

**HIA LETTER OF EXEMPTION
PROPOSED STORAGE AND HANDLING OF
DANGEROUS GOODS AT THE ASHGATE CHEMICAL
LOGISTICS FACILITY, AMANZIMTOTI, KWAZULU-
NATAL**

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1. INTRODUCTION

The Applicant, Reddale Trading (Pty) Ltd, proposes to store and handle dangerous goods at the Ashgate chemical logistics facility in Umbogintwini which falls within the eThekweni Metropolitan Municipality. The main activities to be undertaken on the proposed site is the storage, movement, and repackaging of chemicals in accordance with client specifications.

This letter serves as an application for exemption from undertaking a Phase 1 Heritage Impact Assessment for the proposed activity.

2. LOCATION OF THE SITE

The site is situated on the Remaining Extent of Portion 2345 of Umlazi Native Location 4676-ET on Ashgate Road. The centre point coordinates of the proposed facility is 30°01'34.72"S; 30° 53'56.08"E (**see Figures 1 and 2 below**).

The site is situated within the Umbogintwini Industrial Complex (UIC) which was selected as it is a National Key Point within a secure well developed industrial park situated 20km south of Durban. The UIC is a major chemicals hub with thirteen or more chemical companies in the immediate area of the project area. The Umbogavango Nature Reserve and Education Centre is situated immediately east of the proposed facility.

The proposed storage and handling of dangerous goods will take place within an area that will exceed 0.5 hectares therefore the activity triggers section 38 (1) (c) (i) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) that refers to developments or any other activity which will change the character of a site that exceeds 5 000 m² in extent.

