

## Novashni Moodley

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**Subject:** Invitation to the SWWTW EIA and WML Focus Group Meeting (EIA Phase)  
**Location:** SWWTW Boardroom - 2 Byfield Road, Merewent / Bluff

**Start:** Wed 2015/04/22 10:00 AM  
**End:** Wed 2015/04/22 12:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Novashni Moodley  
**Required Attendees:** Des D'sa (desmond@sdceango.co.za); mdlaloseN@dwa.gov.za; MoonsamyC@dwaf.gov.za; 'andy.blackmore@kznwildlife.gov.za'; thambud@kznwildlife.com; Omar Parak; andrew.mather@durban.gov.za; Schmid (Michele.Schmid@kzntransport.gov.za); Keith Brackenbury; Ashley Pillay (Ashley.Pillay@durban.gov.za) (Ashley.Pillay@durban.gov.za); Samista Jugwanth (Samista.Jugwanth@AECOM.COM); Hennie Van Staden (Hennie.VanStaden@AECOM.COM); Natasha Brijlal (Natasha.Brijlal@kzndae.gov.za); cheea@telkomsa.net; dijones@iafrica.com; Diane Van Rensburg; bobby@groundwork.org.za; Griffiths, Bronwen; Rod Bulman; zaks4@mtn.blackberry.com; leburun@dwa.gov.za; Sumaiya Arabi (SArabi@csir.co.za); Christopher Fennemore (Christopher.Fennemore@durban.gov.za); Tandi Breetzke; Catherine Meyer; Siva Chetty; rafiq.gafoor@mondigroup.co.za

Dear Stakeholder

**PROPOSED SOLIDS REMOVAL AND TREATMENT FACILITIES UPGRADE AT  
SOUTHERN WASTE WATER TREATMENT WORKS, MEREWENT,  
IN ETHEKWINI METROPOLITAN MUNICIPALITY**

**EDTEA REF NO: DM/0032/2014**

**WASTE MANAGEMENT REFERENCE NO: DM/WML/0050/2014**

**WUL REFERENCE NO: 11/U60G/H/1623**

**CWDP REFERENCE NO: To be confirmed**

**DWA EXEMPTION NO: 1747B**

**Classified as a Major Hazardous Installation**

Notice is hereby given in terms of the **Environmental Impact Assessment (EIA) Regulations** (2010) published in Government Notice No.R543 to No.R545, in terms of Section 24 (5) of the National Environmental Management Act (Act No 107 of 1998) (as amended), the National Environmental Management Waste Act (Act No 59 of 2008), the National Environmental Management: Integrated Coastal Management Act (Act No 44 of 2008) and the National Water Act (Act 36 No of 1998) of the initiative by the **eThekweni Municipality, Water and Sanitation Department**, to undertake the **Solids Removal and Treatment Facilities Upgrades at the Southern Waste water Treatment Works (SWWTW) in Merewent, KwaZulu-Natal Province.**

In respect of the above, the applicant, eThekweni Municipality is undertaking the general EIA and Waste Management License (WML) processes. The Scoping phase was carried out in 2014, with approval of the resultant Scoping Report and plan for the next phase of the process, being obtained in December 2014. This process is as contemplated in the EIA Regulations for the process of applying for authorisation for the above proposed development to the Competent Authority, the KwaZulu-Natal Department of Economic Development, Tourism & Environmental Affairs (KZN edtea), as well as a WML application in terms of Section 19(2) of the National Environmental Management: Waste Act (Act No 59 of 2008).

## INVITATION TO THE FOCUS GROUP MEETING

You have been identified as a key stakeholder to form part of the focus group and are hereby invited to attend the focus group meeting to be held at the following venue:

**Date: 22 April 2015**

**Venue: SWWTW Boardroom, 2 Byfield Road, Merewent / Bluff**

**Time: 10h00**

The meeting will provide discussions on the proposed project and the findings of the EIA studies and will further provide the opportunity to raise key and salient issues or concerns.

## WHO SHOULD YOU CONTACT?

Royal HaskoningDHV, as an independent environmental assessment practitioner, has been assigned to undertake the required EIA and WML Application for the proposed project.

