

STAKEHOLDER/IAP	DATE	COMMENT	RESPONSE
DEADP: DM		<p>REFERENCE NUMBER: 16/3/3/1IA1 /2/3015/19</p> <p>The draft Basic Assessment Report ("BAR") dated and received by this Department on 20 May 2019, refers.</p> <p>1. This letter serves as an acknowledgement of receipt of the draft BAR by this Directorate.</p> <p>2. This Directorate will now review the draft BAR and provide a comment on the draft BAR within the legislated timeframe.</p>	Noted with thanks.
DEADP: DM	18 June 2019	<p>I. Activity Description</p> <p>The activity description is inadequate. The following information must be provided:</p> <p>I. I. The description of the proposed development must relate to the listed activities that are triggered. As such, the description must indicate that the proposed development entails the proposed storage of dangerous goods for the establishment of an extruded polystyrene plant and associated infrastructure.</p> <p>I .2. A list of the dangerous goods to be stored and the respective volumes to be stored must be provided.</p>	<p>Activity description amended as requested.</p> <p>This is provided in numerous places in the Draft and Final BAR:</p> <ol style="list-style-type: none"> 1. Page 12 of the BAR – listed activities 2. Page 15 of the BAR – Storage facilities section

			<p>Dangerous goods (according to NEMA definition) to be stored on site:</p> <ul style="list-style-type: none"> • Dimethy Ether (DME) (45m3) • Ethanol (9m3) • Flame retardant (50m3)
		<p>I .3. An indication of whether the dangerous goods will be stored in aboveground tanks must be provided. The number of storage tanks must be provided.</p>	<p>Page 15 of the BAR – Storage facilities section</p> <ul style="list-style-type: none"> • <i>Dimethyl ether (DME) (45m3) – one above ground tank</i> • <i>Flame retardant (50m3) - stored in an enclosed warehouse in 25 kg bags</i> • <i>Ethanol (9m3) – one above ground tank</i> <p>Tank Specifications included in APPENDIX K9 - Technical specifications and drawings of the tanks.</p>
		<p>I .4. Should the dangerous goods be stored aboveground, a description of the bunds must be provided.</p>	<p>BAR states <i>“Bundling of above ground storage of dangerous goods will have a bund wall that is in accordance with the requirements of SANS 0089 part 1.”</i></p>

			<p><i>The DME (45m3) and 152a (9m3) CO2 (22m3) is to be stored above ground but are <u>Vapour</u> at room temperature.</i></p> <p>Bunding would therefore only be applicable to the above ground ethanol storage.</p> <p>Flame retardant is solid pellets and stored in an enclosed warehouse in 25 kg bags.</p>
		<p>1.5. A detailed description of the proposed piping of the dangerous goods must be provided.</p>	<p>See Appendix K2.</p> <p>Added to BAR:</p> <ul style="list-style-type: none"> • DME piping specification: ASME 106A • CO2 piping specification: EN 13480 • High pressure piping specification: SANS 10260 (all parts) • R 152a piping specifications: 316 stainless steel
		<p>1.6. <u>All associated infrastructure</u> must be included in the activity description.</p>	<ul style="list-style-type: none"> • Existing factory building in the north west corner (existing) • Raw material storage area north-west of the site (existing)

			<ul style="list-style-type: none"> • A second raw material storage area will be in the south west corner of the main factory building (existing) • Blowing Agent storage will be via dedicated tanks located on the eastern boundary of the site (new) • Blowing Agent will be transferred to the process building via pipework (new) • XPS will be stored in the XPS Finished Board Storage Area to the west and south-west of the site (new) • Structural grid and loading platform for 24m articulated trucks (new) • Flammable liquids store (existing) • New reclaimer building with reclaiming plant (new) • Silo (new) • Relocated store with chipper (existing) • Filter Unit (new) • Chiller (new) • Gas pumps (new) • Internal road (new) • Office buildings (existing)
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			<ul style="list-style-type: none"> • Parking bays (existing) • Main factory building with XPS extrusion machine (existing building) <p>Included in activity description.</p>
		<p>2. Alternatives</p> <p>The description of the investigation of alternatives is inadequate. Further motivation with respect to the following must be provided:</p> <p>2. 1. Page 37 of the draft BAR indicates that "There are two ways to produce polystyrene, EPS (expanded polystyrene) and XPS (extruded polystyrene)." However, no further details have been provided.</p>	<p>Detail as below added to the Final BAR:</p> <p>The energy efficiency of a building often depends on the materials that create its envelope. Selecting the appropriate insulation type is crucial in delivering the required insulation performance for your project. The use of XPS and EPS insulation in building construction offers great flexibility, compatibility and thermal efficiency for all areas of the building envelope system. But what is the difference between EPS and XPS insulation?</p> <p>MANUFACTURING</p> <p>Extruded polystyrene insulation (XPS) is manufactured using a process of extrusion. This continuous process results in a closed cell structure with a smooth</p>

