

27 July 2020

South African Heritage Resources Agency  
111 Harrington Street  
Cape Town  
8001

**Mr. D. Kolwane**

**THE RECTIFICATION OF THE UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: THE ESTABLISHMENT OF AN ASPHALT PLANT ON PORTION 57 OF THE FARM STRATHMORE 214, NELSPRUIT DISTRICT, MPUMALANGA.**

Notice is given of an application for Environmental Authorisation ("EA") in terms of Section 24(G) and 24(F) of the National Environmental Management Amendment Act (Act No.62 of 2008) for rectification of the unlawful commencement of a listed activity – the establishment of an Asphalt Plant on Portion 57 of the farm Strathmore 214, Nelspruit District, Mpumalanga.

The activity commenced with is Activity 14 of GN R. 327 of the Environmental Impacts Assessment ("EIA") Regulations of 2014 as amended – *"The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres"*.

An Asphalt Plant is also scheduled as a Macadam Preparation Process which normally requires an Atmospheric Emission License ("AEL") in terms of the National Environmental Management: Air Quality Act ("NEM:AQA") (Act No. 39 of 2004). However, a letter was issued by the Ehlanzeni District Municipality (Competent Authority for the AEL) exempting the facility from complying with the provisions of Chapter 5 of NEM:AQA, because the facility is currently a mobile, temporary emitter that was planned to operate on the site for less than 2 years.

However, the applicant intends to tender for more road construction projects in the area and would in this case need to extend the operating period of the Asphalt Plant. Therefore, application for an AEL will also be lodged.

This notification provides stakeholders and / or identified Interested and Affected Parties (“**I&AP**”) with the opportunity to comment on the proposed project and to indicate their interest.

### **Related Activities**

The following activities will be applied for:

GN. R. 327 of the 2014 EIA Regulations as amended:

- Activity 14 – *“The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.”*

GN. R. 325 of the 2014 EIA Regulations as amended:

- Activity 6 – *“The development of facilities or infrastructure for any process or activity which requires a permit or license or an amended permit or license in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent”.*

GN. R. 893 of the NEM:AQA 2013 Regulations:

- *Category 5: Mineral Processing, Storage and Handling, Subcategory 5.10: Macadam Preparation - “Permanent facilities used for mixtures of aggregate; tar or bitumen to produce road-surfacing materials.”*

### **Project Description:**

- Turn 180 Environmental Consultants was appointed by the applicant (i.e. At Road Construction (Pty) Ltd) as Environmental Assessment Practitioner to manage the required authorisation processes on their behalf.
- An application will be submitted to the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (“**DARDLEA**”) to obtain EA.
- An application will also be submitted to the Ehlanzeni District Municipality to obtain an AEL.

Although the Asphalt Plant has been established on site, it is not yet in operation (no asphalt is being produced yet). It is planned that operation will start at the end of August/beginning of September. The Asphalt Plant has the capacity to store approximately 296 000 L dangerous goods on site in the form of diesel (1 × 23 000L tank), Paraffin (1 × 23 000 L tank), bitumen (approximately 204 000 L) and Heavy Fuel Oil (HFO) (2 × 23 000L tanks).

The basic operation of the Asphalt Plant includes heating raw aggregate inside a dryer bin using a paraffin burner. This heated aggregate is then screened and separated and stored in different bins according to size. The aggregate then gets weighed and discharged into a mixing unit where it gets mixed with heated bitumen. The final product (asphalt) then gets discharged into silos to be stored or into trucks to be transported to site.

It should be noted that this project is of national importance, as the asphalt produced by the Asphalt Plant will be used to upgrade the N4 National Road.

**Locality:**

The development was established on Portion 57 of the farm Strathmore 214, Nelspruit District, Mpumalanga at the following coordinates:

25°31'55.52"S and 31°27'2.48"E

Please refer to the map attached hereto (Figure 1) for an indication on the location of the activities.

