PROPOSED E/F SLAB EXPANSION, PORT OF RICHARDS BAY
Revised Final Stakeholder Engagement Report

September 2013

Public

Revised: 2015/09/30
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1. Description of the stakeholder engagement process

The stakeholder engagement process was undertaken in accordance with the provisions of GN: R543, Chapter 6 of the 2010 NEMA EIA Regulations. The process ensured that the widest range of potential stakeholders were identified and provided with an opportunity to review the details of the proposed project and submit any issues and concerns. The following was undertaken:

1.1. Advertising

In accordance with the 2010 NEMA EIA Regulations, advertisements were placed in the Umlozi Wezindaba (Zulu) and the Zululand Observer (English) on the 30th of January and 2nd of February 2012, respectively. The advert gave notice in terms of the EIA Regulations for the proposed project and requested stakeholders to register their interest in the project with WSP Environmental (WSP).

![Figure 1: Proof of newspaper advertisement published in the Umlozi Wezindaba on the 2nd of February 2012.](image1)

![Figure 2: Proof of newspaper advertisement published in the Zululand Observer on the 30th of January 2012.](image2)

1.2. Public Notices

Posters conforming to the size specifications of the 2010 NEMA EIA Regulations were placed in English and Zulu at the following destinations as illustrated below. These posters were placed on the 30th of January 2012.
Figure 3: English poster placed at the entrance to the proposed site.

Figure 4: Zulu poster placed across the road from the site entrance.

Figure 5: English and Zulu posters placed at the East Gate of the Port.

Figure 6: English and Zulu posters placed at the Transnet offices within the Port (uMhlatuze Building - foyer).

Figure 7: Zulu poster placed at the West Gate of the Port.

Figure 8: English poster placed at the West Gate of the Port.
1.3. Flyer Distribution
Flyers (English and Zulu) were placed at the Transnet offices within the Port (uMhlathuze building). These flyers included a brief description of the project and the environmental authorisation process, as well as contact details of the Environmental Assessment Practitioner (EAP).

1.4. Written Notices
Written notices (Figure 10) were distributed via email to landowners and occupiers of land adjacent to the proposed site on the 31st of January 2012. Additional written notices were distributed via email to the District and Local Municipalities, the local Ward Councillor and the uMhlathuze Ratepayers & Residents Association.

1.5. Background Information Document
A Background Information Document was distributed to stakeholders on the 13th of February 2012, providing further information on the project and the environmental authorization process and inviting stakeholders to register their interest in the project and submit queries / comments.
Dear Stakeholder

Notice is given in terms of Section 24 of the National Environmental Management Act, (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2010 (GN: R544, R545, and R546), of the intent to submit a Basic Assessment application to the KwaZulu-Natal Department of Agriculture, Environmental Affairs and Rural Development (DAEARD) in terms of GN R544, for the following activity:

**Proposed E/F Slab Expansion, Port of Richards Bay**

Transnet Port Terminals proposes to expand the storage and throughput capacity of their dry bulk cargo terminal within the Port of Richards Bay. This expansion comprises the construction of an open storage slab immediately south of the existing C and D slabs. The environmental assessment process will include an amendment to the existing Air Emissions License.

**Stakeholder Engagement:**

WSP Environmental (Pty) Ltd (WSP) has been appointed as the independent environmental assessment practitioner to facilitate stakeholder engagement and undertake the EIA process for the above activity in accordance with the EIA Regulations.

To receive further information on the project and to participate in the process, please submit your details to the contact person below.

Regards,

Kelly Taylor
Assistant Consultant

WSP Environmental (Pty) Ltd
Tel: (031) 240 8876
Fac: (031) 240 8861
Email: kelly.taylor@wsgroup.co.za

---

Figure 9: Written Notice distributed to surrounding landowners and occupiers
PROPOSED E/F SLAB EXPANSION,
PORT OF RICHARDS BAY
13 February 2012
BACKGROUND INFORMATION DOCUMENT (BID)

Purpose of this Document

This Background Information Document (BID) provides an introduction to the environmental authorisation process for the proposed expansion of the E/F Slab within the Port of Richards Bay.

The BID provides a description of the project, the environmental authorisation process to be followed, the role of stakeholders in the process, and details for registration as a stakeholder.

Project Overview

Transnet Port Terminals proposes to expand the storage and throughput capacity of their dry bulk cargo terminal within the Port of Richards Bay. The proposed slab is situated within the confines of the Richards Bay harbour operations, located approximately 3km South-west of the Richards Bay City Centre. This expansion comprises the construction of an open storage slab immediately south of the existing C and D slabs (Refer to Figure 1). The environmental assessment process will include an amendment to the existing Air Emissions Licences.

The proposed slab will be used for the storage of dry bulk cargo such as chrome, magnetite and coal, and will be suitably engineered with the use of G-blocks, or similar material, underlain by an impermeable membrane. Associated infrastructure includes a stormwater management system, dust suppression mechanisms, high mast lighting and conveyors.

Legal framework

The environmental authorisation process will be undertaken in compliance with the following legal requirements:


- Activities listed in GN: R544 and R546 require a Basic Assessment process to be undertaken, while activities listed in GN: R545 are subject to a full Scoping and EIA process.

The following have been identified as relevant listed activities:

- GN: R544

(16) The proposed slab will be larger than 50 square meters (20 000m²) and will increase the harbour capacity throughput capacity.

(28) The proposed open stockpiles are likely to be used for the storage of coal and/or ore (e.g. magnetite (ferrous-ferric oxide) and ferrochrome). Therefore an amendment to the Air Emissions License (AEL) is will to be required, with regards to the additional emissions from the stockpiles (in terms of Section 5 of the GN: R248, Subsection 5.1 – Storage and handling of ore and coal).

The project is therefore subject to the Basic (environmental) Assessment process.

Who is a stakeholder?

Any person, group of persons or organisation interested and/or affected by the proposed development.

Register your interest by completing the Registration and Comments Form attached to this document and send it to WSP.

WSP Environment and Energy (WSP) has been appointed by the project applicant as the independent environmental assessment practitioner to undertake the Environmental Impact Assessment and required permitting application for the project and to facilitate stakeholder engagement.

To become a registered stakeholder please forward your contact details on the attached response sheet to the below WSP contact person. The BID is for information purposes only, but should anyone wish to comment please do so by 27 February 2012.

Consultant: Kelly Taylor
Company: WSP Environment and Energy
Address: P.O. Box 1442, Westville, 3539
Tel: (031) 240 6876
Fax: (031) 240 8861
Email: kelly.taylor@wspgroup.co.za
BACKGROUND INFORMATION DOCUMENT
Proposed E/F Slab Expansion, Port of Richards Bay

Environmental Authorization process
In order for the project to proceed, it will require Environmental Authorisation from the KwaZulu-Natal Department of Agriculture, Environmental Affairs and Rural Development (DAEARD). The Basic Assessment process includes all the environmental impact assessment aspects required by the NEMA, but in a way that facilitates a concise process. The procedure involves the consideration, investigation, assessment and reporting of the proposed project in order to identify the impacts the proposed development may have on the environment. The following process will be followed:

- **Identification of Issues:** Environmental issues, concerns, and development constraints will be evaluated using professional judgement, project information, experience of similar projects, a review of available literature, site visits and consultation with authorities and the public.

- **Evaluation of Potential Alternatives:** Reasonable alternatives will be identified and evaluated. Alternatives may consist of alternative positioning of the infrastructure, design and construction process, as well as the 'no-go' option.

- **Evaluation of Impacts:** The significance of environmental issues will be evaluated in terms of potential impacts, their expected extent, intensity, duration and probability of occurrence. The undertaking of Specialist Studies, where necessary and in accordance with Regulation 33 of the EIA Regulations 2010, will also occur to achieve this end.

Mitigation and Management Measures: Measures to manage and minimise impacts to acceptable levels and maximise the benefits associated with project, will be identified and recorded in the Basic Assessment (BA) report.

Authority Decision: The BA Report will be submitted to the DAEARD and the information therein used to make a decision regarding the proposed project.

Stakeholder engagement process
- The purpose of stakeholder engagement is to consult with interested and affected parties in the public and private sectors to ensure inclusion in the decision-making process. The process aims to develop and maintain open channels of communication between the project team and stakeholders.
- Stakeholders are invited to participate in the environmental authorisation process by commenting on the project, asking questions and raising issues that will be included in the project documents. The environmental assessment practitioner (WSP) will document the views and concerns of stakeholders, and make the project team and relevant authority aware of issues that need to be considered during the compilation and evaluation of the potential risks and impacts associated with the project.

What does the Public Participation Process consist of?
**Notification of Project**
The first step is to notify the public through the following mediums:
- Newspaper advertisements;
- Site notices;
- Written notification letters to surrounding landowners, municipal ward councillors and other key stakeholders; and
- Distribution of the BID to surrounding landowners and registered stakeholders.

**Stakeholder Comments and Basic Assessment Report Review**
All comments received in response to the project will be recorded so that they can be addressed in an Issues Trail and Response Report.

Once the Draft BA report has been completed, it will be made available for public review for 60 days. WSP will notify all registered stakeholders of the location of the documents for review and date of the public review period for the BA report.

The Final Basic Assessment Report will be updated after the public review period to include all additional comments made by the public and will then be submitted to the DAEARD for decision making. Registered stakeholders will be notified, in writing, of the decision made by the Department.

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*Project number: 27959*
*Dated: 2012/09/05*
*Revised: 2012/11/12*
BACKGROUND INFORMATION DOCUMENT
Proposed E/F Slab Expansion, Port of Richards Bay

Registration and Comments Sheet

To be a registered stakeholder and ensure all comments and queries regarding this project are accurately documented and addressed, please forward your comments and contact details with the attached response sheet to:

Kelly Taylor
WSP Environmental (Pty) Ltd
Address: P.O. Box 1442, Westville, 3630
Tel: (031) 249 8876
Fax: (031) 240 8861
Email: Kelly.taylor@wspgroup.co.za

Please insert your personal details below:

Name: 
Organisation & Designation: 
Address: 
Tel: 
Fax: 
E-mail: 

Please list your interest in the project and comments below:


Do you require any additional information?

Other parties which you think should be included in the process:

WSP
Figure 1. Project Locality (SA Topographical Maps, 2832CC, 1997).
1.6. Comments and Responses

Comments on the BID were received from:

- WESSA, and
- RBCAA.

All comments received and responses by the EAP are presented Table 1 below.

Table 1: BID Comment and Response Report

<table>
<thead>
<tr>
<th>No</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Carolyn Schwegman (WESSA) – Letters dated 21 February 2012</strong></td>
<td><strong>1.1</strong> The issues of interest to WESSA and Coastwatch relate to contamination of the environment by stored substances (i.e. chrome, manganite and coal) and we would like to receive detail on the stormwater management system and dust suppression mechanisms in particular. Potential impacts relating to contamination by stored substances have been assessed as part of the BAR. A stormwater management plan has been prepared and is included in Appendix D of the BAR. Details of proposed dust suppression mechanisms are given in the project description of the BAR.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>1.2</strong> Is the RoD amendment for the C/D Slab in anyway linked to the expansion of slab E/F? The storage areas appear to be in the same locality and we trust that the Dry Bulk Terminal Area is being looked at in its entirety in terms of potential contamination and the cumulative impacts thereof. Issues of interest relate to the stormwater management systems and final disposal of stormwater. The amendment of the environmental authorisation for the C/D Slab is not linked to the E/F slab expansion, although they will serve a similar purpose within the Richards Bay Terminal (RBT). WSP is currently undertaking a cumulative air quality study of the RBT. The storm water systems will be managed separately. A stormwater management plan has been prepared and is included in Appendix D of the BAR.</td>
</tr>
<tr>
<td>2</td>
<td><strong>Sandy Camminga (RBCAA) – Letter dated 5 March 2012</strong></td>
<td><strong>2.1</strong> An Air Quality Specialist Study must be undertaken. An Air Quality assessment is being undertaken for the E/F slab expansion, and will be included in the draft Basic Assessment Report.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>2.2</strong> The RBCAA must be afforded the opportunity to review and comment on the draft Terms of Reference for the Air Quality Study. The terms of reference for the Air Quality Study were finalised and agreed to in advance of the commencement of this environmental assessment process, and public scrutiny of these documents is not required to be part of this process in terms of current legislation. The air quality specialist report will be included into the draft basic assessment report, which will be made available to stakeholders for review. It must be noted, however, that that the terminal has recently received an Atmospheric Emissions License (in accordance with the National Environmental Management: Air Quality Act), and is WSP is currently undertaking a cumulative model for the terminal as a whole. This will provide a strong background for the E/F</td>
</tr>
<tr>
<td></td>
<td>slab specialist assessment.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>----------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>2.3</strong></td>
<td>The Dispersion Modelling for the Air Quality Study should not be undertaken in-house, as this is a clear conflict of interest.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The air quality specialists remain independent of the client, TPT, and therefore WSP does not consider this as a conflict of interest.</td>
<td></td>
</tr>
<tr>
<td><strong>2.4</strong></td>
<td>The use of the Hawk Model for dispersion modelling is strongly recommended.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>WSP have adopted ADMS v4.2 it handles area sources better than most other steady state models and does not require extensive amounts of prognostic data to produce an accurate result.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Hawk model is not widely used internationally and appears to have been replaced by proprietary models even in South Africa. It is also not readily available to other consultants.</td>
<td></td>
</tr>
</tbody>
</table>
Dear Kelly

**BID Transnet Expansion, R Bay: Dry Bulk Terminal Slab E/F**

Thank you for the information which describes expanding the dry bulk terminal where bulk cargo such as chrome, manganite (magnetite ?) and coal are stored. The issues of interest to WESSA and Coastwatch relate to contamination of the environment by these substances and we would like to receive detail on the stormwater management system and dust suppression mechanisms in particular.

Regards

Carolyn Schwegman  
EIA Co-ordinator, WESSA KZN

---

**WESSA**  
**COASTWATCH**

Tel: Tel: 039 9752147 / 083 9814814  
Fax: 039 975 2147 (on request)  
email: afromatz@telkomsa.net  
Post: P O Box 343, Pennington, 4184

**ADD YOUR VOICE TO CONSERVATION. SEND A R20 SMS TO 40706 WITH THE KEYWORD 'WESSA'**  
Terms and conditions apply. See [www.thumbtribe.co.za](http://www.thumbtribe.co.za)

**PLEASE consider the environment before printing this email.**

This email message, and any attached files, are confidential and may contain privileged information. Any views expressed in this message are those of the sender, except where the sender specifically states them to be the view of WESSA. In the interests of effective and appropriate communication, anyone who is not an addressee of this email, may not copy, disclose, distribute or otherwise use it, or any part of it, in any form whatsoever. Furthermore, no-one may further distribute this email, or any part of it, without permission of the author. If you are not the intended recipient, please notify the sender immediately or by return email, and then delete this email.

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**Figure 10: WESSA Comment on the BID: Page 1**
Hi Kelly

BID 1) Transnet Terminals - Expansion E/F Slab; 2) BID RoD Amendment

My recent email with respect to Transnet expansion of Slab E/F refers. Is the RoD amendment - see attached comment on the BID sent to your colleague - in any way linked to the expansion of slab E/F? The storage areas appear to be in the same locality and we trust that the Dry Bulk Terminal Area is being looked at in its entirety in terms of potential contamination and the cumulative impacts thereof. Issues of interest are, for example, while the stormwater management system for each site may be acceptable, and may be linked to the system on the adjacent site, where is the stormwater finally disposed of?

Regards

Carolyn Schwegen
EIA Co-ordinator, WESSA KZN

Figure 11: WESSA Comment on the BID: Page 2
Dear Kelly,

COMMENT ON: BACKGROUND INFORMATION DOCUMENT: PROPOSED E/F SLAB EXPANSION, PORT OF RICHARDS BAY

Please accept our sincere apology for the late submission. We hope that it’s not too late for our comments to be considered.

