

27 September 2019

South African Heritage Resources Agency 111 Harrington Street Cape Town 8001

Attention: Ms. R. Redelstorff

NOTICE OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION AND AN ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF AN EMULSION PLANT ON ERF 1559, HARDUSTRIA, HARRISMITH, FREE STATE.

Notice is given of an application for Environmental Authorisation ("EA") in terms of the 2014 Environmental Impact Assessment ("EIA") Regulations as amended under the National Environmental Management Act (Act 107 of 1998) ("NEMA"), for the establishment of an Emulsion Plant on erf 1559, Hardustria, Harrismith, Free State ("Site"). The establishment of an Emulsion Plant is scheduled as a Macadam preparation process that also needs an Atmospheric Emission License ("AEL") in terms of the National Environmental Management Air Quality Act (Act 39 of 2004) ("NEM:AQA").

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. 893 of the NEM: AQA 2013 Regulations:

- Category 2: Subcategory 2.4: Storage and Handling of Petroleum Products: "All permanent immobile liquid storage facilities at a single site with a combined storage capacity of greater than 1000 cubic meters."
- 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."

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

- Activity 4 "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 metres."
- Activity 6 "The development of facilities or infrastructure for any process or activity which
 requires a permit or licence or an amended permit or licence in terms of national or
 provincial legislation governing the generation or release of emissions, pollution or effluent".

Project Description:

- Turn 180 Environmental Consultants was appointed by the applicant (i.e. South African Road Binders (Pty) Ltd.) as Environmental Assessment Practitioner to manage the required authorisation processes on their behalf.
- Applications will be submitted to the Department of Economic, Small Business Development,
 Tourism and Environmental Affairs ("DESTEA") to obtain EA and to the Thabo Mofutsanyana
 District Municipality to obtain an AEL.

The development will entail the establishment of an Emulsion Plant for which approximately 0.74 ha of vegetation will need to be cleared. Bitumen emulsion that is produced during the operational phase of the proposed plant will be sold commercially to be used in projects involving the construction and repair of roads. The basic operation of the plant includes mixing heated raw bitumen with water, emulsifiers, chemicals and additives in a colloid mill. The product is then stored in cold storage tanks, ready to be sold. The Emulsion Plant will have the capacity to store approximately a total of 1 102 000 L of dangerous substances. This will include 816 000 L Raw Bitumen, 9 000 L Diesel, 23 000 L Paraffin and 254 000 L Bitumen Emulsion. Approximately 5 tons of Caustic Soda and 5 000 L of Hydrochloric Acid will also be stored on site.

Locality:

The development will involve erf 1559, Hardustria, Harrismith, Free State at the following coordinates:

28°17'46.80"S and 29° 8'15.25"E

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

Proposed Site Description:

- The Site has an approximate footprint of 0.74 ha.
- The Site is currently zoned as "General Industrial". However, the site may need to be rezoned in order to allow an Emulsion Plant, which falls under Noxious Industrial.
- The Site is not located close to any natural wetlands or watercourses. The closest watercourse is the Wilgeriver, which is located approximately 1.3 km to the southwest of the Site. This will be verified by an ecologist.

• The Site falls within the Eastern Free State Sandy Grassland (Gm 4) vegetation type, which is classified as Least Concern according to the National List of Threatened Ecosystems (Notice 1477 of 2009) (National Environmental Management Biodiversity Act, 2004). The Site also falls within an Ecological Support Area 1 as per the Free State Biodiversity Management Plan (2015). However, it should be noted that the Site is situated within an industrial area of a town and thus the Site is degraded.

Potential Impacts of Proposed Project and Mitigation Measures:

- Contamination of soil and groundwater resources may occur due to spillage of hazardous substances. However, potentially hazardous substances will be stored inside a bunded area with an impermeable surface which has the capacity to store more than 110% of the volume of the substance.
- The proposed project may have a negative aesthetic impact due to its industrial look, especially since it is located adjacent to a national road. The Site will always be kept clean and neat through correct housekeeping and waste disposal. It should be noted that the Site is located within an industrial area.
- Construction and operational activities will lead to noise and dust generation. Appropriate
 measures will be taken to minimize this. Activities will only take place during daylight
 working hours and appropriate dust suppression measures will be implemented if necessary.
- The Emulsion Plant will generate some emissions during operation. An air emission monitoring programme will be implemented and air emissions from the plant will comply with NEM:AQA. An Atmospheric Impact Report will be done as part of the EIA process and will be included in the EIA reports.
- A Heritage and Paleontological Impact Assessment will be conducted as part of the EIA process and will be included in the EIA reports.
- The proposed project will have a positive impact on the socio-economic structure of the area, as jobs may be provided to local people.

Invitation to participate

You are requested to send any issues and/or concerns regarding the proposed 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 / admin@turn180.co.za (e-mail) before 28 October 2019.

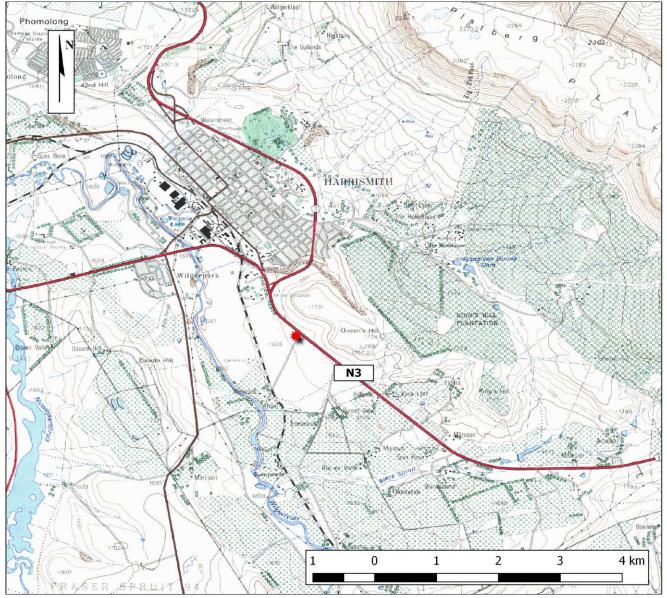


Figure 1: Locality Map for the proposed project

MAP INDICATING THE
LOCALITY OF THE
PROPOSED
ESTABLISHMENT OF AN
EMULSION PLANT ON ERF
1559, HARDUSTRIA,
HARRISMITH, FREE STATE.

APPLICANT: SOUTH AFRICAN ROAD BINDERS (PTY) LTD

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SITE INFORMATION: Centre Coordinates: 28°17'46.80"S and 29° 8'15.25"E Site Footprint - 0.74 ha

MAP INFORMATION: Topo Map - 2829AA and AC Coordinate System - WGS84 Scale - 1: 30 000 Date - September 2019