Interested I&APs are invited to register by submitting their name, contact information and interest in the project to the Environmental consultant.



**Novashni Sharleen Moodley**

Royal HaskoningDHV

PO Box 55, Pinetown, 3600

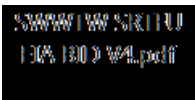
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***Kindly note that there will also be a public meeting held on 24 April 2015, where all members of the public (as well as yourselves and other stakeholders and authorities) are welcome. A separate invitation has been circulated for the Public Meeting.***

*Please feel free to contact: Novashni Sharleen Moodley – [novashni.moodley@rhdhv.com](mailto:novashni.moodley@rhdhv.com) (031 719 5532) for any further details.*





**ENVIRONMENTAL IMPACT ASSESSMENT  
THE SOUTHERN WASTE WATER TREATMENT WORKS (SWWTW) SOLIDS REMOVAL AND TREATMENT  
FACILITIES UPGRADE**

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**FOCUS GROUP MEETING**





**DATE: 22 April 2015**

**TIME: 10h00**

**VENUE: SWWTW Boardroom**

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**PURPOSE OF THE MEETING**

-  To discuss the EIA and the proposed project;
  -  To provide information containing all relevant facts regarding the project;
  -  To provide an opportunity to submit comments / concerns regarding the project; and
  -  To discuss the findings of the EIA phase.
- 

**AGENDA**

- |    |                                      |             |
|----|--------------------------------------|-------------|
| 1. | <b>WELCOME &amp; INTRODUCTION</b>    | Rod         |
| 2. | <b>TECHNICAL PRESENTATION ON EIA</b> | RHDHV / EWS |
| 3. | <b>DISCUSSION</b>                    | All         |

EIA AND WASTE MANAGEMENT LICENSE  
APPLICATION FOR THE PROPOSED SWWTW  
SOLIDS REMOVAL AND TREATMENT  
FACILITIES UPGRADE,  
KWAZULU-NATAL  
ENVIRONMENTAL IMPACT  
ASSESSMENT  
PROCESS

FOCUS GROUP MEETING  
DATE: 22.04.2015



## PROCEEDINGS

- Facilitator
- Introduce yourself
- Discuss after presentation
- Project specific focus

Southern Waste Water Treatment Works - Upgrades

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## AGENDA

1. Introductions
2. Presentation of proposed project and EIA process
3. Discussions
4. Meeting closure

Southern Waste Water Treatment Works - Upgrades

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## OBJECTIVE OF PRESENTATION

- Discuss the EIA & WML Process
- Discuss the findings of the EIA phase

Southern Waste Water Treatment Works - Upgrades

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## PROJECT PURPOSE

- Develop the Southern WWTW *Solids Removal Facility* with a long term goal of disposal out to sea containing significantly less solids.
- Objective of upgrades: **to remove more primary sludge before discharging out to sea.**

Southern Waste Water Treatment Works - Upgrades

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## PROJECT MOTIVATION

- Need to reduce the suspended solids going out to sea *via* sea outfall
- Seabed near the SWWTW outfall is enriched with particulate organic material - modification of benthic macrofauna (CSIR, 2011/2012)
- Move toward best practice

Southern Waste Water Treatment Works - Upgrades

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## PROJECT DESCRIPTION

- AIM: reduce the quantity of solids being disposed of through the sea outfall by re-commissioning existing and developing new sludge treatment facilities
  
- Therefore a suite of upgrades are proposed to be undertaken on:
  - Preliminary treatment
  - Primary sedimentation
  - Sludge processing
  - Electrical work
  - General works

## PROJECT DESCRIPTION

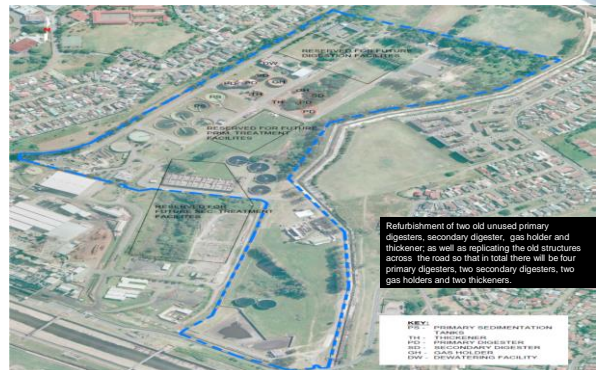
The options proposed for the disposal of the dewatered sludge are as follows:

