different air qualities. The instrument air is filtered and dried and the service air is just filtered.
LPG Storage and delivery	LPG will be delivered to site via road tankers from the Richard's Bay ports import facility. The LPG will be unloaded via 4 gantries, stored under pressure in up to 13 bullets with a total capacity of 10,000 m ³ .
	LPG will be vaporized by reheating it immediately prior to delivery into the gas turbines via an onsite pipeline. The LPG will be heated by a boiler operated on LPG.
	In addition to the main equipment, the site will have a water treatment plant building, fire protection pumphouse, workshop building, warehouse, common administrative offices and control building, and guard house.
	The primary purpose of the BESS will be to bridge the start-up time of
diesel generator	the 320 MW RMPP, where the gas turbines are off and ancillary

	service dispatch instructions are received from Eskom. To enable the 320 MW RMPP to respond immediately with the ancillary services to Eskom, the batteries will provide power to the grid during the 4 min lag period it takes for the gas turbines to start-up. The diesel generator will be used as back up in the event of an emergency.
Plant Electrical	The gas turbines will be connected to step-up transformers via a
System	generator circuit breaker and isolated phase bus ducts (one separate system for each).
Distributed Control System	A plant distributed control system to provide common human machine interface for the operator in the control room. This will be located within the office building.
Power Evacuation and	Power will be evacuated via new 132 kV substation on site.
Transmission	Underground transmission lines will be constructed, connecting the project to the unutilised 132 kV distribution lines located approximately 1,8 km to the south of the site, commonly referred to as the Bayside transmission lines. This is part of a separate basic assessment environmental application.
Demineralisation Water Treatment Plant	Clarified water supplied by Malthuze Water will be further treated by filtration and reverse osmosis treatment to produced Demineralized
Water storage	water suitable for use by the 320 MW RMPP plant equipment. Clarified water as well as demineralized water will be stored on site in steel tanks. The water storage will also be available for emergency firefighting water.
Zero Liquid Discharge	Zero liquid discharge ("ZLD") designed to eliminate any process
Vaporisation and	effluent discharge from site. Main source of effluent is the
Crystallisation System	demineralized water treatment plant brine, this effluent will be directed to ZLD where it will undergo forced evaporation and crystalized. Solid salts and minerals will be produced and disposed of by licensed waste contractor.
Stormwater	Clean rainwater will be collected from the site and discharged back to
management System	the surrounding environment. An attenuation basin will be designed to ensure flows do not exceed maximum predevelopment rainwater runoff rates to the surrounding environment.
Oily water and	Rainwater runoff on potentially oil contaminated areas will be directed
separator	to an oily water separator prior to discharge. Oily water collected in the separator will be removed from the site for disposal by a third-party service provider in terms of South African legislation.
Fire protection system	Fire Protection System is provided to ensure that all equipment, instrumentation, human, and properties inside and around the Plant and ancillaries surrounding possess equipment to fight a fire incident. It consists of fire water pumping system, deluge system and CO ₂ system.

Since off-site incidents may result due to hazards of some of the chemical components to be stored on, produced at or delivered to site, RISCOM (PTY) LTD was commissioned to conduct a quantitative risk assessment (QRA), the impacts onto surrounding properties and communities as part of an environmental impact assessment (EIA).

1.1 Legislation

Legislation discussed in this subsection is limited to the health and safety of employees and the public.

Risk assessments are conducted when required to do so by law or by companies wishing to determine the risks of the facility for other reasons, such as insurance.

In South Africa, risk assessments are carried out under the legislation of two separate acts, each with different requirements. These are discussed in the subsections that follow.

1.1.1 National Environmental Management Act (No. 107 of 1998) (NEMA) and its Regulations

The National Environmental Management Act (NEMA) contains South Africa's principal environmental legislation. It has, as its primary objective to make provision for cooperative governance by establishing principles for decision making on matters affecting the environment, on the formation of institutions that will promote cooperative governance and on establishing procedures for coordinating environmental functions exercised by organs of state as well as to provide for matters connected therewith (Government Gazette 1998).

Section 30 of the NEMA act deals with the control of emergency incidents where an "incident" is defined as an "unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed".

The act defines "pollution" as "any change in the environment caused by:

- (i) Substances;
- (ii) Radioactive or other waves; or
- (iii) Noise, odours, dust or heat...

Emitted from any activity, including the storage or treatment of waste or substances, construction and the provision of services, whether engaged in by any person or an organ of state, where that change has an adverse effect on human health or wellbeing or on the composition, resilience and productivity of natural or managed ecosystems, or on materials useful to people, or will have such an effect in the future...

"Serious" is not fully defined but would be accepted as having long lasting effects that could pose a risk to the environment or to the health of the public that is not immediately reversible.

This is similar to the definition of a MHI as defined in the Occupational Health and Safety Act (OHS Act) 85 of 1993 and its MHI regulations.

Section 28 of NEMA makes provision for anyone who causes pollution or degradation of the environment being made responsible for the prevention of the occurrence, continuation or reoccurrence of related impacts and for the costs of repair of the environment. In terms of the provisions under Section 28 that are stated as:

"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped..."

1.1.2 The Occupational Health and Safety Act No. 85 of 1993

The Occupation Health and Safety Act 85 (1993) is primarily intended for the health and safety of the employees, whereas its MHI regulations is intended for the health and safety of the public.

The OHS Act shall not apply in respect of:

- a) A mine, a mining area or any works as defined in the Minerals Act, 1991 (Act No. 50 of 1991), except in so far as that Act provides otherwise;
 - b) Any load line ship (including a ship holding a load line exemption certificate), fishing boat, sealing boat and whaling boat as defined in Section 2 (1) of the Merchant Shipping Act, 1951 (Act No. 57 of 1951), or any floating crane, whether or not such ship, boat or crane is in or out of the water within any harbour in the Republic or within the territorial waters thereof, (date of commencement of paragraph (b) to be proclaimed.), or in respect of any person present on or in any such mine, mining area, works, ship, boat or crane.

1.1.2.1 Major Hazard Installation Regulations

The MHI regulations (July 2001) published under Section 43 of the OHS Act require employers, self-employed persons and users who have on their premises, either permanently or temporarily, a major hazard installation or a quantity of a substance which may pose a <u>risk</u> (our emphasis) that could affect the health and safety of employees and the public to conduct a risk assessment in accordance with the legislation.

In accordance with legislation, the risk assessment must be done **prior to construction of the facility** by an approved inspection authority (AIA; see Appendix A and Appendix B), registered with the Department of Labour and accredited by the South African Accreditation Systems (SANAS).

Similar to Section 30 of NEMA as it relates to the health and safety of the public, the MHI regulations are applicable to the health and safety of employees and the public in relation to the operation of a facility, and specifically in relation to sudden or accidental major incidents involving substances that could pose a risk to the health and safety of employees and the public.

The notification of the MHI is described in the regulations as an advertisement placement and specifies the timing of responses from the advertisement. It should be noted that the regulation does not require public participation.

The regulations, summarised in Appendix C, essentially consists of six parts, namely:

- 1. The duties for notification of a MHI (existing or proposed), including:
 - a. Fixed:
 - b. Temporary installations;
- 2. The minimum requirements for a quantitative risk assessment (QRA);
- 3. The requirements for an on-site emergency plan:
- 4. The reporting steps for risk and emergency occurrences:
- 5. The general duties required of suppliers;
- 6. The general duties required of local government.

As this is not an MHI risk assessment, the application of the above legislation is not mandatory but the legislation is described to give a background to this report.

1.2 Terms of Reference

The main aim of the investigation was to quantify the risks to employees, neighbours and the public with regard to the proposed 320 MW RMPP facility at Richards Bay.

This risk assessment was conducted in accordance with the MHI regulations and can be used as notification for the facility. The scope of the risk assessment included:

- 1. Development of accidental spill and fire scenarios for the facility;
- 2. Using generic failure rate data (for tanks, pumps, valves, flanges, pipework, gantry, couplings and so forth), determination of the probability of each accident scenario;
- 3. For each incident developed in Step 2, determination of consequences (such as thermal radiation, domino effects, toxic-cloud formation and so forth);
- 4. For scenarios with off-site consequences (greater than 1% fatality off-site), calculation of maximum individual risk (MIR), taking into account all generic failure rates, initiating events (such as ignition), meteorological conditions and lethality.

1.3 Purpose and Main Activities

The main activity of the power plant would be the generation of mid-merit power supply to the South African electricity grid. The fuel used to generate power would be LPG, that will be delivered to site by truck.

1.4 Main Hazards Due to Substance and Process

The main hazards that would occur with a loss of containment of hazardous components at the proposed 320 MW RMPP facility in Richards Bay include exposure to:

- Thermal radiation from fires;
- Overpressure from explosions.

1.5 Software

Physical consequences were calculated with TNO's EFFECTS v.9.0.26 and the data derived was entered into TNO's RISKCURVES v. 9.0.23. All calculations were performed by Mr M P Oberholzer.

1.6 Assumptions and Limitations

The risk assessment was based on the conceptual designs of the facility, excluding the details still to be determined from the detailed designs. Furthermore, EIAs are intended to suggest mitigation which may alter the design and layout of the project. It is thus understood that detailed designs would be required to complete the project for construction.

RISCOM used the information provided and made engineering assumptions as described in the document for the purposes of compiling this quantitative risk assessment. The accuracy of the document would be limited to the available documents presented for the completion of this report. However, the inventory of hazardous goods of the facility is not expected to increase from the amounts stated in this document and despite the potential of an improved site layout, we expect the maximum impacts to be representative.

With the detailed designs, we expect additional mitigation, which should reduce the risks as recommended.

The greatest impact on accuracy would be omissions from the design presented, changes to the process, substitution of hazards goods (typically), as required by the equipment supplier or the increase of hazardous goods inventory. These would be evaluated under the Major Hazardous Installation regulations, prior to construction.

The risk assessment excludes the following:

- Natural events, such as earthquakes and floods;
- Ecological risk assessment;
- An emergency plan.

2 ENVIRONMENT

2.1 General Background

The 320 MW RMPP will be located on Portion 1 and Remainder of Erf 1854 in the Alton core industrial area in Richards Bay, as shown in Figure 2-1, approximately 3.5 km from the Richards Bay CBD and 3 km from the Richards bay Harbour.

Richards Bay is the most north-easterly port of South Africa, located approximately 160 km northeast of Durban and 465 km southwest of Maputo. The harbour is a deep-sea port which, by virtue of its sheer proximity, provides easy access to markets and is suitable for the importation of LPG from large ships.



Figure 2-1: Location of the proposed 320 MW RMPP facility in Richards Bay

The surrounding land use is primarily industrial, with undeveloped area to the south. The Bayside Aluminium smelting plant is located to the south of the proposed 320 MW RMPP. The sister company, Hillside Aluminium smelting plant is situated to the east of the proposed 320 MW RMPP.

The closest residential area is the Arboretum Extension, which is located approximately 3.8 km east of the proposed 320 MW RMPP. No vulnerable facilities, including hospitals, schools, etc. are located within the nearby vicinity.

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2.2 Meteorology

Meteorological mechanisms govern dispersion, transformation and eventual removal of hazardous vapours from the atmosphere. The extent to which hazardous vapours will accumulate or disperse in the atmosphere is dependent on the degree of thermal and mechanical turbulence within the earth's boundary layer.

Dispersion comprises of vertical and horizontal components of motion. The stability and the depth of the atmosphere from the surface (known as the mixing layer) define the vertical component. The horizontal dispersion of hazardous vapours in the atmospheric boundary layer is primarily a function of the wind field. Wind speed determines both the distance of downwind transport and the rate of dilution as a result of stretching of the plume, and generation of mechanical turbulence is a function of the wind speed in combination with surface roughness. Wind direction and variability in wind direction, both determine the general path hazardous vapours will follow and the extent of crosswind spreading.

Concentration levels of hazardous vapours therefore fluctuate in response to changes in atmospheric stability, to concurrent variations in the mixing layer depth and to shifts in the wind field.

For this report, the meteorological conditions at Richards Bay, as measured by the South African Weather Service, were used as the basis of wind speed, direction and atmospheric stability.

The long-term rainfall, humidity and temperature used a 30-year average for Richards Bay, as measured by the South African Weather Service.

2.2.1 Surface Winds

Hourly averages of wind speed and direction recorded at Richards Bay were obtained from the South African Weather Service for the period from the 1st of January 2013 to the 31st of January 2020.

The predominant winds blow from the north and southwest quadrants, with calm conditions occurring up to 2.4% of the time. Low to medium wind speeds are predominant, with wind speeds of more than 8.7 m/s occurring about 1.4% of the time.

Although, wind shifts between the north-easterly and south-westerly sectors occur all the months of the year, the frequency with which such wind shifts occur varies seasonally as a function of synoptic climatology. The predominant weather directions for the summer and winter months are the north and north-easterly winds with westerly and easterly winds occurring less frequently, as shown in Figure 2-2.

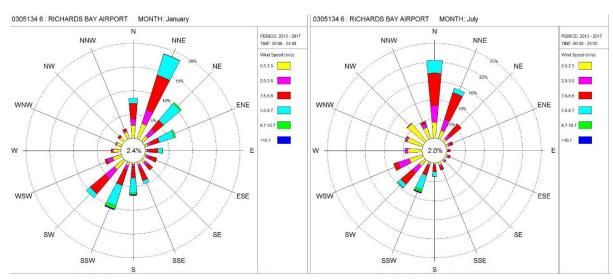


Figure 2-2: Wind analysis for winter and summer variations

2.2.2 Precipitation and Relative Humidity

The long-term rainfall and relative humidity recorded at Richards Bay was obtained from the South African Weather Service for the period from 1994 to 2020.

Relative humidity, the amount of water that is contained in the atmosphere, influences the extent of fires and toxic clouds. The warmer the air, the more moisture it can hold. Should the relative humidity reach 100%, precipitation occurs. The long-term average precipitation and humidity supplied by the South African Weather Service in Table 2-1, indicates an average annual relative humidity in excess of 50%.

Table 2-1: Long-term average precipitation and relative humidity for Richards Bay

Month	Average Precipitation (mm)	Relative Humidity at 14H00 (%)	Relative Humidity at 20H00 (%)
January	172	70	79
February	167	71	79
March	107	71	78
April	109	71	81
May	109	63	79
June	57	61	72
July	60	59	74
August	65	59	74
Sept	77	66	73
October	105	67	79
November	114	70	80
December	86	69	79
Year	1228	67	79

2.2.3 Temperature

Air temperature is important for determining the effect of plume buoyancy (the larger the temperature difference between the plume and the ambient air, the higher the plume is able to rise), for estimating evaporation rates and for determining the development of the mixing and inversion layers.

The long-term temperatures recorded at Richards Bay were obtained from the South African Weather Service for the period from 1994 to 2020, as given in Table 2-2. Extreme temperatures frequently occur due to berg wind conditions, during which temperatures over 40°C are reported for all months of the year.

Table 2-2: Long-term temperature averages for Richards Bay

Month	Average Maximum (°C)	Average Minimum (°C)	Mean Average (°C)
January	29.2	21.2	25.2
February	28.9	21.2	25
March	28.9	20.4	24.6
April	27	18.1	22.5
May	24.8	15.2	20
June	23.1	12.3	17.7
July	23	12.3	17.6
August	24	14.1	19
September	24.9	16	20.3
October	25.4	17.3	21.3
November	26.7	18.6	22.7
December	28.7	20.4	24.5
Year	26.2	17.3	21.7

2.2.4 Atmospheric Stability

Atmospheric stability is frequently categorised into one of six stability classes. These are briefly described in Table 2-3. The atmospheric stability, in combination with the wind speed, is important in determining the extent of a pollutant from a release.

A very stable atmospheric condition, typically at night, would have a low wind speed and produce the greatest endpoint for a dense gas. Conversely, a buoyant gas would have the greatest endpoint distance at a high wind speed.

Table 2-3: Classification scheme for at	mospheric stability
---	---------------------

Stability Class	Stability Classification	Description	
Α	Very unstable	Calm wind, clear skies, hot daytime conditions.	
В	Moderately unstable	Clear skies, daytime conditions.	
С	Unstable	Moderate wind, slightly overcast daytime conditions.	
D	Neutral	Strong winds or cloudy days and nights.	
E	Stable	Moderate wind, slightly overcast night-time conditions.	
F	Very stable	Low winds, clear skies, cold night-time conditions.	

The atmospheric stability for Richards Bay, as a function of the wind class, was calculated from hourly weather values supplied by the South African Weather Service from the 1st of January 2013 to the 31st of January 2020, as given in Figure 2-3.

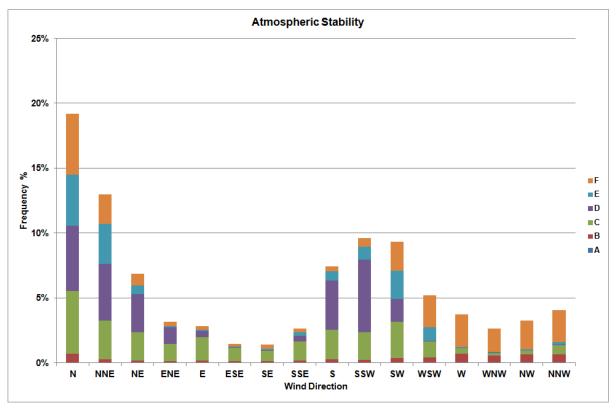


Figure 2-3: Atmospheric stability as a function of wind direction in Richards Bay

This risk assessment's calculations are based on six representative weather classes covering the stability conditions of stable, neutral and unstable as well as low and high wind speeds. In terms of Pasquill classes, the representative conditions, are given in Table 2-4.

Table 2-4: Representative weather classes

Stability Class	Wind (m/s)
В	3
D	1.5
D	5
D	9
E	5
F	1.5

The allocation of observations into the six weather classes is summarised in Table 2-5 with the representative weather classes, given in Figure 2-4.

Table 2-5: Allocation of observations into six weather classes

Wind Speed	Α	В	B/C	С	C/D	D	E	F
< 2.5 m/s	B 3 m/s		D 1.5 m/s		F 1.5 m/s			
2.5 - 6 m/s				D 5 m/s		E 5 m/s		
> 6 m/s				D 9 m/s			111/5	

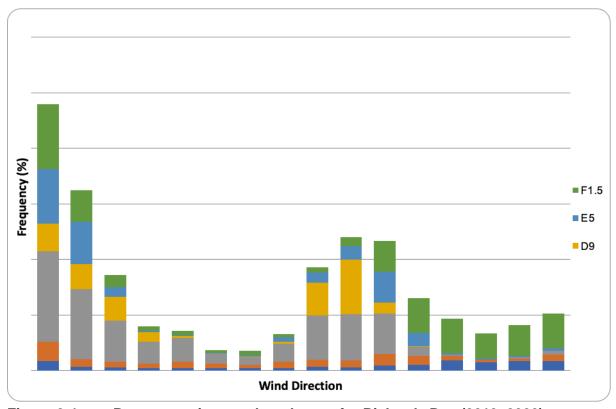


Figure 2-4: Representative weather classes for Richards Bay (2013–2020)

2.2.5 Meteorological Simulation Values

Default meteorological values used in simulations, based on local conditions, are given in Table 2-6.

Table 2-6: Default meteorological values used in simulations, based on local conditions

Parameter	Default Value Daytime	Default Value Night-time	
Ambient temperature (°C)	26	17	
Substrate/bund temperature (°C)	22	22	
Water temperature (°C)	22	22	
Air pressure (bar)	1.013	1.013	
Humidity (%)	67	78	
Fraction of a 24-hour period	0.5	0.5	
Mixing height	1	1	

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The mixing height is calculated as part of the software

3 PROJECT DESCRIPTION

3.1 Site

The proposed 320 MW RMPP facility in Richards Bay is to consist of bulk LPG storage vessels, offices, workshops and five gas turbines, as shown in Figure 3-1.

The site will be accessed from Kraft Link, as well as the inlet and exit in Kalbelkring Street for the LPG road tankers to offload the LPG at the offloading gantry.

The facility will consist of bulk LPG storage vessels, a boiler, a series of gas turbines, admin buildings, control rooms, warehouse and workshop facilities, staff facilities, a guard house, oil tanks, dangerous goods (hydraulic fluid, diesel, lubricant) tanks and sludge tanks, water storage tank(s) or reservoir, LPG storage tank(s) and LPG vaporisation facilities, battery storage, backup diesel generator, a facility substation, and ancillary infrastructure.