The Richards Bay Clean Air Association (RBCAA) has reviewed the Background Information Document (BID), and herewith our comment:

1. An Air Quality Specialist Study to be undertaken.
2. The RBCAA to be afforded the opportunity to review and comment on the draft Terms of Reference for the Air Quality Study.
3. The Dispersion Modelling for the Air Quality Study should not to be undertaken in-house, as this is a clear conflict of interest.
4. The use of the Hawk Model for dispersion modelling is strongly recommended.

Thank you.

Kind Regards

Sandy Camminga

Richards Bay Clean Air Association
Phone: +27 (31) 786 9076
Mobile: +27 (81) 515 2384
Fax: +27 (31) 907 5340
E-mail: camminga@iafrica.com

Figure 12: RBCAA Comment on the BID
2. Stakeholder Database

Stakeholders with an interest in the project were identified at the project outset, and continue to be identified throughout the basic assessment process. Specific attention was paid to local community organizations, government departments, non-governmental organisations (NGO's) and other active organisations in the area. The stakeholder database contains the details of known stakeholders, together with those persons who registered as a result of the notification process. **Table 2** provides the name, organisation and position or division of the stakeholders listed on the database.

**Table 2: Stakeholder Database**

<table>
<thead>
<tr>
<th>Authority Departments: National</th>
<th>Organisation</th>
<th>Division / Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Strinivasen Govender</td>
<td>Department of Water Affairs</td>
<td></td>
</tr>
<tr>
<td>Ms. Colleen Moonsamy</td>
<td>Department of Water Affairs</td>
<td></td>
</tr>
<tr>
<td>Mr Chris Hlabisa</td>
<td>Department of Transport</td>
<td>Head: Transport</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Authority Departments: Provincial</th>
<th>Organisation</th>
<th>Division / Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ms Zama Mbanjwa</td>
<td>DAEA North Region</td>
<td></td>
</tr>
<tr>
<td>Jenny Longmore</td>
<td>Ezemvelo KZN Wildlife</td>
<td>Coordinator IEM</td>
</tr>
<tr>
<td>Ms Sbongile Nyembe</td>
<td>Ezemvelo KZN Wildlife</td>
<td>IEM Technician</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Authority Departments: District and Local</th>
<th>Organisation</th>
<th>Division / Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Hennie Smit</td>
<td>UThungulu District Municipality</td>
<td></td>
</tr>
<tr>
<td>Ms Nkosingiphile Khuluse</td>
<td>UThungulu District Municipality</td>
<td></td>
</tr>
<tr>
<td>Sharin Govender</td>
<td>Mhlathuze Municipality</td>
<td>Projects Manager: Environment Planning</td>
</tr>
<tr>
<td>C.M. Mathenjwa</td>
<td>RB Municipality: Environmental Health</td>
<td></td>
</tr>
<tr>
<td>Tokoloho Masilo</td>
<td>Dept. of Planning and Sustainability - City of UMHlathuze</td>
<td></td>
</tr>
<tr>
<td>Xolile Makhoba</td>
<td>Mhlathuze Municipality - Environmental Services - Water Department</td>
<td></td>
</tr>
<tr>
<td>Ms Liz Wood</td>
<td>City of UMHlathuze</td>
<td>Secretary of Ward 2, Ward Committee</td>
</tr>
<tr>
<td>Cllr A. Viljoen</td>
<td>City of UMHlathuze</td>
<td>Ward 2 Councillor</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Surrounding Landowners</th>
<th>Organisation</th>
<th>Division / Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Neal Naidoo</td>
<td>Transnet National Ports Authority</td>
<td></td>
</tr>
<tr>
<td>Mr Vuyo Keswa</td>
<td>Transnet National Ports Authority</td>
<td></td>
</tr>
<tr>
<td>Mr Cobie Snyman</td>
<td>Transnet National Ports Authority</td>
<td></td>
</tr>
<tr>
<td>Ms Martha Ntombela</td>
<td>Transnet National Ports Authority</td>
<td></td>
</tr>
<tr>
<td>Mrs Marie Dreyer</td>
<td>Mission to Seafarers</td>
<td>Manager</td>
</tr>
<tr>
<td>Wendy Muller</td>
<td>BHP Billiton</td>
<td>BHP: SHEQ Manager</td>
</tr>
<tr>
<td>Tessa Stoltz</td>
<td>BHP Billiton</td>
<td>BHP: Environment Superintendent</td>
</tr>
<tr>
<td>Rhona Koogje</td>
<td>SRMT</td>
<td>SRMT: SHEQ Superintendent</td>
</tr>
<tr>
<td>Name</td>
<td>Organisation</td>
<td>Division / Position</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>Anthony Majola</td>
<td>Sasol Nitro</td>
<td>Sasol Nitro : SHEQ Officer</td>
</tr>
<tr>
<td>Muhammad Ali</td>
<td>Foskor</td>
<td></td>
</tr>
<tr>
<td>Carolyn Schwegman</td>
<td>WESSA</td>
<td>WESSA EIA co-ordinator (KZN)</td>
</tr>
<tr>
<td>Mrs Sandy Camminga</td>
<td>Richards Bay Clean Air Association (RBCAA)</td>
<td>Public Officer</td>
</tr>
<tr>
<td>Mrs Sandy Camminga</td>
<td>UMhlabhuze Ratepayers &amp; Residents Association (URRA)</td>
<td>Public Officer</td>
</tr>
<tr>
<td>Thandela Mabusa</td>
<td>Private</td>
<td></td>
</tr>
</tbody>
</table>
3. Draft Report

3.1. Distribution

The Draft Basic Assessment Report was made accessible for stakeholder comment at:

- **Richards Bay Library** (Krugerrand Street, Arboretum, Richards Bay)
- **www.wspenvironmental.com/publicreview**

As legislated in NEMA, the report was made available for a public and authority comment for a period of 30 days. Hard copies of the Draft Basic Assessment report and Environmental Management Programme (EMP) were made available to key stakeholders (authorities) for comment. Public stakeholders identified in Table 2 were informed of the availability of reports. Authorities and key stakeholders who received hard copies of the draft BAR are listed below in **Table 3**.

**Table 3: Draft BAR Distribution List**

<table>
<thead>
<tr>
<th>Name</th>
<th>Company / Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Muzi Mdamba</td>
<td>Department of Agriculture and Environmental Affairs (DAEA) North Region - uThungulu District Office</td>
</tr>
<tr>
<td>Mr Robert Lindsay</td>
<td>KZN Department of Transport</td>
</tr>
<tr>
<td>Mr Strinivasen Govender</td>
<td>Department of Water Affairs</td>
</tr>
<tr>
<td>Ms Nkosingiphile Khuluse</td>
<td>UThungulu District Municipality</td>
</tr>
<tr>
<td>Ms Sharin Govender</td>
<td>UMhlathuze Municipality</td>
</tr>
<tr>
<td>Ms Liz Scates</td>
<td>City of UMhlathuze</td>
</tr>
<tr>
<td>Mr Dominic Wieners</td>
<td>Ezemvelo KZN Wildlife - Coordinator IEM</td>
</tr>
<tr>
<td>Mrs Carolyn Schwegman</td>
<td>WESSA EIA Co-ordinator (KZN)</td>
</tr>
<tr>
<td>Mr Neal Naidoo</td>
<td>Transnet National Ports Authority</td>
</tr>
</tbody>
</table>

3.2. Comments and Responses

Comments on the Draft BAR were received from the following stakeholders:

- Ward Councilor’s Offices,
- RBCAA,
- uThungulu District Municipality,
- WESSA,
- Coastwatch, and
- DAEA.