			<p>skin on the top and bottom of the board. The closed cell structure of extruded polystyrene (XPS) prevents water penetration to the structure of the insulation board and provides long term strength and durability.</p> <p>Expanded Polystyrene insulation (EPS) is manufactured using beads of foam within a mould, heat or steam is then applied directly to the beads which causes them to expand and fuse together. This process produces a closed cell structure, not a closed cell insulation board, due to voids that can occur between the beads.</p> <p>COMPRESSIVE STRENGTH</p> <p>Compressive strength is demanded in the most challenging environments such as under slabs on a flat roof, concrete floors, foundations, plaza and podium decks and cold storage. In general, when comparing EPS and XPS board densities, the compressive strength of XPS is greater than that of EPS. For EPS to achieve the same compressive strength as XPS, the</p>
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			<p>density of the foam would need to be increased, often resulting in a greater thickness of board being required.</p> <p>THERMAL CONDUCTIVITY Insulation is one of the most practical and cost-effective ways to improve a building's energy efficiency, by improving the insulation in new and existing buildings, significant cost savings and reductions in energy usage can be achieved. Both XPS and EPS provide good thermal conductivity performance. However, the air trapped in the voids in the EPS will conduct heat. A much higher density EPS board will be required to match the thermal performance of XPS insulation.</p> <p>WATER VAPOUR DIFFUSION Water vapour diffusion resistance (μ) of EPS ranges from approximately 30 – 70 compared to the water vapour diffusion resistance (μ) of XPS that ranges from approximately 80 – 250. XPS is often selected over EPS for</p>
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			wetter environments that require a higher water vapour diffusion resistance value.
		2.2. Page 37 of the draft BAR further indicates that "Bundling of above ground storage of dangerous goods will have a bund wall that is in accordance with the requirements of SANS 0089 part 1. Belowground storage in accordance with SANS 1535," However, no further details have been provided.	No below ground tanks. Bundling only applicable to ethanol tank.
		2.3. A more detailed description of the preferred alternative must be provided. This must include reasons as to why the preferred alternative is deemed the preferred. These reasons would include the reasons why the expanded polystyrene process and the below ground storage tanks are not deemed as preferred.	Updated as requested.
		3. Receiving environment It is noted that the proposed site is owned by the applicant and existing buildings are located on the proposed site. A detailed description of the existing buildings and associated infrastructure and the existing processing activities (if any) must be provided.	The site has recently been purchased by the applicant. No processing activities, the site was sold without machinery etc. No operations are taking place on site currently. The site has existing buildings. <ul style="list-style-type: none"> • Existing factory building in the north west corner (existing) • Raw material storage area north-west of the site (existing)

			<ul style="list-style-type: none"> • A second raw material storage area in the south west corner of the main factory building (existing) • Flammable liquids store (existing) • Relocated store with chipper (existing) • Office buildings (existing) • Parking bays (existing) • Main factory building (existing building)
		<p>4. Site development plan Appendix B of the draft BAR provides two site development plans. The site development plan for the preferred alternative must be labelled accordingly.</p>	<p>Layout 1 is the Preferred Alternative as stated in numerous places in the BAR. This is stated on the SDPs in the FINAL BAR as requested.</p>
		<p>5. Specialist study 5.1. Given that flame retardant is considered a dangerous good in terms of the NEMA EIA Regulations, 2014 as amended) and has not been included in the specialist report, an updated statement from the Major Hazard Installation Risk Assessment specialist must be provided.</p>	<p>Please find updated MHI Report attached: Revision 4. see Section 5.1 for the change regarding flame retardant.</p> <p>Flame retardant - Brominated SBS.</p> <p>MSDS for the three NEMA dangerous goods attached as Appendix K3.</p>
		<p>5.2. Every alternate page of the Major Hazard Installation Risk Assessment Report (compiled by MMRisk IPty) Ltd.</p>	<p>Apologies for the printing error in the DRAFT BAR. The FINAL BAR will be printed correctly.</p>