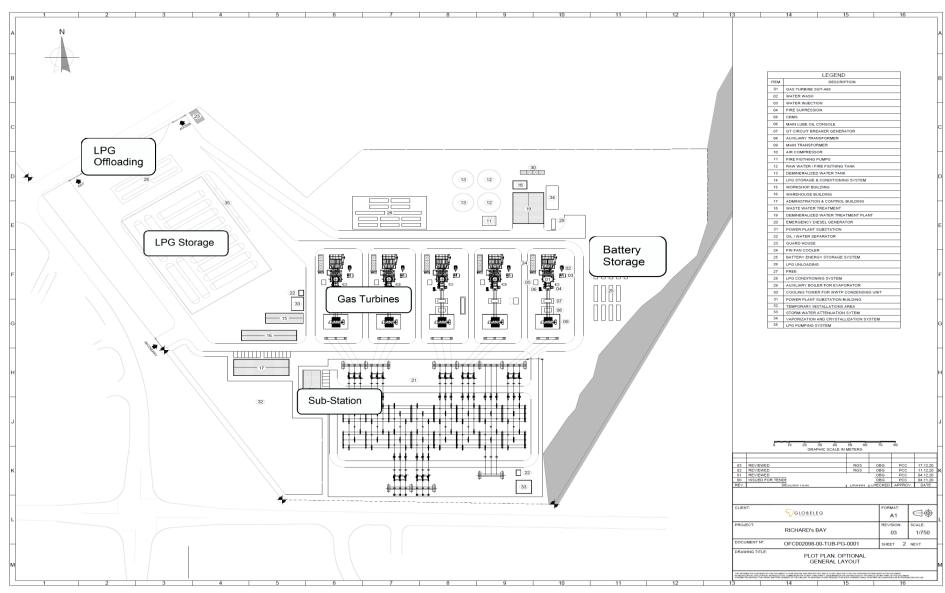


Figure 3-1: Site layout

3.2 Project Description

The simplified process description is provided in Figure 3-2, whereby LPG would be used to generate 320 MW electricity using open cycle gas turbines (OCGT).

LPG will be delivered to site via road tankers and offloaded into LPG storage tanks of maximum capacity 10 000 m³. The LPG will be vapourised in water baths, after which the gas will be directed to the gas turbines to generate electricity. It is expected that the turbines will operate at a maximum of 16.5 hours per day and will not be required if the grid demand can be met by the renewable facilities.

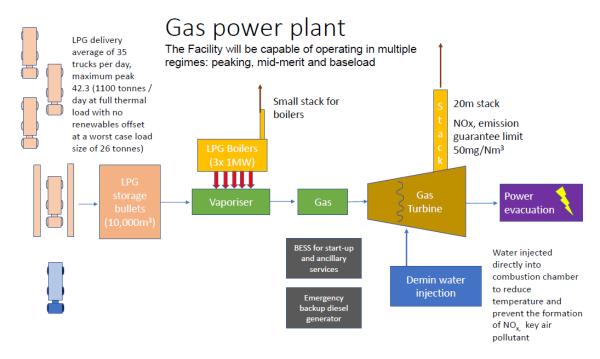


Figure 3-2: Simplified process flow diagram

3.3 LPG Installation

Road tankers, with a maximum capacity of 26 t, will deliver LPG to site and offload at a five-bay gantry. It is estimated that approximately 35 road tankers will be required per day.

LPG from the road tankers will be pumped into the 13 LPG storage tanks, each having a capacity of 385 tonne (770 m³). The LPG tanks will be compliant with the requirements of the South African National standard SANS 10087:3. The position of the tanks and associated equipment, is indicated in Figure 3-1.

The LPG from the storage tanks would pass through water bath vaporisers, operating at about 75°C that would heat the LPG from the storage temperature and convert the liquefied gas into vapour.

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3.4 Utilities

3.4.1 Boiler

3 x 1 MW boilers, operating on LPG, would be provided to supply heating for the vaporiser and zero liquid waste evaporators.

3.4.2 Diesel

A 50 m³ diesel storage tank would be provided for emergency power. At this stage of the design, the diesel storage tank location is unknown.

3.4.3 Demineralised Water

Demineralised water will be produced from clarified water supplied by Mhlathuze Water using reverse osmosis. The demineralised water would be used in the gas turbines for NOx reductions.

3.4.4 Battery Energy Storage System (BESS)

The operating regime of the project, due to its renewable's hybrid component, will enable the shutdown of the thermal facility during periods where the renewables are fully able to meet the demands of the grid. The primary purpose of the BESS Plant will be to bridge the start-up time of the facility, where the gas turbines are off and ancillary service dispatch instructions are received from Eskom.

To enable the thermal plant to respond immediately with the ancillary services from Eskom, the BESS will provide power to the grid during the 4-minute lag period it takes for the gas turbines to start-up. Whilst the thermal plant is idle, fuel consumption, as well as water consumption and the associated atmospheric discharges, will be completely avoided resulting in a more environmentally friendly and economical facility.

The BESS will:

- Store energy (where possible excess energy) for use whilst the thermal plant is idle (during the first 4 minutes of operation (i.e., start-up) before the turbines are operational;
- Permit the thermal plant's output to be reduced to zero under certain circumstances (primarily when sufficient renewable resources are available for the Project to meet any dispatch instruction);
- Whilst the thermal plant is idle, the BESS will react to any ancillary service dispatch instruction issued by Eskom;
- Reduce the fuel and water consumption and the associated atmospheric discharges of the project.

There will be 1 x BESS at the thermal facility with a maximum of 25 MW.

A battery is a device that is able to store electrical energy in the form of chemical energy and convert that energy into electricity. The project will use Solid State BESS technology for the project.

Solid State Batteries

These energy storage units come in a range of containerised systems with size categories from 500 kWh to 4 MW per container. The typical footprint area required for a 10 MW is about 0.5 ha to 0.75 ha. Such systems are flexible and can be expanded or reduced, depending upon supplier format and size of storage required.

Figure 3-3 below provides a visual presentation of the difference between the conventional battery system and the solid-state battery, as well as the advantages of using the solid-state battery technology.

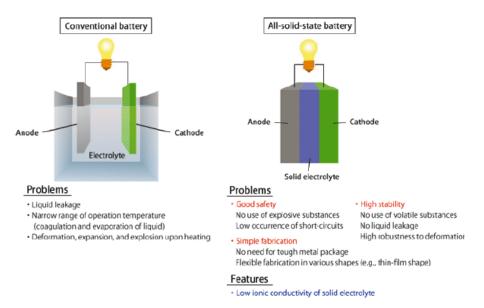


Figure 3-3: Battery comparison

Solid state batteries consist of multiple battery cells that collectively form modules. Each cell contains of an anode, cathode and a solid electrolyte. Modules are usually assembled within the containers (often shipping containers) and delivered to the project site. Multiple containers will be required.

The container unit dimensions vary between suppliers and do not exceed a typical 40" shipping container which is approximately 12 m long, 2.4 m wide, and 2.6 m high.

Containers will be placed on a raised concrete plinth (30 cm) and may be stacked on top of each other to a maximum height of approximately 5.2 m. Additional instrumentation, including inverters and temperature control equipment, may be positioned between the battery containers. The typical layout of such a facility, is presented in Figure 3-4.



Figure 3-4: Example of a Solid-State battery facility layout

3.5 Summary of Bulk Materials to be Stored on Site

A summary of bulk materials that can give hazardous effects that are to be stored on site, is given in Table 3-1.

Table 3-1: Summary of hazardous components to be stored on site

No.	Component	CAS No.	Inventory				
1	LPG (propane)	74-98-6	10, 000 m ³				
2	Diesel	68334-30-5	50 m ³				

4 METHODOLOGY

Risk assessments done in accordance with the MHI regulations are required to be conducted according to SANS 1461((2018). This standard is specific to the MHI risk assessment that is required to be done prior to construction and includes elements that are not usually available at the preparation stage of a project, such as emergency plans and mitigation suggested during the EIA process.

SANS 1461 (2018) is based on RIVM (2009) for process plants. The latter standards describe the minimum scenarios to be included in the assessment, as well as the assumptions to be used. As full compliance of SANS 1461 (2018) cannot be achieved within the NEMA legislative framework, general compliance of the aforementioned standards at this stage would be applicable and briefly described in the sections below. This general compliance assessment constitutes a quantitative risk assessment (QRA).

The QRA process is summarised with the following steps:

- 1. Identification of components that are flammable, toxic, reactive or corrosive and that have potential to result in a major incident from fires, explosions or toxic releases;
- Development of accidental loss of containment (LOC) scenarios for equipment containing hazardous components (including release rate, location and orientation of release);
- 3. For each incident developed in Step 2, determination of consequences (such as thermal radiation, domino effects, toxic-cloud formation and so forth);
- 4. For scenarios with off-site consequences (greater than 1% fatality off-site), calculation of maximum individual risk (MIR), taking into account all generic failure rates, initiating events (such as ignition), meteorological conditions and lethality.

4.1 Hazard Identification

The first step in any risk assessment is to identify all hazards. The merit of including a hazard for further investigation is then determined by how significant it is, normally by using a cut-off or threshold value.

Once a hazard has been identified, it is necessary to assess it in terms of the risk it presents to the employees and the neighbouring community. In principle, both probability and consequence should be considered but there are occasions where, if either the probability or the consequence can be shown to be sufficiently low or sufficiently high, decisions can be made based on just one factor.

During the hazard identification component of the report, the following considerations are taken into account:

- Chemical identities;
- Location of on-site installations that use, produce, process, transport or store hazardous components;
- Type and design of containers, vessels or pipelines;
- Quantity of material that could be involved in an airborne release;
- Nature of the hazard most likely to accompany hazardous materials spills or releases, e.g., airborne toxic vapours or mists, fires or explosions, large quantities to be stored and certain handling conditions of processed components.

The evaluation methodology assumes that the facility will perform as designed in absence of unintended events, such as component and material failures of equipment, human errors, external events and process unknowns.

4.1.1 Notifiable Substances

The General Machinery Regulation 8 and its Schedule A on notifiable substances, requires any employer who has a substance equal to or exceeding the quantity listed in the regulation to notify the divisional director. A site is classified as a Major Hazard Installation if it contains one or more notifiable substances, or if the off-site risk is sufficiently high. The latter can only be determined from a quantitative risk assessment.

The notifiable threshold for LPG is listed 25 t in a single vessel. As the proposed installation exceeds the threshold limit, LPG will be classified as a notifiable substance, which would automatically classify the facility a Major Hazard Installation.

4.1.2 Substance Hazards

All components on site were assessed for potential hazards according to the criteria discussed in this section.

4.1.2.1 Chemical Properties

A short description of bulk hazardous components to be stored on, produced at or delivered to site is given in the following subsections. The material safety data sheets (MSDSs) of the respective materials are attached in Appendix E.

Liquid Petroleum Gas (LPG)

Liquid petroleum gas (LPG) primarily consists of propane with minor impurities such as butane. It is a colourless gas at room temperature with the odour of commercial natural gas. It has a low boiling point of -41.9°C and is often compressed and transported and sold as a liquid, primarily as a fuel.

Propane is a severe fire and explosion hazard with an invisible vapour that spreads easily and can be ignited by many sources such as pilot lights, welding equipment, electrical motors, switches and so forth. It is heavier than air and can travel along the ground for some distance to an ignition source.

It is not compatible with strong oxidants and can react with these, resulting in fires and explosions.

It is not considered a carcinogenic material. The toxicology and the physical and chemical properties suggest that overexposure is unlikely to aggravate existing medical conditions.

Overexposure may cause dizziness and drowsiness. Effects of a single (acute) overexposure may result in asphyxiation, due to lack of oxygen, which could be fatal. Self-contained breathing apparatus may be required by rescue workers. Moderate concentrations may cause headaches, drowsiness, dizziness, excitation, excess salivation, vomiting and

unconsciousness. Vapour contact with the skin will not cause any harm. However, contact with the liquid may cause frostbite due to the low temperature of liquid propane.

• Diesel

Diesel is a hydrocarbon mixture with variable composition, with a boiling-point range of between 252°C and 371°C. It is a pale-yellow liquid with a petroleum odour. Due to the flash point of diesel between 38°C and 65°C, this material is not considered highly flammable but will readily ignite under suitable conditions.

Diesel is stable under normal conditions. It will react with strong oxidising agents and nitrate compounds. This reaction may cause fires and explosions.

Diesel is not considered a toxic material. Contact with vapours may result in slight irritation to nose, eyes and skin. Vapours may cause headache, dizziness, loss of consciousness or suffocation as well as lung irritation with coughing, gagging, dyspnoea, substernal distress and rapidly developing pulmonary oedema.

If swallowed, diesel may cause nausea or vomiting, swelling of the abdomen, headache, CNS depression, coma and death.

The long-term effects of diesel exposure have not been determined. However, this may affect the lungs and may cause the skin to dry out and become cracked.

Diesel floats on water and can result in environmental hazards with large spills into waterways. It is harmful to aquatic life in high concentrations.

4.1.2.2 Corrosive Liquids

Corrosive liquids considered under this subsection, are those components that have a low or high pH and that may cause burns if they come into contact with people or may attack and cause failure of equipment.

No bulk corrosive materials are expected to be stored on site.

4.1.2.3 Reactive Components

Reactive components are components that when mixed or exposed to one another react in a way that may cause a fire, explosion or release a toxic component.

All components to be stored on, produced at or delivered to site are considered thermally stable in atmospheric conditions. The reaction with air is covered under the subsection dealing with ignition probabilities.

4.1.2.4 Flammable and Combustible Components

Flammable and combustible components are those that can ignite and give a number of hazardous effects, depending on the nature of the component and conditions. These effects may include pool fires, jet fires and flash fires as well as explosions and fireballs.

The flammable and combustible components to be stored on, produced at or delivered to site, are listed in Table 4-1. These components have been analysed for fire and explosion risks.

Table 4-1: Flammable and combustible components to be stored on, produced at or delivered to site

Component	Flashpoint (°C)	Boiling Point (°C)	LFL (vol. %)	UFL (vol. %)
LPG	-103.5	-42	2.1	9.5
Diesel	> 55	290	0.6	7

4.1.3 Physical Properties

For this study, LPG were modelled as a pure component, as given in Table 4-2. The physical properties used in the simulations were based on the DIPPR¹ data base, which are preloaded in the simulation software.

Table 4-2: Representative components

Component	Modelled as
LPG	Propane
Diesel	Dodecane

4.1.4 Components Excluded from the Study

Components excluded from the study, are listed in Table 4-3.

Table 4-3: Components excluded from the study

Component	Inventory	Reasons for Exclusion
Nitrogen	Portable cylinders	Will only be brought on site when maintenance would be required and would be in cylinders.
Lube oil	Small, used to lubricate the gensets	High flash point >100ºC.

¹ Design Institute for Physical Properties

4.2 Physical and Consequence Modelling

In order to establish which impacts follow an accident, it is first necessary to estimate the physical process of the spill (i.e., rate and size), spreading of the spill, evaporation from the spill, subsequent atmospheric dispersion of the airborne cloud and, in the case of ignition, the burning rate and resulting thermal radiation from a fire and the overpressures from an explosion.

The second step is then to estimate the consequences of a release on humans, fauna, flora and structures in terms of the significance and extent of the impact in the event of a release. The consequences could be due to toxic or asphyxiant vapours, thermal radiation or explosion overpressures. They may be described in various formats.

The simplest methodology would show a comparison of predicted concentrations, thermal radiation or overpressures to short-term guideline values.

In a different but more realistic fashion, the consequences may be determined by using a dose-response analysis. Dose-response analysis aims to relate the intensity of the phenomenon that constitutes a hazard to the degree of injury or damage that it can cause. Probit analysis is possibly the method mostly used to estimate probability of death, hospitalisation or structural damage. The probit is a lognormal distribution and represents a measure of the percentage of the vulnerable resource that sustains injury or damage. The probability of injury or death (i.e., the risk level) is in turn estimated from this probit (risk characterisation).

Consequence modelling gives an indication of the extent of the impact for selected events and is used primarily for emergency planning. A consequence that would not cause irreversible injuries would be considered insignificant, and no further analysis would be required. The effects from major incidents are summarised in the following subsections.

4.2.1 Fires

Combustible and flammable components within their flammable limits may ignite and burn if exposed to an ignition source of sufficient energy. On process plants, releases with ignition normally occur as a result of a leakage or spillage. Depending on the physical properties of the component and the operating parameters, combustion may take on a number of forms, such as pool fires, jet fires, flash fires and so forth.

4.2.1.1 Thermal Radiation

The effect of thermal radiation is very dependent on the type of fire and duration of exposure. Certain codes, such as the American Petroleum Institute API 520 and API 2000 codes, suggest values for the maximum heat absorbed by vessels to facilitate adequate relief designs in order to prevent failure of the vessel. Other codes, such as API 510 and the British Standards BS 5980 code, give guidelines for the maximum thermal radiation intensity and act as a guide to equipment layout, as shown in Table 4-4.

The effect of thermal radiation on human health has been widely studied, relating injuries to the time and intensity of exposure.

Table 4-4:	Thermal radiation	guidelines	(BS 5980 of 1990)
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Thermal Radiation Intensity (kW/m²)	Limit
1.5	Will cause no discomfort for long exposure.
2.1	Sufficient to cause pain if unable to reach cover within 40 seconds.
4.5	Sufficient to cause pain if unable to reach cover within 20 seconds.
12.5	Minimum energy required for piloted ignition of wood and melting of plastic tubing.
25	Minimum energy required to ignite wood at indefinitely long exposures.
37.5	Sufficient to cause serious damage to process equipment.

For pool fires, jet fires and flash fires CPR 18E (Purple Book; 1999) suggests the following thermal radiation levels be reported:

- 4 kW/m², the level that glass can withstand, preventing the fire entering a building, and that should be used for emergency planning;
- 10 kW/m², the level that represents the 1% fatality for 20 seconds of unprotected exposure and at which plastic and wood may start to burn, transferring the fire to other areas:
- 35 kW/m², the level at which spontaneous ignition of hair and clothing occurs, with an assumed 100% fatality, and at which initial damage to steel may occur.

4.2.1.2 Bund and Pool Fires

Pool fires, either tank or bund fires, consist of large volumes of a flammable liquid component burning in an open space at atmospheric pressure.

The flammable component will be consumed at the burning rate, depending on factors including prevailing winds. During combustion, heat will be released in the form of thermal radiation. Temperatures close to the flame centre will be high but will reduce rapidly to tolerable temperatures over a relatively short distance. Any building or persons close to the fire or within the intolerable zone, will experience burn damage with severity depending on the distance from the fire and time exposed to the heat of the fire.

In the event of a pool fire, the flames will tilt according to the wind speed and direction. The flame length and tilt angle affect the distance of thermal radiation generated.

4.2.1.3 Jet Fires

Jet fires occur when a flammable component which is released with a high exit velocity, ignites.

In process industries, this may be due to design (such as flares) or due to accidental releases. Ejection of a flammable component from a vessel, pipe or pipe flange may give rise to a jet fire and in some instances, the jet flame could have substantial 'reach'.

In modelling jet fires from punctures, the release can be considered to be steady-state. For underground modelling, consequence model considers a vertical jet flame at ground level, with wind tilt created by the current wind velocity. Above ground pipelines are modelled as horizontal releases at the release height.

Depending on wind speed, the flame may tilt and impinge on other pipelines, equipment or structures. The thermal radiation from these fires may cause injury to people or damage equipment some distance away from the source of the flame.

4.2.1.4 Fireball

A fireball occurs with the immediate ignition of a large gas release forming a mushroomshaped cap that is fed from below by the established part of the fire, lasts typically for up to 30 seconds (depending on pipeline diameter and initial pressure).

4.2.1.5 Flash Fires

A loss of containment of a flammable component may mix with air, forming a flammable mixture. The flammable cloud would be defined by the lower flammable limit (LFL) and the upper flammable limit (UFL). The extent of the flammable cloud would depend on the quantity of the released and mixed component, physical properties of the released component, wind speed and weather stability.