**Proposed Site Description:**

- The site has an approximate footprint of 1.4 ha. However, no indigenous vegetation was cleared for the establishment of the Asphalt Plant, as the site is located on a Magnesite mine. Thus, the site was significantly disturbed prior to the establishment of the Asphalt Plant.
- The site is located approximately 250 m from a NFEPA wetland. The Crocodile River is located approximately 3 km north of the site.
- The Asphalt Plant uses municipal water on site.
- The site falls within the Baberton Serpentine Sourveld and the Kaalrug Mountain Bushveld vegetation types. These vegetation types are classified as Least Concern according to the National List of Threatened Ecosystems (Notice 1477 of 2009) (National Environmental Management Biodiversity Act, 2004). Please refer to the Sensitivity map in Figure 2.

**Potential Impacts of Proposed Project and Mitigation Measures:**

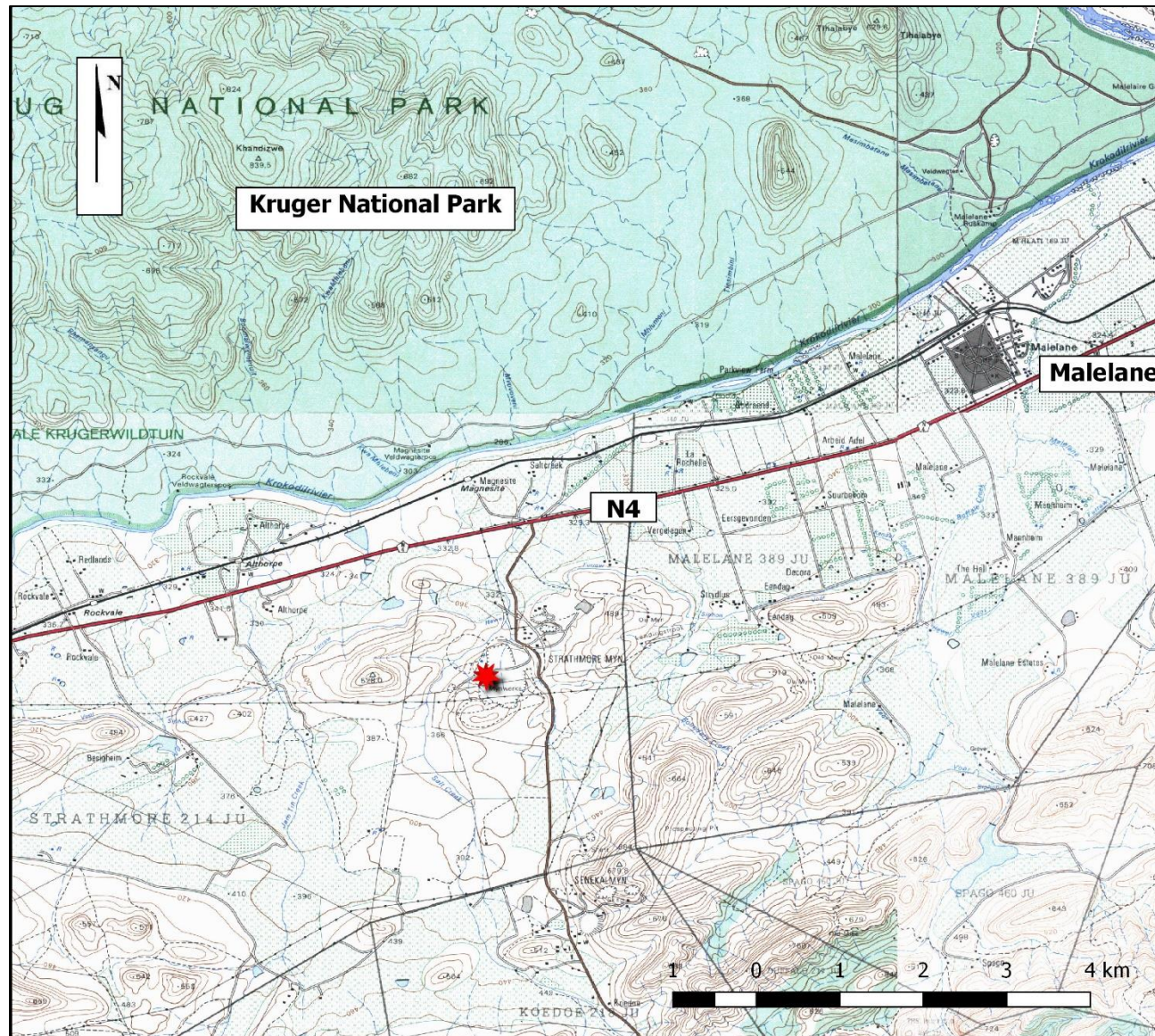
- Operational activities will be kept to the site boundary in order to limit disturbance on natural vegetation in the surrounding area.
- Contamination of soil and groundwater resources may occur. However, potentially hazardous substances are stored inside a bunded area with an impermeable surface which has the capacity to store more than 110% of the volume of the substance. It is not expected that there will be an impact on the nearby wetland, due to the fact that

