

**From:** Novashni Moodley  
**Sent:** 01 April 2015 12:56 PM  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION PROCESS FOR THE SWWTW EIA  
**Attachments:** SWWTW SRTFU EIA BID V4.pdf

**NOTICE OF APPLICATION FOR ENVIRONMENTAL AUTHORISATION AND  
WASTE MANAGEMENT LICENCE**

**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 **eThekwini 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, eThekwini 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).

**PUBLIC PARTICIPATION PROCESS**

A background Information Document is attached for more information on the project. All individuals or groups interested in or affected by the project are invited to attend the **public meeting** to be held at the following venue:

**Date: 24 April 2015**

**Venue: Merewent Community Centre (Main Hall), Krishna Rabibal Road, Merewent**

**Time: 18h00**

The meeting will provide Interested and Affected Parties (I&APs) with information regarding the proposed project and will provide them with an opportunity to raise any issues or concerns.

As part of the public participation process, you are invited to review the draft EIA Report and make comment on the document. This report will be available for review at the following public places:

- SDCEA Offices, John Dunn House 224 Gouritz Crescent, Austerville 4052
- Southern Waste Water Treatment Works,
- Merebank Library, Bombay Square, 12 Natraj Lane, Merebank, Durban, 4052
- Royal HaskoningDHV website: [www.rhdhv.co.za](http://www.rhdhv.co.za)

Please note: The comment period is from **22 April to 31 May 2015.**

## 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.

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**Kindly forward/ circulate.**

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

PUBLIC MEETING  
DATE: 24.04.2015



## 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

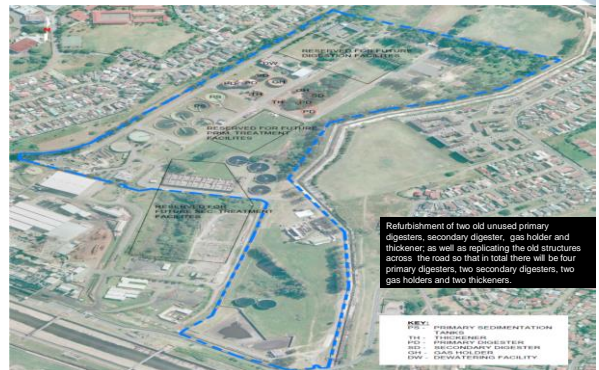
The options proposed for the disposal of the dewatered sludge are as follows:

- 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

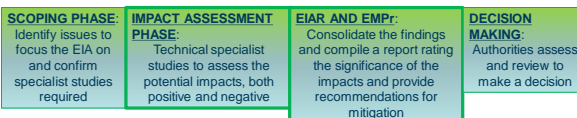
- Most hazards identified are of low to medium risk for health and safety of personnel and the environment, resulting in a conservative classification from the risk matrix.



## 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.

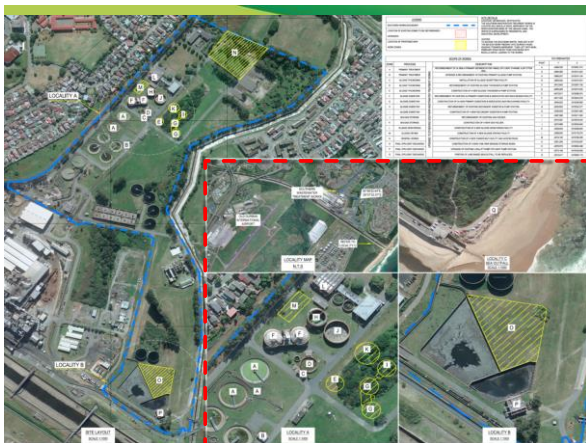
## KEY POINTS / CONCLUSIONS

- 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





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- QUESTIONS AND ANSWERS / DISCUSSIONS?



(a)

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



ATTENDANCE REGISTER TO PUBLIC MEETING






24 April 2015









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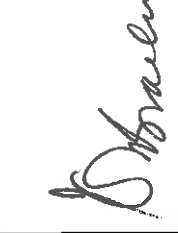



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<b>Record</b>	Minutes of Public Meeting
<b>Project and Project Number</b>	The SWWTW Upgrades and Solids Removal Facility EIA [T01.DUR.000274] EDTEA Reference No. DM/0032/2014 and DM/WML/0050/2014
<b>Date and Venue</b>	24.04.2015 Merebank Community Centre

## Attendance

Name	Organisation	Attended
Refer to attached Register		X

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:

Item	Discussion/ Resolution	Action / Response
1	The project was perceived as a smokescreen for taking on more capacity.	The attendees were assured that the upgrades have no objective or intention to increase capacity.
2	The Applicant / Department / Clients only attend PM when the project has a "good" objective, but not when there is a problem.	Noted. However, the solution / addressing of this matter falls outside of the ambit of this project.
3	Must consider cumulative impact for the larger area. A lot of impact from Shell and the Engen Refinery.	Cumulative impact is addressed as part of the impact assessment of the study area and the project. Mr Chris Fennemore provided a 24hr call line: 080 131 3013) and acknowledged that many complaints are received.
4	There must be consideration for a city plan – not peace meal developments	Noted. However, the solution / addressing of this matter fall outside of the ambit of this project.
5	Clairwood – 2000 trucks per hour – increases traffic impact - has this been considered?	Yes, all traffic forecasts have been addressed in the TIS.
6	Will the effluent from Dug Out Port be pumped to SWWTW?	Ethekwini Water and Sanitation (EWS) assured the attendees that it will not.
7	Where will sludge be dumped?	As stated in the final EIA Report, at this stage three options are provided, these are: <ol style="list-style-type: none"> <li>1. Disposal to agricultural land</li> <li>2. Disposal to a registered landfill;</li> </ol> or