An ignition within a flammable cloud can result in an explosion if the front is propagated by pressure. If the front is propagated by heat, then the fire moves across the flammable cloud at the flame velocity and is called a flash fire. Flash fires are characterised by low overpressure, and injuries are caused by thermal radiation. The effects of overpressure due to an exploding cloud are covered in the subsection dealing with vapour cloud explosions (VCEs).

A flash fire would extend to the lower flammable limit; however, due to the formation of pockets, it could extend beyond this limit to the point defined as the ½ LFL. It is assumed that people within the flash fire would experience lethal injuries, while people outside of the flash fire would remain unharmed. The ½ LFL is used for emergency planning to evacuate people to a safe distance in the event of a release.

4.2.2 Explosions

The concentration of a flammable component would decrease from the point of release to below the lower explosive limits (LEL), at which concentration the component can no longer ignite. The sudden detonation of an explosive mass would cause overpressures that could result in injury or damage to property.

Such an explosion may give rise to any of the following effects:

- Blast damage;
- Thermal damage;
- Missile damage;
- Ground tremors:
- Crater formation;
- Personal injury.

Obviously, the nature of these effects depends on the pressure waves and the proximity to the actual explosion. Of concern in this investigation are the 'far distance effects', such as limited structural damage and the breakage of windows, rather than crater formations.

Table 4-5 and Table 4-6 give a more detailed summary of the damage produced by an explosion due to various overpressures.

CPR 18E (Purple Book; 1999) suggests the following overpressures be determined:

- 0.03 bar overpressure, corresponding to the critical overpressure causing windows to break;
- 0.1 bar overpressure, corresponding to 10% of the houses being severely damaged and a probability of death indoors equal to 0.025:
 - No lethal effects are expected below 0.1 bar overpressure on unprotected people in the open;
- 0.3 bar overpressure, corresponding to structures being severely damaged and 100% fatality for unprotected people in the open;
- 0.7 bar overpressure, corresponding to an almost entire destruction of buildings.

Table 4-5: Summary of consequences of blast overpressure (Clancey 1972)

Pressure (Gauge)		D
Psi	kPa	Damage
0.02	0.138	Annoying noise (137 dB), if of low frequency (10 – 15 Hz).
0.03	0.207	Occasional breaking of large glass windows already under strain.
0.04	0.276	Loud noise (143 dB); sonic boom glass failure.
0.1	0.69	Breakage of small under strain windows.
0.15	1.035	Typical pressure for glass failure.
0.3	2.07	'Safe distance' (probability 0.95; no serious damage beyond this value); missile limit; some damage to house ceilings; 10% window glass broken.
0.4	2.76	Limited minor structural damage.
0.5–1.0	3.45–6.9	Large and small windows usually shattered; occasional damage to window frames.
0.7	4.83	Minor damage to house structures.
1.0	6.9	Partial demolition of houses, made uninhabitable.
1.0–2.0	6.9–13.8	Corrugated asbestos shattered; corrugated steel or aluminium panels, fastenings fail, followed by buckling; wood panels (standard housing) fastenings fail, panels blown in.
1.3	8.97	Steel frame of clad building slightly distorted.
2.0	13.8	Partial collapse of walls and roofs of houses.
2.0-3.0	13.8–20.7	Concrete or cinderblock walls (not reinforced) shattered.
2.3	15.87	Lower limit of serious structural damage.
2.5	17.25	50% destruction of brickwork of house.
3.0	20.7	Heavy machines (1.4 t) in industrial building suffered little damage; steel frame building distorted and pulled away from foundations.
3.0-4.0	20.7–27.6	Frameless, self-framing steel panel building demolished.
4.0	27.6	Cladding of light industrial buildings demolished.
5.0	34.5	Wooden utilities poles (telegraph, etc.) snapped; tall hydraulic press (18 t) in building slightly damaged.
5.0-7.0	34.5–48.3	Nearly complete destruction of houses.
7.0	48.3	Loaded train wagons overturned.
7.0–8.0	48.3–55.2	Brick panels (20 – 30 cm) not reinforced fail by shearing or flexure.
9.0	62.1	Loaded train boxcars completely demolished.
10.0	69.0	Probable total destruction buildings; heavy (3 t) machine tools moved and badly damaged; very heavy (12 000 lb. / 5443 kg) machine tools survived.
300	2070	Limit of crater lip.

Table 4-6: Damage caused by overpressure effects of an explosion (Stephens 1970)

Fin.m.aut		Overpressure (psi)																										
Equipment	0.5	1	1	.5	2	2.5	3	3.5	4	4.5	5	5.5	6	6.5	7	7.5	8	8.5	9	9.5	10	12	14	16	18	20		
Control house steel roof	Α	С	; \	/				N																			A W	Vindows and gauges break
Control house concrete roof	Α	E	F	>	D			N																			B L	ouvers fall at 0.3-0.5 psi
Cooling tower	В				F			0																			C S	witchgear is damaged from roof collapse
Tank: cone roof		D)				K							U													D R	oof collapses
Instrument cubicle			1	1			LM						Т														E Ir	nstruments are damaged
Fire heater					G	Τ					Т																F Ir	nner parts are damaged
Reactor: chemical					Α				1				Р						Т								G B	racket cracks
Filter					Н					F									٧			Т					H D	ebris-missile damage occurs
Regenerator							ı				ΙP					Т											I U	Init moves and pipes break
Tank: floating roof							K							U												D	J B	racing fails
Reactor: cracking								ı							I							Т					K U	Init uplifts (half filled)
Pine supports								Р					SO														L P	ower lines are severed
Utilities: gas meter										Q																	M C	controls are damaged
Utilities: electric transformer										Н					1						Т						N B	lock wall fails
Electric motor											Н								ı							V	O F	rame collapses
Blower											Q										Т						P F	rame deforms
Fractionation column												R			Т												Q C	ase is damaged
Pressure vessel horizontal													PΙ						Т								R F	rame cracks
Utilities: gas regulator													ı								MQ						S P	iping breaks
Extraction column														ı							٧	Т					T U	Init overturns or is destroyed
Steam turbine																I						М	S			V	U U	Init uplifts (0.9 filled)
Heat exchanger																I			Т								V U	Init moves on foundations
Tank sphere																	I						1	Т				
Pressure vessel vertical																						Ι	Т					
Pump																						Ι		Υ				

4.2.2.1 Vapour Cloud Explosions (VCEs)

The release of a flammable component into the atmosphere could result in formation of a flash fire, as described in the subsection on flash fires, or a vapour cloud explosion (VCE). In the case of a VCE, an ignited vapour cloud between the higher explosive limits (HEL) and the lower explosive limit (LEL) could form a fireball with overpressures that could result in injury or damage to property.

4.2.2.2 Boiling Liquid Expanding Vapour Explosions (BLEVEs)

A boiling liquid expanding vapour explosion (BLEVE) can occur when a flame impinges on a pressure cylinder, particularly in the vapour space region where cooling by evaporation of the contained material does not occur; the cylinder shell would weaken and rupture with a total loss of the contents, and the issuing mass of material would burn as a massive fireball.

The major consequences of a BLEVE are intense thermal radiation from the fireball, a blast wave and propelled fragments from the shattered vessel. These fragments may be projected to considerable distances. Analyses of the travel range of fragment missiles from a number of BLEVEs suggest that the majority land within 700 m from the incident. A blast wave from a BLEVE is fairly localised but can cause significant damage to immediate equipment.

A BLEVE occurs sometime after the vessel has been engulfed in flames. Should an incident occur that could result in a BLEVE, people should be evacuated to beyond the 1% fatality line.

4.3 Risk Analysis

4.3.1 Background

It is important to understand the difference between hazard and risk.

A hazard is anything that has the potential to cause damage to life, property and the environment. Furthermore, it has constant parameters (like those of petrol, chlorine, ammonia, etc.) that pose the same hazard wherever present.

On the other hand, risk is the probability that a hazard will actually cause damage and goes along with how severe that damage will be (consequence). Risk is therefore the probability that a hazard will manifest itself. For instance, the risks of a chemical accident or spill depends upon the amount present, the process the chemical is used in, the design and safety features of its container, the exposure, the prevailing environmental and weather conditions and so on.

Risk analysis consists of a judgement of probability based on local atmospheric conditions, generic failure rates and severity of consequences, based on the best available technological information.

Risks form an inherent part of modern life. Some risks are readily accepted on a day-to-day basis, while certain hazards attract headlines even when the risk is much smaller, particularly in the field of environmental protection and health. For instance, the risk of one-in-tenthousand chance of death per year associated with driving a car is acceptable to most people, whereas the much lower risks associated with nuclear facilities (one-in-ten-million chance of death per year) are deemed unacceptable.

A report by the British Parliamentary Office of Science and Technology (POST), entitled 'Safety in Numbers? Risk Assessment and Environmental Protection', explains how public perception of risk is influenced by a number of factors in addition to the actual size of the risk. These factors were summarised as follows in Table 4-7.

Table 4-7: Influence of public perception of risk on acceptance of that risk, based on the POST report

Control	People are more willing to accept risks they impose upon themselves or they consider to be 'natural' than to have risks imposed upon them.
Dread and Scale of Impact	Fear is greatest where the consequences of a risk are likely to be catastrophic rather than spread over time.
Familiarity	People appear more willing to accept risks that are familiar rather than new risks.
Timing	Risks seem to be more acceptable if the consequences are immediate or short term, rather than if they are delayed (especially if they might affect future generations).
Social Amplification and Attenuation	Concern can be increased because of media coverage, graphic depiction of events or reduced by economic hardship.
Trust	A key factor is how far the public trusts regulators, policy makers or industry; if these bodies are open and accountable (being honest as well as admitting mistakes and limitations and taking account of differing views without disregarding them as emotive or irrational), then the public is more likely to consider them credible.

A risk assessment should be seen as an important component of ongoing preventative action, aimed at minimising or hopefully avoiding accidents. Reassessments of risks should therefore follow at regular intervals and after any changes that could alter the nature of the hazard, so contributing to an overall prevention programme and emergency response plan of the facility. Risks should be ranked with decreasing severity and the top risks reduced to acceptable levels.

Procedures for predictive hazard evaluation have been developed for the analysis of processes when evaluating very low probability accidents with very high consequences (for which there is little or no experience) as well as more likely releases with fewer consequences (for which there may be more information available). These address both the probability of an accident as well as the magnitude and nature of undesirable consequences of that accident. Risk is usually defined as some simple function of both the probability and consequence.

4.3.2 Predicted Risk

Physical and consequence modelling addresses the impact of a release of a hazardous component without taking into account probability of occurrence. This merely illustrates the significance and the extent of the impact in the event of a release. Modelling should also analyse cascading or knock-on effects due to incidents in the facility and the surrounding industries and suburbs.

During a risk analysis, the likelihood of various incidents is assessed, the consequences calculated and finally the risk for the facility is determined.

4.3.3 Generic Equipment Failure Scenarios

In order to characterise various failure events and assign a failure frequency, fault trees were constructed starting with a final event and working from the top down to define all initiating events and frequencies. Unless otherwise stated, analysis was completed using published failure rate data (RIVM 2009). Equipment failures can occur in tanks, pipelines and other items handling hazardous chemical components. These failures may result in:

 Release of combustible, flammable and explosive components with fires or explosions upon ignition.

4.3.3.1 Storage Vessels

Scenarios involving storage vessels can include catastrophic failures that would lead to leakage into the bund with a possible bund fire. A tank-roof failure could result in a possible tank-top fire. The fracture of a nozzle or transfer pipeline could also result in leakage into the bund.

Typical failure frequencies for atmospheric and pressure vessels are listed, respectively, in Table 4-8 and Table 4-9.

Table 4-8: Failure frequencies for atmospheric vessels

Event	Leak Frequency (per item per year)		
Small leaks	1x10 ⁻⁴		
Severe leaks	3x10 ⁻⁵		
Catastrophic failure	5x10 ⁻⁶		

Table 4-9: Failure frequencies for pressure vessels

Event	Failure Frequency (per item per year)
Small leaks	1x10 ⁻⁵
Severe leaks	5x10 ⁻⁷
Catastrophic failure	5x10 ⁻⁷

4.3.3.2 Transport and Process Piping

Piping may fail as a result of corrosion, erosion, mechanical impact damage, pressure surge (water hammer) or operation outside the design limitations for pressure and temperature. Failures caused by corrosion and erosion usually result in small leaks, which are easily detected and corrected quickly. For significant failures, the leak duration may be from 10–30 minutes before detection.

Generic data for leak frequency for process piping is generally expressed in terms of the cumulative total failure rate per year for a 10 m section of pipe for each pipe diameter. Furthermore, failure frequency normally decreases with increasing pipe diameter. Scenarios and failure frequencies for a pipeline apply to pipelines with connections, such as flanges, welds and valves.

The failure data given in Table 4-10 represents the total failure rate, incorporating all failures of whatever size and due to all probable causes. These frequencies are based on an assumed environment where no excessive vibration, corrosion, erosion or thermal cyclic stresses are expected. For incidents causing significant leaks (such as corrosion), the failure rate will be increased by a factor of 10.

Table 4-10: Failure frequencies for process pipes

Description	Frequencies of Loss of Containment for Process Pipes (per meter per year)								
	Full Bore Rupture	Leak							
Nominal diameter < 75 mm	1x10 ⁻⁶	5x10 ⁻⁶							
75 mm < nominal diameter < 150 mm	3x10 ⁻⁷	2x10 ⁻⁶							
Nominal diameter > 150 mm	1x10 ⁻⁷	5x10 ⁻⁷							

4.3.3.3 Pumps and Compressors

Pumps can be subdivided roughly into two different types, reciprocating pumps and centrifugal pumps. This latter category can be further subdivided into canned pumps (sealless pumps) and gasket (pumps with seals). A canned pump can be defined as an encapsulated pump where the process liquid is located in the space around the rotor (impeller), in which case gaskets are not used.

Compressors can also be subdivided roughly into reciprocating compressors and centrifugal compressors.

Failure rates for pumps and compressors, are given in Table 4-11 and Table 4-12.

Table 4-11: Failure frequency for centrifugal pumps and compressors

Event	Canned (No Gasket) Frequency (per annum)	Gasket Frequency (per annum)
Catastrophic failure	1.0x10 ⁻⁵	1.0x10 ⁻⁴
Leak (10% diameter)	5.0x10 ⁻⁵	4.4x10 ⁻³

Table 4-12: Failure frequency for reciprocating pumps and compressors

Event	Frequency (per annum)
Catastrophic failure	1.0x10 ⁻⁴
Leak (10% diameter)	4.4x10 ⁻³

4.3.3.4 Loading and Offloading

Loading can take place from a storage vessel to a transport unit (road tanker, tanker wagon or ship), or from a transport unit to a storage vessel. The failure frequencies for loading and offloading arms, are given in Table 4-13.

Table 4-13: Failure frequencies for loading and offloading arms and hoses

	Frequency (per hour)	
Event	Loading and Offloading Arms	Loading and Offloading Hoses
Rupture	3x10 ⁻⁸	4x10 ⁻⁶
Leak with effective diameter at 10% of nominal diameter to max. 50 mm	3x10 ⁻⁷	4x10 ⁻⁵

4.3.3.5 Human Failure

Human error and failure can occur during any life cycle or mode of operation of a facility. Human failure can be divided into the following categories:

- Human failure during design, construction and modification of the facility;
- Human failure during operation and maintenance;
- Human failure due to errors of management and administration.

Human failure during design, construction and modification is part of the generic failure given in this subsection. Human failure due to errors of organisation and management are influencing factors. Some of the types of tasks that have been evaluated for their rates of human failure are given in Table 4-14.

Table 4-14: Human failure rates of specific types of tasks (CPR 12E 2005; Red Book)

Tasks	Human Failure (events per year)
Totally unfamiliar, performed at speed with no real idea of likely consequences.	0.55
Failure to carry out rapid and complex actions to avoid serious incident such as an explosion.	0.5
Complex task requiring high level of comprehension and skill.	0.16
Failure to respond to audible alarm in control room within 10 minutes.	1.0x10 ⁻¹
Failure to respond to audible alarm in quiet control room by some more complex action such as going outside and selecting one correct value among many.	1.0x10 ⁻²
Failure to respond to audible alarm in quiet control room by pressing a single button.	1.0x10 ⁻³
Omission or incorrect execution of step in a familiar start-up routine.	1.0x10 ⁻³
Completing a familiar, well-designed, highly-practiced, routine task occurring several times per hour, performed to highest possible standards by a highly-motivated, highly-trained and experienced person totally aware of implications of failures, with time to correct potential error but without the benefit of significant job aids.	4.0x10 ⁻⁴

4.3.3.6 Ignition Probability of Flammable Gases and Liquids

Estimation of probability of an ignition is a key step in assessment of risk for installations where flammable liquids or gases are stored. There is a reasonable amount of data available relating to characteristics of ignition sources and effects of release type and location.

Probability of ignition for stationary installations, is given in Table 4-15 (along with classification of flammable substances in Table 4-16). These can be replaced with ignition probabilities related to surrounding activities. For example, probability of a fire from a flammable release at an open flame would increase to a value of 1.

Table 4-15: Probability of direct ignition for stationary installations (RIVM 2009)

Substance Category	Source-Term Continuous	Source-Term Instantaneous	Probability of Direct Ignition
Category 0 Average to high reactivity	< 10 kg/s 10 – 100 kg/s > 100 kg/s	< 1000 kg 1000 – 10 000 kg > 10 000 kg	0.2 0.5 0.7
Category 0 Low reactivity	< 10 kg/s 10 – 100 kg/s > 100 kg/s	< 1000 kg 1000 – 10 000 kg > 10 000 kg	0.02 0.04 0.09
Category 1	All flow rates	All quantities	0.065
Category 2	All flow rates	All quantities	0.0043 ¹
Category 3 Category 4	All flow rates	All quantities	0

Table 4-16: Classification of flammable substances

Substance Category	Description	Limits
Category 0	Extremely flammable	Liquids, substances and preparations that have a flashpoint lower than 0°C and a boiling point (or the start of the boiling range) less than or equal to 35°C Gaseous substances and preparations that may ignite at normal temperature and pressure when exposed to air.
Category 1	Highly flammable	Liquids, substances and preparations that have a flashpoint of below 21°C.
Category 2	Flammable	Liquids, substances and preparations that have a flashpoint equal to 21°C and less than 55°C.
Category 3		Liquids, substances and preparations that have a flashpoint greater than 55°C and less than or equal to 100°C.
Category 4		Liquids, substances and preparations that have a flashpoint greater than 100°C.

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This value is taken from the CPR 18E (Purple Book; 1999). RIVM (2009) gives the value of delayed ignition as zero. RISCOM (PTY) LTD believes the CPR 18E is more appropriate for warmer climates and is a conservative value.

4.4 Risk Criteria

4.4.1 Maximum Individual Risk Parameter

Standard individual risk parameters include: average individual risk; weighted individual risk; maximum individual risk; and, the fatal accident rate. The lattermost parameter is more applicable to occupational exposures.

Only the maximum individual risk (MIR) parameter will be used in this assessment. For this, parameter frequency of fatality is calculated for an individual who is presumed to be present at a specified location. This parameter (defined as the consequence of an event multiplied by the likelihood of the event) is not dependent on knowledge of populations at risk. So, it is an easier parameter to use in the predictive mode, than average individual risk or weighted individual risk. The unit of measure is the risk of fatality per person per year.

4.4.2 Acceptable Risks

The next step, after having characterised a risk and obtained a risk level, is to recommend whether the outcome is acceptable.

In contrast to the employees at a facility, who may be assumed to be healthy, the adopted exposure assessment applies to an average population group that also includes sensitive subpopulations. Sensitive subpopulation groups are those people that for reasons of age or medical condition have a greater than normal response to contaminants. Health guidelines and standards used to establish risk normally incorporate safety factors that address this group.

Among the most difficult tasks of risk characterisation is the definition of acceptable risk. In an attempt to account for risks in a manner similar to those used in everyday life, the UK Health and Safety Executive (HSE) developed the risk ALARP triangle. Applying the triangle involves deciding:

- Whether a risk is so high that something must be done about it;
- Whether the risk is or has been made so small that no further precautions are necessary:
- If a risk falls between these two states so that it has been reduced to levels as low as reasonably practicable (ALARP).

This is illustrated in Figure 4-1.