		<p>and dated 15 May 2019) is printed incorrectly (i.e. upside down). Please ensure that the study is printed correctly.</p>	
		<p>5.3. Page 25 of the Major Hazard Installation Risk Assessment Report (dated 15 May 2019) indicates "Error/ Reference source not found." Please correct this error.</p>	<p>Updated as requested.</p>
		<p>6. Potential impacts Page 45 of the draft BAR indicates that "It is not anticipated that that the proposed development will have a significant impact on traffic as the number of additional trips generated will not be significant." An indication of the additional number of trips to be generated must be reported on in the final BAR.</p>	<p>48 people worked at the previous business which occupied the building bought by Swartland. Deliveries and collections would have also taken place.</p> <p>The site is an existing industrial site but the operational process is changing.</p> <p>During Construction 25 people will be on site and delivery vehicles.</p> <p>During Operations 50 people will be on site and trucks leaving the premises per day will be 7 (Based on maximum capacity).</p> <p>As such the increase in traffic during construction is considered zero and the increase in traffic during operations in negligible.</p>
		<p>7. Draft Atmospheric Emissions Licence Application Page 14 of the draft Atmospheric Emissions Licence Application form indicates that "There will be no stacks at</p>	<p>We have requested this clarity from the City of Cape Town, who are the competent authority in this</p>

		<p>the plant. However, it is recommended to conduct once-off ambient air quality monitoring (ambient VOCs concentrations) at 3 selected locations within the the building where extrusion takes place. This investigation will serve to verify that the possible emissions from the process are negligible."</p> <p>Since there will be no stacks associated with the proposed development, clarity must be provided with respect to the applicability of the National Environmental Management: Air Quality Act, 2004 Act. No. 39 of 2004).</p>	<p>regard. Ian Gildenhuys stated "We consulted with Dr Vincent Gololo of National DEA on this matter. The trigger is the use in production "of organic chemicals not specified elsewhere" – above the threshold of 100t/annum.</p> <p>Dr Gololo confirmed that the activity as described thus triggers the listing notice."</p> <p>Please see Correspondence in Appendix K4 and K5.</p>
		<p>8. Public Participation</p> <p>8.1. Proof of the public participation process conducted must be provided in the final BAR. This must include. inter alia. the following:</p> <p>8.1.1. The copies of the advertisements placed in 'Die Burger' and 'Weskus Nuus' are unclear. Please provide clear copies of the advertisements.</p> <p>8. 1.2. A copy of the written notification to interested and affected parties.</p>	<p>Clearer copies provided in FINAL BAR.</p> <p>All copies and proofs included in FINAL BAR.</p>
		<p>9. Environmental Management Programme ("EMPr")</p> <p>9.1. The requirements of Appendix 4 of the NEMA EIA Regulations, 2014 (as amended) have not been met. The following information is required:</p> <p>9. I. I. A map at an appropriate scale which superimposes the proposed activity, its associated structures, and</p>	<p>A map at an appropriate scale which superimposes the proposed activity, its associated structures, and associated infrastructure on the environmental sensitivities added to the EMPr.</p>

		associated infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers;	
		9.1.2. Objective CB (i.e. Archaeology and Paleontology Management) on page 24 of the draft BAR indicates that underground storage tanks will be installed. However, the draft BAR does not indicate whether underground or aboveground storage tanks will be installed. Clarification is required;	As above. The Draft and Final BAR do indicate what tanks will be used.
		9.1.3. Objective C 14 (i.e. Pesticides) of page 26 of the draft BAR indicates that pesticides will be applied. However, no further information with respect to the use of pesticides has been provided. Clarification is required;	Swartland will make use of Rentokil pest control for mouse traps. Swartland will make use of roundup for controlling unwanted weeds.
		9.1.4. Objective C 16 (i.e. Diesel fuel and lubricant handling programme) on page 27 of the draft BAR indicates that fuel tanks will be installed. However, the draft BAR does not indicate that fuel tanks will be installed. Clarification is required; and	As above. The Draft and Final BAR do indicate what tanks will be used.
		9.1.5. The EMPr must be amended to include mitigation measures for the storage and handling of the dangerous goods (i.e. dimethyl ether difluoroethane, ethanol and flame retardant).	EMPr has been amended – see Goal 7.
		10. General Page 24 of the draft BAR indicates that "The site is located 50km north east of Cape Town and falls within the jurisdiction of the Cape Town Metropolitan Municipality	Amended as requested.