All comments received and responses by the EAP are presented in the Comment and Response Report (Table 4).
<table>
<thead>
<tr>
<th>No.</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
</table>
| 1.  | Liz Scates (Ward Councillor’s Office, City of UMhlathuze) – Letter dated 10 October 2012 | a) The health side of the report is virtually non-existent and with the proposed commodities to be stockpiled thereon, both in their dry and wet condition, needs elaboration. Attention to the magnetite in particular.  
b) The windage in that particular area in the Harbour can be vicious at times and the dust factor can be very high.  
c) With the shortage of fresh water looming are we to understand that this will not be problematic and that Transnet will be looking at recycled water?  
d) There will be enormous run offs of water and contaminants, especially during the very dry windy and the wet rainy season. I am not 100% satisfied that this will be sufficiently bunded. Dubious housekeeping has been noticed over the past 25 years. |
| 1.1 |                                                                           | a) AQIA results have been compared with National Ambient Air Quality Standards (NAAQS), which take into account the health risks associated with particulate matter. TPT undertakes personalized monitoring annually, gauging employee exposure to silica. Magnetite, not being a hazardous material, will be considered under the general occupational health monitoring. Further, occupational hygiene surveys (incorporating particulate matter exposure) are undertaken annually, over and above the legislated biennial requirement for these surveys.  
b) Agreed: incorporated in the meteorological data used for modelling.  
c) Recycled water will not be used during the operational phase of the project.  
d) The Stormwater Management Plan has recommended the installation of an impervious edge restraint in the form of a berm, or if required, a wall to prevent materials stored on the slab from spilling over into clean water channels. Please refer to Section 4 of the Stormwater Management Plan. |
| 2.  | Sandy Camminga (RBCAA) – Letter dated 2 November 2012                    |                                                                                                                                           |
| 2.1 |                                                                           | a) While the BID made reference to the DBAR being available for a 60 day comment period, this was erroneously inserted into the BID and WSP apologises for the error. As the project is not subject to a waste management licence, the legislated period for public comments is 30 days, and not 60. As legislated, a comment period of 40 days was allowed for authorities to submit comments, and 30 days were given to all other stakeholders.  
b) There are no requirements for the Terms of Reference for specialist studies to be subject to review by Interested and Affected Parties.  
c) Public or stakeholder meetings were not deemed necessary due to the limited interest in the project. WSP did not receive any requests for a public or stakeholder meetings during the course of the EIA process.  
d) RBCAA were engaged with during the EIA process, within which the AQIA was conducted. The AQIA was made available for public comment. |
<p>| 2.2 | Authority Participation:                                                 | a) It should be noted that all stakeholders were given opportunity to submit comments following advertisement of the project, distribution of |</p>
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|  | a) Refer 31 of 162; It is noted with concern that no comments have been received from authorities.  
Can the PP process been considered effective if there are no comments from authorities?  
b) In view of the above (2.1 and 2.2), we do not believe that appropriate measures have been taken to ensure adequate public participation. | written notices and the BID and availability of the DBAR. Email reminders for the submission of comments were sent to all stakeholders (1 and 8 November 2012). Adequate provision has been made for authorities to comment. As per the Public Participation Guideline Document published 10 October 2012, if a state department fails to comment on a report within 40 days it will be regarded that this department will not be providing comments.  
b) While the necessary stakeholder engagement was undertaken, it is our experience that the majority of comments arise after stakeholders are given an opportunity to study the DBAR, and not necessarily after distribution of the BID. As a number of comments have been received following availability of the DBAR, we would consider the process to be effective. |
| 2.3 | Stakeholder Database:  
a) There is no one on the list from the uMhlathuze Municipality, Air Quality Management.  
b) The following Stakeholders do not appear on the IAP list: Grindrod, CTC, Mondi Silvacel, Richards Bay IDZ. All are situated in close proximity to the TPT, and should be informed of the proposed development.  
c) Please provide details of the Assessing Officer. | a) Sharin Govender of uMhlathuze Municipality was included as a key stakeholder in the project, and distributed the documentation to those departments deemed appropriate. In addition, representatives of the Environmental Health, Water and Planning and Sustainability Departments were included as stakeholders.  
b) During the stakeholder engagement process, surrounding landowners were notified of the project via written notice and given an opportunity to register as stakeholders. In addition, advertisements were placed in local newspapers and posters were placed at the site and within the harbour (including the harbour entrances). These notices included WSP’s contact details and provided the opportunity to register as a stakeholder. All those who responded were included in our stakeholder database. The stakeholders mentioned in this comment did not express interest in the project.  
c) Details of the assessing officer have been included in Section 6 of the Stakeholder Engagement Report, and have been provided to RBCAA via email (29 November 2012). |
| 2.4 | Acknowledgements:  
a) RBCAA data and information has been used with no acknowledgement. | a) Stated in Section 5.4, but a formal Acknowledgement has now been included in the report. |
| 2.5 | Corrections:  
a) Refer Air Quality Impact Assessment Report; Page 15 of 29 – The RBCAA network comprises 6 SO2 Monitoring stations (not 5), 9 meteorological stations (not 8), 4 PM10 stations (not 2), and a TRS monitoring station. | a) The number of stations was taken from the RBCAA map on their website. WSP assumed this to be correct; other stations must therefore be unmapped or beyond the extent of the current RBCAA map. |
| 2.6 | Draft BAR:  
a) Refer page 19 of 162; In the list of legislation, policies and guidelines there | a) The relevant legislation has been included in the Final BAR.  
b) The Stormwater Management Plan recommends that the stormwater |
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<td>are some guideline documents which are not mentioned:</td>
<td>flow is sampled and tested in a first flush system in order to understand the water quality before discharge to the environment. Should leachable concentrations be elevated, this water will have to be contained or treated. In terms of hazardous waste storage from sweepings of the chrome ore, this will be stored in colour coded 6 cubic meter skips before disposal at an approved waste disposal facility. Cumulative amounts will not exceed 35 cubic metres at any one time.</td>
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<td>- SANS1929:2005 dust deposition</td>
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<td>- GN 704</td>
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<td>- DWA Best Practice Guidelines G1: stormwater management</td>
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<td>b) Refer page 20 of 162; The report states that no part of the solid</td>
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<td>waste is classified as hazardous. Chrome ore will be stored on this slab,</td>
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<td>so are we to understand that there will be no hazardous waste generated</td>
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<td>during the operational phase, despite the hazardous nature of the</td>
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<td>materials being stored?</td>
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<td>2.7</td>
<td>Stormwater Management:</td>
<td>a) The use of an edge restraint is recommended regardless. This can take the form of a berm or wall. The word “warranted” refers to the use of a wall, only needed if the stockpiles are high enough to require this measure to prevent materials spilling from the site.</td>
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<td>a) The Stormwater Management Plan states that an impervious edge</td>
<td>b) Should the runoff be contaminated, this may require treatment to improve the quality to discharge guidelines. This is dependent on where the water will be discharged (stormwater or effluent system) and the site specific limits set for this discharge. The recommendation within the report regarding water quality sampling holds in terms of determining the dissolved load in surface water runoff.</td>
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<td>restraint will be put in place “should the stockpiles warrant this”.</td>
<td>c) The conveyors are expected to be covered, hence limited dissolved phase contamination is expected. Since the conveyors will transport material stored on the site, any contamination arising from them will not differ from that originating at the slab and will be managed with the slab stormwater system.</td>
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<td>What other methods of preventing contaminated stormwater runoff will</td>
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<td>be put in place if the impervious edge is not “warranted”</td>
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<td>b) How will contaminated stormwater runoff be dealt with? Where will</td>
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<td>it go to?</td>
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<td>c) Has contamination from conveyors been considered? This does not</td>
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<td>appear to have been considered in the report.</td>
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<td>2.8</td>
<td>Draft Environmental Management Program (AQMP):</td>
<td>a) No mitigation used in model or accounted for, therefore no factor was applied to chute loading. i.e. a worst-case scenario was modelled.</td>
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<td>Refer page 26; Key mitigation measures stipulated in the AQMP include;</td>
<td>b) TPT manages its stockpiles to a height of 3m on average. Cargo stockpiling is transient (caused only when vessels are delayed and should stockpile height exceed the height of partition blocks, all dust mitigation measures will be employed, including the use of sprinklers and tarpaulins. TPT, in terms of current stockpile height management, remains within the limits set out by its Atmospheric Emission License.</td>
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<td>a) “Operation of dust-free loading chutes during vessel loading” – The</td>
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<td>RBCAA wishes to place on record that based on observations, and reports,</td>
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<td>this has not been implemented. This should be factored into the</td>
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<td>dispersion modeling.</td>
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<td>b) “Stockpile height must be managed and kept below the partition block</td>
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<td>height (wind zone height)” - The RBCAA wishes to place on record that</td>
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<td>based on observations, and reports, this in not being adhered to.</td>
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<td>This should be factored into the dispersion modeling.</td>
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<td>2.9</td>
<td>Air Quality Impact Assessment Report:</td>
<td>a) The closest PM10 station is located 5km away in the CBD; this was not considered adequate to account for all external sources as listed by the RBCAA. Many of these sources are much further than 5km away from the station. Furthermore, the concentrations from the station located in</td>
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<td>a) The report appears to only take into account the storage facilities</td>
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<td>operated by TPT Richards Bay. The cumulative impacts from the closest</td>
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<td>activities i.e. RBCT, Bayside Aluminium, Foskor and Grindrod Terminals need to be included in the assessment.</td>
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<td>b) There are no dose maps. These need to be included in the report.</td>
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<td>c) Toxicity of materials is not addressed. The report treats the materials as PM-10 only. Different materials might have an impact at different toxicities.</td>
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<td>d) Health impacts are not addressed.</td>
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<td>e) It is noted that annual and 24h PM10 limits are exceeded. In 2015 these PM10 limits will reduce to 40 μg/m³ and 75 μg/m³ respectively. How does TPT intend achieving the new stricter limits. More importantly what Plan is in place to achieve the current limits in the areas where they are predicted to be exceeded.</td>
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<td>f) All of the modelled 24h PM10 values exceed the new limit of 75 μg/m³ except for Alton – considering the hazardous nature of the materials which will be stored, this is of concern and a plan should be submitted for measures that will be taken (with dates) to ensure compliance with the new limit of 75 μg/m³.</td>
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<td>g) The report does not state how many times the daily limit will be exceeded (it says more than 4 times). The report needs to state exactly how many times the daily limit is predicted to be exceeded.</td>
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<td>h) Refer Page 78 of 162 – Table 3 – what is the limit value for the referred to “adjacent land use”, and is it complied with?</td>
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<td>i) It is of concern that the PM10 data at the Waterfront exceeds 200 μg/m³.</td>
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<td>j) The option of enclosed/partially enclosed stockpiles needs to be considered. The well documented dust complaints support the consideration of an enclosed facility.</td>
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<td>k) It is noted that the E/F slab is significantly closer to the harbour, which significantly increases the risk of an uncontrolled spillage into the harbour.</td>
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<td>l) Sprinklers are proposed to be installed on slabs. The existing sprinkler system has proven to be unreliable and ineffective. How is this going to be improved upon?</td>
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<td>m) Two conveyors (running East/West) are to be installed servicing E/F slab – these should be covered.</td>
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<td>n) The report is silent on air quality monitoring requirements. This needs to be addressed in the report.</td>
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<td>o) The locations of the current monitoring sites, with the exception of the single TopasTM, are not included in the report. It is our understanding that the current system is a bucket system. We would argue that this system may not the CBD were found to be low. WSP did not, therefore, use background concentrations to account for neighbouring sources. If the appropriate data is available, this can be added in a blanket fashion.</td>
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<td>b) Dose maps are not part of a standard AQIA, but rather of a dedicated a health risk assessment.</td>
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<td>c) Toxicity: True – but then require exact composition and mix of materials being handled each hour, which is typically not available.</td>
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<td>d) Health impacts are firstly addressed in respect of NAAQS, as developed for the protection of human health in ambient environment. The ToR of this AQIA did not include a full toxicity / epidemiological study</td>
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<td>e) TPT is investing heavily in new, efficient equipment geared towards achieving the current and future air quality standards. Coupled to this hardware investment, TPT intends on rigorously enforcing the current dust management requirements and further refining and improving these management methods going forward.</td>
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<td>f) There are no hazardous materials being handled on site. Ambient PM10 standards are conservative and designed to allow for typical health risks from a variety of source materials. Further, all cargo complies with the legal obligation to be accompanied by MSDS’s which allows for TPT to assess potential hazards to human health. TPT undertakes personalized monitoring twice a year, gauging employee exposure to silica. Further, occupational hygiene surveys (incorporating particulate matter exposure) are undertaken annually, over and above the legislated biennial requirement for these surveys.</td>
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<td>g) Agreed. This has been addressed in the report.</td>
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<td>h) The SANS 1929: 2005 sets out dust deposition rates, expressed in units of mg/m²/day over a typical 30-day averaging period. The relevant adjacent land use is classified as ‘residential’ and the respective standard is set at 600 mg/m²/day. The offsite sampler located at TF8 (see map in report) constantly returns DFO rates that are fully compliant with respect to the ‘residential’ standard.</td>
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<td>i) Agreed. Transnet is looking to improve mitigation on an on-going basis, including compliance with the more stringent PM10 standards for 2015. This is likely to be a cumulative impact of surrounding activities. TPT has no jurisdiction in terms of attempting to improve nearby organizations air quality management. TPT onsite air quality is managed in accordance with established SOP’s and its dust mitigation strategy mentioned earlier.</td>
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<td>be sufficient to quantify impacts of fallout. The dust buckets measure vertical dust flux i.e. downward motion or settling, this occurs at low wind speeds, for this reason we don’t believe they can be used to determine horizontal dust flux (for sideways dust movement), during high wind speeds. The deposition witnessed in the residential areas occurs following high winds speeds.</td>
<td>j) Agree in theory; however in reality this is more challenging</td>
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<td>p) The TopasTM instrument appears to be located out of the prevailing winds in relation to the current and proposed stockpiles, which would create uncertainty regarding the level of current impacts.</td>
<td>k) The proposed mitigation and stormwater management system aim to mitigate against this potential risk. In addition there are controls embedded in the terminal’s environmental management system, namely a first-flush system to capture surface contaminants, cleaning of sumps, use of sprinklers and surfactants, vacuum trucks, on-going housekeeping activities. This is in addition to the established stormwater monitoring programme in place. The slab is 160 from the quayside, therefore it is unlikely that cargo will be spilled directly into the harbour.</td>
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<td>q) To the best of our knowledge TPT does not have any PM10 or dust monitoring sites beyond their boundary, and can therefore not state with any certainty that the dust from their operations does not impact beyond their fence-line. The RBCAA tested samples of “dust” collected from a home in Arboretum Extension in October 2012, which indicated the presence of Magnetite, which is one of the products to be stored on slab E/F. In fact magnetic material with a similar composition to magnetite has been collected as far as Veldenvlei. The RBCAA’s own complaints record indicates that dust levels are rather poorly managed in this area of the Port and that a more attention is required in this matter. We would therefore argue that Transnet’s so-called “well-vegetated” buffer is not effective.</td>
<td>l) Sprinklers are currently functional, but must be used more frequently, water supply permitting.</td>
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<td>r) TPT should consider expanding their monitoring system beyond their fenceline.</td>
<td>m) Agreed. New conveyors will be covered as for all existing conveyors.</td>
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<td>o) Vertical dust flux is the only recognised method in South Africa at present. Horizontal dust flux gives erratic results that are not directly comparable with any recognised standards.</td>
<td>n) Recommendations are made in Section 7 of the AQIA report, these have been included into the Environmental Management Plan (Section 4.4.7). Furthermore, and comprehensive monitoring requirements are covered in a dedicated Dust Management Report compiled for TPT. However, TPT will not release this complete dust report as internal information contained in the report is not for public consumption.</td>
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<td>p) The Topas has so far been located onsite for a source apportionment exercise and is not out of prevailing wind directions. The instrument will be relocated to the fenceline for ambient compliance purposes at the outset of 2013.</td>
<td>q) Some of these statements are far-reaching and not necessarily common-cause. Some are also beyond the scope of this impact assessment (the E&amp;F Slab) and part of a much greater issue, with additional contributors. A full cumulative impact assessment/model has been completed for TPT, but this not the only source of dust in the locality, as noted by the RBCAA. One source (TPT) cannot be held accountable for all of the dust issues in Richards Bay. RBCAA has itself stated that that there are many sources of dust in Richards Bay (see Section 2.9).</td>
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<td>q) This is historically the mandate of RBCAA. Under NEMQA, ambient monitoring is the responsibility of the local and district municipality. TPT will also be installing two continuous PM analyser(s) at its fenceline (both East and West) in the third quarter of 2013, as above and recommended in the Dust Management Strategy.</td>
<td>r) TPT should consider expanding their monitoring system beyond their fenceline.</td>
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| 2.10 | Information Request:  
We kindly request that the following information be made available to the RBCAA;  
a) Copies of MSDS’s for all products.  
b) Copy of TPT’s Air Quality Management Plan, as referred to on page 25 & 26 of the Draft Environmental Management Programme.  
c) Dose Maps that are absent from the Air Quality Assessment Report.  
d) Copy of the Emission Inventory used to model background air quality.  
e) Map indicating TPT’s current monitoring sites. | a) Copies of MSDS’s of proposed materials to be stored have been included in the Final BAR.  
b) TPT is willing to its release Dust Monitoring and Mitigation Strategy Document, if required. It is TPT’s understanding that RBCCA has had sight of this document  
c) Dose-response maps form part of a dedicated health risk study, which is beyond the requirements of an AQIA, and did not form part of the ToR. Furthermore, health risk assessments have been undertaken by TPT’s health clinic service provider.  
d) TPT is happy to release the emissions inventory..  
e) Monitoring site map is now included in the report. |
| 2.11 | a) In view of the above, we respectfully request that the process be put on hold until such time as the RBCAA, and other interested Stakeholders, have been afforded the opportunity to discuss concerns regarding the development with WSP and TPT. | a) Note: Should all issues and comments not be adequately addressed in the Issues Trail, RBCCA to please confirm the need for meeting to discuss further. |
| 3. D.P. Lubbe (uThungulu District Municipality) – Letter dated 9 November 2012 | a) uThungulu District Municipality has perused the Draft Basic Assessment Report for the above-mentioned proposed development. Based on the information provided, all environmental issues and impacts have been addressed. uThungulu would like to be continuously updated with the proceedings of the projects.  
b) Should you have any further queries, please contact the Environmental Officer, Miss Nkosingiphile Khuluse, at Tel: 035-7992684 or 082 2660178 during office hours. | a) The comment has been noted.  
b) uThungulu District Municipality will be kept informed of the status of the project. |
| 4. Carolyn Schwegman (WESSA and Coastwatch) – Letter dated 12 November 2012 | a) The two issues of concern which WESSA and Coastwatch raised are the runoff from potentially contaminated stormwater impacting on water quality and air quality deterioration in Richards Bay. The potential impacts have been identified but we are of the opinion that the assessment has inadequately established the risk of contamination. We comment on the proposed expansion of the Dry Bulk Terminal with the construction of E/F slab as follows. | a) The comments have been noted.  
The relevant sections have been amended in the report and discussed in further detail. |
| 4.2 | Alternatives:  
Technology alternatives are put forward in the report and dismissed without detailed discussion. An Enclosed Storage Area (technology alternative 3) would most | a) Technology Alternative 3, the enclosed storage area, has not been investigated further in the assessment as this alternative would essentially result in a no-go of the project. The cost of this option is |
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<td>effectively minimise the potential impacts arising from stormwater runoff and air emissions, however, the option has not been assessed further because of “cost and efficiency implications”. This would mean, therefore, that while costs to Transnet are minimised through open storage facilities the costs of any impacts will be borne by the environment and society.</td>
<td>prohibitive to the process and is therefore not feasible. The preferred option of the open storage slab is the only way forward for the applicant in terms of cost viability. Should the preferred option not be selected, the project will most likely not go ahead.</td>
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<td>WESSA finds that Technology Option 3 has been dismissed as “unsuitable” without full justification and it would be irresponsible for the competent authority to concur without detailed information being made available.</td>
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<td>We comment further on the Preferred Alternative – Open Storage Slab – which, in our opinion, is an option which overlooks the mitigation hierarchy and seeks only to mitigate potential impacts where avoidance and minimisation should be considered.</td>
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### 4.3 Air Quality:

**a) Mitigation: Dust Suppression**

Dust will be suppressed using a sprinkler system and without information on the current operations which will be extended to the new E/F slabs we assume that it is municipal water which will be used (BAR section A, 12) i.e. potable water. The costs of using this scarce and valuable resource need to be factored into the identification of an alternative which bests suits the applicant, the environment and society.

**b) Cumulative Impacts on Air Quality**

An assessment of cumulative impacts should consider the contribution of the new facility to the ambient air quality in Richards Bay – that would be the contribution by the proposed activity to the existing impacts of all industry in the Richards Bay area. Although particulate emissions from the new Slab E/F are predicted to be below accepted levels it is not said how the increase in air-borne residue affects overall air quality in Richards Bay. It is considered only that the impacts on air quality will be long term and of medium significance as there will be an increase in emissions from those currently experienced (increased vehicular emissions and dust and air-borne residue).

**c) Environmental Management Programme**

It is required that Transnet adheres to the mitigation measures outlined in their internal Air Quality Management Plan which includes a dust monitoring and mitigation strategy. In order to understand the effectiveness of the strategy and compliance with mitigation measures an audit report should be presented to give value to the proposed mitigation for the new facility.

With respect to commenting on behalf of civil society WESSA would defer to the Richards Bay Clear Air Association (RBCAA) and we note that the organisation requested that it be afforded the opportunity to review and comment on the draft Terms of Reference for the Air Quality Study (email 05/03/2012) however it seems that the opportunity was denied as “the terms of reference for the Air Quality Study prohibitive to the process and is therefore not feasible. The preferred option of the open storage slab is the only way forward for the applicant in terms of cost viability. Should the preferred option not be selected, the project will most likely not go ahead. |
were finalised and agreed to in advance of the commencement of this environmental assessment process and public scrutiny of these documents is no required to be part of this process in terms of current legislation.”

WESSA accepts that legislated requirements have been met however after circulating a background information document and inviting input from I&APs we feel that ignoring reasoned and reasonable input from a recognised and well regarded civil organisation is contrary to the spirit of public participation and the objectives of the EIA process.

WESSA is concerned that input from RBCAA, the organisation best placed to represent the interests of communities in Richards Bay with respect to air quality, has been overlooked.