ALARP stands for 'as low as reasonably practicable'. As used in the UK, it is the region between that which is intolerable, at 1x10⁻⁴ per year, and that which is broadly acceptable, at 1x10⁻⁶ per year. A further lower level of risk, at 3x10⁻⁷ per year, is applied to either vulnerable or very large populations for land-use planning.

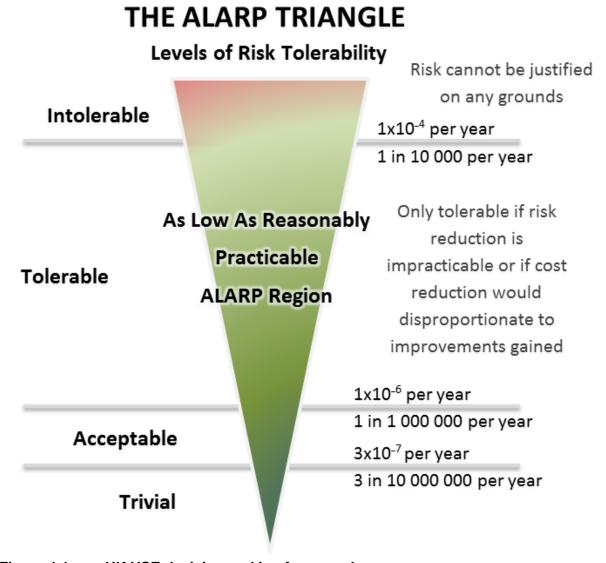


Figure 4-1: UK HSE decision-making framework

It should be emphasised that the risks considered acceptable to employees are different to those considered acceptable to the public. This is due to the fact that employees have personal protection equipment (PPE), are aware of the hazards, are sufficiently mobile to evade or escape the hazards and receive training in preventing injuries.

The HSE (UK) gives more detail on the word practicable in the following statement:

In essence, making sure a risk has been reduced to ALARP is about weighing the risk against the sacrifice needed to further reduce it. The decision is weighted in favour of health and safety because the presumption is that the duty-holder should implement the risk reduction measure. To avoid having to make this sacrifice, the duty-holder must be able to show that it would be grossly disproportionate to the benefits of risk reduction that would be achieved. Thus, the process is not one of balancing the costs and benefits of measures but, rather, of adopting measures except where they are ruled out because they involve grossly disproportionate sacrifices. Extreme examples might be:

- To spend £1m to prevent five staff members suffering bruised knees is obviously grossly disproportionate; but,
- To spend £1m to prevent a major explosion capable of killing 150 people is obviously proportionate.

Proving ALARP means that if the risks are lower than 1x10⁻⁴ fatalities per person per year, it can be demonstrated that there would be no more benefit from further mitigation, sometimes using cost benefit analysis.

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4.4.3 Land Planning

SANS 1461 (2018) provides guidelines for land planning criteria This standards is a requirement for completing the MHI risk assessment. Thus, the land planning criteria can only be applied after completion of the MHI risk assessment, under Section 9 of the MHI regulation.

In this study, RISCOM can only suggest land planning approvals, based on the information provided and would require governmental authorities to make final decisions, based on the MHI risk assessment that would be completed after final designs.

Land zoning applied in this study follows the SANS 1461 (2018) and HSE (UK) approach of defining the area affected into three zones, consistent to the ALARP approach (HSE 2011).

The three zones are defined as follows:

- The inner zone is enclosed by the risk of 1x10⁻⁵ fatalities per person per year isopleth;
- The middle zone is enclosed by the risk of 1x10⁻⁵ fatalities per person per year and the risk of 1x10⁻⁶ fatalities per person per year isopleths;
- The outer zone is enclosed by the risk 1x10⁻⁶ fatalities per person per year and the risk of 3x10⁻⁷ fatalities per person per year isopleths.

The risks decrease from the inner zone to the outer zone, as shown in Figure 4-2 and Figure 4-3.

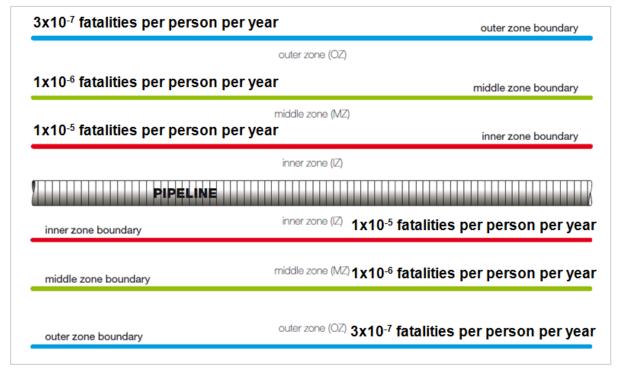


Figure 4-2: Town-planning zones for pipelines

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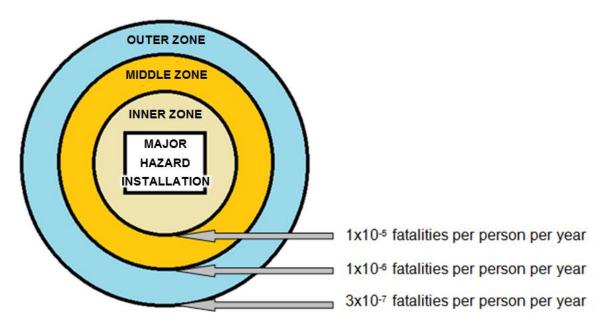


Figure 4-3: Town-planning zones

Once the zones are calculated, the HSE (UK) methodology then determines whether a development in a zone should be categorised as 'advised against' (AA) or as 'don't advise against' (DAA), depending on the sensitivity of the development, as indicated in Table 4-17. There are no land-planning restrictions beyond the outer zone.

l able 4-17:	Land-use decision matrix
	1

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

The sensitivity levels are based on a clear rationale: progressively more severe restrictions are to be imposed as the sensitivity of the proposed development increases.

There are four sensitivity levels, with the sensitivity for housing defined as follows:

- Level 1 is based on workers who have been advised of the hazards and are trained accordingly;
- Level 2 is based on the general public at home and involved in normal activities;
- Level 3 is based on the vulnerability of certain members of the public (e.g., children, those with mobility difficulties or those unable to recognise physical danger);
- Level 4 is based on large examples of Level 2 and of Level 3.

Refer to Appendix D for detailed planning advice for developments near hazardous installations (PADHI) tables. These tables illustrate how the HSE land-use decision matrix, generated using the three zones and the four sensitivity levels, is applied to a variety of development types.

4.4.4 Societal Risk Parameter

Risk criteria discussed so far have been for individual risks. There is also a need to consider incidents in the light of their effect on many people at the same time. Public response to an incident that may harm many people is thought to be worse than the response to many incidents causing the same number of individual deaths. Compliance with an individual risk criterion is necessary but not always sufficient. Even if it were sufficient, societal risk would also have to be examined in some circumstances.

Societal risk is risk of widespread or large-scale harm from a potential hazard. The implication is that consequence would be on such a scale as to provoke a major social or political response and may lead to public discussion about regulation in general. Societal risk therefore takes into account, the density of the population around a Major Hazard Installation site and is the probability in any one year (F) of an event affecting at least a certain number (N) of people (also known as an FN curve).

4.4.5 Scenario Selection

The standard used for the calculation was SANS 1461 (2018), which describes that cross-country pipelines must be done to IGEM/TD/2 and PD 8010-3. Furthermore, the SANS 1461 (2018) is based on RIVM (2009). The respective event trees represented below were taken from the respective standards. The cross-country pipeline was underground with a vertical release, while the process piping and plant were above ground with a horizontal release.

4.4.5.1 Scenarios for Release of a Pressurised Liquefied Gas

The nature of the release of a liquefied gas from a pressurised vessel is dependent on the position of the hole.

A hole above the liquid level will result in a vapour release only, and the release rate would be related to the size of the hole and internal pressure of the tank. Over a period of time, bulk temperature reduces, with an associated decrease in the vapour release rate.

A hole below the liquid level will result in a release of a liquid stream. In the reduced pressure of the atmosphere, a portion of the liquid will vaporise at the normal boiling point. This phenomenon is called flashing and is shown in Figure 4-4. The pool, formed after flashing, then evaporates at a rate proportional to the pool area, surrounding temperature and wind velocity.

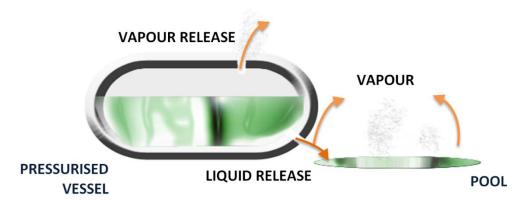


Figure 4-4: Airborne vapours from a loss of containment of liquefied gas stored in a pressurised vessel

4.4.5.2 Instantaneous Release of a Pressured Liquefied Flammable Gas

An instantaneous loss of containment of a liquefied flammable gas could result in the consequences given in the event tree of Figure 4-5. Probability of the events occurring is dependent on a number of factors and is determined accordingly. All the scenarios shown in the figure are determined separately and reported in relevant subsections of the report.

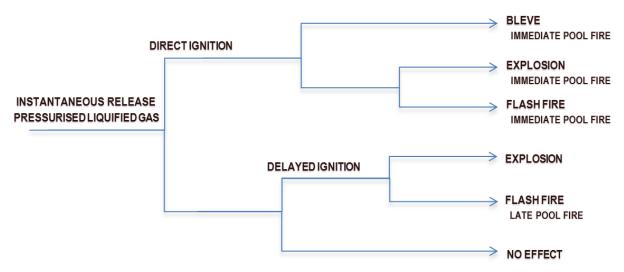


Figure 4-5: Event tree for an instantaneous release of a liquefied flammable gas

4.4.5.3 Continuous Release of a Pressurised Liquefied Flammable Gas

The continuous loss of containment of a liquefied flammable gas could result in the consequences given in the event tree of Figure 4-6. Probability of the events occurring is dependent on a number of factors and is determined accordingly. All the scenarios shown in the figure are determined separately and reported in relevant subsections of the report.

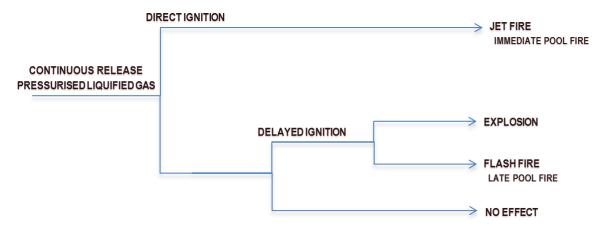


Figure 4-6: Event tree for a continuous release of a liquefied flammable gas

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4.4.5.4 Continuous Release of a Flammable Gas

The continuous loss of containment of a flammable gas could result in the consequences given in the event tree of Figure 4-7. Probability of the events occurring is dependent on a number of factors and is determined accordingly. All the scenarios shown in the figure are determined separately and reported in relevant subsections of the report.

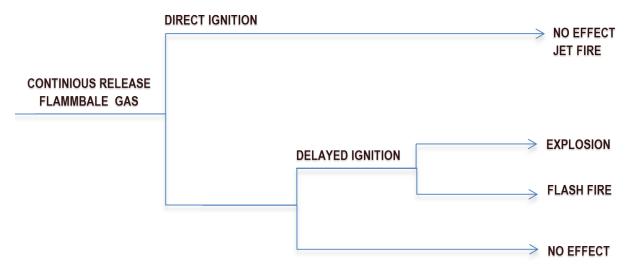


Figure 4-7: Event tree for a continuous release of a flammable gas

4.4.5.5 Continuous Release of a Flammable Liquid

The continuous loss of containment of a flammable liquid could result in the consequences given in the event tree of Figure 4-8. Probability of the events occurring is dependent on a number of factors and is determined accordingly. All the scenarios shown in the figure are determined separately and reported in relevant subsections of the report.

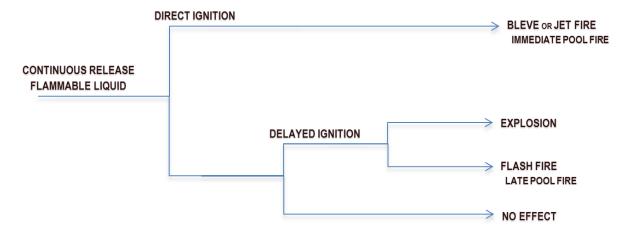


Figure 4-8: Event tree for a continuous release of a flammable liquid

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5 RISK ASSESSMENT

Risk assessment was done of each processing unit by firstly selecting a scenario and then completing consequence and outflow modelling. Consequences with possible impacts beyond the site boundary were retained for risk analysis of the unit.

Finally, the risk of the entire facility is determined as a combination of the risk calculated for each unit.

5.1 LPG Installation

5.1.1 The Purpose of the Processing Unit

The LPG storage installation will consist of a road tanker offloading bay, LPG storage bullets, LPG vaporisers and pipeline to the respective gensets.

As the detailed engineering designs have not been completed, a number of assumptions were made regarding the designs. The following was assumed in the modelling:

- Maximum of 13 x 800 m³ LPG storage bullets
- 5 x 100% product pumps from the LPG bullets to the vaporisers;
- 3 x 50% vaporisers;
- Overfill protection failure rate, 1 in 100 years.

5.1.2 Hazardous Components

LPG is extremely flammable, but not considered toxic. The hazards of LPG are described in more detail in Section 4.1.2.1.

5.1.3 Consequence Modelling

The scenarios modelled for the LPG installation are listed in Table 5-1.

Table 5-1: Scenarios modelled

Equipment	Scenarios Modelled	Potential Consequences	Comments
LPG tanker	Tanker failureHose failureHose leak	 Jet fire Flash fires VCE	 Only on site when delivering LPG Tanker does not reverse Safety distances to SANS 10087 4 x Offloading bays Time to offload 1 hour Operating time 20 h/d
Offloading Pump	FailureLeak	Pool fireJet fireFlash firesVCE	 Flow rate= 4 X 26 t/hr Temperature = ambient temperature Diff head = 4bar
LPG storage	Catastrophic failureOverfill10 Minute release10 mm Hole	BLEVEPool fireJet fireFlash firesVCE	Pressure relief valveBuilt to SANS 10087
Product Pump	FailureLeak	Pool fireJet fireFlash firesVCE	 Max flow rate= 180 m³/h Temperature = ambient temperature Pressure = 12 bar(g)
Vaporiser	Catastrophic failureSingle tube failure	Jet fireFlash firesVapour cloud explosion (VCE)	 Temperature (out) =70°C Pressure = 12 bar(g) Flow rate = same as product pump

5.1.3.1 LPG Offloading Gantry

The LPG will be delivered to site in road tankers of approximately 60 m³ each and offloaded at the 4-bay road gantry into the storage tanks via offloading pumps.

In the event of a loss of containment, the maximum extent to the 1% fatality, will occur from a catastrophic failure of a 60 m³ road tanker at high wind speeds, as shown in Figure 5-1. The coloured lines show the maximum extent of the potential effects from a westerly wind direction, while the orange curve indicates the maximum extent from all wind directions.

In this case, the BLEVE dominates the impacts and determines the maximum extent to the 1% fatality. The BLEVE has no significant overpressure and the fatalities indicated would be due to thermal radiation onto people in the open. The VCE overpressure for the 1% fatality is equal to 0.1 bar overpressure, that would result in damage to the gas turbines and electrical transmission. Due to the storage temperature of the LPG, no significant pool fire was simulated.

The maximum extent from a major event at the road gantry could extend beyond the site boundary into the nearby Alton industrial area, but would not extend into residential areas.

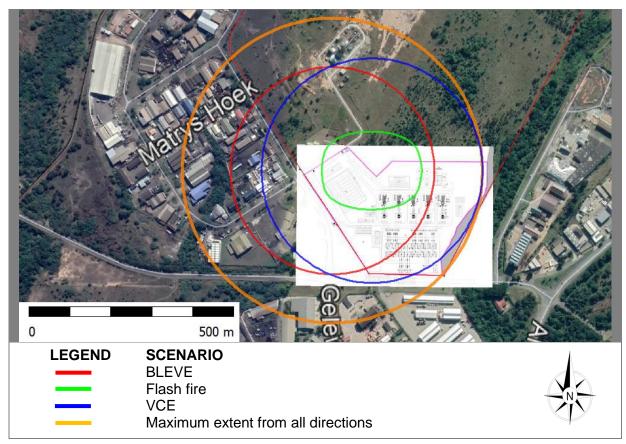


Figure 5-1: The maximum extent to the 1% fatality from a catastrophic failure of a 60 m³ road tanker

5.1.3.2 LPG Storage

The LPG will be received from LPG road tankers and will be stored in 13 x 800 m³ bullets at ambient temperature.

The maximum extent to the 1% fatality will occur from a release of the entire contents of an 800 m³ LPG storage tank over 10 minutes, as shown in Figure 5-2. The coloured lines show the maximum extent of the potential effects from a westerly wind direction, while the orange curve indicates the maximum extent from all wind directions.

In this case, the flash fires and vapour cloud explosions dominate the impacts and determines the maximum extent to the 1% fatality. People in the open within the flash fire, are assumed to suffer fatal injuries. The VCE overpressure for the 1% fatality is equal to 0.1 bar overpressure, that would result in mild damage to the neighbouring properties.

The maximum extent of the 1% fatality could extend 1227 m downwind of the release mostly into the Alton industrial area, and could extend as far as the Mondi property to the west, as well as beyond the John Ross Parkway to the south.

Most of the surrounding areas are undeveloped and would not experience significant impacts. The impacts from a large loss of containment of an LPG bullet, would not reach the residential areas.

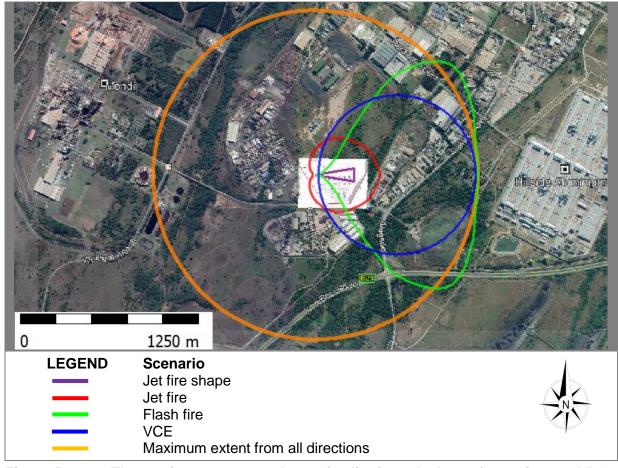


Figure 5-2: The maximum extent to the 1% fatality from the loss of containment LPG storage tank over a 10-minute period

5.1.3.3 LPG Product Pumps

The LPG from the storage bullets will be transported to the vaporisers and subsequently to the gensets via the product pumps. A large failure of the product pump, e.g., pump casing failure will result in an outlet flow from the storage vessel at the flow rate, determined by the outlet pipeline. Material will continue to flow until stopped or the vessel has been emptied.

Figure 5-3 shows the maximum extent from the failure of the product pumps to the 1% fatality. The coloured lines show the maximum extent of the potential effects from a release in a single direction, while the orange curve indicates the maximum extent from all wind directions.

In this case, the flash fires and vapour cloud explosions dominate the impacts and determines the maximum extent to the 1% fatality. People in the open within the flash fire, are assumed to suffer fatal injuries. The VCE overpressure for the 1% fatality is equal to 0.1 bar overpressure, that would result in mild damage to the neighbouring property, including damage to walls and the roof.

The impacts from a large release from the product pump could extend beyond the site boundary, primarily impacting the neighbouring Alton industrial area.

A large release from a pump failure could result in significant onsite damage. Mitigation could be provided to reduce the risks from such events.

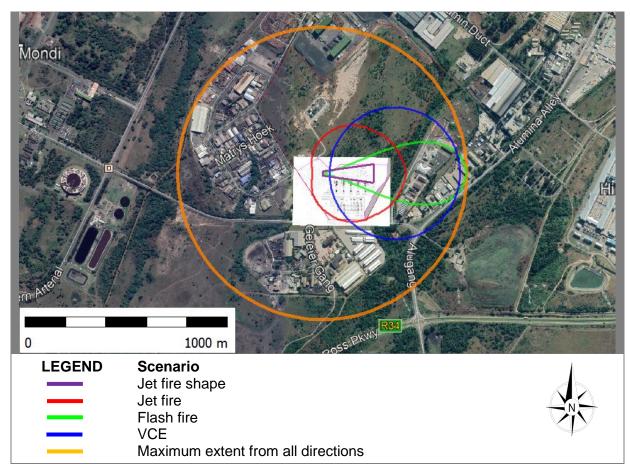


Figure 5-3: The maximum extent to the 1% fatality from the product pump failure

5.1.3.4 LPG Vaporisers

The vaporisers would be a water bath type, whereby the LPG will be vapourised into a gas phase and would exit at approximately 70°C.