		{CTMM})." The proposed site falls within the jurisdiction of the City of Cape Town. Please correct this error.	
		11. You are reminded that the BAR must be duly dated and originally signed by the applicant, the environmental assessment practitioner and specialists. In addition, you are reminded that the BAR must be submitted within 90 days of the date of receipt of the application by the Department. The deadline for the submission of the BAR is therefore 14 August 2019.	The FINAL BAR will be submitted before 14 August 2019.
		12. If however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.	No additional 50 days required. An additional 30 day commenting period is taking place 9 July 2019 to 8 August 2019.
DEADP: PCM	20 June 2019	The Directorate: Pollution and Chemicals Management ID: PCM} hereby acknowledges receipt of the above-mentioned application on 20 May 2019. The D: PCM has reviewed the above-mentioned document and has no comment.	Noted with thanks.
CoCT	20 June 2019	1.1 Basic Assessment Report: a. No DEA&DP reference number has been provided with the application. as required. The DEA&DP reference number must be clearly reflected on the cover letter and DBAR.	There was NO reference number when the Draft BAR was sent for comment. As no pre-application stage was conducted the APPLICATION and DRAFT BAR were submitted on the same day without a reference number.

		<p>b. It must be confirmed whether this is a Pre-Application Basic Assessment Report.</p>	<p>It is a DRAFT BAR. No pre-application stage took place for this project due to time urgency.</p>
		<p>c. The subject site is situated between the 5 - 16km Urgent Protective Action Planning Zone (UPZ) boundary of the Koeberg Nuclear Power Station (KNPS). The Disaster Risk Management Centre (DRMC) is the custodian (on behalf of the City of Cape Town) for the execution of the Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR) and is tasked with the responsibility of ensuring that the public safety arrangements are in place in the case of a nuclear emergency and that individual citizens are not endangered with particular emphasis on the population residing in the UPZ of the 0- 16km area from the KNPS.</p> <p>Procedure 7 .2.38 (revision 2), dated 16/10/2015 of the City of Cape Town: Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR) stipulates that the TEM Testing Protocol shall be processed 'once the City's Department of Development Management received an application for land use changes or the Environmental Management Department IEMDI receives any documentation relating to the National Environmental Management Act'. As such the attached TEM form (refer to Appendix 1) must be completed and attached to the next EIA report in order to test whether the increased population as a result of the <u>proposed mining</u> activity can be evacuated within 16 hours.</p>	<p>Noted with thanks.</p> <p>The application form is attached as Appendix K6.</p> <p>This is not a proposed mining activity.</p>

		<p>d. The BAR has not identified waste as an impact. It is most likely that the polystyrene plant activities will produce various types and volumes of waste as well as waste water that must be managed appropriately. Accurate information regarding waste types to be generated, expected volumes and storage requirements must be provided as well as the anticipated waste water to be generated as a result of the proposed development.</p>	<p>No waste water will be generated.</p> <p>Estimate the following: Plastic's 1100kg/month Paper/Carton 300 kg/month General Waste 1000 kg/month</p> <p>Removable bins manage by accredited service provider.</p> <p>Detail added to BAR. See APPENDIX K15 - Waste Management for Stand 245 Atlantis.</p>
		<p>e. The BAR states that the raw materials are to be stored in a covered outside area. A detailed drawing illustrating the storage area and equipment to store the raw materials is required. It must be ensured the materials are not going to pose a risk to the environment by being exposed to wind in a covered outside area.</p>	<p>Outside infrastructure:</p> <ul style="list-style-type: none"> • Blowing agent storage area • XPS Finished Board Storage Area <p>Inside infrastructure:</p> <ul style="list-style-type: none"> • Main process building - manufacturing facility • Raw material storage • Raw material feed <p>Raw materials are to be stored inside.</p>
		<p>f. The site is located in the Atlantis Aquifer Secondary Protection Zone. The Atlantis Aquifer is classified as a Strategic Water Source Area (SWSA), more specifically the</p>	<p>Noted. Detailed added to BAR and EMPr and impact tables.</p>

		<p>West Coast Groundwater SWSA. It is essential that the OBAR consider the SWSA and Atlantis Aquifer in the application and avoid any potential impacts. Stormwater and waste water from the site must be managed very carefully to avoid impacting on the Aquifer.</p>	<p>The site will not produce waste water and storm water will be managed according to the EMP.</p> <p>See Appendix K7.</p>
		<p>1.2 The Site Development Plans do not include the title of the plans. i.e. Layout Alternative I. Drawing numbers. date. north arrow or scale. The SDP's must include more detail.</p>	<p>SDP's updated as requested.</p>
		<p>1.3 It is noted that the proposed additions and alterations to the site will result in the loss of existing mature trees on the site. It is requested that the number of trees to be lost to the additions and alterations be replaced with new mature trees elsewhere on the site.</p>	<p>5 mature trees to be lost. Will be replaced/replanted. Stated in BAR and EMPr.</p>
		<p>1.4 Environmental Management Programme EMPr compiled by Eco Impact dated May 2019</p> <p>a. The EMPr must confirm the extent of construction work required and the expected duration for the construction period in order to determine the frequency of ECO audits to be undertaken.</p>	<p>11 months.</p> <p>New infrastructure includes:</p> <ul style="list-style-type: none"> • Blowing Agent storage will be via dedicated tanks located on the eastern boundary of the site (new) • Blowing Agent will be transferred to the process building via pipework (new) • XPS will be stored in the XPS Finished Board Storage Area to the west and south-west of the site (new)