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<td>Quality Impact Assessment) provides stakeholders the opportunity of raising concerns. In addition, it was not part of WSP's Terms of Reference that RBCAA was to be consulted during the course of the AQIA. The involvement of RBCAA is at the discretion of TPT.</td>
<td>a) This will be determined following testing as recommended in the Stormwater Management Plan (Section 6). If required, runoff from the existing C/D slab can be tested as an indication of the potential situation on the E/F slab. It is recommended that this approach be made a condition of authorisation.</td>
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<td>WESSA accepts that legislated requirements have been met however after circulating a background information document and inviting input from I&amp;APs we feel that ignoring reasoned and reasonable input from a recognised and well regarded civil organisation is contrary to the spirit of public participation and the objectives of the EIA process.</td>
<td>b) The method of containment and disposal will be determined following testing.</td>
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<td>WESSA is concerned that input from RBCAA, the organisation best placed to represent the interests of communities in Richards Bay with respect to air quality, has been overlooked.</td>
<td>c) Sediment traps will be concreted. Sediment will be cleaned and the material returned to the stockpile.</td>
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| 4.4 | **Water Resource Contamination:**  
|     | The Preferred Alternative – open slab – seeks to mitigate, not avoid, runoff which may be contaminated and although potential impacts are identified (such as a potential risk to groundwater resources from magnetite and chrome) they have not all been fully investigated. This does not allow a complete suite of mitigation measures to be considered in decision making.  
|     | Environmental Management Programme: Stormwater Management  
|     | Clarity is required on the following –  
|     | 1. “To determine if the magnetite and chrome ore is expected to pose a contamination risk to surface and groundwater resources, leachate testing should be conducted on these materials. Should leachable concentrations be elevated, runoff leaving the sediment traps may require appropriate containment and disposal. The ....”  
|     | a) When will it be determined if the magnetite and chrome ore is a risk to water resources? Why is a risk assessment not undertaken? When will it be done?  
|     | b) Should runoff leaving the sediment traps require appropriate containment and disposal how will this be achieved?  
|     | c) Sediment: what risk is there of sediment causing contamination? Will sediment traps be lined? How will sediment be disposed of?  
|     | 2. “Should there be contamination risk to the underlying groundwater, the paving should be underlain by an impervious membrane, or potential subsurface impacts should be monitored through an appropriate groundwater monitoring plan.”  
|     | d) It should be determined during the assessment whether there is contamination risk to the underlying groundwater in order to inform the planning and design of the facility? When will it be determined whether an impervious membrane is required? The Stormwater Management Plan – | d) Groundwater monitoring is being undertaken for the entire harbour as part of a separate project. Should it be determined that contamination exists following testing, it will be required that an impervious membrane is installed for the E/F slab. This is recommended to be a condition of authorisation. |
|     | e) As the water quality limits for chrome concentration are high, it is recommended that testing is undertaken first rather than upfront mitigation, which may not be required.  
|     | f) The capacity of the pipeline and areas covered is yet to be determined, and TPT is to provide this information prior to commencement of construction. Should it be determined that the pipeline capacity is not sufficient, construction of a new pipeline will be required to prevent flooding.  
<p>|     | g) Monitoring of stormwater runoff from all slabs will be undertaken as part of a separate, on-going broad monitoring process. It is recommended that this be monitoring be integrated into existing monitoring protocols. This should be made a requirement of | g) Monitoring of stormwater runoff from all slabs will be undertaken as part of a separate, on-going broad monitoring process. It is recommended that this be monitoring be integrated into existing monitoring protocols. This should be made a requirement of |</p>
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<td>conceptual - based on the applicant’s communication proposes that the area is paved in semi-permeable G-block pavers.</td>
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<td>e) Should an impervious membrane not be installed what interventions will be put in place should monitoring determine that subsurface impacts are occurring?</td>
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<td>“The capacity of the pipeline located west of the proposed E/F Slab, and currently routing water from the A/B East and C/D East Slabs, should be determined to ensure it can route the stormwater volumes expected from the slab. Should it prove insufficient, an additional pipeline will be required to prevent flooding.”</td>
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<td>f) When will it be determined whether the existing pipeline capacity is sufficient for the expected stormwater volumes from the new slab? Only after flooding occurs? What construction will then be required to increase the capacity of the existing stormwater infrastructure?</td>
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<td>WESSA expects the answers to the above questions to be reported as outputs from the basic assessment process and we find that conclusions have been reached without a full understanding of the potential risk to the environment and society.</td>
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<td>g) The Stormwater Management Plan (specialist report section 6, Appendix D) recommends that a stormwater monitoring plan be developed. This is not included in the EMPr 4.4.6. which deals with stormwater management.</td>
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<td>4.5</td>
<td>a) We look forward to an improved understanding of the level of risk posed by the proposed expanded storage facility. Thank you for the report and opportunity to comment.</td>
<td>a) The comment is noted.</td>
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<td>5.</td>
<td><strong>Sikhali Methenjwa (KZN Department of Agriculture and Environmental Affairs) – Letter dated 13 November 2012</strong></td>
<td></td>
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<td>5.1</td>
<td>a) The abovementioned port project entails the construction of a slab that will be used for the storage of dry bulk cargo such as chrome, magnetite and coal and will be suitably engineered with the use of G-blocks or similar material, underlain by an impervious membrane. The proposed slab is 20,000m² in size, and will have a maximum stockpile capacity of approximately 200kt. The estimated throughput capacity is 2 million tons per annum, dependent on the density of the cargo. Cargo is proposed to be brought in via road truck and conveyor and stacked by pay-loader onto the storage slab until transfer via conveyor belts onto ships for export. Associated infrastructure includes a stormwater management system, dust suppression mechanisms, high mast lighting and conveyors.</td>
<td>a) Noted.</td>
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<td>5.2</td>
<td>This Department has a few concerns and recommendations:</td>
<td></td>
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<td></td>
<td>a) The Local Municipality on its jurisdiction must provide a written proof regarding capacity. This written proof can be provided to the assessing</td>
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<td>portraying capacity to provide services involving bulk water, solid waste removal, effluent discharge, stormwater management and electricity services.</td>
<td>officer in conjunction with the submission of the Final BAR,</td>
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<td>b) A stormwater management plan must be implemented during construction and operation of the facility.</td>
<td>- Increased water consumption will be catered for from existing volumes supplied by the Delkor plant (onsite water treatment facility). This comment is based on the fact that current water usage nowhere near approaches the amount of recycled water the Delkor plant produces.</td>
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<td></td>
<td>c) Mitigation measures to reduce detrimental impacts on the marine life.</td>
<td>- Additional waste volumes catered for in terms of existing waste contract as mentioned.</td>
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<td></td>
<td>d) Hydrological features along the port must be protected by ensuring no leaks or contaminations.</td>
<td>- Increased electrical requirements are considered to be negligible in terms of infrastructure to be deployed for this operation. Furthermore, TPT is in the process of hiring an Energy Manager and associated Project manager to assess electricity usage and identify savings opportunities countrywide within all terminals. TPT will also be implementing its ISO 51000 Energy Management System over the next three years, which will identify further savings and manage energy requirements effectively.</td>
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<tr>
<td>5.3</td>
<td>a) This Department encourages implementation of mitigation measures as outlined in the BAR and EMPr so that the project does not result in any environmental degradation.</td>
<td>b) The Stormwater Management Plan contained within the EMPr will be implemented during construction, and the Stormwater Management Plan will be implemented during operation.</td>
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<td></td>
<td>c) Mitigation measures for protection of surface water and marine life have been included in the EMPr and internal TPT protocols.</td>
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<tr>
<td></td>
<td></td>
<td>a) The Final BAR has made the recommendation that implementation of the EMPr be made a condition of environmental authorization.</td>
</tr>
</tbody>
</table>
Taylor, Kelly

From: Liz Scates <liz.scateswood@telkomza.net>
Sent: 10 October 2012 09:56 AM
To: Taylor, Kelly
Subject: RE: Availability of Draft Basic Assessment Report: E/F Slab Expansion, Port of Richards Bay

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good morning and greetings from Richards Bay.
Thank you very much for the documentation received some time ago and I must say it is very well done except for the following:
The health side of the report is virtually non existant and with the proposed commodities to be stockpiled thereon, both in their dry and wet condition, needs elaboration. Attention to the magnatite in particular.
The windage in that particular area in the Harbour can be vicious at times and the dust factor can be very high.
With the shortage of fresh water looming are we to understand that this will not be problematic and that Transnet will be looking at recycled water??
There will be enormous run offs of water and contaminants, especially during the very dry windy and the wet rainy season. I am not 100% satisfied that this will be sufficiently bunded. Dubious housekeeping has been noticed over the past 25 years.
Thank you for your attention in these matters

Liz

-----BEGIN PGP SIGNED MESSAGE-----

From: Taylor, Kelly [mailto:kelly.taylor@wspgroup.co.za]
Sent: 02 October 2012 03:55 PM
To: undisclosed-recipients:
Subject: Availability of Draft Basic Assessment Report: E/F Slab Expansion, Port of Richards Bay
Importance: High

Dear Stakeholder

Draft Basic Assessment Report: Proposed E/F Slab Expansion, Port of Richards Bay

This letter serves to notify all stakeholders that the Draft Basic Assessment Report for the above mentioned project will be available from 3 October to 2 November 2012 for public review and comment. Please see the attached notice for further details.

Thank you in advance for your participation.

Yours sincerely,

Kelly Taylor
Assistant Consultant

WSP Environment & Energy South Africa
Block A. 1 on Langford, Langford Road, Weweke, Durban, 3628
Tel: +27 31 240 8879
Fax: +27 31 240 8861
Mobile: +27 78 171 1889
Email: kelly.taylor@wspgroup.co.za
Website: www.wspenvironmental.co.za

-----END PGP SIGNED MESSAGE-----
Dear Kelly

COMMENT: DRAFT BASIC ASSESSMENT REPORT: E/F SLAB EXPANSION, PORT OF RICHARDS BAY

Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment.

We apologise for the late submission, due to technical difficulties beyond our control. Thank you for your understanding in this regard.

The Richards Bay Clean Air Association (RBCAA) has reviewed the Draft BAR, and Air Quality Impact Assessment, and herewith provide comment;

(A) Public Participation:
1. The BID received on 13th February 2012, stated that “once the Draft BA has been completed, it will be made available for public review for 60 days. We were given 30 days.
2. The RBCAA was not afforded the opportunity to provide input into the Terms of Reference (ToR) for the Air Quality Impact Assessment as these “were finalised and agreed to in advance of the commencement of the environmental assessment process.”
3. There is no evidence that a Public Meeting or Stakeholder meeting was held. The RBCAA was not invited to a meeting, nor were we afforded the opportunity to request such a meeting, as a result the RBCAA has not been given the opportunity to discuss concerns regarding the development with WSP and TPT.
4. The RBCAA was not consulted during the course of carrying out the Air Quality Impact Assessment

(B) Authority Participation:
1. Refer 31 of 162; It is noted with concern that no comments have been received from authorities.

Can the PP process been considered effective if there are no comments from authorities?

In view of (A) & (B) above, we do not believe that appropriate measures have been taken to ensure adequate public participation.
(C) Stakeholder Database:
1. There is no one on the list from the uMhlathuze Municipality, Air Quality Management.
2. The following Stakeholders do not appear on the IAP list: Grindrod, CTC, Mondi Silvaceal, Richards Bay IDZ. All are situated in close proximity to the TPT, and should be informed of the proposed development.
3. Please provide details of the Assessing Officer.

(D) Acknowledgements:
1. RBCAA data and information has been used with no acknowledgement.

(E) Corrections:
1. Refer Air Quality Impact Assessment Report; Page 15 of 29 – The RBCAA network comprises 6 SO2 Monitoring stations (no! 5), 9 meteorological stations (not 8), 4 PM10 stations (not 2), and a TRS monitoring station.

(D) Draft BAR:
1. Refer page 19 of 162; In the list of legislation, policies and guidelines there are some guideline documents which are not mentioned:
   - SANS1929:2005 dust deposition
   - GN704
   - DWA Best Practice Guidelines G1: stormwater management
2. Refer page 20 of 162; The report states that no part of the solid waste is classified as hazardous. Chrome ore will be stored on this slab, so are we to understand that there will be no hazardous waste generated during the operational phase, despite the hazardous nature of the materials being stored?

(E) Stormwater Management:
1. The Stormwater Management Plan states that an impervious edge restraint will be put in place “should the stockpiles warrant this”. What other methods of preventing contaminated stormwater runoff will be put in place if the impervious edge is not “warranted”
2. How will contaminated stormwater runoff be dealt with? Where will it go to?
3. Has contamination from conveyors been considered? This does not appear to have been considered in the report.

(F) Draft Environmental Management Program (AQMP):
Refer page 26; Key mitigation measures stipulated in the AQMP include:
a) “Operation of dust-free loading chutes during vessel loading” – The RBCAA wishes to place on record that based on observations, and reports, this has not been implemented. This should be factored into the dispersion modeling.
b) “Stockpile height must be managed and kept below the partition block height (wind zone height)” - The RBCAA wishes to place on record that based on observations, and reports, this in not being adhered to. This should be factored into the dispersion modeling.

(G) Air Quality Impact Assessment Report:
1. The report appears to only take into account the storage facilities operated by TPT Richards Bay. The cumulative impacts from the closest neighboring activities i.e. RBCT, Bayside Aluminium, Foskor and Grindrod Terminals need to be included in the assessment.
2. There are no dose maps. These need to be included in the report.
3. Toxicity of materials is not addressed. The report treats the materials as PM-10 only. Different materials might have an impact at different toxicities.
4. Health impacts are not addressed.
5. It is noted that annual and 24h PM10 limits are exceeded. In 2015 these PM10 limits will reduce to 40 μg/m³ and 75 μg/m³ respectively. How does TPT intend achieving the new stricter limits? More importantly what Plan is in place to achieve the current limits in the areas where they are predicted to be exceeded.
6. All of the modeled 24h: PM10 values exceed the new limit of 75 μg/m³ except for Alton – considering the hazardous nature of the materials which will be stored, this is of concern and a plan should be submitted for measures that will be taken (with dates) to ensure compliance with the new limit of 75 μg/m³.
7. The report does not state how many times the daily limit will be exceeded (it says more than 4 times). The report needs to state exactly how many times the daily limit is predicted to be exceeded.
8. Refer Page 78 of 162 – Table 3 – what is the limit value for the referred to “adjacent land use”, and is it complied with?
9. It is of concern that the PM10 data at the Waterfront exceeds 200 μg/m³.
10. The option of enclosed/partially enclosed stockpiles needs to be considered. The well documented dust complaints support the consideration of an enclosed facility.
11. It is noted that the E/F slab is significantly closer to the harbour, which significantly increases the risk of an uncontrolled spillage into the harbour.
12. Sprinklers are proposed to be installed on slabs. The existing sprinkler system has proven to be unreliable and ineffective. How is this going to be improved upon?
13. Two conveyors (running East/West) are to be installed servicing E/F slab – these should be covered.
14. The report is silent on air quality monitoring requirements. This needs to be addressed in the report.
15. The locations of the current monitoring sites, with the exception of the single Topas™, are not included in the report. It is our understanding that the current system is a bucket system. We would argue that this system may not be sufficient to quantify impacts of fallout. The dust buckets measure vertical dust flux i.e. downward motion or settling, this occurs at low wind speeds, for this reason we don’t believe they can be used to determine horizontal dust flux (for sideways dust movement), during high wind speeds. The deposition witnessed in the residential areas occurs following high wind speeds.
16. The Topas™ instrument appears to be located out of the prevailing winds in relation to the current and proposed stockpiles, which would create uncertainty regarding the level of current impacts.
17. To the best of our knowledge TPT does not have any PM10 or dust monitoring sites beyond their boundary, and can therefore not state with any certainty that the dust from their operations does not impact beyond their fence-line. The RBCCA tested samples of “dust” collected from a home in Arborietum Extension in October 2012, which indicated the presence of Magnette, which is one of the products to be stored on site E/F. In fact magnetic material with a similar composition to magnetite has been collected as far as Veldervlei. The RBCCA’s own complaints record indicates that dust levels are rather poorly managed in this area of the Port and that a more attention is required in this matter. We would therefore argue that Transnet’s so-called “well-vegetated” buffer is not effective.
18. TPT should consider expanding their monitoring system beyond their fence line.

**[H] Information Request:**

We kindly request that the following information be made available to the RBCCA;

1. Copies of MSDS’s for all products.
3. Dose Maps that are absent from the Air Quality Assessment Report.
4. Copy of the Emission Inventory used to model background air quality.
5. Map indicating TPT’s current monitoring sites.

In view of the above, we respectfully request that the process be put on hold until such time as the RBCCA, and other interested Stakeholders, have been afforded the opportunity to discuss concerns regarding the development with WSP and TPT.

We reserve the right to provide further comment.

Thank you for your consideration.

Kind Regards,

*Sandy Camminga*

Chairman EIA Sub-Committee

*R Richards Bay Clean Air Association*

Phone: +27 (35) 786 3076
Mobile: +27 (83) 515 2364
Fax: +27 (35) 907 5340
E-mail: camminga@nbica.com
Visit: www.rbcaa.org.za

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Figure 16: RBCCA Comment on the DBAR: Page 3
WSP Environment & Energy
P.O. Box 1442
WESTVILLE
3630

Attention: Kelly Taylor

Dear Sir / Madam,

DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED E/F SLAB EXPANSION, PORT OF RICHARDS BAY

uThungulu District Municipality has perused the Draft Basic Assessment Report for the above-mentioned proposed development. Based on the information provided, all environmental issues and impacts have been addressed. Uthungulu would like to be continuously updated with the proceedings of the project.

Should you have any further queries, please contact the Environmental Officer, Miss Nkosingiphile Khuluse, at Tel: 035-7992684 or 082 2660178 during office hours.

Yours faithfully,

D.P. LUBBE
DEPUTY MUNICIPAL MANAGER

Cc Internal Copy : DP Lubbe-Deputy Municipal Manager
Mr H. Smit : Acting Senior Manager: Planning & Development
Postal Address: Private Bag X 1025 Richards Bay 3990 Address: Uthungulu House, Car Krugerrand & Barbal Street, Richards Bay CBD
Tel: (035) 799 2500 Fax: (035) 789 1409

Figure 17: uThungulu District Municipality Comment on the DBAR
Dear Ms Taylor

Port of Richards Bay – Proposed E/F Slab Expansion
(Dry Bulk Terminal)

Draft Basic Assessment Report (BAR):

The two issues of concern which WESSA and Coastwatch raised are the runoff from potentially contaminated stormwater impacting on water quality and air quality deterioration in Richards Bay. The potential impacts have been identified but we are of the opinion that the assessment has inadequately established the risk of contamination. We comment on the proposed expansion of the Dry Bulk Terminal with the construction of E/F slab as follows.