- Removal off site to agriculture and/or landfill;
- Thermal drying and then removal off site to agriculture; and
- Manufacture of fertilizer through a separate sludge pelletizing process to be established on site by a private entity (unconfirmed at this stage) and then removal off site. **This option may be investigated under a separate study to be undertaken by others and does not form part of this study nor the scope of work described hereunder.**

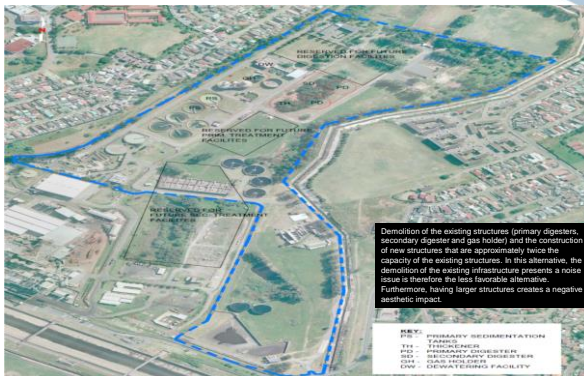
## BASIC LOCALITY



## ALTERNATIVE ONE (PREFERRED)



## ALTERNATIVE TWO



## ENVIRO-LEGAL DESCRIPTION

- NEMA 2010 EIA listed activities being triggered:
  - GNR. 544 (BA) :11, 12, 13, 14, 16, 17, 18, 40, 42, 43, 45, 55A, 55B & 56
  - GNR. 545 (EIA) : 3, 24, 27
  - GNR. 546 (Geographically determined BA) : 12
  
- NEM: WA listed waste activities being triggered:
  - Category A (BA) : 1, 3, 9 and 10

*Therefore a full general EIA and WML Application is to be followed – for authorisation from edtea*

## ENVIRO-LEGAL DESCRIPTION

- NEM: WA listed waste activities being triggered:
  - Category A (BA) : 1, 3, 9 and 10
 These are elaborated on below:

Government Notice No. 921 - Category A activity no(s):	Describe the relevant waste management activity as per the project description:
1	The storage of general waste (sludge) will be undertaken in 350m <sup>3</sup> silos on the site, for a period of a few days prior to being trucked to a landfill site. The waste water treatment works facility constitutes a "lagoom" hence the triggering of this activity. Please see attached explanation on the classification of the sludge.
3	The scope of work includes the option of the provision of dewatered sludge to a pelletizing plant which constitutes the recycling of general waste. The pelletizing plant will be outside of the premises of the SWWTW.
9	The options for the disposal of the dewatered sludge (inert waste) include disposal to agricultural land or landfill. This will not exceed 25000 tons per day.
10	The options for the disposal of the dewatered sludge (general waste) include disposal to agricultural land or landfill. The land area will not exceed 200m <sup>2</sup> and the waste will not exceed 25000 tons per day.

## THE FULL SUITE

### Authorisations / Licenses Competent Authority

Environmental Authorisation as per NEMA	edtea
Waste Management License as per NEM:WA	edtea
Coastal Waters discharge permit (amendment)	DEA
Water Use License (authority consultation)	DWS

## THE FULL SUITE

Specialist studies to support the assessment:

- Air Quality Impact Assessment
- Heritage Impact Assessment
- Biodiversity Study
- Major Hazardous Installation Study
- Social Impact Assessment
- Integrated Waste Water Management Plan
- Process Risk Assessment / HAZID
- Traffic Impact Assessment

## AIR QUALITY FINDINGS

Based on the dispersion modelling simulations, the main conclusions can be summarised as follows:

### Phase 1:

All hourly, daily and annual maximum average concentrations of pollutants were below the respective standards. There were no exceedances of any guidelines. The odour perception threshold was below the 50% recognition for a given population size. The concentrations were highest during the primary treatment particularly from the primary sedimentation tanks.