Item	Discussion/ Resolution	Action / Response
		<p>3. Provision of sludge to a possible pelletizing plant.</p> <p>The reason that options are provided is due to the fact that the grading of the sludge is unknown at this point in time. The sludge must meet a certain grade if it is to be disposed of to agricultural land.</p>
8	Traffic impacts are noted.	The Traffic Impact Statement conducted did not identify any significant impact.
9	How is smell measured? Odour remains the most significant impact.	Siva Chetty of Royal HaskoningDHV explained the chemicals tested for in the Air Quality Assessment, which included the measure of H <sub>2</sub> S and Ammonia, furthermore there are also panels and committees which regulate these levels. The AQA does provide for mitigation measures and an odour abatement plan.
10	The CSIR representatives stated that the water in the south Durban coastal strip is bad in quality due to the Umlaas River and actual stormwater – not because of the SWWTW sea outfall	Noted.
11	More alternatives should be assessed, and the no-go alternative must be assessed.	All feasible alternatives were assessed, including the No-go alternative.
12	The process of treatment at the works was explained in layman terms to the best of Ashley Pillay ability upon request.	N/A
13	It was confirmed that the conveyor screens received wastewater for grit such as rags etc. and nothing finer (smaller in size).	N/A
14	In clarification of how project scopes are presented to the public, Bronwen Griffiths of Royal HaskoningDHV explained that there are three layers, essentially, the EAP needs to explain the scope in layman's terms, while not distorting the description and compromising transparency, hence sometimes the scientific term must be used (jargon) and explained. Therefore, it must be scientific, transparent and in laymen terms.	N/A
15	The old Mondi road must be considered as an alternative for the truck routes.	This will be considered.
16	The sludge to agricultural land option must not be considered in Merebank – should make use of rail system to take elsewhere (recommendation from attendee).	It cannot be Merebank because there is no agricultural land appropriately suited for the disposal of the sludge.
17	Important to note that the proposed upgrades will only provide additional temporary employment.	Noted by all.
18	It was emphasized, reiterated and confirmed that this is an upgrade not an expansion	Noted by all.
19	The upgrades will reduce spillages	This was stated in response to the recurring statement of the impact of beach spillages. There will be the building of the tanker depot and Low

Item	Discussion/ Resolution	Action / Response
		Level Sump (LLS) for mitigation of the spillages to beach (stormwater attenuation).
20	Will there be consideration of WWTW elsewhere, outside of Merebank?	No, the growth does not forecast a sufficient increase in Water Treatment (WT) to warrant another works in Durban, i.e. no exponential growth. There is no increased capacity to feed the flow to SWWTW
21	Does Veolia's dilution of WT affect the quality of water going out to sea?  What is the quantity of this effluent (Mondi) by secondary use?	The dilution only affects the Chatsworth trunk sewer / line, the others all go along with the Mondi effluent, hence dilution impacts are insignificant. For the quantity – please refer to the report (final EIAR).
22	The CSIR clarified that the sea outfall is 4 km out to sea, therefore no impact on fishing, it is the Umlaas Canal and the pollution that occurs there which impacts on fishing zone	Noted.
23	What is the synergistic impact of trade effluent going out to sea (this could render the upgrades useless).	This has already been investigated and there will not be any new impact on digestion which will render the use of primary treatment useless.
24	The SIA should be re-looked at to include surveys / change methodology	Noted. The methodology including the use of surveys is one which is employed when there is a lack of platforms and avenues afforded to the community to participate – however, in the case of this project and study area, the community is vocal and it was agreed that engagement through meetings would better suit the project, from which the social specialist drew primary data.
25	It was recommended that the Public Meeting be held at Settlers School because the target community is not reached at the community centre – many people do not have transport and the affected persons are therefore not consulted with.	Noted with thanks of the suggestion. However, the community centre borders the study area (it is one road from the SWWTW) hence falls directly within the study area.
26	There was not enough PP –the Rising Sun should have been used.	Noted. The public participation conducted includes the following (also refer to Appendix B of the final EIAR): <ol style="list-style-type: none"> <li>1. Advertisements for Scoping and EIA phase in the <b>Rising Sun</b> and Mercury;</li> <li>2. Erection of a total of 25 site notices;</li> <li>3. Circulation of a total of 4,000 background Information Documents (inserted into post boxes and handed out at the</li> </ol>

Item	Discussion/ Resolution	Action / Response
		<p>Badulla / Tara Road Intersection);</p> <ol style="list-style-type: none"> <li>4. Placement of the draft reports for comment at a four venues;</li> <li>5. An introductory meeting with the mobilised NGO's in the area'</li> <li>6. A Focus Group Meeting per phase of the EIA;</li> <li>7. A PM per phase of the EIA (this one being the PM of the EIA phase);</li> <li>8. An NGO specialist discussion meeting;</li> <li>9. Request for assistance to spread awareness of the project from the local NGO's.</li> <li>10. Maintenance of the project I&amp;AP database;</li> <li>11. Maintenance of the project Issues Trail</li> </ol> <p>Furthermore Rod Bulman stressed the importance of completing the register thoroughly to ensure everyone can be reached and to note that comments forwarded after the meeting would be taken into account.</p>
27	Flyers should have been slotted into the paper.	Noted for future methods.