Jessica

From:	lan Gildenhuys <lan.gildenhuys@capetown.gov.za></lan.gildenhuys@capetown.gov.za>
Sent:	Friday, 01 March 2019 1:59 PM
То:	demosd@xsinet.co.za; Ed Filby
Cc:	'Amy Xu'; jessica@ecoimpact.co.za; Derrick Nel
Subject:	RE: SWARTLAND POLYSTYRENE EXTRUSION

Hi Demos

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.

Dr Gololo confirmed that the activity as described thus triggers the listing notice.

Regards

Ian Gildenhuys Head Specialised Environmental Health City Health

246 Voortrekker Road, Vasco

Tel: 021 5905200 Fax: 021 590 5215 Cell: 0842200139 Ian.Gildenhuys@capetown.gov.za



From: Demos Dracoulides [mailto:demosd@ddaenviro.co.za]
Sent: 01 March 2019 12:56 PM
To: Ed Filby; Ian Gildenhuys
Cc: 'Amy Xu'; jessica@ecoimpact.co.za; Derrick Nel
Subject: RE: SWARTLAND POLYSTYRENE EXTRUSION

Dear Eddie,

We have been contacted by Ecoimpact (Jessica Hansen) on behalf of Swartland for the proposed polystyrene extrusion plant in Atlantis to assist with the air quality and AEL application. The process flow and chemicals used can be seen below.

Process flow:

The mixing station feeds into the primary extruder where by screw the polystyrene and master batch gets mixed and the necessary gasses get blown in (Not all gasses are being used it depends on the size product that we will run).

The primary extruder feeds into the secondary extruder where the product starts cooling down and feeds through a die and a calibre where the board will start to foam. From here on the board will travel over a long distance to cool down before the polystyrene will be planed, edged and trimmed to size. After this the product will travel over conveyers and be stacked and ready for shipment.

In terms of all of the gasses/chemicals/substances to be stored and used on site, please see below: Resin to be made up of:

- Polystyrene / Crystal Polystyrene (in the form of small spherical beads) The MSDS does not provide any detail as to the composition. Polystyrene is an organic compound with the chemical formula: (C8H8)n. It is a synthetic aromatic hydrocarbon polymer made from the monomer styrene. Polystyrene can be solid or foamed. Polystyrene, a hard, transparent synthetic resin produced by the polymerization of styrene. 18048,00 kg/day
- 2. Talc for Styrene Hydrous magnesium silicate 192,00 kg/day
- 3. Flame retardant <45% Brominated SBSpolystyrene-polybutadiene- polystyrene/Benzene, ethenyl-, polymer with 1,3-butadiene, brominated & <10% Polystyrene with 1,3-butadiene polymer & <5%Carbonato(2) hexadecahvdroxvbis(aluminium)hexamaqnesium 768,00 kg/day
- 4. Colour Blend of organic and inorganic pigments dispersed in an ethylene methylacrylate copolymer. Polymeric masterbatch consists of ethylene copolymer, PE wax, Zinc stearate, Titanium Dioxide Pigment White 6, Carbon Black Pigment Black 7, Pigment Yellow 191, and Calcium carbonate. 96,00 kg/day
- 5. Process Aid Zinc Oxide 96,00 kg/day

Blowing Agent to be made up of:

- 6. CO2 248,24 kg/day
- 7. Dimethyl ether(DME) aerosol grade 630,15 kg/day
- 8. 152a (gas) Difluoroethane 267,34 kg/day
- 9. Ethanol Ethyl alcohol of 99.99 % (volume) purity, denatured with 5 % (volume) ethyl acetate 343,72 kg/day

The process will use polystyrene beads and with adding some chemicals will extrude polystyrene boards. <u>There are</u> <u>no</u>:

- 1. <u>Production of organic chemicals;</u>
- 2. <u>Production of organometallic compounds;</u>
- 3. Polymerisation or co-polymerisation;
- 4. Manufacture, recovery or purification of or any ester of acrylic acid;
- 5. <u>Use of toluene di-isocyanate or other di-isocyanate of comparable volatility; or recovery of pyridine.</u>

As specified in the Category 6 below.

Therefore, the proposed activity **does not appear to** trigger Category 6 listed activity. Please kindly confirm.

Category 6:	Organic Chemica	Is Industry
	Description:	The production, or use in production of organ elsewhere including acetylene, acetic, maleic or acids, carbon disulphide, pyridine, formaldehyde, its derivatives, acrylonitrile, amines and synthetic The production of organometallic compounds, or surface=active agents. The polymerisation or co-polymerisation of any substituted hydrocarbon (including vinyl chloride). The manufacture, recovery or purification of ac acrylic acid. The use of toluene di-isocyanate or other di- volatility; or recovery of pyridine.
	Application:	All installations producing or using more than 100 the listed compounds.

Kind Regards, Demos

Demos Dracoulides **DDA Environmental Engineers** PO Box 60034 7439 Table View tel: +27 21 551 1836 fax: +27 21 557 1078 cell: +27 82 684 8082

Unit 11 Prosperity Park, Computer Road Milnerton

From: Jessica [mailto:jessica@ecoimpact.co.za] Sent: Tuesday, February 19, 2019 9:13 AM To: 'Amy Xu'; eddie.wiggins@Swartland.co.za Cc: demosd@ddaenviro.co.za; Derrick Nel Subject: RE: SWARTLAND POLYSTYRENE EXTRUSION

Good day Amy

This information needs to come from Swartland directly. As information may have changed and they are the technical experts. I need to be included as well as I will need this information for the EIA.

