



Lynelle Matthys
Regional Air Quality Officer

T: +27 21 590 5200 F: +27 21 590 5215
E: lynelle.matthys@capetown.gov.za
Ref: WCCT 031

14 April 2021

The Responsible Person
Fine Chemicals Corporation (PTY) Ltd
15 Hawkins Avenue
Epping Industria
7460

For attention: Mr Yakeen Kowlas

RE: REQUEST FOR GUIDANCE: PROPOSED INCREASE IN STORAGE VOLUME OF DANGEROUS GOODS AT THE FINE CHEMICALS CORPORATION (PTY) LTD PLANT, 15 HAWKINS AVENUE, EPPING INDUSTRIA

The emailed correspondence from Mr Kowlas regarding the proposed increase in the dangerous goods storage at the Fine Chemicals Corporation (PTY) LTD plant (hereafter referred to as FCC) in Epping Industria, dated 1 April 2022, refers.

The information provided, which included, a feedback letter from the Western Cape Government (Department of Environmental Affairs and Development Planning (DEA&DP)) the FCC Chemical's List, and the FCC Flammable store fire plan, has been reviewed and this office advises as follows:

1. This office concurs that the proposed increase in the facility's chemicals storage area and number of drums being stored on site at any given time, will not result in any other listed activities, in terms of the National Environmental Management: Air Quality Act, 2014, (NEM:AQA) being triggered.
 - 1.1 According to the information provided, FCC is currently authorised to store 914, 210 L drums, equating to approximately 191,940 L or 191.94 m³, this capacity is planned to be increased to 2,071, 210 L drums which will equate to approximately 434,910 L or 434.91 m³.
 - 1.2. This volume is still below the 1,000 m³ threshold as listed in Category 6 of Section 21 of the NEM: AQA.
 - 1.3 In addition, the process of handling the drums would only be delivery, storage, removal from the store and delivered on site to various users.
 - 1.4 There are no changes to the production outputs or process at the facility.
2. Furthermore, the information provided states that the storage of the said chemicals will be in closed 210 L drums and not tanks that will vent to atmosphere, and therefore, will not result in an increase in emissions from the site.
3. This office however also concurs with the recommendation from the DEA&DP that the increase in the chemical storage volumes must be documented in the existing AEL and therefor a non-substantive administrative amendment to the AEL will be required.
4. In terms of the amendment to the AEL, please note the following:
 - 4.1 The current AEL issued to the facility will be administratively amended by this office, specifying the increased storage volume of drums in the chemicals storage area.

- 4.2 An online application via the SAAELIP portal for the said administrative amendment will not be required and the necessary information can be provided to this office via formal correspondence on an FCC Letterhead;
- 4.3 Therefore, a Public Participation Process, notifying the community of the administrative amendment to the FCC AEL, will not be required;
- 4.4 In addition, a Review of the AEL will not be undertaken and no tariff payment will be required.

I trust this clarifies the way forward but please feel free to correspond should you have any queries.

Yours faithfully,

Ian Gildenhuys
CITY OF CAPE TOWN AIR QUALITY OFFICER