## AIR QUALITY FINDINGS

### DISPERSION MODELLING



Annual			
Ammonia	1.62	2.43	2.92
Hydrogen sulphide	0.07	0.11	0.13
Acetone	0.08	0.12	0.14
Benzene	0.06	0.10	0.12
Chloroform	0.07	0.10	0.12
Methanol	0.04	0.06	0.07
Phenol	0.01	0.02	0.02
Toluene	0.06	0.09	0.11

Figure 8-7: Phase 1 hourly, daily and annual average predicted ground level concentration ( $\mu\text{g}/\text{m}^3$ ) for the SWWTW.

## AIR QUALITY FINDINGS

### Phase 2:

All hourly, daily and annual average concentrations of pollutants for phase 2 were below the respective standards. There were no exceedances of any guidelines.

The odour perception threshold was below the 50% recognition for a given population size, with the exception of Hydrogen sulphide which exceeded the detection limit.

The concentrations were highest at the primary sedimentation tanks.

There are expected to be nuisance impacts associated with the phased upgrades at the SWWTW, this would be primarily the result of the release of Hydrogen Sulphide into the atmosphere during phase 2.



## AIR QUALITY FINDINGS

Due to the high concentration of Hydrogen Sulphide, passive sampling was carried to determine the accuracy of the model outputs. All other pollutants evaluated during the assessment were compliant with their guidelines and thresholds.

The passive sampling showed that.....

## AIR QUALITY MITIGATIONS

MITIGATION INCLUDES:

- Closed dewatering facilities;
- Covered Digesters;
- Spray bars on the dam;
- Covers on thickeners;
- Grid washers;
- Washings of screens.

## BIODIVERSITY FINDINGS

- The biodiversity study rated the positive cumulative impacts after mitigation for the whole proposed development as a positive very high (+13) due mainly to the removal of the alien species.
- The only potential high negative impact, was the removal of the Natal Fig and the *Fuschia* (*Schotia brachypetala*) trees, however, these will be demarcated to be protected and retained,
- On the coastal end, the biodiversity study did not identify any potential negative impacts.
- Overall the proposed development will result in negligible biodiversity impacts as there are only negative impacts posed through the possible

## BIODIVERSITY FINDINGS



## BIODIVERSITY MITIGATION

- The intent is thus to avoid indigenous plants,
- avoid important non-invasive alien plants, and,
- to remove alien invasive species according to their invader classification either through this project or during the tanker depot formalisation process.
- Mitigation will involve the planting of indigenous trees and other indigenous plants native to the area in parts of the study area where no development is pledged and planned in the future.

## (MHI) FINDINGS

- The MHI Risk Assessment classifies the site post upgrades as an MHI due mainly to the risk of the biogas holder rupture and delayed explosion.
- Under abnormal accident situations, it is possible for the biogas to be stored on site to have a significant impact on public persons outside the site.
- However, the individual risk of being fatally exposed to the major hazards associated with the new biogas facility would be about  $75 \times 10^{-6}$  fatalities per person per year near the existing gas holder, reducing to  $0.002 \times 10^{-6}$  at the NW site boundary.



## (MHI) MITIGATION

- Maintenance and inspection of vessels and piping.
- No smoking on the site except in designated areas.
- Implementation of Emergency procedures and obtaining fire-fighting equipment.
- Ensuring the maintenance and testing of protective measures.
- Any methane detectors that are installed around the plant must be regularly tested and calibrated.
- Ensure that all plant staff are fully aware of the hazards associated with the plant.

## HIA FINDINGS

- The findings of the heritage impact assessment were that there were no artefacts of cultural or historical value on the project site were found or were likely to be found.

## HIA MITIGATION

- Should there be the findings of cultural artefacts during construction then all work must be ceased and AMAFA contacted immediately

## SIA FINDINGS

- The SIA does not show a comparative difference in the significance ratings of impacts for Alternative 1 versus Alternative 2, as results in terms of ratings before and after mitigation from a social point of view are in most cases, similar. Subsequently, this SIA is not leaning towards any specific preferred Alternative. Either is preferred over the No-Go Alternative.
- No significant impacts identified.