The maximum extent to the 1% fatality will occur from a catastrophic failure of a single vaporiser, as shown in Figure 5-4. The release would be in the vertical orientation. The coloured lines show the maximum extent of the potential effects from a westerly wind direction, while the orange curve indicates the maximum extent from all wind directions.

The maximum extent of the 1% fatality could extend beyond the site boundary, into a currently undeveloped area, but would not impact residential areas.

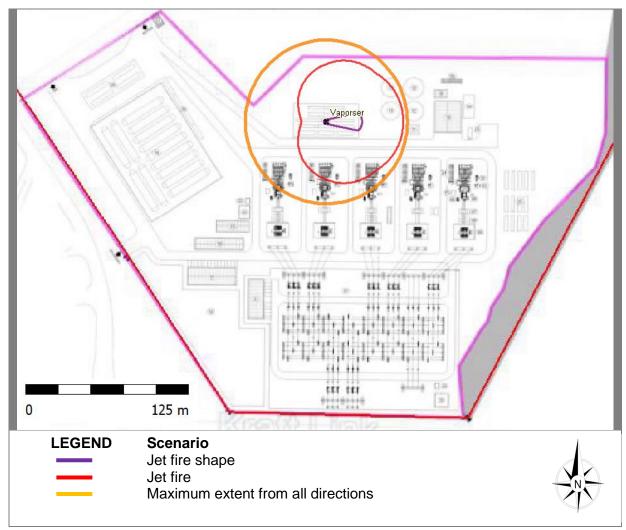


Figure 5-4: The maximum extent to the 1% fatality from a catastrophic failure of a vaporiser

5.1.3.5 Summary of Impacts

Maximum distances from the point of release to the 1% fatality, are summarised for each scenario in Table 5-2.

Table 5-2: Maximum distance to 1% fatality from the point of release

Scenarios	Max. Distance to 1% Fatality (m)
LPG Offloading Gantry	
LPG Tanker - Catastrophic failure	366
LPG Tanker - Leak largest nozzle	125
LPG Tanker hose - Failure	87
LPG Tanker hose - Leak	12
LPG Storage	
LPG Bullet - 10 mm Hole	37
LPG Bullet - Fixed duration	1227
LPG Bullet - PSV failure	172
LPG Bullet - Catastrophic failure	882
LPG Bullet - BLEVE	825
LPG Offloading Pump	
Offloading pump-failure	75
Offloading pump-leak	25
Product Pumps	
Product pump - Failure	712
Product pump- Leak	24
LPG Vaporisers	
Vaporiser tube- Failure	9
Vaporiser Vessel failure	62
LPG Offloading Pipeline	
Pipeline - Failure	75
Pipeline Leak	25
LPG Pipeline –Product Pumps to Vaporiser	
Pipeline - Failure	112
Pipeline Leak	86

LPG Pipeline -Vaporiser to Power Plant	
Pipeline - Failure	171
Pipeline Leak	36

5.2 Battery Storage

The Battery Energy Storage System (BESS) would be limited to maximum 25 MW, with the technology vendor not selected at this stage of the project.

5.2.1 Risk Matrix Associated with The BESS Technology Alternatives

Table 5-3 below outlines the different battery technology associated with BESS as well as the capability to mitigate the risk, based on practical and applicable technology solutions. The BESS battery alternative technologies considered for the proposed project are Li-ion (lithium ion) Battery Technology.

Table 5-3: Risks and design mitigation measures associated with each battery Technology

recimology			
Risk	Mitigation		
Li-ion battery technology			
Temperature fluctuations	The design of the Li-ion system includes:		
Temperature fluctuations in the Richards Bay area (maximum temperatures of over 25°C) mean that the batteries may be at risk of being damaged due to instability of temperatures. Resultant impacts could include fire, or permanent structural damage to the batteries.	 Insulated containers. High powered HVAC (Heating, Ventilation and Air-Conditioning) System, monitored centrally. Multiple temperature sensors for both the cells and air temperature. Automated shut down mechanism if temperatures get too high. Containers sealed and douse in case of fire to prevent the spread. Battery management system to prevent overuse and maintain good battery condition. 		
Fire and dangerous chemicals	The design of the Li-ion system includes:		
The volatility of the battery system, prior to any mitigation, could result in significant fire danger. In addition to this, there is a risk associated with the chemicals contained within the actual battery storage system itself.	 Fire detection and suppressant systems. Gas level monitoring for several different gases (related to degradation of the batteries that increases risk of fire). Heat sensors. Battery condition monitoring. Dousing mechanism for emergency cooling and fire suppression. Density limits in the containers. Spacing limits between containers. 		
Vanadium redox flow battery technology			
<u>Dangerous chemicals and gases</u> The design of the VRFBs includes:			
Due to the use of aqueous electrolytes, the fire risk of VRFB systems is much lower than with other technologies. Overcharging the battery does not lead to fire but to a reduction in battery performance and aging	 Battery condition monitoring. Fire detection and suppressant systems. Leak detection and monitoring system. 		

of the stacks. Thermal runaway as with lithium-ion batteries is excluded.

In addition to its corrosive character, the vanadium electrolyte solution is classified as toxic and hazardous to groundwater. The electrolyte is used in a closed system and vanadium can escape solely through electrolyte leaks.

In spite of the measures described above, there will always be a small amount of hydrogen produced during charging at high states of charge, which is a safety risk due to the possible explosive reaction with atmospheric oxygen. The amount is extremely small, but must be taken into account when installing the battery.

- A secondary containment to prevent the escape of vanadium solution into the environment during operation (storage and refilling when required). The VRFBs will be placed within a 2.5 m high berm wall.
- Hydrogen gas is discharged from the negative tank into the environment through a simple pipe and the battery room or container is well ventilated and flushed with fresh air to prevent any build-up of hydrogen gas.
- A Major Hazards Risk Assessment must be undertaken prior to construction (should VRFBs be used), and the recommendations of the assessment implemented.

Zinc-hybrid (zinc-bromine) flow battery technology

Bromine is a highly toxic material through inhalation and absorption. Maintaining a stable amine complex with the bromine is key to system safety.

In addition, repeated plating of metals in general is difficult due to the formation of "rough" surfaces (dendrite formation) that can puncture the separator.

The design of the ZNBRs includes:

- Active cooling systems are provided by system manufacturers to maintain stability of the bromineamine complex when ambient temperatures may exceed 95°F.
- Special cell design and operating modes (pulsed discharge during charge) are required to achieve uniform plating and reliable operation.

5.2.2 Consequence Modelling

The modelling of battery fires assumed the battery manufactured of a pure component, lithium, as the worst case. Lithium can burn in oxygen under the correct conditions providing an intense flame. Lithium combusts in the vapour phase and would require sufficient energy to melt the lithium. In this instance the pool fire was limited to the container area of 2.4 m x 12 m.

The maximum extent of a lithium fire in a container, is shown in Figure 5-5. The solid lines indicate the maximum thermal radiation from a westerly wind, while the dashed lines indicated the maximum distance from all directions. The thermal radiation values are represented as follows:

- 4 kW/m², the level that glass can withstand, preventing the fire entering a building, and that should be used for emergency planning;
- 10 kW/m², the level that represents the 1% fatality for 20 seconds of unprotected exposure and at which plastic and wood may start to burn, transferring the fire to other areas:
- 35 kW/m², the level at which spontaneous ignition of hair and clothing occurs, with an assumed 100% fatality, and at which initial damage to steel may occur.

 The thermal radiations from a battery fire could result in serious damage to the battery container, but limited damage would occur beyond the battery storage area, especially beyond the site's boundary.

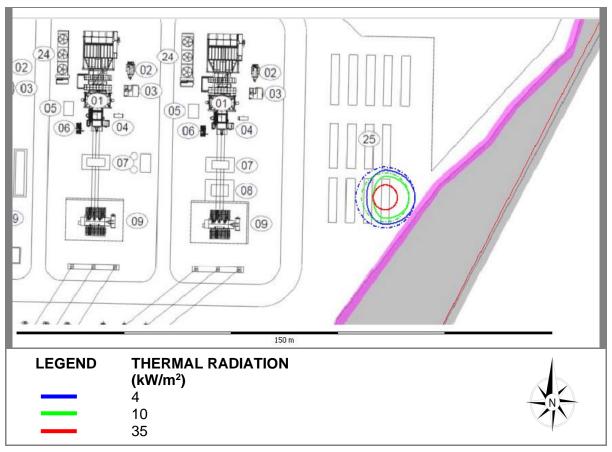


Figure 5-5: Thermal radiation from large lithium- ion battery for a single container

The battery alternatives described in this study would all be obtained from specific vendors, who would supply the batteries as well as the configuration for the control of charging and discharging of the batteries. Units containing the batteries would be prefabricated by the specialist vendor and would include the features necessary for safe operation. The products would be delivered to site and assembled in accordance with the vendor instructions. Where hydrogen can be produced during the process, adequate ventilation must be provided to keep the hydrogen below its flammable limits.

While potential hazards were described for the respective battery alternatives, the study found only one historical incident of a battery failure, a sodium sulphur battery fire, and some incidents involving Li-ion BESS and involved thermal runaway¹.

It should be noted that the vendors of these batteries have designed and fabricated a number of these units around the world, particularly for the use of renewable energy (mostly wind farms and solar parks). With numerous installations worldwide, a single incident of fire constitutes a good safety record.

It can therefore be said, that from a safety viewpoint there should be no preference for battery type and the choice would be made with other criteria in view.

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¹ https://spectrum.ieee.org/energywise/energy/batteries-storage/dispute-erupts-over-what-sparked-an-explosive-liion-energy-storage-accident

5.3 Diesel Storage and Offloading

5.3.1 The Purpose of the Processing Unit

Diesel will be used for back-up generators.

As the detail engineering designs have not been completed, a number of assumptions were made regarding the designs. The following was assumed in the modelling:

- 1 x 50 m³ atmospheric storage tank;
- 100 m² bund size;
- Road tanker size 20 m²;
- Delivery of 1 tanker per month;
- Location north of the gensets and not on the site boundary;
- Tanker spillage limited to 250 m², due to the natural barriers on the road.

5.3.2 Hazardous Components

Diesel is considered combustible and will sustain combustion when lit. It is not considered toxic. The hazards of LPG are described in more detail in Section 4.1.2.1.

5.3.3 Consequence Modelling

The scenarios modelled for the transport pipeline, are listed in Table 5-4.

Table 5-4: Scenarios modelled

Containment System	Causes	Potential Consequences	Comments
Diesel storage tank	Catastrophic failureSerious release into bund	Pool fire	Located within a bunded areaOverfill protection on the tanks
Diesel tanker	Tanker failureHose failureHose leak	Pool fire	Secondary containmentLimited time on site
Pumps	Tank failure	Pool fire	Located within a bunded area

5.3.3.1 Diesel Storage Tank

Diesel offloaded from the road tanker is transferred to the 50 kl storage tank. A loss of containment of the storage tank can be the due to a vessel/pipeline failure or overfilling.

An Instantaneous (catastrophic) failure of a storage tank can result in a proportion of the component overflowing the top of the bund, referred to as 'overtopping'. For the scenario of an instantaneous release, the amount of overtopping is taken to be an average of 33%. This is translated to the risk assessment by increasing the surface area of the bund by 50% (RIVM 2009) and would represent the worst-case scenario for the tank installation.

A tank leak, overfilling or piping failure (severe leak) would not result in overtopping, and even in the worst case, the spilt material would be contained within the bunded area.

The maximum effect of a pool fire from a loss of containment (catastrophic failure of the tank) in the storage area, is shown Figure 5-6. The isopleth represents the worst-case radiation at a high wind speed (9 m/s) and shows the maximum impact distance expected. The solid lines indicate the extent of the fire from a westerly wind, while the dashed lines indicate the maximum extent from all wind directions.

The 1% fatality or 10 kW/m² should remain within the site boundary, provided the diesel tank is not located near a site boundary.

The red line represents the extent of the 1% fatality high velocity westerly winds, while the orange line indicates the maximum extent from to winds in all directions. The 10 kW/m² representing the 1% fatality, should remain within the site boundary, provided the diesel tank is not located near a site boundary.

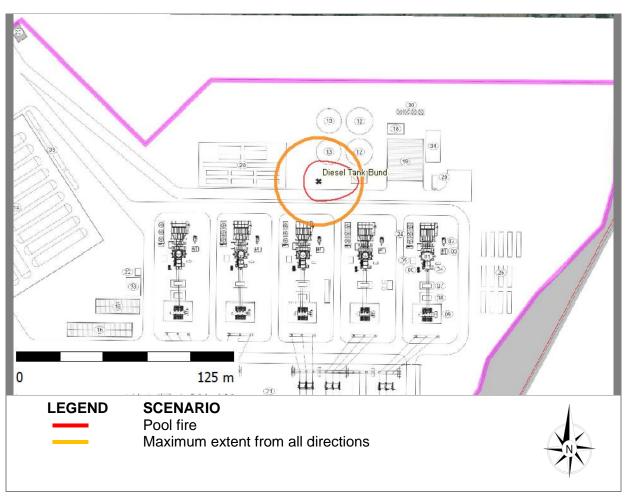


Figure 5-6: Thermal radiation from large diesel pool fires in the storage area

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5.3.3.2 Diesel Offloading

A loss of containment of diesel would result from a failure of the offloading hose of the delivery tanker.

The maximum effect of pool fires is shown in Figure 5-7. In this instance, the spilt material was calculated as the loss of containment from one 5 000 \(\) compartment and was assumed to spread evenly to a maximum area of the secondary containment of 250 m² RIVM (2009). The pool would shrink as the fuel is consumed during the fire.

The 1% fatality or 10 kW/m² should remain within the site boundary, provided the diesel tank is not located near a site boundary.

The red line represents the extent of the 1% fatality high velocity westerly winds, while the orange line indicates the maximum extent from to winds in all directions. The 10 kW/m² representing the 1% fatality, should remain within the site boundary, provided the diesel tank is not located near a site boundary.

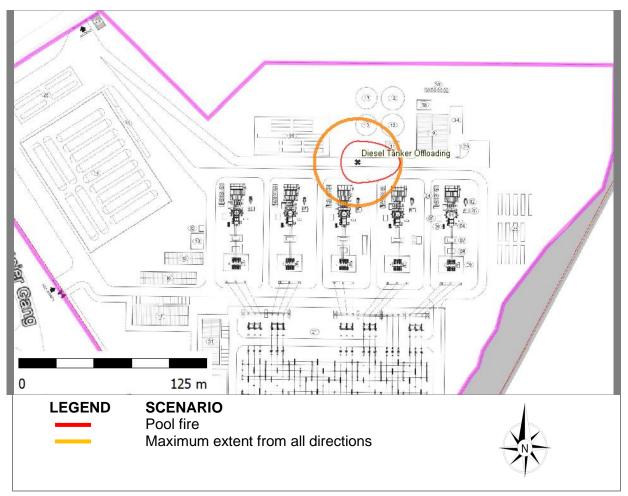


Figure 5-7: Thermal radiation from large diesel pool fires at the road offloading area

5.3.3.3 Summary of Impacts

Maximum distances from the point of release to the 1% fatality, are summarised for each scenario in Table 5-5.

Table 5-5: Maximum distance to 1% fatality from the point of release

Scenarios	Max. Distance to 1% Fatality (m)
Diesel Tank Bund	
Diesel tank - Overfill	20
Diesel tank - Severe leak Set	20
Diesel tank -Catastrophic failure	25
Diesel Tanker Offloading	
Diesel tanker - Hose failure	5
Diesel tanker - Hose leak	29
Diesel tanker -Failure	20

5.4 Combined Site Risk

The combined site risks are the summation of all risks posed by the site onto works or the public. These are represented as Maximum Individual Risks or Societal Risks, as described in Section 4.4.

5.4.1 Maximum Individual Risk

The combined site risk is the summation of all the individual risks, and is shown in Figure 5-8.

The risk of 1x10⁻⁶ fatalities per person per year isopleths extends beyond the site boundary and alone **would be classified as a Major Hazard Installation** based on the risk posed.

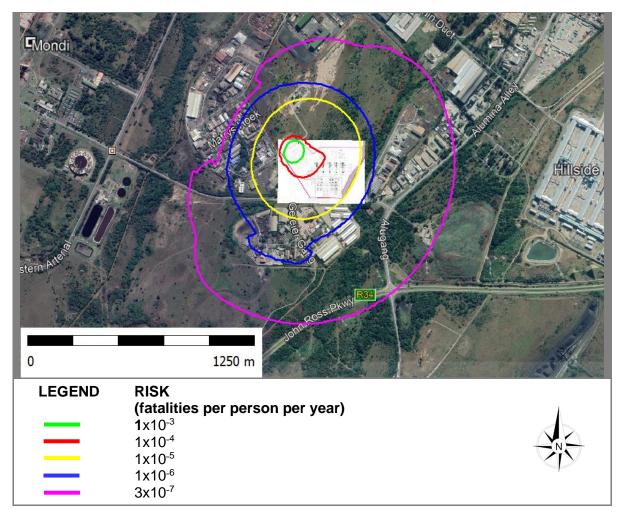


Figure 5-8: Lethal probability isolines associated with the 320 MW RMPP facility in Richards Bay

Risks greater than 1x10⁻³ fatalities per person per year, for workers would be considered excessive. These risks would remain onsite and associated with the offloading operation.

Risks greater than 1x10⁻⁴ fatalities per person per year, considered tolerable for industrial areas but excessive for residential areas, extends beyond the 320 MW RMPP site to the south.

The risk of 3x10⁻⁷ fatalities per person per year isopleth indicates the extent for land-use that would be suitable for vulnerable populations, such as hospitals, retirement homes, nursery

schools, prisons, large gatherings in the open, and so forth. No such populations would be located within this area, indicating the acceptability of the location.

No new land planning should be approved without consultation of the PADHI land-planning tables attached in Appendix D and confirmed from the MHI risk assessment.

5.4.2 Societal Risk

The 320 MW RMPP facility will be located within the Alton Industrial area. Currently, the project site is undeveloped, but overtime could be fully occupied with industrial type industries. To this end, the societal risks was based on the completed occupied Alton Industrial area.

The societal risks were based on the following population assumptions:

- Industrial areas (medium density): 40 persons per hectare (day) and 8 persons per hectare (night);
- Residential areas: 10 persons per hectare (day) and 80 persons per hectare (night).

The societal risk for the facility, including and excluding workers, is given in Figure 5-9. The red line illustrates the combined societal risk, including workers, while the blue line illustrates the combined societal risks including the workers. The black line is the upper guide value and the orange line is the lower guide value.

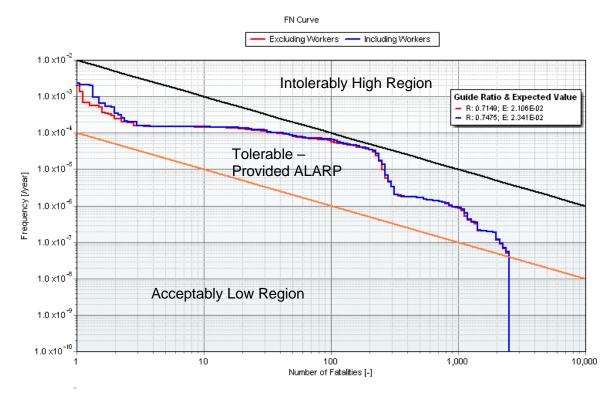


Figure 5-9: Societal risks for the 320 MW RMPP facility

The societal risks for workers and the public are similar, and does not change the outcome of the analysis. The societal risks posed by the 320 MW RMPP facility is within the ALARP range and would be considered tolerable.

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6 RISK TREATMENT/REDUCTION

From the simulations performed, the areas of highest risk have been identified as the release of LPG, concluding that the risks to the public and workers would be considered excessive and would require mitigation for acceptance of the project, under the MHI regulations.