- Alternatives

Technology alternatives are put forward in the report and dismissed without detailed discussion. An Enclosed Storage Area (technology alternative 3) would most effectively minimise the potential impacts arising from stormwater runoff and air emissions, however, the option has not been assessed further because of “cost and efficiency implications”. This would mean, therefore, that while costs to Transnet are minimised through open storage facilities the costs of any impacts will be borne by the environment and society.
WESSA finds that Technology Option 3 has been dismissed as “unsuitable” without full justification and it would be irresponsible for the competent authority to concur without detailed information being made available.

We comment further on the Preferred Alternative – Open Storage Slab – which, in our opinion, is an option which overlooks the mitigation hierarchy and seeks only to mitigate potential impacts where avoidance and minimisation should be considered.

- **Air Quality**

  - **Mitigation: Dust Suppression**

    Dust will be suppressed using a sprinkler system and without information on the current operations which will be extended to the new E/F slabs we assume that it is municipal water which will be used (BAR section A, 12) ie potable water. The costs of using this scarce and valuable resource need to be factored into the identification of an alternative which bests suits the applicant, the environment and society.

  - **Cumulative Impacts on Air Quality**

    An assessment of cumulative impacts should consider the contribution of the new facility to the ambient air quality in Richards Bay – that would be the contribution by the proposed activity to the existing impacts of all industry in the Richards Bay area. Although particulate emissions from the new Slab E/F are predicted to be below accepted levels it is not said how the increase in air-borne residue affects overall air quality in Richards Bay. It is considered only that the impacts on air quality will be long term and of *medium significance* as there will be an increase in emissions from those currently experienced (increased vehicular emissions and dust and air-borne residue).

  - **Environmental Management Programme**

    It is required that Transnet adheres to the mitigation measures outlined in their Internal Air Quality Management Plan which includes a dust monitoring and mitigation strategy. In order to understand the effectiveness of the strategy and compliance with mitigation measures an audit report should be presented to give value to the proposed mitigation for the new facility.

    With respect to commenting on behalf of civil society WESSA would defer to the Richards Bay Clear Air Association (RBCCA) and we note that the organisation requested that it be afforded the opportunity to review and comment on the draft Terms of Reference for the Air Quality Study (email 05/09/2012).
however it seems that the opportunity was denied as “the terms of reference for the Air Quality Study were finalised and agreed to in advance of the commencement of this environmental assessment process and public scrutiny of these documents is not required to be part of this process in terms of current legislation.”

WEssa accepts that legislated requirements have been met however after circulating a background information document and inviting input from I&APs we feel that ignoring reasoned and reasonable input from a recognised and well regarded civil organisation is contrary to the spirit of public participation and the objectives of the EIA process.

WEssa is concerned that input from RBCCA, the organisation best placed to represent the interests of communities in Richards Bay with respect to air quality, has been overlooked.

- Water Resource Contamination

The Preferred Alternative – open slab – seeks to mitigate, not avoid, runoff which may be contaminated and although potential impacts are identified (such as a potential risk to groundwater resources from magnetite and chrome) they have not all been fully investigated. This does not allow a complete suite of mitigation measures to be considered in decision making.

- Environmental Management Programme: Stormwater Management

Clarity is required on the following –

1. “To determine if the magnetite and chrome ore is expected to pose a contamination risk to surface and groundwater resources, leachate testing should be conducted on these materials. Should leachable concentrations be elevated, runoff leaving the sediment traps may require appropriate containment and disposal. The ....”

- When will it be determined if the magnetite and chrome ore is a risk to water resources? Why is a risk assessment not undertaken? When will it be done?

- Should runoff leaving the sediment traps require appropriate containment and disposal how will this be achieved?

- Sediment: what risk is there of sediment causing contamination? Will sediment traps be lined? How will sediment be disposed of?

Figure 20: WESSA & Coastwatch Comment on the DBAR: Page 3
2. “Should there be contamination risk to the underlying groundwater, the paving should be underlain by an impervious membrane, or potential subsurface impacts should be monitored through an appropriate groundwater monitoring plan.”

- It should be determined during the assessment whether there is contamination risk to the underlying groundwater in order to inform the planning and design of the facility? When will it be determined whether an impervious membrane is required? The Stormwater Management Plan – conceptual - based on the applicant’s communication proposes that the area is paved in semi-permeable G-block pavers.

- Should an impervious membrane not be installed what interventions will be put in place should monitoring determine that subsurface impacts are occurring?

3. “The capacity of the pipeline located west of the proposed E/F Slab, and currently routing water from the A/B East and C/D East Slabs, should be determined to ensure it can route the stormwater volumes expected from the slab. Should it prove insufficient, an additional pipeline will be required to prevent flooding.”

- When will it be determined whether the existing pipeline capacity is sufficient for the expected stormwater volumes from the new slab? Only after flooding occurs? What construction will then be required to increase the capacity of the existing stormwater infrastructure?

WESSA expects the answers to the above questions to be reported as outputs from the basic assessment process and we find that conclusions have been reached without a full understanding of the potential risk to the environment and society.

4. The Stormwater Management Plan (specialist report section 6, Appendix D) recommends that a stormwater monitoring plan be developed. This is not included in the EMPr 4.4.6. which deals with stormwater management.

We look forward to an improved understanding of the level of risk posed by the proposed expanded storage facility. Thank you for the report and opportunity to comment.

Yours sincerely

Carolyn Schwegman
EIA Co-ordinator, WESSA KZN Region

Figure 21: WESSA & Coastwatch Comment on the DBAR: Page 4
FROM

FRAGA & ENVIRONMENTAL AFFAIRS
Department of Agriculture & Environmental Affairs
PROVINCE OF KwaZulu-Natal

Fax Transmission

WSP Environmental (Pty) Ltd
PO BOX 1442
Westville
3830

Attention: Kelly Taylor
Fax no: 031 240 8881

Dear Madam,

APPLICATION FOR ENVIRONMENTAL AUTHORIZATION (BASIC ASSESSMENT PROCESS) FOR THE PROPOSED RICHARDS BAY TERMINAL E1F SLAB EXPANSION, KwaZULU-NATAL PROVINCE.

The abovementioned document received by the Department of Agriculture and Environmental Affairs (DAEA) for comment dated 01 October 2012 refers.

The abovementioned port project entails the construction of a slab that will be used for the storage of dry bulk cargo such as chrome, magnetite and coal and will be suitably engineered with the use of G-bocks or similar material, underlain by an impervious membrane. The proposed slab is 20,000 m² in size, and will have a maximum stockpile capacity of approximately 200,000 mt. The estimated throughput capacity is 2 million tons per annum, dependent on the density of the cargo. Cargo is proposed to be brought in via road truck and conveyor and stacked by pay-loader onto the storage slab until transfer via conveyor belts onto ships for export. Associated infrastructure includes a storm-water management system, dust suppression mechanisms, high mast lighting and conveyors.

This Department has a few concerns and recommendations:

- The local Municipality on its jurisdiction must provide a written proof portraying capacity to provide services involving bulk water, solid waste removal, effluent discharge, storm-water management and electricity services.
- A storm-water management plan must be implemented during construction and operation of the facility.
- Mitigation measures to reduce detrimental impacts on the marine life.
- Hydrological features along the port must be protected by ensuring no leaks or contaminations.

GIBELA UMKHUMBI OLAWE NOBUBHA

Page 1 of 2

Figure 22: Department of Agriculture and Environmental Affairs Comment on the DBAR Page 1
This Department encourages implementation of mitigation measures as outlined in the BAR and EMPr so that the project does not result in any environmental degradation.

Please contact this Department should you have any queries regarding this correspondence.

Yours faithfully

For: Head of Department:
Department of Agriculture & Environmental Affairs
Cc: National Department of Environmental Affairs: 012 320 7539
4. Final Report

4.1. Distribution

The Final BAR was made available for a 21-day comment period from the 13 September 2013 until the 4 October 2013. An electronic copy of the report was made available from WSP on request, or via the WSP website www.wspenvironmental.co.za.

All stakeholders were notified of the revised report and informed of an opportunity to comment on the final BAR. All comments are to be provided directly to the assessing officer, Ms Portia Leshilo, at the National Department of Environmental Affairs (DEA) and the EAP via email.

4.2. Comments and Responses

Comments on the Final BAR were received from RBCAA. These comments and responses by the EAP are presented
Table 5 below.
### Table 5: Final BAR Comments and Responses

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<th>No.</th>
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<tr>
<td>1.</td>
<td>Richards Bay Clean Air Association (Sandy Camminga)</td>
<td>RBCAA was given an opportunity to view the responses to their comments in the final Stakeholder Engagement Report. WSP acknowledges it would have been ideal to provide RBCAA with an opportunity prior to the submission of the final report; however, due to delays from TPT prior to finalisation of the Final BAR and subsequent project time constraints, this was the most appropriate approach at the time.</td>
</tr>
<tr>
<td>1.1</td>
<td>Feedback on DBAR Comments: The RBCAA did not receive feedback on their comments. Our first sighting of a response to our comments on the DBAR was in the Final Stakeholder Engagement Report, dated September 2013.</td>
<td>WSP was given an opportunity to view the responses to their comments in the final Stakeholder Engagement Report. It was acknowledged that it would have been ideal to provide RBCAA with an opportunity prior to the submission of the final report; however, due to delays from TPT prior to finalisation of the Final BAR and subsequent project time constraints, this was the most appropriate approach at the time.</td>
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<td>1.2</td>
<td>Stakeholder Meeting: We stand by our comment that a Stakeholder meeting should have been held to afford stakeholders the opportunity to discuss issues and concerns with WSP and TPT. The response from WSP that public or stakeholder meetings were not deemed necessary is not accepted since the RBCAA specifically requested such a meeting.</td>
<td>The proposed project is unlikely to have any impact on the existing air quality within Richards Bay, or any other environmental aspect, and therefore it was not deemed necessary at the time to conduct a stakeholder meeting.</td>
</tr>
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<td>1.3</td>
<td>Comments from Authorities: We raised concern that no comments were received from authorities. In response WSP states that all stakeholders were given an opportunity to submit comments, however the stakeholder data base excluded the uMhlathuze Municipality's Air Quality Management Unit as well as the uThungulu's Air Quality Manager who responsible for the issuing of Atmospheric Emission Licenses.</td>
<td>WSP received comments from uThungulu District Municipality. The letter received stated: &quot;Based on the information provided, all environmental issues and impacts have been addressed&quot;.</td>
</tr>
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<td>1.4</td>
<td>Stockpile Height: We placed on record that based on observation and reports that the stockpile height is not being managed and is not being kept below the partition block height (wind zone height). In response WSP states that TPT manages its stockpiles to a height of 3m on average, we would argue that this is a false statement based on observations, reports and Figure 11 as contained on page 18 of the Dust Monitoring and Mitigation Strategy Document, Version 2, December 2011.</td>
<td>Stockpiles were assumed to not exceed this limit; however TPT acknowledges that the stockpile heights at the Transnet terminals can intermittently exceed the 3m stockpile limit.</td>
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</table>
| 1.5 | Dose Maps: We requested the inclusion of dose maps. In response WSP states that dose maps are in place (e.g. improved sprinkler systems – refer to response 1.9 below). | The cumulative plume maps are provided in Section 3 (Figures 3 to 6). These }
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<td>maps were not part of a standard AQIA. The RBCAA stands by its request for dispersion (Dose) maps, as without these cumulative impacts on sensitive receptors cannot be assessed.</td>
<td>maps indicate no impact of the proposed E&amp;F Slab on the current cumulative ambient air quality.</td>
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<td>1.6</td>
<td>Daily Limit Exceedance: The RBCAA commented that DBAR does not state how many times the daily limit will be exceeded. The report says more than 4 times.</td>
<td>The Air Quality Impact Assessment For Proposed Storage Area Expansion (WSP, November 2013) has been updated - please refer to Table 10 on page 27 of the report (Appendix 2).</td>
</tr>
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<td>1.7</td>
<td>Enclosed Stockpiles: The RBCAA requested that the option of enclosed or partially enclosed stockpiles be considered. In response WSP states that they agree in theory, however in reality this is more challenging. This is not an acceptable response.</td>
<td>TPT has considered the option of enclosing or covering the stockpiles. The cost of building sheds for housing stockpiles, however, is not considered economically feasible, and therefore cannot be considered at this time. The cost of constructing sheds would need to be passed on to the client, and this would potentially preclude Richards Bay TPT terminals from being a viable option for clients. The issue of dust is not solely as a result of TPT’s operations at Richards Bay. This is a greater issue which needs to be addressed holistically by TNPA.</td>
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<td>1.8</td>
<td>Location of TopasTM: The RBCAA commented that the instrument was located out of the prevailing winds in relation to the current and proposed stockpiles. In response WSP states that the Topas is not located out of prevailing winds. We stand by our comment. The prevailing winds are SW and NE. Based on the location of the Topas the impacts from the stockpile area will not be picked up by the Topas.</td>
<td>The Topas has, so far, been located onsite for Transnet’s source apportionment exercise, not to solely measure dust from the current and proposed stockpile areas. Analysis of wind field and particulate matter (PM) data from the instrument allows for onsite source apportionment to inform Transnet of where dust mitigation is most needed. With use of this data, Transnet have focused their investment in engineering solutions to abate PM emissions stem from various sources on site. These solutions have included the installation of an Alumina Handling Transfer Unit, and dust extraction systems at the bottom discharge and tippler sheds. A reduction in dust fallout and PM concentrations has since been observed in the vicinity of the Alumina handling Berth. Dust concentrations have been detected at the Topas unit when a southerly wind blew from the stockpile direction (refer to wind roses, Table 2 on page 13 of AQIA - Appendix 2). In addition, Figure 1 (Section 3) provides a pollution rose showing PM$<em>{10}$ concentrations for one month of monitoring. From the pollution rose, the contributions of the stockpiles to the south to ambient PM$</em>{10}$ from the stockpiles are evident. WSP recommends that the Topas is moved to various other locations within the port to assess the impact of other potential dust generating operations. Data from the instrument can then be used as to facilitate further abatement decisions.</td>
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<td>1.9</td>
<td>Sprinkler System: We stand by our comment that the sprinkler system is ineffective.</td>
<td>Sprinkler system is fully operational and is operated frequently each day. Further, a binding agent is utilized in these sprinklers to form a hard “crust” on top of cargo stockpiles when used. Furthermore, should proposed E&amp;F Slab be built, the sprinkler system will automatically be expanded to become a part of the construction plans.</td>
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<td>1.1</td>
<td>Air Quality Monitoring Requirements: This was not addressed in the DBAR and in response WSP stated that the Dust Monitoring Report compiled by TPT would not be released as internal information contained in the report is not for public consumption. This is a disturbing response and it is noted with concern that the report is marked &quot;confidential&quot;. The RBCAA requested a copy of the AQMP referred to in the Air Quality Impact Assessment Report, and has since been provided with the 2011 Dust Monitoring and Mitigation Strategy Report.</td>
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<td></td>
<td>A number of recent management measures have been put in place. These include: new ship loaders and grab loaders. TPT is in the process of revising the AQMP, incorporating all the recent upgrades and future upgrades which will be occurring throughout the terminal. The AQMP was be completed early February 2014 – refer to Appendix 6. This was made available to RBCAA once available.</td>
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<tr>
<td>1.1</td>
<td>Expansion of Monitoring System: WSP stated that TPT will be installing 2 continuous PM analysers at its fenceline in the third quarter of 2013. Has this been implemented?</td>
<td>TPT has received the authorisation from TNPA for relocation of PM&lt;sub&gt;10&lt;/sub&gt; monitors to East and West port access points. TPT in process of finalizing electrical supply for monitors with TNPA.</td>
</tr>
</tbody>
</table>
| 1.1 | Information Requests: In our submission on the DBAR we requested the following information:  
   a. Copies of MSDS's for all products. - Not received | MSDS’s are available for generic/typical cargo that passes through the TPT terminals. Specific cargos (e.g. different types of coal) are not kept by TPT, as they are not the custodians of the cargo. In the event that potentially hazardous or harmful materials are moved through the terminal, qualified staff analyse the material, and provide recommendations on its handling and storage. |
| 1.1 | b. Copy of TPT's Air Quality Management Plan, as referred to on page 25 & 26 of the Draft Environmental Management Programme. - Only received on 22 Oct 2013 | TPT in process of revising AQMP, incorporating all the recent upgrades and future upgrades which will be occurring throughout the terminal. Refer to response 1.10 above. |
| 1.1 | c. Dose Maps that are absent from the Air Quality Assessment Report. - Not received | The cumulative plume maps are provided in Section 3. (Figures 3 to 6). |
| 1.1 | d. Copy of the Emission Inventory used to model background air quality. - Not received | The emissions inventory is provided in Appendix 4. |
| 1.1 | e. Map indicating TPT's current monitoring sites. - Included in report. | A map indicating TPT’s current monitoring sites is provided in Figure 2 (Section 3). |
| 1.1 | AIR QUALITY IMPACT ASSESSMENT:  
   This report in our opinion does not adequately address air quality impacts.  
   1. Dose Maps: It is critical that these be provided to the RBCAA to allow for a proper assessment of the various scenarios i.e. current and future impacts. These dose maps will provide a clear indication of predicted PM<sub>10</sub> concentrations beyond the boundary. The report as it stands only provides PM<sub>10</sub> concentrations levels at fenceline and at receptor, but does not provide data on predicted concentrations between fenceline and receptor. WSP undertook a similar study for TPT in 2011 for the expansion of storage areas within TPT and the report dated October 2011 contains dose maps. The dose maps exist by virtue of the fact that modelling was undertaken so it is not understood why these have been excluded from the report. | The cumulative plume maps are provided in Section 3 - Figures 3 to 6. |
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<td>1.1</td>
<td>2. Thulazihleka Pan: We consider this a sensitive receptor, however it has been excluded from the study.</td>
<td>It is understood that from an ecological point of view, the Pan is a sensitive receptor; however, Air Quality impact assessments are primarily aimed at assessing potential impacts on human receptors. Therefore the pan was not included.</td>
</tr>
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<td>1.1</td>
<td>3. Non-Compliance: The significant exceedances within the boundary are of concern as the private sector operating within the Port are at risk.</td>
<td>The in-boundary exceedances are managed from a health and safety perspective by TPT and TNPA. There are unlikely to be large numbers of members of the public on site at any given time. TPT conducts regular health and safety checks on their staff. The members of the public that are on-site (e.g. contractors) should undergo regular checks by their respective companies. They do not fall under TPTs authority.</td>
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<td>1.2</td>
<td>4. Topas Instrument: We previously raised concern that this instrument is located out of the prevailing winds relative to the stockpiles and therefore does not quantify the impacts from the stockpiles. We stand by this assessment. The Dust Monitoring and Mitigation Strategy Document (Oct 2011) states that the authorities indicated that the Topas continuous monitor be deployed on the facility fenceline. The document further states that this instrument would be relocated early 2012. Our assessment of the Air Quality Report, supported by Figure 8 on page 25, the Topas has not been relocated.</td>
<td>Correct. The Topas has not been relocated. Transnet have purchase an additional dust monitoring instrument to be deployed at the fenceline in 2014. Transnet can confirm the proposed date of installation.</td>
</tr>
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<td>1.2</td>
<td>DUST MONITORING AND MITIGATION STRATEGY REPORT:</td>
<td>The use of the 2011 AQMP was a result of the delay experienced on the E&amp;F Slab environmental authorisation process (started in September 2012). In addition, the AQMP has not been updated, and is only proposed to be updated in 2014 (refer to response 1.10 above) Note: the E&amp;F Slab AQIA considered the impact of the E&amp;F Slab project on the off-site sensitive receptors in relation to the current cumulative background conditions. Mitigation measures have been recommended in line to the change in impact, which is unlikely to be significant. Therefore, the mitigation measures are suitable in relation to the overall impact. It should also be noted that the air quality management plan contains management and mitigation measures for the terminals.</td>
</tr>
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<td>1.2</td>
<td>Mitigation Measures: The report cites numerous mitigation measures to be implemented post December 2011, yet nowhere are these confirmed as having been implemented.</td>
<td>During the meeting with RBCCA, it was explained by TPT that a number of new mitigation measures have been implemented, e.g. loaders, grab unloaders are fitted with water spray systems, an alumina handling system has recently been installed and has proven to be very effective, all conveyors are to have dust extraction systems with bag houses; bottom discharge is to be fitted with new dust extraction system; and the sprinkler systems for stockpiles are in working order.</td>
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<tr>
<td>1.2</td>
<td>Exceedances: The report only looks at data within TPT’s boundaries, and goes on to stress that the exceedances occur in areas well within TPT’s boundaries. This is extremely concerning in that there is no assessment of impacts beyond TPT’s boundary, and no cognisance is taken of the fact that the private sector operates within the Port boundaries and are therefore exposed to significant levels of pollution.</td>
<td>Ambient exposure is relevant at and beyond the site’s fenceline. On site concentrations are controlled in terms occupational health regulations. Occupational health falls outside of the scope of the AQIA. Transnet is to address this issue further should it be required.</td>
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<td>1.2</td>
<td>Fenceline Data: The author states that low dust fallout results have been recorded at the property fenceline indicating that high levels of dust recorded on site are not being transferred off site. We strongly disagree with this statement and refer you to point 17 of our previous comments attached as Appendix A.</td>
<td>There is a dust fall out (DFO) unit located at the Water Front. Very low concentrations of dust fallout have been measured by this unit over the two year monitoring period. This informs the statement that the well vegetated buffer helps to contain the dust impact of the port. These reports are submitted regularly to the local licensing authority.</td>
</tr>
<tr>
<td>1.2</td>
<td>We would request that this report be updated and re-submitted to the RBCAA for comment, so that we may make an informed assessment regarding dust control measures.</td>
<td>Noted. At the meeting held with RBCAA (2013/11/28) the comments provided by RBCAA were discussed, and a way forward agreed upon. This includes, the written response to the RBCAA’s comments, the issuing of an addendum to the AQIA report, and allowing a response time.</td>
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<td></td>
<td>In view of our comments we respectfully request that this application be placed on hold until such time that WSP and TPT meet with the RBCAA to discuss the issues and concerns raised by the Association, which have not been adequately addressed.</td>
<td>The final report was rejected by the DEA in order to allow TPT to respond to the comments provided by RBCAA. The final comments and information are contained within this Addendum Report.</td>
</tr>
</tbody>
</table>
27 October 2013