## SIA MITIGATION

- Strict regulation of work hours to reduce impacts of noise and disturbances;
- Equal labour opportunities;
- Adherence to odour mitigations.

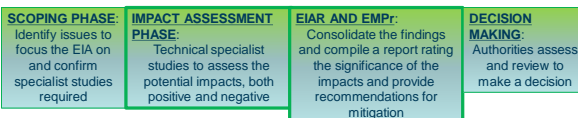
## HAZID FINDINGS

- Most hazards identified are of low to medium risk for health and safety of personnel and the environment, resulting in a conservative classification from the risk matrix.

## HAZID MITIGATION

- Standby Equipment, Bypasses, automated devices incorporated into the design
- Mechanical ventilation for odours
- Proper PPE, health monitoring in place, potable gas detectors
- Existing procedures in place: Proper training, manual overrides, password protected

## EIA PROCESS



## EIA PROCESS

### CURRENT PHASE:

**EIA PHASE:**  
EVALUATE THE SIGNIFICANCE OF IMPACTS IDENTIFIED AND PROVIDE MITIGATIONS MEASURES

### N.B. (Aim of phase):

- RATE IMPACTS
- INFORMATION EXCHANGE
- PROVIDE MITIGATION / RECOMMENDATIONS
- DRAW CONCLUSIONS
- CONSOLIDATE STUDIES

## PUBLIC PARTICIPATION PROCESS



- Role of I&APs during the EIA process
  - Raise issues and/or concerns as well as provide input on the proposed project
  - Review of the Reports
  - Provide the above inputs within the specified timeframes
- All comments received are highly appreciated.

## KEY POINTS / CONCLUSIONS

- NO CAPACITY INCREASE OR INTENTION FOR SUCH
- REDUCED SOLIDS TO SEA DISPOSAL
- NO FATAL FLAWS IDENTIFIED
- IMPACTS IDENTIFIED CAN BE MITIGATED

## KEY POINTS / CONCLUSIONS

- This study provided a quantified scientific analysis of the impacts associated with the proposed development. Sections 10.2, 10.3 and 10.4 above highlight the reasons why the EAP is of the opinion that the project should be positively authorised, outlining the key findings of the study.
- The EIA process and report complies with the EIA Regulations of 2010, under which this project has applied and therefore meets all relevant requirements.

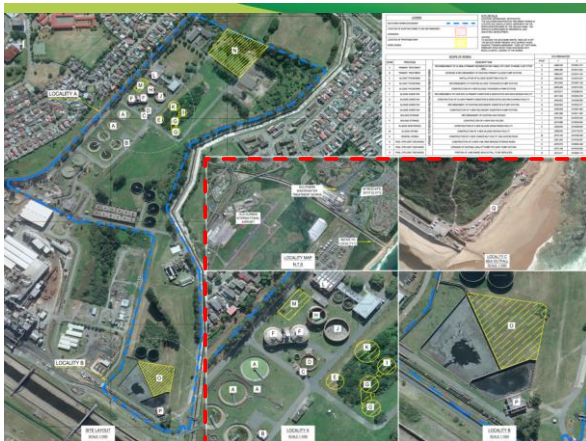
## KEY POINTS / CONCLUSIONS

- The project is envisaged to have a “negative low” significance rating post application of mitigations proposed by the relevant specialists. Other than the classification as an MHI, the project will see most of the newly introduced negative impacts in the construction phase of the project, while the negative impacts associated with the operational phase are not new, but rather pre-existing impacts associated with WWTW and the study area as a whole, being a poorly spatially planned space (having industrial and residential land uses in close proximity).

## TIMELINES

- SCOPING PHASE  
• APRIL 2014 – DECEMBER 2014
- EIA PHASE  
• JANUARY 2015 – OCTOBER 2015
- AUTHORITY DECISION  
• OCTOBER 2015

## CURRENT WORKS





Novashni Sharleen Moodley

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- QUESTIONS AND ANSWERS / DISCUSSIONS?