Mitigations that may be considered, but not limited to reduce risks to acceptable levels are listed in the following subsections.

It should be noted that suggested mitigations are for consideration only. RISCOM does not imply that the suggested mitigation should be implemented or that any suggested mitigation is the only measure to reduce risks. Furthermore, implementation of some or all of the suggested mitigations would not guarantee full compliance with the Major Hazard Installation regulations.

Implementation of any mitigations should always be done in accordance with recognised engineering practices, using applicable codes and standards and be based on benefit versus cost principle.

6.1 Risk Ranking

This risk assessment considered numerous scenarios determining both consequences and a probability of release. Some scenarios have more serious consequences than others. However, the scenarios of particular interest are those with high-risk frequencies extending beyond the boundary of the site.

Figure 6-1 represents the $1x10^{-6}$ fatalities per person per year isopleth for the various site installations. The $1x10^{-6}$ fatalities per person per year isopleth is the lower limit for tolerable risks. The red curve represents the total site risk, while the other installations are shown in other colours. The major offsite incidents would be from the LPG storage and LPG product pump.

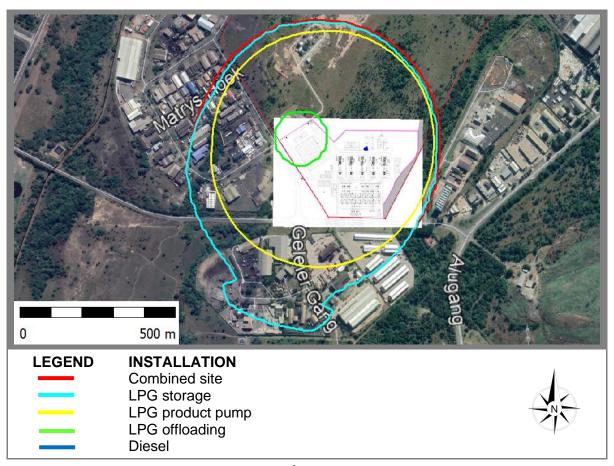


Figure 6-1: Comparison of the 1x10⁻⁶ fatalities per person per year isopleth for various site installations

Figure 6-2 represents the 1x10⁻⁴ fatalities per person per year isopleth for the various site installations. The 1x10⁻⁴ fatalities per person per year isopleth is the lower limit for intolerable risks. The red curve represents the total site risk, while the other installations are shown in other colours. The major offsite incidents causing the offsite 1x10⁻⁴ fatalities per person per year isopleth, are the road tanker LPG offloading and the LPG product pumps.

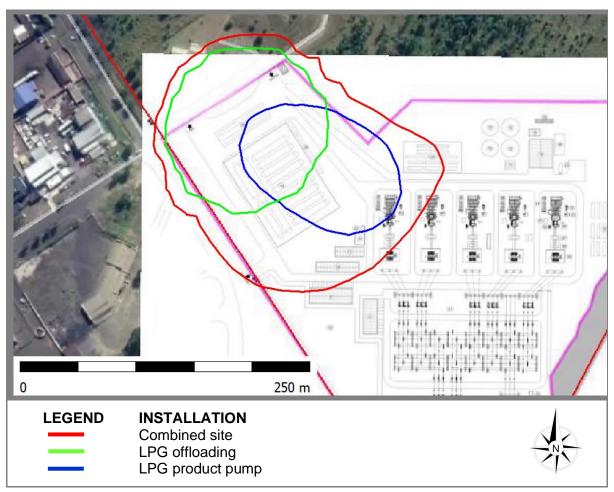


Figure 6-2: Comparison of the 1x10⁻⁴ fatalities per person per year isopleth for various site installations

Table 6-1 gives the risk ranking of the largest contributors to off-site risks for certain analysis points. The ranking can be used to effectively mitigate risks by prioritisation and setting of budgets. These rankings are dominated by product pump and road offloading facilities, as identified in Figure 6-2.

Table 6-1: Off-site risk rankings at analysis points

	Scenario	Risk Contribution (%)	Frequency Value
1	Product pump - Failure	54.1	7.95E-05
2 LPG Tanker hose - Failure		40.3	5.92E-05
3 LPG Bullet - PSV failure		2.37	3.48E-06
4 LPG Bullet -Catastrophic failure		1.62	2.38E-06
5 LPG Bullet - Fixed duration 1.51		1.51	2.22E-06
6	LPG Tanker - Catastrophic failure	0.0385	5.65E-08

The analysis points, are shown in Figure 6-3.

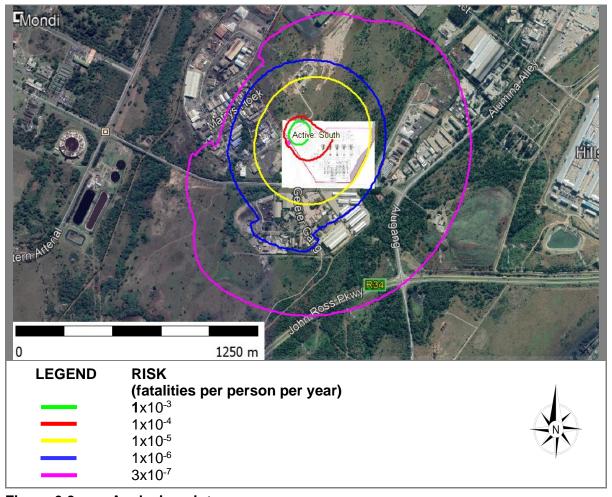


Figure 6-3: Analysis points

6.2 Mitigation

As mentioned, the scenarios with the highest risk rankings are the LPG operations. Suggested mitigation is listed in the following subsections.

6.2.1 Process Hazard Analysis (PHA)

Hazardous areas should be reviewed using detailed Process Hazard Analysis (PHA)¹ such as a HAZOP study that should be completed to identify potential hazards, and suggest further mitigation for safer operations.

6.2.2 Ignition Sources

Ignition sources near the depot must be minimised as far as possible. This is particularly relevant with loading and offloading, and applicable codes should be consulted to the safety distances of other vehicles to the offloading truck.

A hazardous area classification as per SANS 10108 must be developed for all flammable materials. Only suitable instrumentation and electrical equipment should be installed in accordance with the requirement of the code.

6.2.3 Emergency Shut Down System (ESD)

The greatest contribution to the site risk was the uninterrupted flow of LPG, associated with a loss of containment. In some instances, this may result in the complete release of the contents of a storage tank. Thus, the fast detection of a loss of containment with appropriate shut down action to limit the amount of material released, will assist in the reduction of the site risks.

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A Process Hazard Analysis is not a regulated activity but mealy identifies potential hazards and recommends mitigation

6.3 Combined Risk with Mitigation

Figure 6-4 shows the risks with the LPG offloading and the product pumps having ESD systems equivalent to 1 in 100-year failure. The ESD systems would detect a loss of containment and terminate the flow, limiting the amount released and impacts formed.

While the reduction of risks from the mitigation does not change the extent of the outer isopleths, the unacceptable isopleth of $1x10^{-4}$ fatalities per person per does not extend beyond the site boundary. Thus, with the implementation of mitigation, it is possible to reduce the risks to acceptable levels.

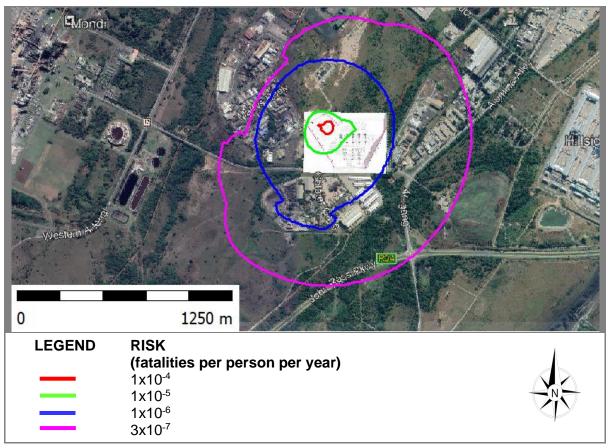


Figure 6-4: Combined risks with mitigation

7 IMPACT ASSESSMENT

As described in the terms of reference of the project, assessment of the Impacts of the loss of containment scenarios considered in this study, took cognisance of the following aspects as they related to local population:

- An assessment of the magnitude of the impacts (the consequences of the project on members of the surrounding public);
- An assessment of the significance of the impacts, taking into account the sensitivity of the receptors;
- Development of mitigation measures to avoid, reduce or manage the impacts; and,
- Assessment of the residual significant impacts after applying the mitigation measures.

The criteria that were used in impact assessment are summarised below (verbatim from the terms of reference document):

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high).
- The **duration**, wherein it will be indicated whether:
 - the lifetime of the impact will be of a very short duration (0–1 years) assigned a score of 1;
 - the lifetime of the impact will be of a short duration (2-5 years) assigned a score of 2;
 - o medium-term (5–15 years) assigned a score of 3;
 - o long term (> 15 years) assigned a score of 4; or,
 - permanent assigned a score of 5.
- The **magnitude**, quantified on a scale from 0-10, where a score is assigned:
 - 0 is small and will have no effect on the environment;
 - 2 is minor and will not result in an impact on processes;
 - 4 is low and will cause a slight impact on processes;
 - o 6 is moderate and will result in processes continuing but in a modified way;
 - o 8 is high (processes are altered to the extent that they temporarily cease);
 - o 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1–5, where:
 - 1 is very improbable (probably will not happen);
 - 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely); and,
 - o 5 is definite (impact will occur regardless of any prevention measures).
- The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and,
- the **status**, which will be described as either positive, negative or neutral:
 - the degree to which the impact can be reversed;
 - o the degree to which the impact may cause irreplaceable loss of resources;

the degree to which the impact can be mitigated.

The significance is calculated by combining the criteria in the following formula:

S = (E+D+M) P

S = Significance weighting

E = Extent

D = Duration

M =Magnitude

P = Probability

The significance weightings for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- > 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

7.1 Methodology - Cumulative Impacts

"Cumulative Impact", in relation to an activity means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

The role of the cumulative assessment is to test if such impacts are relevant to the proposed project in the proposed location (i.e., whether the addition of the proposed project in the area will increase the impact).

This section addresses whether the construction of the proposed development will result in:

- Unacceptable risk;
- Unacceptable loss;
- Complete or whole-scale changes to the environment or sense of place;
- Unacceptable increase in impact.

7.2 Impact Assessment of 320 MW RMPP Thermal Generation Facility at Richards Bay

7.2.1 LPG Installations

The following is the impact assessment of the LPG installations:

Table 7-1: Impact Assessment of LPG Installations

Nature:

Worst case loss of containment scenario – catastrophic rupture of LPG storage vessel leading to a fireball event, flammable vapour dispersion and ignition leading to flash fire thermal radiation effects and/or vapour cloud explosion overpressure effects.

	Without Mitigation	With Mitigation
Extent	Low (2)	Low (1)
Duration	Very short (1)	Very short (1)
Magnitude	High (8)	High (6)
Probability	Very improbable (1)	Very improbable (1)
Significance	Low (11)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	Irreversible (worst case: death)	Irreversible (worst case: death)
Irreplaceable loss of resources?	Yes (human)	Yes (human)
Can impacts be mitigated?	Yes	Yes

Mitigation:

Mitigation would include emergency response arrangements and systems, such as alarms to allow for personnel to muster in case of emergency, as well as fire-fighting systems and cooperation with emergency responders. Preventive measures would include maintenance procedures to prevent the occurrence of a catastrophic loss of containment from corrosion, fire and gas detection and firewater systems to prevent escalation as well as strict control of ignition sources and other measures, which may be required according to standards such as those prescribed by the South African National Standards system.

Residual Risks:

Even with mitigation, there may be residual risk of occurrence due to failures in protection systems and break-down in procedures and documented systems.

7.2.2 Diesel Installation

The following is the impact assessment of the diesel installations:

Table 7-2: Impact Assessment of Diesel Installations

Nature:

Worst case loss of containment scenario – catastrophic rupture of diesel storage vessel leading to a pool fire with impacts not extending beyond the site boundary.

i		
	Without Mitigation	With Mitigation
Extent	Low (2)	Low (1)
Duration	Very short (1)	Very short (1)
Magnitude	High (6)	High (6)
Probability	Very improbable (1)	Very improbable (1)
Significance	Low (8)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	Irreversible (worst case: death)	Irreversible (worst case: death)
Irreplaceable loss of resources?	Yes (human)	Yes (human)
Can impacts be mitigated?	Yes	Yes

Mitigation:

Mitigation would include emergency response arrangements and systems, such as alarms to allow for personnel to muster in case of emergency, as well as fire-fighting systems and cooperation with emergency responders. Preventive measures would include maintenance procedures to prevent the occurrence of a catastrophic loss of containment from corrosion, fire and gas detection and firewater systems to prevent escalation, as well as strict control of ignition sources and other measures, which may be required according to standards such as those prescribed by the South African National Standards system.

Residual Risks:

Even with mitigation, there may be residual risk of occurrence due to failures in protection systems and break-down in procedures and documented systems.

7.2.3 BESS Installations

The following is the impact assessment of the BESS installations:

Table 7-3: Impact Assessment of BESS Installations

Nature:

Worst case loss of containment scenario – catastrophic rupture of BESS leading to a pool fire with impacts not extending beyond the site boundary.

	Without Mitigation	With Mitigation
Extent	Low (2)	Low (1)
Duration	Very short (1)	Very short (1)
Magnitude	High (6)	High (6)
Probability	Very improbable (1)	Very improbable (1)
Significance	Low (8)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	Irreversible (worst case: death)	Irreversible (worst case: death)
Irreplaceable loss of resources?	Yes (human)	Yes (human)
Can impacts be mitigated?	Yes	Yes

Mitigation:

Mitigation would include emergency response arrangements and systems, such as alarms to allow for personnel to muster in case of emergency, as well as fire-fighting systems and cooperation with emergency responders. Preventive measures would include design, installation according to the vendor requirements. Furthermore, the layout separation distances between battery storage units and other units to prevent knock-on effects.

Residual Risks:

Even with mitigation, there may be residual risk of occurrence due to failures in protection systems and break-down in procedures and documented systems.

7.2.4 Cumulative Impact Assessment

This section considers all impacts in the preceding Section 7.2 and the cumulative impact of all installations.

The risks of the site are dominated by the LPG installation, and thus the cumulative impact will be identical to the LPG storage.

Table 7-4: Cumulative impact of project as a whole

Nature:

Potential impact on surrounding human populations, including possibility of serious injury or death as a result of major industrial accidents from hazardous materials used on-site.

	Overall impact of the proposed project in isolation	Cumulative impact of the project and other projects in the area
Extent	Low (2)	Low (1)
Duration	Very short (1)	Very short (1)
Magnitude	High (8)	High (6)
Probability	Very improbable (1)	Very improbable (1)
Significance	Low (11)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	Irreversible (worst case: death)	Irreversible (worst case: death)
Irreplaceable loss of resources?	Yes (human)	Yes (human)
Can impacts be mitigated?	Yes	Yes

Confidence in findings:

Medium to High (more process detail required to increase confidence).

Mitigation:

Mitigation would include emergency response arrangements and systems, such as alarms to allow for personnel to muster in case of emergency, as well as fire-fighting systems and cooperation with emergency responders. Preventive measures could include maintenance procedures to prevent the occurrence of a catastrophic loss of containment from corrosion, fire and gas detection and firewater systems to prevent escalation as well as strict control of ignition sources and other measures, which may be required according to standards such as those prescribed by the South African National Standards system.

Residual Risks:

Even with mitigation, there is still possibility of human death as a result of major incidents on-site due to the nature of operations.

8 CONCLUSIONS

Risk calculations are not precise. Accuracy of predictions is determined by the quality of base data and expert judgements.

This risk assessment included the consequences of fires and explosions at the 320 MW RMPP facility in Richards Bay. A number of well-known sources of incident data were consulted and applied to determine the likelihood of an incident to occur.

This risk assessment was performed with the assumption that the site would be maintained to an acceptable level and that all statutory regulations would be applied. It was also assumed that the detailed engineering designs would be done by competent people, and would be correctly specified for the intended duty. For example, it was assumed that tank wall thicknesses have been correctly calculated, that vents have been sized for emergency conditions, that instrumentation and electrical components comply with the specified electrical area classification, that material of construction is compatible with the products, etc.

It is the responsibility of the owners and their contractors to ensure that all engineering designs would have been completed by competent persons, and that all pieces of equipment would have been installed correctly. All designs should be in full compliance with (but not limited to) the Occupational Health and Safety Act 85 of 1993 and its regulations, the National Buildings Regulations and the Buildings Standards Act 107 of 1977 as well as local bylaws.

A number of incident scenarios were simulated, taking into account the prevailing meteorological conditions, and described in the report.

8.1 Notifiable Substances

The General Machinery Regulation 8 and its Schedule A on notifiable substances, requires any employer who has a substance equal to or exceeding the quantity listed in the regulation to notify the divisional director. A site is classified as a Major Hazard Installation if it contains one or more notifiable substances, or if the off-site risk is sufficiently high. The latter can only be determined from a quantitative risk assessment.

The notifiable threshold for LPG is listed 25 t in a single vessel. As the proposed installation exceeds the threshold limit, LPG will be classified as a notifiable substance, which would automatically classify the facility a Major Hazard Installation.

8.2 LPG Storage and Associated Equipment

LPG would be received at site by truck and stored in a maximum of $13 \times 800 \text{ m}^3$ storage vessels. The liquefied LPG from the storage vessels would be converted into a vapour phase at the vaporisers, and sent to the gensets as fuel.

Depending on the physical conditions of the LPG, a large release could result in pool fires, jet fires, flash fires and vapour cloud explosions and BLEVEs. All of the aforementioned effects were simulated, with the largest downwind distance occurring from a large release from a LPG vessel, extending up to 1.2 km to the 1% fatality from the point of release and could impact surround areas, but would not reach the occupied residential areas.

The risk of 1x10⁻⁶ fatalities per person per year isopleth found to extend beyond the site boundary, and **that alone qualifies the site as a Major Hazard Installation**. The risk of 1x10⁻⁴ fatalities per person per year, representing intolerable to the general public, was found to extend beyond the site boundary. Reducing the risks to acceptable levels was found to be achievable and must be included in the final designs.

8.3 Impacts onto Neighbouring Properties, Residential Areas and Major Hazard Installations

A large release of LPG could extend to the Alton industrial area and could reach the Mondi site to the west. No residential area or vulnerable institutions would be seriously impacted with the construction and operation of the 320 MW RMPP.

8.4 Major Hazard Installation

This investigation concluded that under the current design conditions, the proposed 320 MW RMPP facility in Richards Bay **would be considered as a Major Hazard Installation** and would require notification in accordance with the MHI regulations.

Kindly note that this study is not intended to replace the Major Hazard Installation risk assessment, which should be completed prior to construction of the terminal once final designs are available.

8.5 Land Planning Restrictions

The risks generated from this study concluded that the risk isopleths generated from the proposed project could have risks within the ALARP range resulting in land planning restrictions. As the designs have not been finalised, the full land planning restrictions must be taken from the Major Hazard Installation risk assessment report.

9 RECOMMENDATIONS

As a result of the risk assessment study conducted for the proposed 320 MW RMPP facility in Richards Bay, a number of events were found to have risks beyond the site boundary. These risks could be mitigated to acceptable levels, as shown in the report.

