



Date: 02-10-2012
DEA Ref: 12/9/11/L783/5
LEDET Ref: 12/1/9/2-W07 and LIM/EIA/87/2011
Our Ref: S0342

Attention: Interested and Affected Party

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Dear Interested and Affected Party

Waste Management Licence Application for Waste Management Activities for THE CHAR MANUFACTURING PLANT EXPANSION PROJECT

Notice is hereby given in terms of section 47 of the National Environmental Management: Waste Act (No. 59 of 2008) (NEMWA) and section 54 of the Environmental Impact Assessment (EIA) regulations (GNR 543) made in terms of the National Environmental Management Act (No. 107 of 1998).

Please note that several previous notifications have been provided to you regarding the Char Manufacturing Plant Expansion project. This is an additional notification providing more specific details about the application made for a waste management licence. Interested and affected parties are invited to raise comments or queries on the waste management activities of the proposed project.

Introduction

Exxaro Reductants (Pty) Ltd owns and operates the existing Char Manufacturing Plant, which is located within the boundaries of the Grootegeluk Coal Mine, on the Farm Darby 458 LQ, 20 km west of Lephalale, Limpopo Province. Exxaro Reductants plan to expand their char manufacturing operations and increase the number of retorts at the Char Manufacturing Plant from 4 to a maximum of 12. The expansion would involve the construction of an almost identical plant to the existing Char Manufacturing Plant and would be located adjacent to it. The existing plant covers an area of ~7.4 ha and the expansion will be approximately 6ha, making the entire footprint of the expanded Char Manufacturing Plant ~13.4 ha.

The expansion project is currently the subject of an environmental impact assessment process in support of applications for various environmental authorisations.

The char manufacturing process generates three types of waste: liquor (precipitated water), tar and sludge. The Char Manufacturing Plant expansion will require that Exxaro Reductants undertake waste management activities that require a waste management licence (WML).

Working Together

Directors: KC Fairley (Managing), MG Hemming & M Medallie
Synergistics Environmental Services (Pty) Ltd – South Africa
Registered No. 2003/030216/07

Directors: KC Fairley & MG Hemming
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Registered No. 2003/782

Waste Management Legislation

The National Environmental Management: Waste Act (No. 59 of 2008) regulates waste management in South Africa. On 3 July 2009, the list of waste management activities requiring a WML from a competent authority were published (GN R 718). The schedule of waste management activities is divided into Category A and Category B. Activities identified in Category A require a Basic Assessment process, while activities identified in Category B require a scoping and an EIA process, as stipulated in the environmental impact assessment regulations (GN 543, 18 June 2010) of the National Environmental Management Act, 1998 (No 107 of 1998), in order to inform an application for a WML.

As certain Category B activities will be undertaken at the Char Manufacturing Plant Expansion, a scoping and EIA procedure will be required. The Department of Environmental Affairs (DEA) is the competent authority to administrate the application for a WML as some of the wastes are hazardous. A Waste Management Licence application has been submitted for the project. The WML application forms were submitted to the DEA on the 8th of November 2011 and accepted on the 23rd of November 2011. The DEA reference number for the project is: 12/9/11/L783/5.

Particulars of waste management activities

Table 1 details the waste management activities listed in **GNR 718** that are relevant to the Char Manufacturing Plant Expansion project.

Table 1. NEMWA listed activities at the Char Manufacturing Plant Expansion project

Government Notice	Activity No.	Listed activity	Applicability to the Char Manufacturing Plant Expansion
GN 718 of 3 July 2010	Category A (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 one time, excluding the storage of hazardous waste in lagoons.	Liquor, tar and sludge may be stored in storage tanks or areas on site.
GN 718 of 3 July 2010	Category A (18)	The construction of facilities for activities listed in Category A of this Schedule (not in isolation to associated activity).	Construction of liquor, tar and sludge storage tanks/areas and liquor destructors.
GN 718 of 3 July 2010	Category A (19)	The expansion of facilities of or changes to existing facilities for any purpose or activity, which required an amendment of an existing permit or license or a new permit or license in terms of legislation governing the release of pollution, effluent or waste.	Construction of liquor, tar and sludge storage tanks/areas and liquor destructors.
GN 718 of 3 July 2010	Category B (2)	The reuse and recycling of hazardous waste.	The sludge will be recycled for sale to Eskom by mixing it with char fines.
GN 718 of 3 July 2010	Category B (5)	The treatment of hazardous waste using any form of treatment regardless of the size or capacity of such a facility to treat such waste.	Liquor will be treated through oxidation at elevated temperature.
GN 718 of 3 July 2010	Category B (8)	The incineration of waste regardless of the capacity of such a facility.	Liquor will be oxidized at elevated temperature.
GN 718 of 3 July 2010	Category B (11)	The construction of facilities for activities listed in Category B of this Schedule.	Construction of liquor destructors.

Location of Waste Management Activities

The proposed site of the Char Manufacturing Plant Expansion Project is on a 6 ha portion of an old coal stockpile area adjacent to the existing Char Manufacturing Plant. All the waste management activities will take place at the Char Manufacturing Plant site.

Waste Types

The char manufacturing process generates three types of waste: liquor (precipitated water), tar and sludge.

Liquor

Liquor is precipitated water recovered from the char manufacturing process. Liquor contains a small amount of hydrocarbon oils and sulphur. The liquor is considered to be a hazardous waste under NEMWA. The liquor generated at the Char Manufacturing Plant Expansion project will be treated through oxidation (burning) in a liquor destructor.

Sludge and Tar

Sludge and tar are generated during the char manufacturing process from the tar sludge separator and contain various substances including: naphthalene, flourene, pyrene, polycyclic aromatic hydrocarbons, benzene and toluene. The sludge and tar are considered to be hazardous wastes under NEMWA.

The tar generated at the Char Manufacturing Plant Expansion project will be temporarily stored in a series of tanks where it will be allowed to stand for a period of time to allow the heavier sludge to settle out at the bottom. The lighter tar will be separated from the sludge and will be sold to tar customers for creosote production.

The sludge accumulates in the tar sludge separator as well as at the bottom of the tar storage tanks and will be periodically removed from the tanks. The sludge will be transferred to a mixing station where it will be recycled by mixing it with char product fines to form a dry consistency coal fuel. The sludge/char fines mix will then be transferred to the nearby Eskom Matimba Power Station as part of the coal feed for power generation.

Where further information can be obtained

Should you wish to raise objections, comments or issues of concern with regard to the waste management activities or the application submitted or wish to obtain further information on the waste activities, please submit these by 23 October 2012 to Synergistics Environmental Services at:

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Yours sincerely



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