			<ul style="list-style-type: none"> • Structural grid and loading platform for 24m articulated trucks (new) • New reclaimer building with reclaiming plant (new) • Silo (new) • Filter Unit (new) • Chiller (new) • Gas pumps (new) • Internal road (new) • XPS extrusion machine installation inside existing building • Interior upgrades to existing buildings if required
		b. The ECO must inform the Head: Environmental & Heritage Management Branch of commencement of site activities and construction.	Stated in EMPr.
		c. Monthly ECO Audit Reports must be submitted to the Head: Environmental & Heritage Management Branch.	Stated in EMPr.
		d. The payment of penalties into on environmental NPO must be nominated by the ECO and the Head: Environmental & Heritage Management Branch.	Stated in EMPr.
		e. Proof of payment of penalties must also be sent to the Head: Environmental & Heritage Management Branch.	Stated in EMPr.
		2. City of Cape Town: Environmental Health: Air Quality Management Unit The Air Quality Management Unit has provided the following comments:	

		<p>2.1 Dust Emissions: The EMP for the project must address all potential dust sources and provide for mitigation measures during the construction of storage areas of the project.</p> <p>No dust nuisance is to be generated by any of the activities on site such as. concrete mixing, construction of storage areas. etc.</p> <p>a. Should complaints be received or conditions so warrant by the Air Quality Management office a detailed site-specific dust management plan may be requested which is to be submitted to the Head: Specialised Environmental Health Services for approval.</p>	<p>The only potential source of dust is concrete mixing which is deal with in the EMPr in objective C18.</p> <p>Stated as a “recommended condition of the authorisation” in the BAR.</p> <p>Noted.</p>
		<p>b. Dust mitigation is to be strictly enforced at all times to prevent dust emissions to atmosphere and the surrounding environment and therefore, the conditions stipulated in the Notional Dust Control Regulations (GN. 36974) dated 1 November 2013 must be adhered to at all times during the development process.</p>	<p>Stated in EMPr.</p>
		<p>c. In addition to the NEMA, the site must at all times comply with all the provisions of the City of Cape Town Air Quality Management By-law, 2016, but specifically in terms of Dust and Nuisance emissions is listed in Chapter 9 of the by-law.</p>	<p>Stated in EMPr.</p>
		<p>d. The use of waterless methods or non-potable water is encouraged for dust suppression.</p>	<p>Stated in EMPr.</p>
		<p>2.2 Storage Tanks:</p>	<p>No underground storage tanks are now proposed.</p>

		<p>a. Although actions for underground storage tank management are indicated.</p> <p>The EMP must be amended to make specific reference to a site-specific Leak Detection and Repair (LOAR) programme as a preventative measure to mitigate emissions to atmosphere and leaks from all tanks, pipes, valves etc. on site.</p>	<p>The pump room (flammable liquid store) would require 20 Air changes/hr which can increase to 50 AC/H, with interlocks on the door and flameproof lighting and gas detectors with forced ventilation. Swartland to comply.</p> <p>The extruder section requires 15 air changes / hour with cross ventilation and forced extraction. This area also requires fire detection and gas detection. Swartland to comply to the regulation.</p> <p>The rest of plant require normal ventilation for production plants and fire prevention for XPS finished products.</p> <p>Tanks/Piping:</p> <ul style="list-style-type: none"> • Gas Detection Panel and Control Panel • Sirens and Strobes • Mimic Panel • ATEX Gas Leak Sensor – Flammable Gasses
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			<ul style="list-style-type: none"> • ATEX Oxygen Sensor
		b. The ventilating systems/pipes from above ground storage tanks must be positioned in such a manner so that any fumes generated/released do not negatively impact on the air quality of the occupants on-site or of neighboring properties and their occupants.	<p>Stated in EMPr.</p> <p>No venting system needed for above ground tank installation.</p>
		<p>2.3 Atmospheric Emission Impacts and Point Source Emissions:</p> <p>a. It is noted that the Air Quality Specialist Consultant has advised that there are no point source emission stocks or vents serving the Polystyrene plant.</p>	Noted and agreed.
		b. Furthermore no specific details have been provided regarding the specifications of the Polystyrene plant or the storage tank venting systems.	<p>See APPENDIX K10 - Technical specifications and drawings of the plant.</p> <p>No venting system needed for above ground tank installation.</p>
		c. The Specialist further states that VOC emissions will be negligible.	Noted and agreed.
		<p>d. With regard to points 2.3 a. - c. above. the technical specifications and drawings of the plant and tanks must be submitted for review.</p> <p>Should it be found that these systems do indeed emit emissions to atmosphere an Atmospheric Impact Report and Dispersion Modelling study will be required to be undertaken and submitted. The study, if required, will be required to comply with the guidelines as set out in G.N. R533 of 2014; and R283 of 2015.</p>	<p>See APPENDIX K9 - Technical specifications and drawings of the tanks.</p> <p>See APPENDIX K10 - Technical specifications and drawings of the plant.</p> <p>Noted. To be dealt with as part of the AEL application process.</p>