RISCOM did not find any fatal flaws that would prevent the project proceeding to the detailed engineering phase of the project and would support the project under the following conditions most of which will be detailed in the MHI study:

- Compliance with all statutory requirements, i.e., pressure vessel designs;
- Compliance with applicable SANS codes, i.e., SANS 10087, SANS 10089, SANS 10108, etc.;
- Incorporation of applicable guidelines or equivalent international recognised codes of good design and practice into the designs;
- Completion of a recognised process hazard analysis (such as a HAZOP study, FMEA, etc.) on the proposed facility prior to construction to ensure design and operational hazards have been identified and adequate mitigation put in place;
- Full compliance with IEC 61508 and IEC 61511 (Safety Instrument Systems) standards or equivalent to ensure that adequate protective instrumentation is included in the design and would remain valid for the full life cycle of the tank farm:
 - Including demonstration from the designer that sufficient and reliable instrumentation would be specified and installed at the facility;
- Preparation and issue of a safety document detailing safety and design features reducing the impacts from fires, explosions and flammable atmospheres to the MHI assessment body at the time of the MHI assessment:
 - Including compliance to statutory laws, applicable codes and standards and world's best practice;
 - Including the listing of statutory and non-statutory inspections, giving frequency of inspections;
 - o Including the auditing of the built facility against the safety document;
 - Noting that codes such as IEC 61511 can be used to achieve these requirements;
- Demonstration by 320 MW RMPP owner or their contractor that the final designs would reduce the risks posed by the installation to the South African requirements as prescribed in SANS 1461 (2018);
- Signature of all terminal designs by a professional engineer registered in South Africa in accordance with the Professional Engineers Act, who takes responsibility for suitable designs;
- Completion of an emergency preparedness and response document for on-site and off-site scenarios prior to initiating the MHI risk assessment (with input from local authorities);
- Any increases to the product list or product inventories must be with the approval of the authorities under NEMA;
- Final acceptance of the facility risks with an MHI risk assessment that must be completed in accordance with the MHI regulations;
 - Basing such a risk assessment on the final design and including engineering mitigation.

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11 ABBREVIATIONS AND ACRONYMS

AA	"Advised Against" used in land planning decisions
AIA	See Approved Inspection Authority
ALARP	 The UK Health and Safety Executive (HSE) developed the risk ALARP triangle, in an attempt to account for risks in a manner similar to those used in everyday life. This involved deciding: Whether a risk is so high that something must be done about it; Whether the risk is or has been made so small that no further precautions are necessary; Whether a risk falls between these two states and has been reduced to levels 'as low as reasonably practicable' (ALARP). Reasonable practicability involves weighing a risk against the trouble, time and money needed to control it.
API	The American Petroleum Institute is the largest U.S. trade association for the oil and natural gas industry. It claims to represent nearly 600 corporations involved in production, refinement, distribution, and many other aspects of the petroleum industry.
Approved Inspection Authority	An approved inspection authority (AIA) is defined in the Major Hazard Installation regulations (July 2001)
Asphyxiant	An asphyxiant is a gas that is nontoxic but may be fatal if it accumulates in a confined space and is breathed at high concentrations since it replaces oxygen containing air.
BESS	A Battery Energy Storage System (BESS) is a technology developed for storing electric charge by using specially developed batteries . The underlying idea being that such stored energy can be utilized at a later time.
Blast Overpressure	Blast overpressure is a measure used in the multi-energy method to indicate the strength of the blast, indicated by a number ranging from 1 (for very low strengths) up to 10 (for detonative strength).
BLEVE	Boiling liquid expanding vapour explosions result from the sudden failure of a vessel containing liquid at a temperature above its boiling point. A BLEVE of flammables results in a large fireball.
CBD	A central business district is the commercial and business center of a city. It contains commercial place and offices. In larger cities, it is often synonymous with the city's "financial district".
CEMS	A continuous emission monitoring system (CEMS) is the total equipment necessary for the determination of a gas or particulate matter concentration or emission rate using pollutant analyser measurements and a conversion equation, graph, or computer program to produce results in units of the applicable emission limitation or standard.
CNS	The central nervous system (CNS) controls most functions of the body and mind. It consists of two parts: the brain and the spinal cord. The brain is the center of our thoughts, the interpreter of our external environment, and the origin of control over body movement.
DAA	"Don't Advise Against" used in land planning decisions
Detonation	Detonation is a release of energy caused by extremely rapid chemical reaction of a substance, in which the reaction front of a substance is determined by compression beyond the auto-ignition temperature.

DoE	The Department of Energy is the department of the South African government responsible for energy policy. It was established in 2009 when the former Department of Minerals and Energy was divided into the Department of Energy and the Department of Mineral Resources.
EIA	Environmental assessment is the assessment of the environmental consequences of a plan, policy, program, or actual projects prior to the decision to move forward with the proposed action.
Emergency Plan	An emergency plan is a plan in writing that describes how potential incidents identified at the installation together with their consequences should be dealt with, both on site and off site.
ESD	Emergency Shutdown System (ESD) is designed to minimize the consequences of emergency situations, related to typically uncontrolled flooding, escape of hydrocarbons, or outbreak of fire in hydrocarbon carrying areas or areas which may otherwise be hazardous.
Explosion	An explosion is a release of energy that causes a pressure discontinuity or blast wave.
Flammable Limits	Flammable limits are a range of gas or vapour concentrations in the air that will burn or explode if a flame or other ignition source is present. The lower point of the range is called the lower flammable limit (LFL). Likewise, the upper point of the range is called the upper flammable limit (UFL).
Flammable Liquid	The Occupational Health and Safety Act 85 of 1993 defines a flammable liquid as any liquid which produces a vapour that forms an explosive mixture with air and includes any liquid with a closed cup flashpoint of less than 55°C. Flammable products have been classified according to their flashpoints and boiling points, which ultimately determine the propensity to ignite. Separation distances described in the various codes are dependent on the flammability classification. Class Description O Liquefied petroleum gas (LPG) IA Liquids that have a closed cup flashpoint of below 23°C and a boiling point below 35°C IB Liquids that have a closed cup flashpoint of below 23°C and a boiling point of 35°C or above IC Liquids that have a closed cup flashpoint of 23°C and above but below 38°C II Liquids that have a closed cup flashpoint of 38°C and above but below 60.5°C IIA Liquids that have a closed cup flashpoint of 60.5°C and above but below 93°C
Flash Fire	A flash fire is defined as combustion of a flammable vapour and air mixture in which the flame passes through the mixture at a rate less than sonic velocity so that negligible damaging overpressure is generated.
Frequency	Frequency is the number of times an outcome is expected to occur in a given period of time.
HAZOP	A hazard and operability study (HAZOP) are a structured and systematic examination of a complex planned or existing process or operation in order to identify and evaluate problems that may represent risks to personnel or equipment.

HEL	The maximum concentration of a gas or vapor that will burn in air is defined as the Upper Explosive Limit (UEL). Above this level, the mixture is too "rich" to burn. The range between the LEL and UEL is known as the flammable range for that gas or vapor.
IDZ	Industrial development zones (IDZs) or special economic zones (SEZs) are specific geographical areas in a country where certain economic activities are promoted through a set of policy measures not generally applicable to the rest of the country.
Ignition Source	An ignition source is a source of temperature and energy sufficient to initiate combustion.
Individual Risk	Individual risk is the probability that in one year a person will become a victim of an accident if the person remains permanently and unprotected in a certain location. Often the probability of occurrence in one year is replaced by the frequency of occurrence per year.
IPP	Independent Power Producers (IPPs) or non-utility generator (NUG) are private entities (under unbundled market), which own and or operate facilities to generate electricity and then sell it to a utility, central government buyer and end users.
Isopleth	See Risk Isopleth
Jet	A jet is the outflow of material emerging from an orifice with significant momentum.
Jet Fire or Flame	A jet fire or flame is combusting material emerging from an orifice with a significant momentum.
LC	Lethal concentration is the concentration by which a given percentage of the exposed population will be fatally injured. The LC ₅₀ refers to the concentration of airborne material the inhalation of which results in death of 50% of the test group. The period of inhalation exposure could be from 30 min to a few hours (up to 4 hours).
LEL	Lower Explosive Limit is defined as the lowest concentration (by percentage) of a gas or vapor in air that is capable of producing a flash of fire in presence of an ignition source (arc, flame, heat) In concentrations of 0-5% Methane in air, the mixture is too lean to ignite or burn.
LFL	Lower Flammable Limit see Flammable Limits
LPG	Liquefied natural gas (LPG) is natural gas (predominantly methane, CH4, with some mixture of ethane, C2H6) that has been cooled down to liquid form for ease and safety of non-pressurized storage or transport.
LOC	See Loss of Containment
Local Government	Local government is defined in Section 1 of the Local Government Transition Act, 1993 (Act No. 209 of 1993).
Loss of Containment	Loss of containment (LOC) is the event resulting in a release of material into the atmosphere.
Major Hazard Installation	 Major Hazard Installation (MHI) means an installation: Where more than the prescribed quantity of any substance is or may be kept, whether permanently or temporarily;
	 Where any substance is produced, used, handled or stored in such a form and quantity that it has the potential to cause a major incident (the potential of which will be determined by the risk assessment).

Major Incident	A major incident is an occurrence of catastrophic proportions, resulting from the use of plant or machinery or from activities at a workplace. When the outcome of a risk assessment indicates that there is a possibility that the public will be involved in an incident, then the incident is catastrophic.
Material Safety Data Sheet	According to ISO-11014, a material safety data sheet (MSDS) is a document that contains information on the potential health effects of exposure to chemicals or other potentially dangerous substances and on safe working procedures when handling chemical products. It is an essential starting point for the development of a complete health and safety program. It contains hazard evaluations on the use, storage, handling and emergency procedures related to that material. An MSDS contains much more information about the material than the label and it is prepared by the supplier. It is intended to tell what the hazards of the product are, how to use the product safely, what to expect if the recommendations are not followed, what to do if accidents occur, how to recognize symptoms of overexposure and what to do if such incidents occur.
MHI	See Major Hazard Installation
MIR	Maximum Individual Risk (see Individual Risk)
MSDS	See Material Safety Data Sheet
NEMA	107 of 1998, abbreviated NEMA) is the statutory framework to enforce Section 24 of the Constitution of the Republic of South Africa . The NEMA is intended to promote co-operative governance and ensure that the rights of people are upheld, but also recognising the necessity of economic development.
OCGT	An open cycle gas turbine is a combustion turbine plant fired by liquid fuel to turn a generator. rotor that produces electricity. The residual heat is exhausted to atmosphere at about 550 degrees.
OHS Act	Occupational Health and Safety Act, 1993 (Act No. 85 of 1993)
PAC	See Protective Action Criteria
PADHI	 PADHI (planning advice for developments near hazardous installations) is the name given to a methodology and software decision support tool developed and used in the HSE. It is used to give land-use planning (LUP) advice on proposed developments near hazardous installations. PADHI uses two inputs into a decision matrix to generate either an 'advise against' or 'don't advise against' response: The zone in which the development is located of the three zones that HSE sets around the major hazard: The inner zone (> 1x10⁻⁵ fatalities per person per year); The middle zone (1x10⁻⁵ fatalities per person per year to 1x10⁻⁶ fatalities per person per year); The outer zone (1x10⁻⁶ fatalities per person per year);
	 The 'sensitivity level' of the proposed development which is derived from an HSE categorisation system of 'development types' (see the 'development type tables' in Appendix D).
РНА	A process hazard analysis is a set of organized and systematic assessments of the potential hazards associated with an industrial process.

POST	The Parliamentary Office of Science and Technology is the Parliament of the United Kingdom's in-house source of independent, balanced and accessible analysis of public policy issues related to science and technology.		
PPE	Personal protective equipment , commonly referred to as "PPE", is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses.		
QRA	See Quantitative Risk Assessment		
Quantitative Risk Assessment	A quantitative risk assessment is the process of hazard identification, followed by a numerical evaluation of effects of incidents, both consequences and probabilities and their combination into the overall measure of risk.		
Risk	Risk is the measure of the consequence of a hazard and the frequency at which it is likely to occur. Risk is expressed mathematically as:		
	Risk = Consequence x Frequency of Occurrence		
Risk Assessment	Risk assessment is the process of collecting, organising, analysing, interpreting, communicating and implementing information in order to identify the probable frequency, magnitude and nature of any major incident which could occur at a major hazard installation and the measures required to remove, reduce or control potential causes of such an incident.		
Risk Contour	See Risk Isopleth		
RMPP	Risk Mitigation Power Plant		
SANAS	South African National Accreditation System		
Societal Risk	Societal risk is risk posed on a societal group who are exposed to a hazardous activity.		
UFL	Upper Flammable Limit (see Flammable Limits)		
Vapour Cloud Explosion	A vapour cloud explosion (VCE) results from ignition of a premixed cloud of a flammable vapour, gas or spray with air, in which flames accelerate to sufficiently high velocities to produce significant overpressure.		
VCE	See Vapour Cloud Explosion		
VRFB	The vanadium redox battery , also known as the vanadium flow battery or vanadium redox flow battery, is a type of rechargeable flow battery that employs vanadium ions in different oxidation states to store chemical potential energy.		
ZLD	Zero Liquid Discharge is a treatment process designed to remove all the liquid waste from a system. The focus of ZLD is to reduce wastewater economically and produce clean water that is suitable for reuse, thereby saving money and being beneficial to the environment.		
ZNBR	The zinc-bromine flow battery is a type of hybrid flow battery. A solution of zinc bromide is stored in two tanks. When the battery is charged or discharged, the solutions are pumped through a reactor stack and back into the tanks.		

12 APPENDIX A: DEPARTMENT OF LABOUR CERTIFICATE



13 APPENDIX B: SANAS CERTIFICATES



CERTIFICATE OF ACCREDITATION

In terms of section 22(2)(b) of the Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act, 2006 (Act 19 of 2006), read with sections 23(1), (2) and (3) of the said Act, I hereby certify that:-

RISCOM (PTY) LTD Co. Reg. No.: 2002/019697/07 JOHANNESBURG

Facility Accreditation Number: MHI0013

is a South African National Accreditation System accredited Inspection Body to undertake

TYPE A inspection provided that all SANAS conditions and requirements are complied with

This certificate is valid as per the scope as stated in the accompanying schedule of accreditation,

Annexure "A", bearing the above accreditation number for

THE ASSESSMENT OF RISK ON MAJOR HAZARD INSTALLATIONS

The facility is accredited in accordance with the recognised International Standard

ISO/IEC 17020:2012

The accreditation demonstrates technical competency for a defined scope and the operation of a management system

While this certificate remains valid, the Accredited Facility named above is authorised to use the relevant SANAS accreditation symbol to issue facility reports and/or certificates

> Mr R Josias Chief Executive Officer

Effective Date: 27 May 2017 Certificate Expires: 26 May 2021

This certificate does not on its own confer authority to act as an Approved Inspection Authority as contemplated in the Major Hazard Installation Regulations, Approval to inspect within the regulatory domain is granted by the Department of Labour.

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ANNEXURE A

SCHEDULE OF ACCREDITATION

Facility Number: MHI0013

TYPE A

Permanent Address: Riscom (Pty) Ltd 33 Brigish Dr Northcliff Johannesburg 2195	Postal Address: P O Box 2541 Cresta Johannesburg 2118	
Tel: (011) 431-2198 Fax: 086 624 9423 Mobile: 082 457 3258 E-mail: mike@riscom.co.za	Issue No.: 12 Date of issue: 28 February 2013 Expiry date: 26 May 2017	
Nominated Representative: Mr M Oberholzer	Quality Manager: Mr M Oberholzer Technical Manager: Mr M Oberholzer	Technical Signatory: Mr M Oberholzer
Field of Incomplian		Codes and Bassiletians
Field of Inspection	Service Rendered	Codes and Regulations
Regulatory: 1) Explosive chemicals 2) Gases: i) Flammable Gases ii) Non-flammable, non toxic gases (asphyxiants) iii) Toxic gases 3) Flammable liquids 4) Flammable solids, substances liable to spontaneous combustion, substances that on contact with water release flammable gases 5) Oxidizing substances and organic peroxides 6) Toxic liquids and solids Original date of accreditation: 27 May 2005	i) Frequency/ Probability Analysis ii) Consequence Modelling iii) Hazard Identification and Analysis including HAZARD and Operability studies (HAZOP) iv) Emergency planning reviews	Programmes, guidelines, regulations and codes: MHI regulation par. 5 (5) (b) Reference Manual Bevi Risk Assessments version 3.2 (2009) CPR 18E (1999), Guideline for quantitative risk assessment ("Purple Book"), TNO Apeldoorn. CPR 14E (1997). Methods for the Calculation of Physical Effects ("Yellow Book"), 3 rd Edition, TNO, Apeldoorn. CPR 16E (1992). Methods for the Determination of Possible Damage ("Green Book"), 1 st Edition, TNO, Apeldoorn. Lees FP (2001). Loss Prevention in the Process Industries: Hazard Identification, Assessment and Control, 2 nd Edition, Butterworths, London, UK.

Original date of accreditation: 27 May 2005

Page 1 of 1

ISSUED BY THE SOUTH AFRICAN NATIONAL ACCREDITATION SYSTEM

Field Manager

14 APPENDIX C: NOTIFICATION OF MAJOR HAZARD INSTALLATION

Prior to assessment of potential impacts of various accidental spills, reference needs to be made to the legislation, regulations and guidelines governing the operation of the development.

Section 1 of the Occupational Health and Safety Act (OHS Act; Act No. 85 of 1993) defines a "major hazard installation" to mean an installation:

- (a) Where more than the <u>prescribed quantity</u> of any substance is or may be kept, whether permanently or temporarily;
 - (b) Where any substance is produced, processed, used, handled or stored in such a form and quantity that it has the <u>potential</u> to cause a <u>major incident</u> (our emphasis).

It should be noted that if either (a) or (b) is satisfied, the Major Hazard Installation (MHI) regulations will apply. The <u>prescribed quantity</u> of a chemical can be found in Section 8 (1) of the General Machinery Regulation 8 (our emphasis).

A <u>major incident</u> is defined as: "an occurrence of catastrophic proportions, resulting from the use of plant and machinery or from activities at a workplace". Catastrophic in this context means loss of life and limbs or severe injury to employees or members of the public, particularly those who are in the immediate vicinity (our emphasis).

It is important to note that the definition refers to an <u>occurrence</u>, whereas Section 1b) refers to <u>potential</u> to cause a major incident. If potential to cause a major incident exists, then the OHS Act and the Major Hazard Installation regulations will apply (our emphasis).

On the 16th of January 1998, the MHI regulations were promulgated under the OHS Act (Act No. 85 of 1993), with a further amendment on the 30th of July 2001. The provisions of the regulations apply to installations that have on their premises a certain quantity of a substance that can pose a significant risk to the health and safety of employees and the public.

The scope of application given in Section 2 of the MHI regulations is as follows:

- (1) Subject to the provisions of Sub regulation (3) these regulations shall apply to employers, self-employed persons and users, who have on their premises, either permanently or temporarily, a major hazard installation or a quantity of a <u>substance</u> which may pose a <u>risk</u> that could affect the health and safety of employees and the public (our emphasis);
 - (2) These regulations shall apply to local governments, with specific reference to Regulation 9.

It is important to note that the regulations refer to a <u>substance</u>, and furthermore the regulations are applicable to risks posed by the substance and **NOT** merely the potential consequences (our emphasis).

The regulations essentially consist of six parts, namely:

- 1. Duties for notification of a Major Hazard Installation (existing or proposed), including:
 - a. Fixed (see List 1);
 - b. Temporary installations;
- 2. Minimum requirements for a quantitative risk assessment (see List 2);
- 3. Requirements of an on-site emergency plan (see List 3);
- 4. Reporting steps of risk and emergency occurrences (see List 4);
- 5. General duties required of suppliers;
- 6. General duties required of local government.

Notification of installation (List 1) indicates that:

- Applications need to be made in writing to the relevant local authority and the provincial director for permission:
 - To erect any Major Hazard Installation;
 - Prior to the modification of any existing installation that may significantly increase risk related to it (e.g., an increase in storage or production capacity or alteration of a process);
- Applications need to include the following information:
 - The physical address of installation;
 - Complete material safety data sheets of all hazardous substances;
 - The maximum quantity of each substance envisaged to be on premises at any one time:
 - The risk assessment of the installation (see List 2);
 - Any further information that may be deemed necessary by an inspector in interests of health and safety to the public;
- Applications need to be advertised in at least one newspaper serving the surrounding communities and by way of notices posted within these communities.