ENVIRONMENTAL IMPACT ASSESSMENT  
 THE SOUTHERN WASTE WATER TREATMENT WORKS (SwwTW) SOLIDS REMOVAL AND TREATMENT FACILITIES UPGRADE









ATTENDANCE REGISTER TO FOCUS GROUP MEETING  
 22 April 2015




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<b>Record</b>	Minutes of Focus Group Meeting
<b>Project and Project Number</b>	The SWWTW Upgrades and Solids Removal Facility EIA [T01.DUR.000274] EDTEA Reference No. DM/0032/2014 and DM/WML/0050/2014
<b>Date and Venue</b>	22.04.2015 SWWTW

## Attendance

Name	Organisation	Attended
Refer to attached Register		<input checked="" type="checkbox"/>

Item	Discussion/ Resolution	Action / Response
1	The meeting commenced with an introduction by the facilitator, Rod Bulman, and the project team. A presentation was then made and the following statements / questions / points of discussion raised:	N/A.
a)	A question was raised regarding the pipeline to sea / beach. It was discussed and confirmed that there will be work to a portion of the pipeline and that the tank is used by Veolia Water for storage.	N/A
b)	The Illovo pipeline (contains chemicals and compounds), does this get any treatment?	It follows the main stream out to sea.
c)	It was stated that enforcement is required for better management and operations, there should be weekly testing.	SWWTW do take samples for monitoring purposes.
d)	It must be ensured that generators are working.	Noted.
e)	The classification as an MHI is an issue; there must be an emergency plan.	The SWWTW does have an emergency plan but this must be updated in light of the MHI status post upgrades.
f)	The consideration to use methane to off-set power shortages should be explored.	This is considered, also within the context of the broader eThekweni plans of the Clean Development Mechanism (CDM) however, for the scope of this project the electricity generated will not exceed 1MW and will be used on site only (not fed into the grid and sold to Eskom).
g)	Where will the possible pelletizing plant be located?	Possibly on Mondi land and it will be enclosed.
h)	Maintenance of the SWWTW is poor.	Noted as an operations issue.
i)	It was raised that tankers from other areas come to the	The works does monitor this, but the

Item	Discussion/ Resolution	Action / Response
	works, why are these not stopped?	tanker bay facility that is proposed as part of the upgrades will have formalised and more stringent monitoring facilities. The area will be controlled and will check quality of trucks, for leaks etc.
j)	Regarding the CWDP, how often is the sea outfall pipeline checked?	Every two weeks. Integrity checks cannot be done as the pipeline is underground therefore no inspections.
k)	It was clarified that the new CWDP process has stringent conditions according to the amended legislation. The DWS focused on constituents, whereas the DEA focus of the receiving environment. A technical document must accompany the application.	Noted.
l)	The Mondí Garden Road should be considered as an alternative road for the Tankers and access at the South Gate of the SWWTW.	This was considered; however, the road is too narrow and close to the canal and is therefore a safety hazard to the tankers – also increasing the possibility of spillages.
m)	The MHI report does provide recommendations.	Noted.
n)	The new tanker bay facility will be fully manned, there will be a full time pollution control officer, it will have a functioning and running database and the operations of this facility will be delegated to a dedicated person / manager.	Noted
o)	It was stated that the eThekweni Municipality must not work in silos but must promote integration to improve planning and operations.	Noted.
p)	There are currently four pumps on site which emit terrible odours, are these maintained? This should be a priority.	Maintenance is a priority and forms part of the motivation and scope of this upgrade.
q)	The pelletizing plant should work together with the parks department. Fertilizer must be taken by rail.	Suggestions noted, however, this does not form part of the scope of this project.
r)	The quality of the Low Level Sump and the resultant odours was raised.	This is only a problem if it is not properly operated; the odours can and must be masked. The service area must be controlled.
s)	It was summarised that two major issues arising are alternative routes for the tankers and the assurance of maintenance of the Works.	Noted.
t)	A simplified flow diagram was requested.	To be provided.