there is mine infrastructure between the Plant and the wetland. However, an ecologist and wetland specialist will be appointed to verify this.

- The plant may have a negative aesthetic impact. The site will always be kept clean and neat through correct housekeeping and waste disposal. However, it should be noted that the Asphalt Plant is not visible from any public roads and that it is located on a mining area.
- Operational activities, like movement of vehicles and loading and hauling of aggregate, may lead to noise and dust generation. Appropriate measures have already been taken to minimize this. Dust suppression measures, such as spraying water on dirt roads and operational areas, have been implemented. Dust sampling is also done monthly to ensure compliance to national standards. The Plant is also located on a mining area far from any residential areas and thus the impact of noise is expected to be low.
- It is not expected that there are any cultural heritage objects or sites and/or paleontological remains present on the property, and none have been observed so far. A Heritage and Paleontological Impact Assessment will be conducted as part of the application process.
- Some emissions will be generated during operation of the Asphalt Plant, which may include NO<sub>x</sub>(Nitrogen oxides), SO<sub>2</sub> (Sulfur dioxide), CO<sub>2</sub> (Carbon dioxide),CO (Carbon monoxide), Volatile Organic Compounds (VOCs) and particulate matter (PM). Specialist will be appointed to do an Atmospheric Impact Assessment on the Asphalt Plant.
- The project has a positive impact on the socio-economic structure of the area, as jobs were provided to local people.

### **Invitation to participate**

You are requested to send any issues and/or concerns regarding the project to Turn 180 Environmental Consultants at Suite 221, Private Bag X01, Brandhof, 9324 or 072 873 6665 (T) or 072 967 7962/072 838 8189 (C) or [ansune@turn180.co.za](mailto:ansune@turn180.co.za) / [admin@turn180.co.za](mailto:admin@turn180.co.za) (e-mail) before 28 August 2020.



**MAP INDICATING THE LOCALITY OF THE ASPHALT PLANT ON PORTION 57 OF THE FARM STRATHMORE 214, NELSPRUIT DISTRICT, MPUMALANGA.**

**APPLICANT:  
AT-ROAD CONSTRUCTION (PTY) LTD**

**CONSULTANT:  
TURN 180 ENVIRONMENTAL CONSULTANTS  
SUITE 221, P/BAG X01,  
BRANDHOF, 9324  
072 967 7962/072 873 6665  
(T)  
ANSUNE@TURN180.CO.ZA/  
ADMIN@TURN180.CO.ZA (E-MAIL)**

**MAP AND SITE INFORMATION:**  
Centre Coordinates:  
25°31'55.52"S and 31°27'2.48"E  
Topo Map - 2531AD, BC, CB, DA  
Coordinate System - WGS84  
Scale - 1:40 000  
Date - June 2020