		<p>2.4 General</p> <p>a. The annexure of the draft Atmospheric Emission License application is noted, but on electronic submission will be required to be made on the South African Atmospheric Emissions Licensing and Inventory Portal (SAAELIP). after the Environmental Authorisation has been issued. The application for an atmospheric emission license is subject to payment of the prescribed processing fees, which must be paid upon receipt of an official invoice from the City of Cape Town.</p>	<p>Noted. Included for public participation purposes.</p>
		<p>b. Although it is proposed that once-off ambient air quality monitoring at three different locations for ambient VOC's will be conducted once the plant is operational, the City's Air Quality Officer will prescribe the air quality monitoring requirements in the Atmospheric Emission License (AEL), in the event that a positive decision to grant the AEL is indeed made.</p>	<p>Noted.</p>
		<p>c. A fugitive emission management plan will be requested as a condition of authorisation in the AEL.</p>	<p>Noted.</p>
		<p>d. Reporting in terms of Section 43(1) (l) of NEM: AQA, shall be done in accordance with the National Greenhouse Gas (GHG) Reporting Regulations. Please note that the competent authority for assessment of GHG reporting is the National Department of Environmental Affairs.</p> <p>This reporting requirement will also be specified in the AEL.</p>	<p>Noted.</p>
		<p>e. This office supports the comment that no open fires will be permitted on site.</p>	<p>Noted.</p>

		<p>3. City of Cape Town: Development Management Department</p> <p>The Development Management Department has provided the following comments:</p> <p>The property is zoned General Industrial Subzone GI 1. This zone may not be used for noxious trade or risk activities (definitions below taken from the Municipal Planning By-Law, 2015).</p> <p>'risk activity' means an undertaking where the material handled or the process carried out is liable to cause combustion with extreme rapidity, give rise to poisonous fumes, or cause explosion, and includes major hazardous installations and activities involving dangerous and hazardous substances that are controlled in terms of national legislation;</p> <p>'noxious trade ' means an offensive, poisonous or potentially harmful trade, use or activity which, because of fumes, emissions. smell, vibration, noise, waste products, nature of material used. processes employed, or other cause, is considered by the City to be a potential source of danger, nuisance or offence to the general public or persons in the surrounding area;</p> <p>If the proposed use is considered to fall in either of these categories. the current GI 1 zone is not the most appropriate zone for such use. The applicant must provide</p>	<p>Christopher Hewett from the City of Cape Town's Investment Facilitation Unit, Enterprise & Investment Department Economic Opportunities and Asset Management had a discussion with the Head of Land Use Management (Town Planning) on behalf of Swartland about the zoning enquiry. If the applicant (Swartland) employs sufficient mitigation measures (as proposed in the MHI report of MMRisk (Pty) and are satisfied with these safety measures that you are not triggering the below definitions of a Risk or Noxious activity, then the GI zone is appropriate for the intended activity. When it therefore comes to building plan submission stage your plans can be cleared from a land-use (and zoning) perspective.</p> <p>However, if the City is not satisfied, rezoning would be required.</p>
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		clarity on whether the use falls within the above definitions or not.	
		4. City of Cape Town: Energy & Climate Change: Electricity Generation and Distribution Branch The Electricity Generation and Distribution Branch has provided the following comments: 4.1 Any alterations or deviations to electricity services necessary as a consequence of the proposal, or requested by the applicant. will be carried out at the applicant's cost.	Noted.
		4.2 If the electricity supply to Erf 245 is increased, timeous application is required.	Noted.
		4.3 The connection fee, Shared Network Charge and conditions of supply will be determined upon receipt of the formal application. The Shared Network Charge is based on the increase in supply capacity applied for.	Noted.
		4.4 In accordance with policy and tariffs approved by Council. the connection fee and Shared Network Charge shall be paid.	Noted.
		4.5 Electrical infrastructure may exist on the property or in its vicinity. A wayleave shall be obtained from the Electricity Services Department before any excavation work may commence. In this regard. please contact the Drawing and Record Centre Office North on 021 444 2146.	Noted.
		4.6 Depending on the power requirement. substation sites may be required. These substation sites shall be directly accessible from public road. i.e. on the erf boundary adjacent to the road reserve. At street level. and shall not be traversed by any other services.	Noted.

