

**MEETING MINUTES: PRE-APPLICATION
MEETING WITH DEA, PRETORIA – PROPOSED
DEVELOPMENT OF AN ASBESTOS WASTE
DISPOSAL SITE AT THE BUFFELS MARINE
MINING RIGHT, KLEINZEE, NORTHERN CAPE**

Reference #: 20004

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Item No	AGENDA ITEM	
1	<p><u>Opening and Project Background:</u></p> <ul style="list-style-type: none"> • WN thanked all attending and provided background information for the proposed project. • The request is for the proposed development of a H:H hazardous waste disposal site, for the disposal of asbestos, within one of the existing open mining voids in the Buffels Marine Mining Complex (BMC) between the towns of Kelinzee and Port Nolloth. • The asbestos waste is generated from the existing mining infrastructure that are in the process of being demolished. • Namaqualand Mines had been partially sold to Transhex, but the BMC had remained with De Beers. The mine is in the process of closure and all infrastructure that do not have an alternative use or future purpose need to be demolished and the land rehabilitated. • Thus the various buildings constructed using asbestos sheeting as well as pipes used for the transportation of both potable and process water need to be removed and disposed of. • It is estimated that the total volume of asbestos that requires to be disposed of amounts to approximately 1000 tons (3000m³). • The area had been screen for potential sites based on available voids, but no further environmental screening had been done to date. • The proposed sites had been selected based on the following criteria: <ul style="list-style-type: none"> - Distance from the waste source - Accessibility and the proximity to potential future mining activities - Whether all diamondiferous resources had been removed from the void. 	WN

<p>2</p>	<p><u>Confirmation of Activities and Process:</u></p> <ul style="list-style-type: none"> The following activity had been identified and would require confirmation from the provincial Department of Environmental Affairs, Northern Cape (Department of Environment and Nature Conservation). In terms of the National Environmental Management Act, Act 108 of 1998 (as amended) the following activity is considered to be triggered: <i>GN R 984 Listing Notice 2: Activity 4:</i> <i>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 more than 500 cubic meters.</i> <p>It need to be confirmed with DENC whether the above activity is triggered, since the interpretation may be related to liquid and chemical waste as opposed to asbestos.</p> <ul style="list-style-type: none"> Based on the activities identified within the National Environmental Management: Waste Act, Act 59 of 2008 the proposed activity is considered to be a Category B Waste activity and must conduct a scoping and environmental impact reporting process set out in the Environmental Impact Assessment Regulations made under section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in section 45 read with section 20(b) of the Act. <p><i>(7) Disposal of any quantity of hazardous waste to land</i> Asbestos waste is considered to be hazardous waste.</p>	<p>LP</p>
<p>3</p>	<p><u>Departments to include during Consultation:</u></p> <ul style="list-style-type: none"> The following Departments would need to be consulted. <ul style="list-style-type: none"> -Department of Mineral Resources -Department of Water and Sanitation (DWS) -Department of Environment and Nature Conservation DEA would be the Competent Authority for the Waste License Application. DENC would be the Competent Authority for the EIA process. 	<p>LP</p>
<p>4</p>	<p><u>Requested Specialist Studies:</u></p> <ul style="list-style-type: none"> No specific specialist studies are required, since the proposed project is not a green fields project and envisage to use an existing mined out void for the disposal. In this project it is not the impact of the waste on the resource that need to be established, but rather the impact of the resource on the waste. Only statements are required from the following specialists: <ul style="list-style-type: none"> - Palaeontology and Archaeology Statement - Ecological specialist statement (Fauna and Flora) - Ground water Statement - Surface Water Statement The containment barrier would need to be designed based on the requirements provided in the Norms and Standards for disposal of waste to landfill. 	<p>LP</p>

5	<p><u>Temporary Storage:</u></p> <ul style="list-style-type: none"> • It need to be confirmed whether the asbestos waste currently located at the temporary storage area had been there for more than 180 days, if so, it is not considered to be temporary storage and a full waste license application is required. • The site has to conform to the Norms and Standards as provided. 	NG
6	<p><u>Way Forward:</u></p> <ul style="list-style-type: none"> • Provide engineering design drawings of the proposed waste disposal facility to DWS for approval prior to commencement of the EIA process. • Ensure the facility incorporates a Class A lining as described in the Norms and Standards attached hereto. • Arrange a pre-application meeting with DENC to confirm whether a Scoping EIA will be required, since a similar process is conducted during the Waste license application due to asbestos being a hazardous waste. 	<p>LP</p> <p>NG</p> <p>LP</p>
7	<p><u>Conclusion:</u></p> <ul style="list-style-type: none"> • WN thanked all for attending and providing valuable insights in the project. 	