**Legend**  
 Asphalt Plant location



Figure 1: Asphalt Plant locality

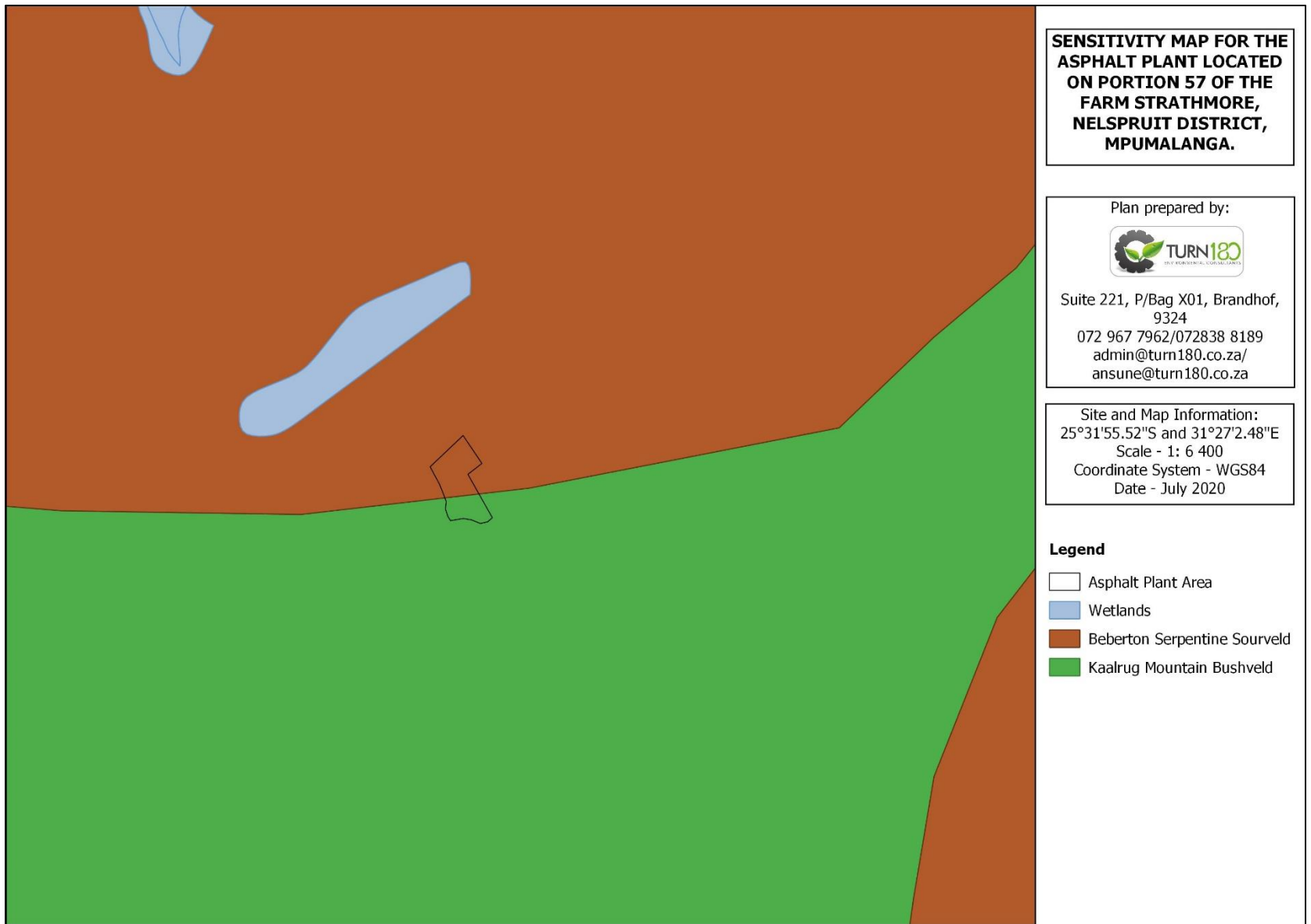


Figure 2: Sensitivity map for the Asphalt Plant