		<p>Depending on requirements this can take the form of any combination of the following:</p> <ul style="list-style-type: none"> • outdoor substations on 5 m x 4 m site: or • substation buildings on 20 m x 14 m site. 	
		<p>4.7 These substations shall be appropriately subdivided and zoned in the plan approved by the Surveyor General. The sites shall be subdivided and registered and transferred to the City free of all costs.</p>	<p>Noted.</p>
		<p>5. City of Cape Town: Water & Sanitation Department: Catchment & Stormwater Management</p> <p>The Catchment and Stormwater Management Branch has provided the following comments:</p> <p>5.1 It must be confirmed how the proposed plant making products from virgin polystyrene qualifies for the Special Economic Zone (SEZ) that WESGROW and the City of Cape Town are trying to establish in Atlantis, as it is intended to encourage "green industries"?</p>	<p>See Appendix K8 – Letter from Greenplan Consultants.</p> <p>Swartland Windows and Doors wish to expand their offering to include the production of extruded polystyrene (XPS) boards in the Atlantis Special Economic Zone (SEZ).</p> <p>XPS boards serve as thermal insulation in a variety of building applications, including homes, storage facilities and refrigeration rooms. The function of insulation is to reduce the amount of heat transfer through the building envelope (walls, roof, floor). The reduction in heat transfer can significantly reduce the energy required to condition buildings and therefore plays a role in building efficiency. Greenplan Consultants would therefore like to express</p>

			support for the manufacture of insulation for the building industry.
		5.2 The BAR does not address the fact that the site is located in the Atlantis Aquifer Secondary Protection Zone (refer to Annexure 2).	BAR and impact tables updated.
		5.3 A geotechnical report must be provided to confirm the depth of the water table on the site. As there is currently no geotechnical report provided with the application it is unclear how the EAP has determined what the water table level is.	No underground storage tanks are proposed. Added as APPENDIX K16 – Geotech.
		5.4 Accurate information regarding waste generation must be provided. It is not possible that the factory will not generate waste as they claim in Section 2 of the DBAR. Plastic nurdles are an insidious form of pollution. Polystyrene offcuts and millings are worse. The BAR does not sufficiently address waste handling and how it will be prevented from entering the stormwater system and the general environment. The sections mentioning it in the EMP are also vague.	BAR and EMP updated. There will be no waste as all offcuts will go through a reclaiming system back into an enclosed silo for recycling. Part of activity description and see site layout for machinery. The only waste generated on site will be plastic, paper/carton and general waste. It will be stored in closed bins
		5.5 The Ethanol store is located close to the stormwater pipeline. Extra precautions must be put in place to prevent contamination of the stormwater system.	Ethanol tank to be above ground in a bunded area. The storm water pipeline will not be affected. Drip

			trays for refuelling / spill kit / training. Added to EMPr.
		5.6 This Branch will require a Stormwater Management and Maintenance Plan prior to any planning approvals being granted.	See Appendix K7.
		<p>6. City of Cape Town: Water & Sanitation Department: The Water and Sanitation Department has provided the following comments:</p> <p><u>Background</u> This erf was not identified as a Future Developed Area in the 2015 Water and Sanitation Master Plan.</p> <p>The information provided in this report is based on City of Cape Town master plan model. The report provides an overview of the existing water and sewer infrastructure near the development.</p> <p>No water will be used in the process only water for domestic purposes, sanitation etc. will be used.</p> <p>A 10m wide servitude exists along the eastern boundary of the property.</p> <p><u>Water Reticulation</u> There is an existing 150mm water main in Charles Matthews Street. See Figure 1 in Annexure 3 for the existing water network layout.</p> <p><u>Bulk Water</u></p>	Noted.