WSP Environment & Energy (PTY) Ltd
Block A, on Langford
Langford Road, Westville
Durban
3629
Danielle.Michel@WSPGroup.co.za

Cc Ms Portia Leshilo
Dept. of Environmental Affairs
P.Leshilo@environment.gov.za

Attention: Danielle Michel

PROPOSED E/T SLAB EXPANSION, PORT OF RICHARDS BAY

We have reviewed the Final Basic Assessment report, together with all relevant reports, and herewith provide comment;

From the outset we wish to place on record that not all the issues & concerns raised by the RBCAA in their comment on the Draft Basic Assessment Report (DBAR) have been satisfactorily addressed.

We are particularly concerned that our specific request to be afforded an opportunity to meet with WSP and TPT to discuss issues and concerns was ignored.

FINAL STAKEHOLDER ENGAGEMENT REPORT:

The comments submitted by the RBCAA on 2 November 2012 have reference, and are attached as Appendix A;

1. Feedback on DBAR Comments: The RBCAA did not receive feedback on their comments. Our first sighting of a response to our comments on the DBAR was in the Final Stakeholder Engagement Report, dated September 2013.
2. **Stakeholder Meeting:** We stand by our comment that a Stakeholder meeting should have been held to afford stakeholders the opportunity to discuss issues and concerns with WSP and TPT. The response from WSP that public or stakeholder meetings were not deemed necessary is not accepted since the RBCAA specifically requested such a meeting.

This is particularly concerning since TPT is a member of the RBCAA.

3. **Comments from Authorities:** We raised concern that no comments were received from authorities. In response WSP states that all stakeholders were given an opportunity to submit comments, however the stakeholder data base excluded the uMhlathuze Municipality’s Air Quality Management Unit as well as the uThungulu’s Air Quality Manager who responsible for the issuing of Atmospheric Emission Licenses.

As a result, neither of the above has provided comment which is unacceptable considering that the most significant impacts of this expansion are air quality related.

4. **Stockpile Height:** We placed on record that based on observation and reports that the stockpile height is not being managed and is not being kept below the partition block height (wind zone height). In response WSP states that TPT manages its stockpiles to a height of 3m on average, we would argue that this is a false statement based on observations, reports and Figure 11 as contained on page 18 of the Dust Monitoring and Mitigation Strategy Document, Version 2, December 2011.

5. **Dose Maps:** We requested the inclusion of dose maps. In response WSP states that dose maps were not part of a standard AQIA. The RBCAA stands by its request for dispersion (Dose) maps, as without these cumulative impacts on sensitive receptors cannot be assessed.

6. **Daily Limit Exceedances:** The RBCAA commented that DBAR does not state how many times the daily limit will be exceeded. The report says more than 4 times. In response WSP states that this has been addressed in the report. We cannot find reference to this?

7. **Enclosed Stockpiles:** The RBCAA requested that the option of enclosed or partially enclosed stockpiles be considered. In response WSP states that they agree in theory, however in reality this is more challenging. This is not an acceptable response.

8. **Location of TopasTM:** The RBCAA commented that the instrument was located out of the prevailing winds in relation to the current and proposed stockpiles. In response WSP states that the Topas is not located out of prevailing winds. We stand by our comment. The prevailing winds are SW and NW. Based on the location of the Topas the impacts from the stockpile area will not be picked up by the Topas.

9. **Sprinkler System:** We stand by our comment that the sprinkler system is ineffective.

10. **Air Quality Monitoring Requirements:** This was not addressed in the DBAR and in response WSP stated that the Dust Monitoring Report compiled by TPT would not be released as internal information contained in the report is not for public consumption. This is a disturbing response and it is noted with concern that the report is marked “confidential”. The RBCAA requested a copy of the AQMP referred to in the Air Quality Impact Assessment Report, and has since been provided with the 2011 Dust Monitoring and Mitigation Strategy Report.

11. **Expansion of Monitoring System:** WSP stated that TPT will be installing 2 continuous PM analysers at its fenceline in the third quarter of 2013. Has this been implemented?
12. Information Requests: In our submission on the DBAR we requested the following information;

a) Copies of MSDS’s for all products – not received
b) Copy of TPT’s Air Quality Management Plan, as referred to on page 25 & 26 of the Draft Environmental Management Programme. – only received on 22 Oct 2013
c) Dose Maps that are absent from the Air Quality Assessment Report. - Not received
d) Copy of the Emission Inventory used to model background air quality. – Not received
e) Map indicating TPT’s current monitoring sites. – included in report.

AIR QUALITY IMPACT ASSESSMENT:

This report in our opinion does not adequately address air quality impacts.

1. Dose Maps: It is critical that these be provided to the RBCAA to allow for a proper assessment of the various scenarios i.e. current and future impacts. These dose maps will provide a clear indication of predicted PM10 concentrations beyond the boundary. The report as it stands only provides PM10 concentrations at fenceline and at receptor, but does not provide data on predicted concentrations between fenceline and receptor. WSP undertook a similar study for TPT in 2011 for the expansion of storage areas within TPT and the report dated October 2011 contains dose maps. The dose maps exist by virtue of the fact that modeling was undertaken so it is not understood why these have been excluded from the report.

2. Thulazihleka Pan: We consider this a sensitive receptor, however it has been excluded from the study.

3. Non-Compliance: The significant exceedances within the boundary are of concern as the private sector operating within the Port are at risk.

4. Topas Instrument: We previously raised concern that this instrument is located out of the prevailing winds relative to the stockpiles and therefore does not quantify the impacts from the stockpiles. We stand by this assessment. The Dust Monitoring and Mitigation Strategy Document (Oct 2011) states that the authorities indicated that the Topas continuous monitor be deployed on the facility fenceline. The document further states that this instrument would be relocated early 2012. Our assessment of the Air Quality Report, supported by Figure 8 on page 25, the Topas has not been relocated.

5.

DUST MONITORING AND MITIGATION STRATEGY REPORT:

The Air Quality Impact Assessment Report refers to this report as an AQMP, we would suggest that this is misleading and should be corrected.

This report is outdated (December 2011), and cannot be used to accurately assess proposed mitigation measures.

The mitigation measures referred to in this document are used to promote the acceptability of this application.

If the dust control measures discussed in the document have not been implemented then the magnitude of the impacts have been grossly under-estimated.

1. Mitigation Measures: The report cites numerous mitigation measures to be implemented post December 2011, yet nowhere are these confirmed as having been implemented.
2. **Exceedances:** The report only looks at data within TPT’s boundaries, and goes on to stress that the exceedances occur in areas well within TPT’s boundaries. This is extremely concerning in that there is no assessment of impacts beyond TPT’s boundary, and no cognisance is taken of the fact that the private sector operates within the Port boundaries and are therefore exposed to significant levels of pollution.

3. **Fenceline Data:** The author states that low dust fallout results have been recorded at the property fenceline indicating that high levels of dust recorded onsite are not being transferred offsite. We strongly disagree with this statement and refer you to point 17 of our previous comments attached as Appendix A.

We would request that this report be updated and re-submitted to the RBCAA for comment, so that we may make an informed assessment regarding dust control measures.

In view of our comments we respectfully request that this application be placed on hold until such time that WSP and TPT meet with the RBCAA to discuss the issues and concerns raised by the Association, which have not been adequately addressed.

Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment.

Yours faithfully,

MS S CAMMINGA
CHAIRMAN RBCAA EIA COMMITTEE

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Figure 24: RBCAA – 27 October 2013
5. Further Stakeholder Engagement

Following finalisation of the Basic Assessment report in September 2013, concerns were raised by stakeholders regarding the impact of the proposed expansion on air quality within the context of broader port emissions.

Subsequently TPT engaged with the relevant stakeholders to determine a way forward that would respond more appropriately to the key issues. Stakeholder meetings were held in June 2014 with Richards Bay Clean Air Association, uThungulu District Municipality and Transnet National Ports Authority.

An appropriate approach was agreed upon and TPT subsequently appointed WSP to undertake the required process. It is anticipated that this will include the following:

1) The modelling of air quality for the entire Port of Richards Bay, the modelling of the impact of the proposed E/F Slab on the port air quality and installation of a new meteorological station at the harbour to provide appropriate data;
2) Distribution of the revised Basic Assessment report and additional air quality study to stakeholders for comment;
3) Direct engagement with key stakeholders to discuss key issues raised previously; and,
4) Submission of the final Basic Assessment report to the Department of Environmental Affairs (DEA) for consideration.

In order to accommodate RBCAAs concerns with regards to cumulative air quality issues within Richards Bay, WSP held a stakeholder meeting with the RBCAA and TPT on 28 November 2013, at the uMhlathuze Municipality. The key issues discussed were:

1) The cumulative impacts of expansion projects of this nature, and
2) The related air quality concerns

The minutes of the meeting are provided in Section 5.1.

