



MEMORANDUM

TO Jurgen Theiss, Scaw South Africa (Pty) Ltd

DATE 06 March 2013

CC Siphon Nkosi

FROM Ed Perry

PROJECT No. 12614749

CONSTRUCTION OF A NEW FLASH BUTT WELDING FACILITY

1.0 INTRODUCTION

Scaw South Africa (Pty) Ltd (Scaw) requested Golder Associates Africa (Pty) Ltd (Golder) to provide an opinion on the possible environmental authorisation required for the proposed construction of a new Flash Butt Welding Facility at Chain Products.

The process flow of the new facility, as provided by Scaw, is appended to the memo.

2.0 ASSESSMENT

Upon assessment of the information provided, the following listed activities in terms of the Environmental Impact Assessment Regulations (GN R 544, 545 and 546 in terms of the National Environmental Management Act, 107 of 1998, GNR 718 in terms of the National Environmental Management Act, 59 of 2008, and requirements for water authorisations) have been identified as potential triggers.

Table 1: Activities Undertaken for Construction of New Manufacturing Facility for Railway Car Set Production

General Description of Activity	Comment	Legal Activity	Is a submission required.
Physical construction of building.	An activity will only be triggered if the area for the construction is bigger than 5 hectares. The construction of the new building will be less than 5 hectares.	GNR 544 No.23 The transformation of undeveloped, vacant or derelict land to – Residential, retail, commercial, recreational, industrial or institutional use, inside an urban area, and where the total area to be transformed is 5 hectares	No submission is required
Creation of additional waste during the construction and operation of the facility.	No additional waste management activities will be caused by the construction or operation of this facility i.e. the waste will continue to be taken off site to an appropriate facility or disposed of to the licensed facilities on site. This will not cause the waste storage thresholds will be exceeded of 100 m ³ of general waste or 35m ³ of hazardous waste.	GNR 718 Category A 1 and 2. 1. The storage including the temporary storage of general waste at a facility that has the capacity to store in excess of 100m ³ of general waste at any one time. 2. The storage including the temporary storage of hazardous waste at a facility that has the capacity to store in excess of 35m ³ of hazardous waste at any	No submission is required



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General Description of Activity	Comment	Legal Activity	Is a submission required.
		one time.	
Production of atmospheric emissions associated with the operation of the facility	<p>The facility for Flash Butt Welding includes the following activities:</p> <ul style="list-style-type: none">• Flash Butt Welding machines• Induction and Resistance welders• Presses and Vices• Powder Coating. <p>The heat treatment and shot blasting have been excluded at this time.</p> <p>None of these are listed activities with regards to the National Environmental Management: Air Quality Act (39/2004)</p>	<p>GNR 544 No. 28</p> <p>The expansion of or changes to existing facilities for any process or activity where such expansion or changes to will result in the need for a permit or license in terms of national or provincial legislation governing the release of emissions or pollution, excluding where the facility, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No 59 of 2008) in which case the Act will apply.</p>	No submission is required
Water use and effluent discharge from the operation of the new facility.	<p>The facility will not require more water, need to store more water or need to discharge more than required by the current General Authorisation.</p>	<p>GNR 544 No. 28</p> <p>The expansion of or changes to existing facilities for any process or activity where such expansion or changes to will result in the need for a permit or license in terms of national or provincial legislation governing the release of emissions or pollution, excluding where the facility, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No 59 of 2008) in which case the Act will apply.</p> <p>Water Use Licence</p>	No submission is required



3.0 CONCLUSION

Based on the information provided, it would appear that no submission for an environmental authorisation is required at this time.