		<p>No infrastructure under the control of the City of Cape Town's Bulk Water Branch exists in the immediate vicinity of the proposed development shown in the application.</p> <p><u>Sewer Reticulation</u> There is an existing 150mm sewer main in Charles Matthews Street and an existing 230mm sewer main along the eastern boundary of the property within the 10m servitude.</p> <p>See Figure 2 in Annexure 4 for the existing sewer network layout.</p> <p><u>Wastewater branch</u> The sewer network falls within the catchment of Wesfleur Industrial Wastewater Treatment Works.</p> <p><u>Conclusion</u> There will be no use of water in the process. A 10m wide servitude exists along the eastern boundary of the property.</p> <p><u>General/ Disclaimer</u> Information provided is based on best available data.</p>	
		<p>7. City of Cape Town: Environmental Health: Noise Control Sub Regulation 3 and 4 of the Noise Control Regulations 200/2013 below are applicable to the proposed</p>	<p>Incorrect - Appendix J impact table stipulates noise level to be low.</p> <p>Limited construction is to take place and operational noise is in</p>

		<p>development (see sections highlighted in yellow). The Noise Control Regulations state the following:</p> <p>It is anticipated in Appendix J - Impact Table that the noise level would be high. It is unknown what and when the surrounding plots will be developed. It is therefore required that a Noise Impact Assessment be submitted.</p>	<p>line with zoning and industrial practices. Noise testing in line with the Noise Induced Hearing Loss Regulations is required in terms of the Occupational Health and Safety Act.</p> <p>No residential areas in close proximity.</p>
		<p>8. City of Cape Town: Disaster Risk Management Department</p> <p>The site is situated in the Koeberg Nuclear Power Station emergency planning zone. It is required of the proposed development to have a comprehensive emergency plan in place as referred in the MHI Risk Assessment Report, compiled by MM Risk, dated 15 May 2019. This emergency plan must also include procedures for use in the event of a nuclear emergency for all phases of construction and operation of the proposed plant. This office may be contacted for assist once with the nuclear emergency procedures.</p>	<p>MM Risk have been appointed to develop a comprehensive emergency plan. This emergency plan will also include procedures for use in the event of a nuclear emergency for all phases of construction and operation of the proposed plant. This plan will be submitted to the City of Cape Town for approval prior to the commencement of construction.</p> <p>This plan will take some time to draft and will not be available before the FINAL BAR is to be submitted.</p> <p>The EMPr and BAR stated that the emergency plan must be submitted to the City for approval</p>

			prior to the commencement of construction.
		<p>9. City of Cape Town: Solid Waste Department:</p> <p>The Solid Waste Department has provided the following comments: It must be ensured that only accredited waste service providers are involved in the transportation of waste material. The applicant is also required to register as a waste generator before activities can commence on site.</p>	Stated in EMPr.
		<p>10. City of Cape Town: Fire and Rescue Service:</p> <p>The SANS 10400 and the Community Fire Safety By-law, Provincial Gazette 5832 (Amendments 6447 - 29 June 2007) must be complied with and Building Plans must be submitted to this Department for comments.</p>	Noted and stated in EMPr.
DEADP:WM	05 July 2019	<p>2. The Department has reviewed the documentation and has the following comments:</p> <p>2.1. The first step in the waste hierarchy is to minimise waste through avoidance or reuse, it is suggested that the document specifies the reasons for not using a percentage of recycled polystyrene pellets with mixed virgin pellets to produce the XPS product.</p>	All offcuts will go through a reclaiming system back into an enclosed silo for recycling. Swartland can only use a certain percentage of recycled material before effecting the characteristics of the board hence the virgin material and their own recycled polystyrene pellets.

		<p>2.2. With regards to the impacts mentioned on page 8, it must be noted that the generation of waste during the operational and decommissioning phase should be identified as an impact.</p> <p>2.3. The waste and emissions section on page 43 states that 'no waste' will be generated during the operational phase. This is of concern as there could possibly be waste resulting from virgin pellets not being used or possible rejects produced in error. How would these be managed?</p> <p>2.4. On page 30 of Appendix H - the EMP should include indicators of waste that speaks to litter such as "little to no waste littered onsite" or "little to no windblown litter evident."</p> <p>2.5. Page 31 of Appendix H (EMP) mentions that monitoring will be done of waste documentation complete. Please indicate which documents exactly will be used for monitoring?</p> <p>2.6. Polystyrene is regarded as a problematic plastic to recycle due to its light weight nature. The Producer Responsibility Organisation responsible for the recovery and recycling of this material must be included in the application. It must also be indicated and verified whether the producer (the applicant) is part of the Industry Waste</p>	<p>Waste added as an impact to impact tables and summarised in the BAR.</p> <p>There will be no waste as all offcuts will go through a reclaiming system back into an enclosed silo for recycling. Part of activity description and see site layout for machinery.</p> <p>Added to EMP as requested.</p> <p>EMPr updated as requested.</p> <p>Swartland are producing insulation boards for the building industry which have a very long lifespan whereas packing for food industry produces a much higher waste factor because of the short life cycle. The plan is to register under</p>
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