5.1. Stakeholder Meeting Notes – 28 November 2013

Meeting notes form the stakeholder meeting with RBCAA is provided overleaf.
MEETING NOTES

Job Title | Environmental Authorisation for Slab E/F, Richards Bay
Project Number | 27959
Date | 2013/11/28
Time | 13:00 – 14:00
Venue | Umhlatuzu Health Department Boardroom, Richards Bay Civic Centre, 5 Mark Strasse, Richards Bay
Subject | Stakeholder Meeting with RBCAA
Present (see attached)
- Sandy Carmina | SC | RBCAA
- France Smith | FS | RBCAA
- Candice Webb | CW | RBCAA
- Raymonn Van Rooyen | RV | Transnet
- Anthony Botha | AB | Transnet
- Christina Reddy | CR | Transnet
- Hasneel Tulfarang | HT | WSP
- Daniel Michelle | DM | WSP
- Lisa Ramsay | LR | WSP
Apologies | None

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<td>1. WELCOME</td>
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<td>DM</td>
<td>Welcomed everyone into the meeting and thanked everyone for their presence. DM indicated that she is the project manager for the EIA for the Slab E/F project. Each person present (listed above) introduced themselves and their role in their organisation. The purpose of the meeting was to discuss comments raised by the Richards Bay Clean Air Association (RBCAA) on the final Basic Assessment Report (BAR), and therefore no agenda was prepared.</td>
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<td>2. STAKEHOLDER COMMENTS</td>
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<td>DM then went through the comments from the stakeholders to allow for discussion on each issue as necessary. Inadequate comments from authorities:</td>
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<td>- DM indicated that comment have been received from uThungulu District Municipality, but not from Umhlatuzu. Guguazu (Umhlathuze Local Municipality) and Nozipo Khathi (District Municipality) are key individuals form an air quality perspective. Both municipalities have been provided with an opportunity to comment, but have not responded. DM to obtain contact to contact Nozipo for direct comment on the proposed project.</td>
<td>DM</td>
<td>2013/12/20</td>
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<td>- SC indicted that going forward WSP must inform all stakeholders about their projects in Richards Bay and also provide a brief information document to ensure that stakeholders can attain an understanding of the project1.</td>
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<td>- RV clarified that Transnet Port Terminals (TPT) delayed the project on their side at the start and acknowledged that the project did not commence as planned. As such due to the fragmented approach, this may have resulted in a disjointed public</td>
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1 Note: a background information document was supplied to all registered stakeholders and authorities at the outset of the project

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### Stockpile heights
- DM raised the issue highlight by RBCAA in the comments regarding stockpiles at the terminal exceeding the 3 metre height.
- RvR indicated that there are cases when stockpiles do exceed the height of 3 meters and that this is an operational and logistical issue (e.g. when ships do not arrive and cargo must be held on the site). They have mitigation measures in place, including sprinklers, to reduce dust levels in the port.
- SC queried if whether the ROD does not stipulate stockpile height restrictions. RvR confirmed that the ROD does not stipulate any form of stockpile heights restrictions, and it is not stipulated in the Occupation Health and Safety policies/legislation.
- FS indicated that the issue lies with the fact that above 2.5m or 3m the front loaders need to drive on to the stockpiles, which generates more fines.
- RvR indicated that the Richards Bay Coal Terminal (RBCT) has very high stockpiles, and TPT handles 1/5th of the coal that the RBCT handles.
- SC requested to know when Transnet are going to cover their open stockpiles.
- RvR confirmed that Transnet are not going to cover stockpiles. Building a shed costs R140 million, and this is not economically feasible.

### Air Quality Management Plan (AQMP)
- SC requested a copy of the Dust Management Plan (AQMP).
- RvR indicated that a revised copy of the AQMP is currently being developed and will be released shortly.
- SC specified that during loading dust is a significant issue. RBCAA’s position is that no particulates is acceptable, and projects like this need to consider the cumulative impact and the broader picture within the harbour.
- RvR indicated that all ship loaders, grab unloaders etc. are to be fitted with water spray systems. An upgraded alumina handling system has recently been installed and has proven to be very effective in terms of dust mitigation. All conveyors are to have dust extraction systems with bag houses; the bottom discharge and tippler is to be fitted with new dust extraction systems.
- SC indicated that she has seen dust free chutes that are used for loading product onto vessels lying along the berth and not being used.
- RvR acknowledged that they do not operate adequately. Transnet are in the process of installing appropriate loading equipment to replace these loading chutes.
- SC requested that updates on the AQMP must be provided to the RBCAA to show what steps Transnet have made to reduce dust at the Port.
- RvR acknowledged that the recent updates and improvements need to be compiled in an updated document to reflect these changes.

**RvR**  As soon as available

### Dust buckets:
- SC enquired where the on-line monitoring (AQ) is
- RvR indicated that a third one needs to be purchased, and the position of dust buckets are going to be changed
- SC indicated that RBCAA would like to see monitoring in Arboretum, as there is deposition beyond the boundary of the port. Perhaps put two buckets in residential areas.
- RvR indicated that TPT needs to consider it.
- SC indicated that there is a need for openness and transparency, and that RBCAA is going to request all their members to submit regular reports to RBCAA.
- RvR indicated he is willing to provide information for beyond the boundary, but will need to check with internal policies as to what information can be released.

### Occupational Health

- SC questioned if Transnet's employees have ever undergone medical checks.
- RvR indicated the following:
  - Medicals conducted returned favourable results
  - Radiation specialist conducted tests – these returned favourable results
  - Occupational hygiene surveys conducted by Apex frequently - results were all compliant.
  - Silica tests returned favourable results
  - Casual workers are also going to go through medicals. The problem with casuals was that they worked one day and not the other, along with working different areas within the terminal. Transnet are now tracking their health status.
  - Eyesight perspective Transnet appoint opticians to visit the port and test the dust impact on employees.
- SC occupational issues of other offices in the port - how are they being addressed?
- RvR – Transnet is not responsible for TNPA’s tenants, and highlighted that TPT is leasing the land from TNPA. These other companies/office should be undertaking risk assessments under their own capacity.

### Dose Maps:

- LR The dose maps were not shown in the AQ report, as the E/F slab project looked at the change in air quality rather than the cumulative impacts. A larger cumulative impact assessment has been undertaken.
- SC indicated that this information was never communicated to RBCAA, and we need to understand the broader context to understand and assess the change.
- SC requests that dose Maps be provided as part of the AQIA. WSP agreed to provide these as well as the cumulative model results.

### Location of Topas monitoring equipment:

- LR indicated that the location of the Topas was a result of the overall monitoring for TPT, and is placed so as to obtain information form all potential sources (including woodchip stockpiles), not just for the E/F slab assessment.
- SC this doesn’t really help with indicating what is coming from which area of the port. We did not know this, and need to have access to this type of information so as to understand the broader picture.
- SC enquired as to what the broader modelling was undertaken for.
- RvR indicated this was for the Atmospheric Emission License (AEL), and that this modelling took into account the proposed slabs and development (including E/F Slab).
- SC enquired if TPT is in agreement that RBCAA can see the information that has been produced for the port, as they need to understand the whole picture.

### Boundary of site:

- SC enquired as to what the “southern boundary” of the TPT site was.
- RvR indicated that it is 5m from the quay side into the water.
- SC enquired whether the vessels being loaded are outside of TPT jurisdiction as much of the dust comes from loading onto the vessels.
- CR indicated the vessels are out of TPT’s jurisdiction.
**Material Safety Data Sheets (MSDS)**

- DM enquired as to whether the MSDS's for the cargo going through the TPT terminals in Richards Bay were available
- CR indicated that TPT is not the custodian of the cargo, and therefore do not hold all the MSDS's, but have the generic sheets for typical materials. We have different types and grades of products (e.g. coal), and so don’t have sheets for each shipment.
- CR the new cargo request process includes a very extensive assessment process (for health and safety reasons). Each new cargo goes through 1) an environmental and safety assessment, and 2) three-day assessment by staff doctor, who provides recommendations on working with the cargo on site.

| 3. CLOSE OUT |  
| Way forward | DM  
|  
| WSP will provide written response to RBCAA’s comments on the final report |  
| RvR proposes an addendum to the EIA and / or AQ report is made and issued to stakeholders |  
| WSP intends to provide all information by the end of 2013. |  
| SC indicated that she is on leave from the 18th of Jan to 30th. |  
| DM acknowledged this constraint, and will be in contact with SC and stakeholders on the way forward. |  
| 20 December 2013 |
6. Addendum Report

As a result of comments from stakeholders regarding the Final BAR, TPT and WSP provided an addendum to the Final BAR containing additional information requested, and clarity on issues raised during the basic assessment process:

This report contained the following aspects:

1) Stakeholder Comments Reports
   - Final BAR

2) Additional Information request by RBCAA
   - Pollution Rose for PM10
   - Maps of TPT monitoring sites at Richards Bay Harbour
   - Letter of confirmation of services from uMhlathuze Municipality

6.1. Distribution

The public commenting period was provided from the 17 January to 7 February 2014. All registered stakeholders were be notified when the addendum report availability for comment.

6.2. Comments and Responses

Comments on the Addendum Report were received from:

- RBCAA, and
- CoastwWatch

These comments and responses by the EAP are presented in Table 6 below. The Addendum report was then update for submission to the DEA.
Table 6: Addendum Report - Comments and Responses

<table>
<thead>
<tr>
<th>No.</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>CoastWatch (Carolyn Schwegman), 6 February 2014, Received via email 6 February 2014</td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td>Coastwatch appreciates receiving the information as, in addition to human health related issues arising from poor air quality, dust fallout is likely to compromise the quality of the water in the wetlands in the area, a sensitive receptor being the Thulazihleka Pan (for example, sulphides in coal upon contact with air and water produce sulphuric acid and acid conditions influence the availability of various elements, impacting negatively on water quality). We trust that the additional information/cumulative dispersion model developed by WSP in response to concerns which have been raised will provide TPT with an improved management tool for guidance on effective dust abatement and that TPT continues to strive for improved air quality in their operations. However, notwithstanding the conclusions reached in the Addendum report Coastwatch aligns itself with RBCAA in acceptance of the Addendum Report.</td>
<td>Noted. Refer to response 1.18 above, and comments in Table 5 and Table 6.</td>
</tr>
<tr>
<td>1.2</td>
<td>Richards Bay Clean Air Association (Sandy Camminga), 10 February 2014, Received via email 12 February 2014</td>
<td></td>
</tr>
</tbody>
</table>
| 1.3 | 1. Comments and Response Report – Table 1, PAGES 3 – 8: 
a) Point 1.3 - Comments from uMhlathuze Municipality: Despite all efforts by WSP, it is noted with extreme concern that uMhlathuze Municipality’s Air Quality Management Unit has not provided any comment on this application.  
Agreed. WSP has sent emails and followed up with phone calls to the uMhlathuze municipality to no avail. 

1.5 – Dose Maps & Cumulative Impacts: The Dose Maps provided in Section 3 do not take into account cumulative impacts of current and proposed background sources other than TPT. This is in our opinion a shortcoming 
The Assessing Officer has no way of understanding the current status of air quality in the area, and whether or not the City of uMhlathuze can in fact accommodate any increase in particulate emissions, no matter how small the percentage contribution may be. 
This is particularly important considering TNPA’s proposed coal storage facility, as well as the Grindrod current and approved future coal storage facilities. Assessment of current and future cumulative impacts is critical. 
This development cannot be considered in isolation. TPT’s contribution to the overall pollution load needs to be understood.   
Noted. It is the role of Transnet National Ports Authority to provide cumulative emissions inventory for the Port of Richards Bay. TPT does not have access to this information, and therefore cannot undertake cumulative modelling for the entire port. It is the responsibility of the local municipality, as the delegated local air quality authority to obtain, or request, this information from all relevant parties. As this information is not available currently, and is unlikely to become available within the near future, only the available information can be assessed for the proposed development. |

1.4 | Point 1.7 – Enclosed Stockpiles: The environmental cost of not enclosing the facilities will be borne by the public at large.                                                                                                                                                                                                       | Noted. As enclosing the stockpile is not economically feasible, and there is no legislated requirement, TPT will continue to deploy all dust mitigation measures it currently has to control stockpile dust emissions |
<p>| 1.5 | Point 1.8 &amp; 1.11 – Location of TopasTM &amp; Expansion of Monitoring System: The rationale behind relocating the TopasTM to the East Gate, and locating the E-Sampler at West Gate | TPT intends moving its PM10 monitors to areas which very closely correlate to the proposed locations put forward by the RBCAA, namely in the vicinity of the port’s East and West gates. Power requirements of the PM10 monitors dictate |</p>
<table>
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<th>No.</th>
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<th>Response</th>
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|     | **is not understood.**  
We have plotted the proposed sites for the TopasTM and E-Sampler on the image below, together with a superimposed wind rose based on RBCAA hourly average wind data for the period 2009 - 2013. It is our opinion that the proposed locations for the TopasTM and E-Sampler would not quantify the impacts from the TPT operations. | where they can be placed and, based on the existence of the port entrance offices, these locations are the most suitable in terms of ensuring a reliable power supply to achieve reliable monitoring results. |
| 1.6 | **Point 1.13 – Air Quality Management Plan (AQMP):** Despite numerous requests this document has still not been provided to the RBCAA. On page 28 of the Addendum Report the author states that: “It is critical that Transnet adheres to the mitigation measures as outlined in their Air Quality Management Plan (AQMP) to minimize the environmental impact of operations at the terminal.”  
Sight of this document is critical to the assessment of this application. | **Note of correction – this is stated on page 36 of the Basic Assessment Report.**  
TPT has provided RBCAA with a copy of the Dust Management and Mitigation policy for Richards Bay Terminal.  
This document encompasses all that the AQMP would, albeit under a different title. There are no difference between the AQMP and the Dust Management and Mitigation Policy. |
| 1.7 | **Point 1.15 – Emission Inventory:** The inventory provided is only for TPT operations and not for all current and proposed sources. This relates to comment 1(b) above. | Refer to response 2.2 above. |
| 1.8 | **Point 1.18 - Thulasileka Pan:** The exclusion of the pan from the impact assessment is troubling. Impact from fallout on this ecologically sensitive receptor should be considered. | Noted. As discussed in Table 1 – AQIA’s are only required to undertake impact assessment on human receptors. |
| 1.9 | **Point 1.19 & Point 1.23 – Non-Compliance & Exceedances:** The potential health effects on the large number of private individuals working in the Port remains a concern. This is not an occupational health issue and should be further investigated. | Refer to Table 1 – 1.19 response |
| 1.10 | **DUST MONITORING AND MITIGATION STRATEGY DOCUMENT:**  
It is noted that the “updated” Dust Monitoring and Mitigation Strategy Document received by the RBCAA has no date, author or signature. | This will be attended to accordingly and the changes put in place. Please refer to attached (Error! Reference source not found.) |
| 1.11 | **We would like to commend TPT on the mitigation measures that have thus far been implemented and proven to be successful.**  
We however remain concerned at the length of time taken to implement certain measures, and that others when put into practice are ineffective.  
We do not support the assertion made on page 4 for that “……high levels of dust being recorded onsite are not being transported off-site.” The RBCAA has provided evidence to the contrary in previous submissions. | Noted.  
Timeframes provided by TPT take into account the various FEL studies as well as procurement processes required in obtaining dust mitigation equipment. TPT acknowledges the urgent need for these pieces of equipment but, due to the very considerable cost involved in obtaining same, internal governance processes need to be undertaken. Since meeting with the RBCAA in Dec 2013, a considerable amount of work has already taken place in this regard.  
TPT wishes to advise that dust fallout monitoring undertaken on and offsite supports the assertion that dust generated onsite does not travel offsite at levels breaching environmental thresholds. Due to the heavier mineral nature of the dust generated during TPT’s operations, particles are deposited out of the atmosphere a relatively short distance away from generation and do not reach past TPT boundaries. |
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<tr>
<td>1.12.</td>
<td>The RBCAA’s major concern remains the mitigation of dust emissions during loading of vessels. These emissions are not low level emissions and carry beyond the boundary fence. Having reviewed the recommendations to minimise dust during loading we were unable to assess the feasibility and effectiveness of such measures. We therefore requested the Port Users Committee (PUC), who has expertise in the field of shipping, to provide an opinion on the recommendations. The opinion of the PUC is that the recommendations offer no solution in mitigating dust during loading. We attach this opinion as Appendix A.</td>
<td>TPT wishes to advise that dust fallout monitoring undertaken on and offsite supports the assertion that dust generated onsite does not travel offsite at levels breaching environmental thresholds. Due to the heavier mineral nature of the dust generated during TPT’s operations, particles are deposited out of the atmosphere a relatively short distance away from generation and do not reach past TPT boundaries. This assertion holds, particularly in light of the fact that the shiploaders are even further placed from the terminal boundaries than the other TPT cargo handling operations which relate particularly to the proposed development in question. The PUC’s opinion does not take into account the above considerations, including the additional sources of dust around the harbour which could contribute to the levels of dust claimed by the RBCAA to be directly attributable to TPT operations.</td>
</tr>
<tr>
<td>1.13.</td>
<td>OUTSTANDING INFORMATION: We request that a copy of TPT’s Air Quality Management Plan (AQMP) be made available to the RBCAA.</td>
<td>Refer to response A1.5 above.</td>
</tr>
<tr>
<td>1.14.</td>
<td>RECOMMENDATIONS: The RBCAA recommends that; 1. Comment from the City of uMhlathuze Air Quality Management Unit is insisted upon by the Assessing Officer.</td>
<td>TPT will consider undertaking this exercise in future, acknowledging that this can add value to the process as well as enhancing stakeholder interaction.</td>
</tr>
<tr>
<td>2.</td>
<td>TPT review their strategy for mitigating dust emissions during loading, in consultation with the Port Users Committee (PUC), and communicate this to Stakeholders by means of an updated Strategy document.</td>
<td>TPT is currently not in a position link its monitors to the RBCAA network.</td>
</tr>
<tr>
<td>3.</td>
<td>TPT link their 2 continuous monitors to the RBCAA monitoring network.</td>
<td>These requirements form part of the conditions of the AEL requirements for the Richards Bay terminal. TPT remains available to be audited as and when the authorities schedule such audits.</td>
</tr>
<tr>
<td>4.</td>
<td>An audit of TPT’s compliance with mitigation measures be undertaken by the authorities, and the findings communicated to key external stakeholders.</td>
<td>The Environmental Stakeholder Forum is an initiative of the TNPA. Once established by the TNPA, TPT will participate therein.</td>
</tr>
<tr>
<td>5.</td>
<td>The Environmental Stakeholder Forum is re-established as part of TPT’s external communications strategy.</td>
<td>TPT will provide dust fallout results to the RBCAA.</td>
</tr>
<tr>
<td>6.</td>
<td>TPT make available to the RBCAA their monthly dust monitoring reports.</td>
<td></td>
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</tbody>
</table>
SLABS E AND F – PORT OF RICHARDS BAY
(TRANSNET PORT TERMINALS PROJECT (TPT))