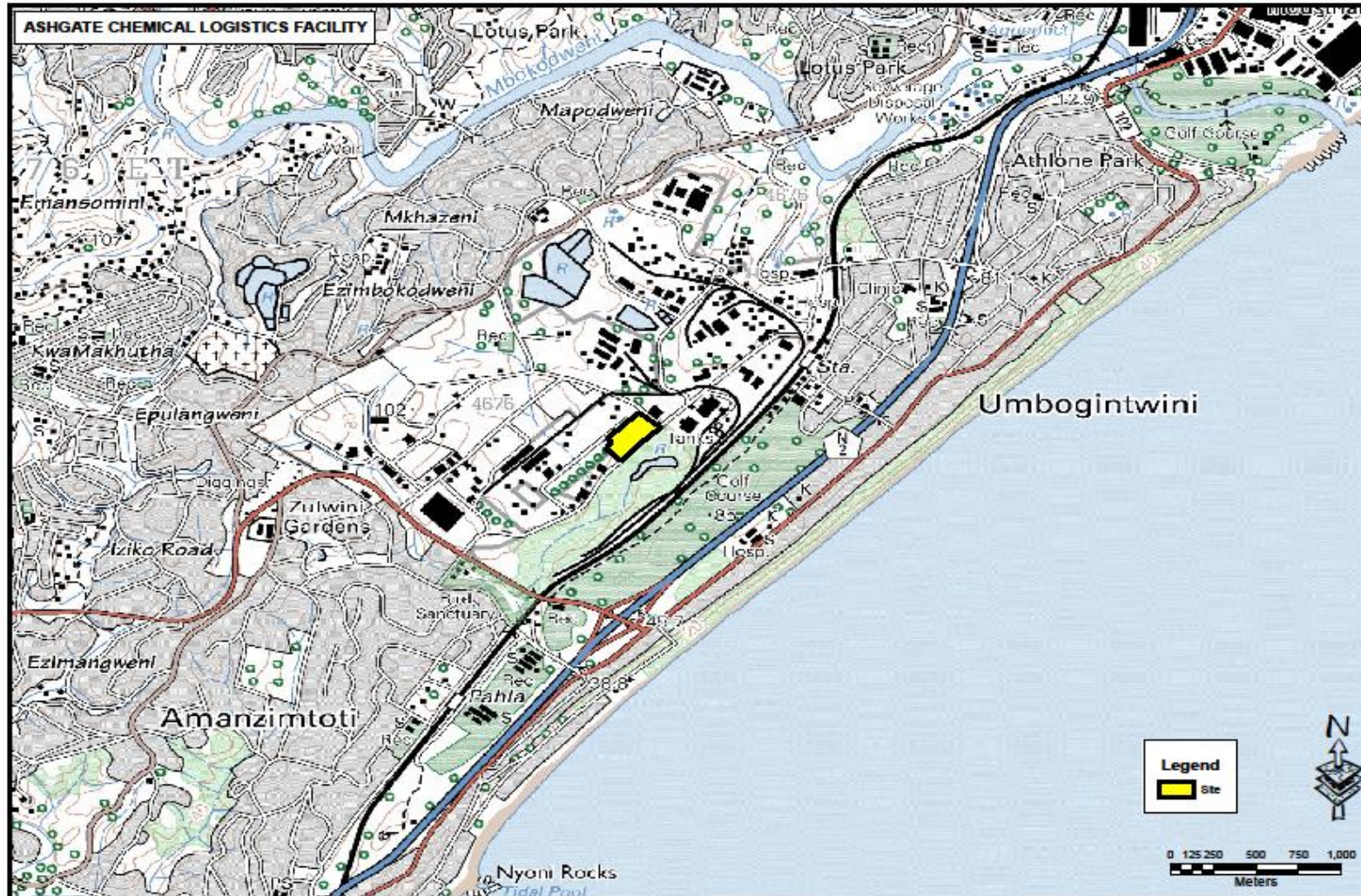


Figure 1: Location of Ashgate chemical logistics facility outlined in yellow



Figure 2: Google Earth image of site of facility outlined in red

3. SITE INSPECTION OF PROJECT SITE

A site inspection was undertaken on 19 August 2016. Currently, the existing buildings on the site are being demolished in terms of a demolition permit which was issued by the Development Planning Department of the eThekweni Municipality dated 28 June 2016. Therefore the site where the storage and packaging of the dangerous goods is proposed will be situated within a building that will be constructed on the demolished site.

4. HISTORICAL BACKGROUND

The UIC celebrated its centenary in 2008 according to the UIC's 2012 Safety, Health and Environmental (SHE) report (UIC 2012:7). According to the report, the current activities undertaken on the site are vastly different to those of 1907 when Kynoch commenced its operation at the site, producing explosives for the coal and gold mining industries in Northern Natal and the Reef, until 1924. During this time Kynoch merged with explosives manufacturers, De Beers of Somerset West and Nobel of Modderfontein, to form African Explosives and Industries Limited. In 1924 the company moved its explosives manufacturing activities to Modderfontein and the Umbogintwini factory, using the sulphuric acid it produced on site, focused on the manufacture of fertilizer, which it continued to produce under the Kynoch label into the 1980s.

During the Second World War (UIC:7), the site served as a naval ammunitions depot, and five very large explosives magazines are still standing today, three in the conservation areas, and two in operational areas where they are used as storage facilities. It is unclear where these explosive magazines/storage facilities are in relation to the project site.

As the upper South Coast developed, AECL employees began moving into surrounding private residential areas, and the village and its facilities gradually fell into disuse. For the first time the houses were leased to non-employees. By 2004 a very large percentage of the village tenants had no connection with the site. With the development of eZimbokodweni and Orient Park, the eKhutuleni hostel and compound too became redundant, and in the 1990s, the eKhutuleni area and part of the compound was developed into a small business area for emerging businesses. The complex currently has 13 major operating companies, 12 of which manufacture a variety of chemical products, human and animal food products and textiles as well as a number of smaller tenants who offer a range of services and products to on- and off- site customers. These include

engineering, mechanical and coating services, warehousing and distribution of food- based products, as well as occupational health services and SHE training.

The above indicates that some structures in the complex are older than 60 years but that over time there have been significant changes within the UIC with companies coming and going from the complex. This indicates that the area has undergone and continues to undergo a constant process of buildings changing ownership with some buildings been demolished, altered or upgraded in order to meet the needs of companies moving into the UIC.

5. MOTIVATION FOR EXEMPTION APPLICATION

The site where the storage and handling of dangerous goods is proposed will be an area with buildings. Much of the site has previously and in future will be taken up by buildings (warehouses, etc.) (**Figures 3 and 4 below**) with a few undeveloped areas that are found along the boundary of the site.

The area on the southern boundary of the site has several structures that appear to be associated with the water treatment works in the larger area and although old, are not regarded as having heritage significance (**see Figures 5 and 6 below**).



Figure 3: Project site looking southwards



Figure 4: Project site looking northwards

In the south-western corner of this area, a low concreted structure with iron railings over it is situated in a fenced off area. It is unclear what the structure was or is used for and why it is fenced off. The structure was thickly overgrown with vegetation making visibility poor (see **Figure 7**).

The area on the eastern boundary of the site is undisturbed as there are no structures in this area apart from a stormwater drain and pipeline.



Figure 5: Structure possibly related to water treatment plant



Figure 6: Old water or sewerage pipeline



Figure 7: Enclosed cement structure overgrown with vegetation

In terms of the SAHRIS fossil sensitivity map (see **Figure 8** below), the area where the proposed facility is to be constructed is situated in an area where the fossil sensitivity is described as high (orange/yellow) that requires a desktop study and possibly a field assessment.