The risk assessment (List 2):

- Is the process of collecting, organising, analysing, interpreting, communicating and implementing information in order to identify the probable frequency, magnitude and nature of any major incident which could occur at a Major Hazard Installation and measures required to remove, reduce or control the potential causes of such an incident;
- Needs to be undertaken at intervals not exceeding 5 years and needs to be submitted to the relevant local emergency services;
- Must be made available in copies to the relevant health and safety committee, with 60 days given to comment thereon and the results of the assessment made available to any relevant representative or committee to comment thereon;
- Should be undertaken by competent person(s) and include the following:
 - A general process description;
 - A description of major incidents associated with this type of installation and consequences of such incidents (including potential incidents);
 - o An estimation of the probability of a major incident;
 - The on-site emergency plan;
 - An estimation of the total result in the case of an explosion;
 - o An estimation of the effects of thermal radiation in the case of fire:
 - o An estimation of concentration effects in the case of a toxic release;
 - Potential effects of a major incident on an adjacent major hazard installation or part thereof;
 - Potential effects of a major incident on any other installation, members of the public (including all persons outside the premises) and on residential areas;
 - Meteorological tendencies;
 - Suitability of existing emergency procedures for risks identified;
 - Any requirements laid down in terms of the Environmental Conservation Act of 1989 (Act No. 73 of 1989);
 - Any organisational measures that may be required;
- The employer shall ensure that the risk assessment is of an acceptable standard and shall be reviewed should:
 - It be suspected that the preceding assessment is no longer valid;
 - Changes in the process that affect hazardous substances;
 - Changes in the process that involve a substance that resulted in the installation being classified a Major Hazard Installation or in the methods, equipment or procedures for the use, handling or processing of that substance;
 - Incidents that have brought the emergency plan into operation and may affect the existing risk assessment;
- Must be made available at a time and place and in a manner agreed upon between parties for scrutiny by any interested person that may be affected by the activities.

Requirements related to the on-site emergency plan (List 3) are:

- After submission of the notification, the following shall be established:
 - An on-site emergency plan must be made available and must be followed inside the premises of the installation or the part of the installation classified as a Major Hazard Installation, in consultation with the relevant health and safety representative or committee;
 - The on-site emergency plan must be discussed with the relevant local government, taking into consideration any comment on the risk related to the health and safety of the public;
 - The on-site emergency plan must be reviewed and where necessary updated, in consultation with the relevant local government, at least once every three years;
 - A copy of the on-site emergency plan must be signed in the presence of two witnesses, who shall attest the signature;
 - The on-site emergency plan must be readily available at all times for implementation and use;
 - All employees must be conversant with the on-site emergency plan;
 - The on-site emergency plan must be tested in practice at least once a year, and a record must be kept of such testing;
- Any employer, self-employed person and user owning or in control of a pipeline that could pose a threat to the general public shall inform the relevant local government and shall be jointly responsible with the relevant local government for establishment and implementation of an on-site emergency plan.

In reporting of risk and emergency occurrences (List 4):

- Following an emergency occurrence, the user of the installation shall:
 - Subject to the provisions of Regulation 6 of the General Administrative Regulations, within 48 hours by means of telephone, facsimile or similar means of communication, inform the chief inspector, the provincial director and relevant local government of the occurrence of a major incident or an incident that brought the emergency plan into operation or any near miss;
 - Submit a report in writing to the chief inspector, provincial director and local government within seven days;
 - Investigate and record all near misses in a register kept on the premises, which shall at all times be available for inspection by an inspector and local government representatives.

The duties of the supplier refer specifically to:

- Supplying of material safety data sheets for hazardous substances employed or contemplated at the installation;
- Assessment of the circumstances and substance involved in an incident or potential incident and the informing all persons being supplied with that substance of the potential dangers surrounding it;
- Provision of a service that shall be readily available on a 24-hour basis to all employers, self-employed persons, users, relevant local government and any other body concerned to provide information and advice in the case of a major incident with regard to the substance supplied.

The duties of local government are summarised as follows:

- "9. (1) Without derogating from the provisions of the National Building Regulations and Building Standards Act of 1977 (Act No. 103 of 1977), no local government shall permit the erection of a new major hazard installation at a separation distance less than that which poses a risk to:
 - (a) Airports;
 - (b) Neighbouring independent major hazard installations;
 - (c) Housing and other centres of population; or,
 - (d) Any other similar facility...

Provided that the local government shall permit new property development only where there is a separation distance which will not pose a <u>risk</u> (our emphasis) in terms of the risk assessment: Provided further that the local government shall prevent any development adjacent to an installation that will result in that installation being declared a major hazard installation.

- (2) Where a local government does not have facilities available to control a major incident or to comply with the requirements of this regulation that local government shall make prior arrangements with a neighbouring local government, relevant provincial government or the employer, self-employed person and user for assistance...
- (3) All off-site emergency plans to be followed outside the premises of the installation or part of the installation classified as a major hazard installation shall be the responsibility of the local government...

15 APPENDIX D: PADHI LAND-PLANNING TABLES

15.1 Development Type Table 1: People at Work, Parking

Development Type	Examples	Development Detail and Size	Justification
	Offices, factories, warehouses, haulage depots, farm buildings, nonretail markets, builder's yards	Workplaces (predominantly nonretail), providing for less than 100 occupants in each building and less than 3 occupied storeys (Level 1)	Places where the occupants will be fit and healthy and could be organised easily for emergency action Members of the public will not be present or will be present in very small numbers and for a short time
		Exclusions	
DT1.1 Workplaces		DT1.1 x1 Workplaces (predominantly nonretail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height (Level 2 except where the development is at the major hazard site itself, where it remains Level 1)	Substantial increase in numbers at risk with no direct benefit from exposure to the risk
	Sheltered workshops, Remploy	DT1.1 x2 Workplaces (predominantly nonretail) specifically for people with disabilities (Level 3)	Those at risk may be especially vulnerable to injury from hazardous events or they may not be able to be organised easily for emergency action
	Car parks, truck parks, lockup garages	Parking areas with no other associated facilities (other than toilets; Level 1)	
		Exclusions	
DT1.2 Parking Areas	Car parks with picnic areas or at a retail or leisure development or serving a park and ride interchange	DT1.2 x1 Where parking areas are associated with other facilities and developments the sensitivity level and the decision will be based on the facility or development	

15.2 Development Type Table 2: Developments for Use by the General Public

Development Type	Examples	Development Detail and Size	Justification
	Houses, flats, retirement flats or bungalows, residential caravans, mobile homes	Developments up to and including 30 dwelling units and at a density of no more than 40 per hectare (Level 2)	Development where people live or are temporarily resident It may be difficult to organise people in the event of an emergency
		Exclusions	
DT2.1 Housing	Infill, back-land development	DT2.1 x1 Developments of 1 or 2 dwelling units (Level 1)	Minimal increase in numbers at risk
	Larger housing developments	DT2.1 x2 Larger developments for more than 30 dwelling units (Level 3)	Substantial increase in numbers at risk
		DT2.1 x3 Any developments (for more than 2 dwelling units) at a density of more than 40 dwelling units per hectare (Level 3)	High-density developments
	Hotels, motels, guest houses, hostels, youth hostels, holiday camps, holiday homes, halls of residence, dormitories, accommodation centres, holiday caravan sites, camping sites	Accommodation up to 100 beds or 33 caravan or tent pitches (Level 2)	Development where people are temporarily resident It may be difficult to organise people in the event of an emergency
DT2.2	Exclusions		
Hotel or Hostel or Holiday Accommodation	Smaller: guest houses, hostels, youth hostels, holiday homes, halls of residence, dormitories, holiday caravan sites, camping sites	DT2.2 x1 Accommodation of less than 10 beds or 3 caravan or tent pitches (Level 1)	Minimal increase in numbers at risk
	Larger: hotels, motels, hostels, youth hostels, holiday camps, holiday homes, halls of residence, dormitories, holiday caravan sites, camping sites	DT2.2 x2 Accommodation of more than 100 beds or 33 caravan or tent pitches (Level 3)	Substantial increase in numbers at risk

Development Type	Examples	Development Detail and Size	Justification
	Motorway, dual carriageway	Major transport links in their own right i.e., not as an integral part of other developments (Level 2)	Prime purpose is as a transport link Potentially large numbers exposed to risk but exposure of an individual is only for a short period
		Exclusions	
DT2.3 Transport Links	Estate roads, access roads	DT2.3 x1 Single carriageway roads (Level 1)	Minimal numbers present and mostly a small period of time exposed to risk Associated with other development
	Any railway or tram track	DT2.3 x2 Railways (Level 1)	Transient population, small period of time exposed to risk Periods of time with no population present

Development Type	Examples	Development Detail and Size	Justification
DT2.4 Indoor Use by Public	Food and drink: restaurants, cafes, drive- through fast food, pubs Retail: shops, petrol filling station (total floor space based on shop area not forecourt), vehicle dealers (total floor space based on showroom or sales building not outside display areas), retail warehouses, super- stores, small shopping centres, markets, financial and professional services to the public Community and adult education: libraries, art galleries, museums, exhibition halls, day surgeries, health centres, religious buildings, community centres. adult education, 6th form college, college of FE Assembly and leisure: Coach or bus or railway stations, ferry terminals, airports, cinemas, concert or bingo or dance halls, conference centres, sports or leisure centres, sports or leisure centres, sports halls, facilities associated with golf courses, flying clubs (e.g., changing rooms, club house), indoor go kart tracks	Developments for use by the general public where total floor space is from 250 m² up to 5000 m² (Level 2)	Developments where members of the public will be present (but not resident) Emergency action may be difficult to coordinate
	traono	Exclusions	
		DT2.4 x1	
		D12.4 x1 Development with less than 250 m² total floor space (Level 1)	Minimal increase in numbers at risk
		DT2.4 x2 Development with more than 5000 m² total floor space (Level 3)	Substantial increase in numbers at risk
DT2.5 Outdoor Use by Public	Food and drink: food festivals, picnic areas Retail: outdoor markets, car boot sales, funfairs	Principally an outdoor development for use by the general public i.e., developments	Developments where members of the public will be present (but

Development Type	Examples	Development Detail and Size	Justification
	Community and adult education: open-air theatres and exhibitions Assembly and leisure: coach or bus or railway stations, park and ride interchange, ferry terminals, sports stadia, sports fields or pitches, funfairs, theme parks, viewing stands, marinas, playing fields, children's play areas, BMX or go kart tracks, country parks, nature reserves, picnic sites, marquees	where people will predominantly be outdoors and not more than 100 people will gather at the facility at any one time (Level 2)	not resident) either indoors or outdoors Emergency action may be difficult to coordinate
	Exclusions		
	Outdoor markets, car boot sales, funfairs picnic area, park and ride interchange, viewing stands, marquees	DT2.5 x1 Predominantly openair developments likely to attract the general public in numbers greater than 100 people but up to 1000 at any one time (Level 3)	Substantial increase in numbers at risk and more vulnerable due to being outside
	Theme parks, funfairs, large sports stadia and events, open air markets, outdoor concerts, pop festivals	DT2.5 x2 Predominantly openair developments likely to attract the general public in numbers greater than 1000 people at any one time (Level 4)	Very substantial increase in numbers at risk, more vulnerable due to being outside Emergency action may be difficult to coordinate

15.3 Development Type Table 3: Developments for Use by Vulnerable People

Development Type	Examples	Development Detail and Size	Justification
DT3.1	Hospitals, convalescent homes, nursing homes, old people's homes with warden on site or 'on call', sheltered housing, nurseries, crèches, schools and academies for children up to school leaving age	Institutional, educational and special accommodation for vulnerable people or that provides a protective environment (Level 3)	Places providing an element of care or protection Because of age, infirmity or state of health the occupants may be especially vulnerable to injury from hazardous events Emergency action and evacuation may be very difficult
Institutional	Exclusions		
Accommodation and Education	Hospitals, convalescent homes, nursing homes, old people's homes, sheltered housing	DT3.1 x1 24-hour care where the site on the planning application being developed is larger than 0.25 hectare (Level 4)	Substantial increase in numbers of vulnerable people at risk
	Schools, nurseries, crèches	DT3.1 x2 Day care where the site on the planning application being developed is larger than 1.4 hectare (Level 4)	Substantial increase in numbers of vulnerable people at risk
DT3.2 Prisons	Prisons, remand centres	Secure accommodation for those sentenced by court, or awaiting trial, etc. (Level 3)	Places providing detention Emergency action and evacuation may be very difficult

15.4 Development Type Table 4: Very Large and Sensitive Developments

Development Type	Examples	Development Detail and Size	Justification
Note: all Level 4 of		ception from Level 2 or 3 onvenient reference	and are reproduced in
DT4.1 Institutional	Hospitals, convalescent homes, nursing homes, old people's homes, sheltered housing	Large developments of institutional and special accommodation for vulnerable people (or that provide a protective environment) where 24-hour care is provided and where the site on the planning application being developed is larger than 0.25 hectare (Level 4)	Places providing an element of care or protection Because of age or state of health the occupants may be especially vulnerable to injury from hazardous events Emergency action and evacuation may be very difficult The risk to an individual may be small but there is a larger societal concern
Accommodation	Nurseries, crèches, schools for children up to school leaving age	Large developments of institutional and special accommodation for vulnerable people (or that provide a protective environment) where day care (not 24-hour care) is provided and where the site on the planning application being developed is larger than 1.4 hectare (Level 4)	Places providing an element of care or protection Because of the occupants that may be especially vulnerable to injury from hazardous events Emergency action and evacuation may be very difficult The risk to an individual may be small but there is a larger societal concern
DT4.2 Very Large Outdoor Use by Public	Theme parks, large sports stadia and events, open air markets, outdoor concerts, pop festivals	Predominantly openair developments where there could be more than 1000 people present (Level 4)	People in the open air may be more exposed to toxic fumes and thermal radiation than if they were in buildings Large numbers make emergency action and evacuation difficult The risk to an individual may be small but there is a larger societal concern

16 APPENDIX E: MATERIAL SAFETY DATA SHEETS

16.1 LPG (Propane)

PROPANE	ICSC: 0319
n-Propane	November 2003
CAS #: 74-98-6	
UN #: 1978	
EC Number: 200-827-9	

	ACUTE HAZARDS	PREVENTION	FIRE FIGHTING
FIRE & EXPLOSION	Extremely flammable. Gas/air mixtures are explosive.	proof electrical equipment and lighting. Prevent build-up of	Shut off supply; if not possible and no risk to surroundings, let the fire burn itself out. In other cases, extinguish with powder, carbon dioxide. In case of fire: keep cylinder cool by spraying with water. Combat fire from a sheltered position.

	SYMPTOMS	PREVENTION	FIRST AID
Inhalation	Drowsiness. Unconsciousness.	Use closed system or ventilation.	Fresh air, rest. Artificial respiration may be needed. Refer for medical attention.
Skin	ON CONTACT WITH LIQUID: FROSTBITE.	Cold-insulating gloves. Protective clothing.	ON FROSTBITE: rinse with plenty of water, do NOT remove clothes. Refer for medical attention.
	ON CONTACT WITH LIQUID: FROSTBITE.	Wear face shield.	First rinse with plenty of water for several minutes (remove contact lenses if easily possible), then refer for medica attention.

SPILLAGE DISPOSAL	CLASSIFICATION & LABELLING
Evacuate danger area! Consult an expert! Personal protection: self-contained breathing apparatus. Remove all ignition sources. Ventilation. NEVER direct water jet on liquid.	According to UN GHS Criteria
STORAGE	Transportation
Fireproof. Cool.	UN Classification UN Hazard Class: 2.1
PACKAGING	



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PROPANE ICSC: 0319

PHYSICAL & CHEMICAL INFORMATION

Physical State; Appearance

ODOURLESS COLOURLESS COMPRESSED

LIQUEFIED GAS.

Physical dangers

The gas is heavier than air and may travel along the ground; distant ignition possible. The gas is heavier than air and may accumulate in lowered spaces causing a deficiency of oxygen. As a result of flow, agitation, etc., electrostatic charges can be generated.

Chemical dangers

Formula: C₃H₈ / CH₃CH₂CH₃ Molecular mass: 44.1 Boiling point: -42°C Melting point: -189.7°C

Relative density (water = 1): 0.5

Solubility in water, g/100ml at 20°C: 0.007 Vapour pressure, kPa at 20°C: 840 Relative vapour density (air = 1): 1.6

Flash point: -104°C

Auto-ignition temperature: 450°C Explosive limits, vol% in air: 2.1-9.5

Octanol/water partition coefficient as log Pow: 2.36

EXPOSURE & HEALTH EFFECTS

Routes of exposure

The substance can be absorbed into the body by inhalation.

Effects of short-term exposure

Rapid evaporation of the liquid may cause frostbite. The substance may cause effects on the central nervous system.

Inhalation risk

On loss of containment this substance can cause suffocation by lowering the oxygen content of the air in confined areas.

Effects of long-term or repeated exposure

OCCUPATIONAL EXPOSURE LIMITS

MAK: 1800 mg/m³, 1000 ppm; peak limitation category: II (4); pregnancy risk group: D

ENVIRONMENT

NOTES

Check oxygen content before entering area.

Turn leaking cylinder with the leak up to prevent escape of gas in liquid state.

High concentrations in the air cause a deficiency of oxygen with the risk of unconsciousness or death.

ADDITIONAL INFORMATION

EC Classification

Symbol: F+; R: 12; S: (2)-9-16

16.2 Diesel (Dodecane)

DIESEL FUEL No. 2	ICSC: 1561
Fuels, Diesel, No. 2 Diesel oil No. 2 Gasoil - unspecified	October 2004
CAS #: 68476-34-6	
UN #: 1202	
EC Number: 270-676-1	

	ACUTE HAZARDS	PREVENTION	FIRE FIGHTING
FIRE & EXPLOSION	Flammable. Gives off irritating or toxic fumes (or gases) in a fire. Above 52°C explosive vapour/air mixtures may be formed.	use a closed system, ventilation and explosion-proof	Use water spray, alcohol- resistant foam, dry powder, carbon dioxide. In case of fire: keep drums, etc., cool by spraying with water.

	SYMPTOMS	PREVENTION	FIRST AID
Inhalation	Dizziness. Headache. Nausea.	Use ventilation, local exhaust or breathing protection.	Fresh air, rest. Refer for medical attention.
Skin	Dry skin. Redness.	Protective gloves.	Rinse and then wash skin with water and soap.
Eyes	Redness. Pain.	Wear safety goggles or eye protection in combination with breathing protection.	First rinse with plenty of water for several minutes (remove contact lenses if easily possible), then refer for medica attention.
Ingestion	See Inhalation.	Do not eat, drink, or smoke during work.	Rinse mouth. Do NOT induce vomiting. Refer for medical attention.

SPILLAGE DISPOSAL	CLASSIFICATION & LABELLING	
Personal protection: filter respirator for organic gases and vapours adapted to the airborne concentration of the substance. Collect leaking and spilled liquid in sealable containers as far as possible. Absorb remaining liquid in sand or inert absorbent. Then store and dispose of according to local regulations.	According to UN GHS Criteria Transportation UN Classification UN Hazard Class: 3; UN Pack Group: III	
STORAGE		
Well closed.		
PACKAGING		
	-	





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DIESEL FUEL No. 2 ICSC: 1561

PHYSICAL & CHEMICAL INFORMATION

Physical State; Appearance BROWN SLIGHTLY VISCOUS LIQUID WITH CHARACTERISTIC ODOUR.

Boiling point: 282-338°C Melting point: -30 - -18°C Density: 0.87-0.95 g/cm³

Physical dangers	Solubility in water, g/100ml at 20°C: 0.0005 Flash point: 52°C c.c.	
Chemical dangers	Auto-ignition temperature: 254-285°C Explosive limits, vol% in air: 0.6-6.5 Octanol/water partition coefficient as log Pow: >3.3	

EXPOSURE & HEALTH EFFECTS

Routes of exposure

The substance can be absorbed into the body by inhalation of its aerosol.

Effects of short-term exposure

The substance is irritating to the eyes, skin and respiratory tract. The substance may cause effects on the central nervous system. If this liquid is swallowed, aspiration into the lungs may result in chemical pneumonitis.

Inhalation risk

A harmful contamination of the air will not or will only very slowly be reached on evaporation of this substance at 20°C

Effects of long-term or repeated exposure

The substance defats the skin, which may cause dryness or cracking.

OCCUPATIONAL EXPOSURE LIMITS

TLV: 100 mg/m³, as TWA; (skin); A3 (confirmed animal carcinogen with unknown relevance to humans)

ENVIRONMENT

The substance is harmful to aquatic organisms.

NOTES

This card does not address Diesel exhaust. Additives to Diesel fuel in winter may change physical and toxicological properties of the substance.

ADDITIONAL INFORMATION

EC Classification

Symbol: Xn; R: 40; S: (2)-36/37; Note: H