COMMENT ON THE ADDENDUM TO THE FINAL BASIC ASSESSMENT REPORT (BAR):

Background:

The expansion project is motivated by the requirement to meet the demand for storage capacity – new slabs E and F are proposed for the storage of magnetite, chrome and coal. Environmental authorisation is required in terms of the EIA regulations and an amendment to the existing Emissions Licence is required.

Addendum:

The Addendum Report aims to address the issues raised by the Richards Bay Clean Air Association (RBCAA) following circulation of the final BAR, and at a subsequent stakeholder meeting, after the Department’s rejection of the final report, pending engagement with RBCAA as per the organisation’s request.

Coastwatch appreciates receiving the information as, in addition to human health related issues arising from poor air quality, dust fallout is likely to compromise the quality of the water in the wetlands in the area, a sensitive receptor being the Thulazihleka Pan (for example, sulphides in coal upon contact with air and water produce sulphuric acid and acid conditions influence the availability of various elements, impacting negatively on water quality).

We trust that the additional information/cumulative dispersion model developed by WSP in response to concerns which have been raised will provide TPT with an improved management tool for guidance on effective dust abatement and that TPT continues to strive...
for improved air quality in their operations. However, notwithstanding the conclusions reached in the Addendum report Coastwatch aligns itself with RBCAA in acceptance of the Addendum Report.

Yours faithfully

[Signature]

For Coastwatch KZN
03 July 2014

WSP Environment & Energy (PTY) Ltd
Block A, on Langford
Langford Road, Westville
Durban
3629
Danielle_Michel@WSPGroup.co.za

Cc  Ms Portia Leshilo
Dept. of Environmental Affairs
P.Leshilo@environment.gov.za

Attention: Danielle Michel

PROPOSED E/F SLAB EXPANSION, PORT OF RICHARDS BAY
ADDITIONAL COMMENT

1.0 BACKGROUND AND INTRODUCTION

The Richards Bay Clean Air Association (RBCAA) appreciates the opportunity to provide additional comment on the Proposed E/F Slab Expansion, following the stakeholder meeting held between the RBCAA and Transnet Port Terminals on 3 June 2014.

The RBCAA has further been provided with the Fugitive Dust Management Plan, prepared by uMoya-NILU Consulting (Pty) Ltd. We understand that this is a follow on from the Dust Monitoring and Mitigation Strategy Document dated December 2011, which the RBCAA had sight of as part of the re-submission of the Final BAR, and the addendum report.

It is the RBCAAs’ understanding that the document prepared by uMoya-NILU is intended to provide a more comprehensive overview of air quality management within TPT Richards Bay.

The comments provided below are based on the outcomes of the stakeholder meeting held between the TPT and the RBCAA on 3 June, the RBCAAs’ submission dated 10 February 2014, and our review of the Fugitive Dust Management plan as prepared by uMoya-NILU.
2.0 STAKEHOLDER MEETING 3RD JULY 2014

At the stakeholder meeting held between the RBCAA and TPT the following was agreed;

- **Fugitive Dust Management Plan** (FDMP) for TPT Richards Bay to be amended to include action dates. The amended report is to be made available to the RBCAA. Further comment is provided under Point 3.0 below.
- **Modelling of Cumulative Impacts** to be undertaken to establish baseline of current and future sources within Richards Bay – Subsequent to the meeting TPT has provided the RBCAA with a copy of the proposed Scope of Work for the E/F Slab Cumulative Air Quality Study.
- **Expansion of TPT Monitoring network** to include monitoring within the nearest residential area – The RBCAA requests TPT to amend their dust management plan accordingly. The RBCAA is available to assist with the identification of a suitable site.
- **TPT Dust Monitoring Reports** to be made available to the RBCAA - We thank TPT for having thus far provided the RBCAA with the February and March 2014 reports. We look forward to receiving the reports on a monthly basis.
- **Environmental Stakeholder Forum** to be re-established – The RBCAA would like to see this Forum re-established as soon as possible. The RBCAA is available to assist in this regard.

3.0 RBCAA SUBMISSION DATED 10 FEBRUARY 2014

Please could we receive a formal response to our written submission dated 10 February 2014?

The RBCAA reserves the right to provide further comment on receipt thereof.

4.0 FUGITIVE DUST MANAGEMENT PLAN AS PREPARED BY UMOYA-NILU

- **Location of Topas and E-Sampler**: (Page 5) - The consultant does not provide an opinion on the suitability of the locations relative to TPT activities and prevailing winds. We request that the consultant be requested to provide an opinion in this regard.
- **Meteorological Monitoring**: (Page 5) - The RBCAA has in previous applications raised concern regarding the Davis weather station and its location. We therefore support the findings and recommendation to acquire a scientific meteorological station and to have it appropriately located.
- **Dust Extraction and Control Units**: (Page 6) - The consultant states that “The full benefits of dust extraction is not being realised as the units are not utilised optimally. Operators should always adhere to the requirements of the Operational Work Instructions to ensure the units are operated correctly to reduce dust emissions.” This is a common finding throughout the report, which implies that dust abatement is significantly dependent on the operators, and that Operational Work Instructions are not being adhered to. The Dust Management Plan does not address this issue.
- **General Housekeeping**: (Page 9) - The RBCAA recommends the purchase of water tankers, as the use of modified haulers is not ideal.
- **Action Plan**: (Table contained in the report) - As discussed in the meeting, the timeframes for the implementation of the actions need to be defined in terms of actual dates.
While the Fugitive Dust Management Plan provides a fairly comprehensive overview of current and proposed dust mitigation measures, the report is lacking in detail when it comes to implementation strategies and enforcement.

The RBCAA therefore recommends that this document be expanded into a detailed Management Plan, against which performance and compliance can be effectively monitored.

**CONCLUSION**

The RBCAA’s primary aim is to facilitate improved air quality in the uMhlathuze area through constructive engagement.

We acknowledge with appreciation TPTs’ open engagement with the Association.

TPTs’ commitment to improving their management of fugitive dust emissions is commendable.

Yours faithfully,

[Signature]

MS S CAMMINGA  
CHAIRMAN RBCAA EIA COMMITTEE
7. Revised Final Report

Following the submission of the Addendum Report, the DEA rejected the Final report, stating that the stakeholder concerns had not been adequately addressed.

TPT engaged with RBCAA on the way forward, and it was established that a detailed cumulative impact assessment would need to be compiled, including data from all industries affecting the air quality in and around the Richards Bat harbour (or as many as possible). The Final BAR would then be revised to include the new air quality report and results.

7.1. Extension of Submission

In order to accommodate this additional scope of work, WSP requested an extension of timeframes from the DEA to obtain and model the air quality information required. This extension was granted until February 2015. Stakeholders were notified of this extension (Figure 25).

Subsequently the process of gathering information to develop the cumulative air quality model became protracted due to lack of availability of, and access to, the required data. WSP therefore motivated to the DEA for a further extension to the submission deadline. This was granted until September 2015 (letter dated: 2015/03/11). Stakeholders were notified of this further extension (Figure 26).

The deadline for submission of the final Basic Assessment report (including stakeholder comment period) is 11 September 2015, in accordance with the DEA letter dated 11 March 2015. Due to delays with obtaining accurate data and the need to rerun the cumulative model, a further Delay was experienced, and a further extension was requested. The DEA was notified of the further delay via telephone discussion and formal letter.

7.2. Distribution

The final report was revised to including the cumulative air quality report and its findings. All stakeholders were notified of the revised report and informed of an opportunity to comment on the Revised BAR (Figure 27). The comment period was 30 days – from 1 to 30 October 2015.

All comments are to be provided to WSP, and will be incorporated into this report for submission to the DEA.
Dear Stakeholder

PROPOSED E/F SLAB EXPANSION, RICHARDS BAY - PROCESS UPDATE

Background
In 2011 WSP Environmental (Pty) Ltd (WSP) was appointed by Transnet Port Terminals (TPT) to undertake a Basic Assessment process required to obtain environmental authorisation in terms of the National Environmental Management Act, 1998 (No. 107 of 1998).

Project progress
Following finalisation of the Basic Assessment report in September 2013, concerns were raised by stakeholders regarding the impact of the proposed expansion on air quality within the context of broader port emissions.

Subsequently TPT engaged with the relevant stakeholders to determine a way forward that would respond more appropriately to the key issues. Stakeholder meetings were held in June 2014 with Richards Bay Clean Air Association, uThungulu District Municipality and Transnet National Ports Authority.

An appropriate approach was agreed upon and TPT subsequently appointed WSP to undertake the required process. It is anticipated that this will include the following:

1. The modelling of air quality for the entire Port of Richards Bay, the modelling of the impact of the proposed E/F Slab on the port air quality and installation of a new meteorological station at the harbour to provide appropriate data;
2. Distribution of the revised Basic Assessment report and additional air quality study to stakeholders for comment;
3. Direct engagement with key stakeholders to discuss key issues raised previously; and,
4. Submission of the final Basic Assessment report to the Department of Environmental Affairs (DEA) for consideration.

Extension of timeframes
On 11 July 2014 WSP notified the Department of Environmental Affairs that TPT wish to extend the timeframes allowed for the submission of a final Basic Assessment Report on the above process. The Department of Environmental Affairs has granted this extension until February 2015 to submit the revised and updated documents (Letter dated: 2014/08/19).

All registered stakeholders will be notified when the revised report is available for comment. Should you have any questions regarding the above, please contact the below practitioner.

Yours sincerely

[Signature]

Danielle Michel
Senior Environmental Consultant

WSP Ref: 45648
DEA Ref: 12/12/16/3/1/708

Figure 25: Notice of extension of timeframes – 1 September 2014
Dear Stakeholder

RE: PROPOSED E/F SLAB EXPANSION, RICHARDS BAY - UPDATE: MARCH 2015

Background

In 2011 WSP Environmental (Pty) Ltd (WSP) was appointed by Transnet Port Terminals (TPT) to undertake a Basic Assessment process required to obtain environmental authorisation, in terms of the National Environmental Management Act (No. 107 of 1998), for the abovementioned project.

Following finalisation of the Basic Assessment report in September 2013, concerns were raised by stakeholders regarding the impact of the proposed expansion on air quality within the context of broader port emissions. Subsequently TPT engaged with the relevant stakeholders to determine a way forward that would respond more appropriately to the key issues.

Project Progress

In September 2014, WSP notified stakeholders of the extension of the timeframes to submit the revised and updated documents to the Department of Environmental Affairs (DEA) until February 2015 (Letter dated: 2014/08/19).

Subsequently, information to develop the cumulative air quality model for the Port of Richards Bay has been collected from various sources. This process has become protracted due to lack of availability of, and access to, the required data. On 22 January 2015, WSP motivated to the Department of Environmental Affairs (DEA) to extend the timeframes allowed for the submission of a final Basic Assessment Report for a second time, to allow additional time to meet the requirements of stakeholders.

The DEA has granted the extension of submission for the revised and updated documents until September 2015 (letter dated: 2015/03/11).

Way Forward

Progress has been made and information is currently being finalised. Following this, the air quality model and report will be revised, and stakeholders will be provided with an opportunity to comment on the revised documents.

Should you have any questions regarding the above, please contact the below practitioner.

Yours sincerely

Danielle Michel
Senior Environmental Consultant
WSP Environment & Energy South Africa
Block A, 1 on Langford, Langford Road, Westville, Durban, 3629
Tel: +27 31 240 8809
Fax: +27 31 240 8801
Email: Danielle.Michel@WSPGroup.co.za

Directors: CA Haycock (Managing), SL Doerf, MC du Plooy**, JH McStay**, ESBF Mtshwa* (non-Executive)

Ver: Feb 2015 (* Pr Sci Natl | ** Pr Eng | *** Pr Tech Eng | 8 British)

Figure 26: Notice of second extension of timeframes – 20 March 2015
WSP Ref: 45848
DEA Ref: 12/12/16/3/3/1/708

1 October 2015

Dear Stakeholder

PROPOSED E/F SLAB EXPANSION, RICHARDS BAY – REvised AIR QUALITY ASSESSMENT AND BASIC ASSESSMENT REPORT

Background

In 2011 WSP Environmental (Pty) Ltd (WSP) was appointed by Transnet Port Terminals (TPT) to undertake a Basic Assessment process required to obtain environmental authorisation, in terms of the National Environmental Management Act (No. 107 of 1998), for the abovementioned project.

Following finalisation of the Basic Assessment report in September 2013, concerns were raised by stakeholders regarding the impact of the proposed expansion on air quality within the context of broader port emissions. Subsequently TPT engaged with the relevant stakeholders to determine a way forward that would respond more appropriately to the key issues.

Revised Report Comment Period

WSP has collected information over the last twelve months (with the assistance of local stakeholders and businesses) to develop the cumulative air quality model for the Port of Richards. An Air quality Impact Assessment (AQIA) including all available background sources of emissions in the Richards Bay Harbour area has been compiled. The AQIA report includes the modelling of the current scenario (existing level of air quality) and the proposed scenario (the proposed E/F slab development).

The revised Basic Assessment Report and AQIA is available for public review for a period of 30 days from 1 October 2015 – 30 October 2015. The report is available from the following locations*

- Richards Bay Library
- From the below practitioner

* Should you require a hard copy of the report, this can be provided on request from the below practitioner.

Please note: All comments on the Final EIA Report must be submitted in writing to the following practitioner by 17:00 on 30 October 2015. Should you have any queries regarding the above, please contact the below practitioner.

Yours sincerely,

Danielle Sanderson
PO Box 1442, Westville, Durban, 3629, South Africa
Tel: +27 31 240 8868
Fax: +27 31 240 8861
Email: Danielle.sanderson@WSPgroup.co.za

Figure 27: Notice of Availability of Revised Report – 1 October 2015