However, it is anticipated that due to the highly disturbed nature of the area, there will be no intact fossils left that could be impacted on therefore it is recommended that no further studies are required for the project area.

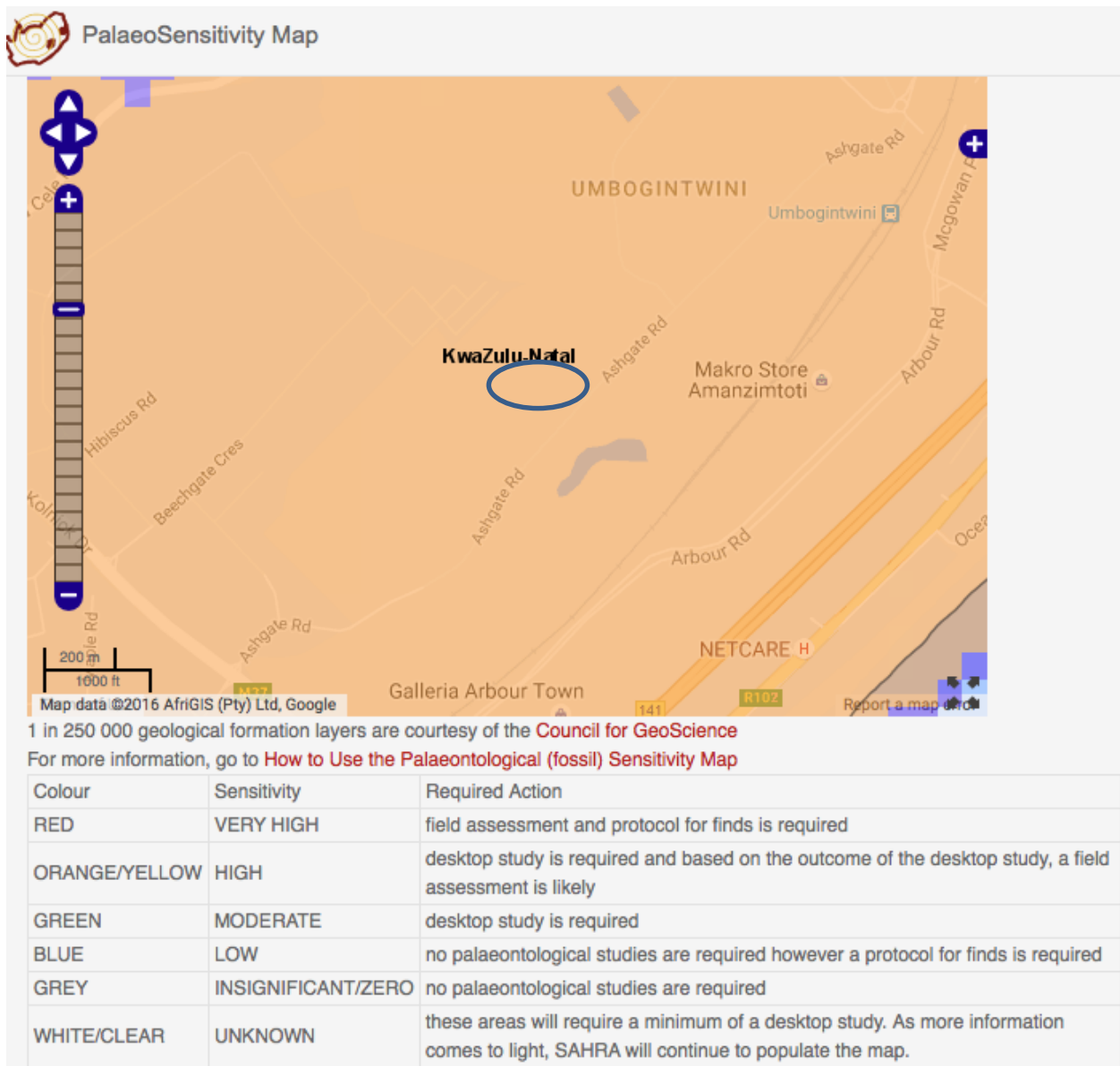


Figure 8: Fossil sensitivity of project area indicated with blue outline

6. RECOMMENDATION

Due to the highly disturbed nature of the project site, no heritage resources are expected to be impacted by the proposed storage and handling of dangerous goods, therefore it is recommended that an exemption from undertaking a Phase 1 HIA is granted to the Applicant for this project.

References

Heartland Services. 2012. *Scope and purpose of Umbogintwini Industrial Complex Safety, Health and Environmental Report*. Umbogintwini Industrial Association (www.aeci.co.za/pdf/sustainability/scope_and_purpose.PDF)

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