Here is the information I have at this stage:

Process flow:

I refer to the Technical drawing of Sunwell Global FEX150200XPS (Attached).

The mixing station feeds into the primary extruder where by screw the polystyrene and master batch gets mixed and the necessary gasses get blown in (Not all gasses are being used it depends on the size product that we will run). The primary extruder feeds into the secondary extruder where the product starts cooling down and feeds through a die and a calibre where the board will start to foam. From here on the board will travel over a long distance to cool down before the polystyrene will be planed, edged and trimmed to size. After this the product will travel over conveyers and be stacked and ready for shipment.

In terms of all of the gasses/chemicals/substances to be stored and used on site, please see below:

Resin to be made up of:

- Polystyrene / Crystal Polystyrene (in the form of small spherical beads) The MSDS does not provide any detail as to the composition. Polystyrene is an organic compound with the chemical formula: (C8H8)n. It is a synthetic aromatic hydrocarbon polymer made from the monomer styrene. Polystyrene can be solid or foamed. Polystyrene, a hard, transparent synthetic resin produced by the polymerization of styrene. 18048,00 kg/day
- 2. Talc for Styrene Hydrous magnesium silicate 192,00 kg/day
- Flame retardant <45% Brominated SBSpolystyrene-polybutadiene- polystyrene/Benzene, ethenyl-, polymer with 1,3-butadiene, brominated & <10% Polystyrene with 1,3-butadiene polymer & <5%Carbonato(2) hexadecahvdroxvbis(aluminium)hexamaqnesium 768,00 kg/day
- Colour Blend of organic and inorganic pigments dispersed in an ethylene methylacrylate copolymer. Polymeric masterbatch consists of ethylene copolymer, PE wax, Zinc stearate, Titanium Dioxide Pigment White 6, Carbon Black Pigment Black 7, Pigment Yellow 191, and Calcium carbonate. 96,00 kg/day
- 5. Process Aid Zinc Oxide 96,00 kg/day

Blowing Agent to be made up of:

- 6. CO2 248,24 kg/day
- 7. Dimethyl ether(DME) aerosol grade 630,15 kg/day
- 8. 152a (gas) Difluoroethane 267,34 kg/day
- 9. Ethanol Ethyl alcohol of 99.99 % (volume) purity, denatured with 5 % (volume) ethyl acetate 343,72 kg/day

All 9 MSDS's attached.

Please keep Derrick in the loop at all times as well. Much appreciated.

Kind regards,

Jessica Hansen Head of Training ISO 50001 Energy Expert Pri.Sci.Nat 400192/16



Eco Impact Legal Consulting (Pty) Ltd

 Reg: 2010/015546/07
 Office: +27 (0) 21 671 1660

 P.O. Box 45070
 Office: +27 (0) 21 671 1660

 Claremont
 Fax: +27 (0) 21 671 9976

 South Africa
 Email: jessica@ecoimpact.co.za

 7735
 Web: www.ecoimpact.co.za

Disclaimer: This message may contain information which is private, privileged or confidential and is intended solely for the use of the individual or entity named in the message. If you are not the intended recipient of this message please notify the sender thereof and destroy/delete the message. Neither the sender nor Eco Impact shall incur any liability resulting directly or indirectly from accessing any of the attached files which may contain a virus file.

From: Amy Xu <<u>amy@ddaenviro.co.za</u>> Sent: Tuesday, 19 February 2019 8:41 AM To: <u>eddie.wiggins@Swartland.co.za</u>; <u>jessica@ecoimpact.co.za</u> Cc: <u>demosd@ddaenviro.co.za</u> Subject: RE: SWARTLAND POLYSTYRENE EXTRUSION

Thanks Eddie. We will go through it and let you know.

@ Jessica, do you maybe have the process description ready? Also, we need to know the chemicals to be used in the process.

Kind Regards

Amy Xu DDA Environmental Engineers PO Box 60034 7439 Table View tel: +27 21 551 1836 fax: +27 21 557 1078

Unit 11, Prosperity Park, Computer Rd, Milnerton

From: Eddie Wiggins [mailto:eddie.wiggins@Swartland.co.za] Sent: 18 February 2019 14:49 To: demosd@ddaenviro.co.za; jessica@ecoimpact.co.za Cc: Derrick Nel Subject: SWARTLAND POLYSTYRENE EXTRUSION Please see attached the different layouts – please ask anytime if you require any additional info /explanation of anything.

Best Regards/ Groete

Eddie Wiggins **Swartland Investments (Pty) Ltd** Cnr of John van Niekerk & Gerwyn Owen St Atlantis Industrial, Cape Town, 7350 South Africa -33.587594, 18.480761

Reception: +27 21 573 7500 | Direct: +27 21 573 3487 | Mobile: +27 83 227 2558 | Web: http://www.swartland.co.za



Please consider the environment before printing this e-mail.



Virus-free. <u>www.avast.com</u>

Disclaimer: This e-mail (including attachments) is subject to the disclaimer published at: http://www.capetown.gov.za/general/email-disclaimer Please read the disclaimer before opening any attachment or taking any other action in terms of this e-mail. If you cannot access the disclaimer, kindly send an email to disclaimer@capetown.gov.za and a copy will be provided to you. By replying to this email or opening any attachment you agree to be bound by the provisions of the disclaimer.