

From:

Sent:

To:

Cc:

Thursday, 31 October 2024 14:26

S [REDACTED] C [REDACTED] | RBCAA; ZA - GLD - PPOffice

M [REDACTED] M [REDACTED] @kznedtea.gov.za; H [REDACTED] K [REDACTED] N [REDACTED] K [REDACTED] L [REDACTED]

K [REDACTED] E [REDACTED] N [REDACTED] C [REDACTED] R [REDACTED] 'D [REDACTED] W [REDACTED]; C [REDACTED] W [REDACTED] F [REDACTED]

S [REDACTED] L [REDACTED] C [REDACTED]

Subject:

RE: RBCAA COMMENT RE: 41106655 - GRINDROD TERMINALS RICHARDS BAY -
SECTION 24G APPLICATION: Draft Environmental Impact Report Review

Dear S [REDACTED],

I confirm receipt of your comments, thank you. I will reach out to you should we require any clarity when addressing the comments.

Kind regards,



P [REDACTED] M [REDACTED]
Principal Consultant

T +27-11-361-1300
M +27-11-254-4826

From: S [REDACTED] C [REDACTED] | RBCAA <S [REDACTED]@rbcaa.org.za>

Sent: Thursday, 31 October 2024 14:12

To: Z [REDACTED]

Subject: RBCAA COMMENT RE: 41106655 - GRINDROD TERMINALS RICHARDS BAY - SECTION 24G APPLICATION:
Draft Environmental Impact Report Review

Importance: High

Dear Phindile

Please find attached the RBCAA's submission on the Grindrod Seamunye 24G DEIAR.

Thank you for the in-principle 1-day extension.

Kind regards,

"IMPROVING THE ENVIRONMENT FOR ALL"

From: ZA - GLD - PPOffice <gld.PP@wsp.com>

Sent: Friday, 27 September 2024 15:53

Subject: 41106655 - GRINDROD TERMINALS RICHARDS BAY - SECTION 24G APPLICATION: Draft Environmental Impact Report Review

Dear Stakeholder,

Grindrod Terminals Richards Bay, a division of Grindrod SA Operations (Pty) Ltd (Grindrod) owns and operates the Sea Munye Terminal, 32 Alugang, Alton South, Richards Bay, 3900. The Sea Munye Terminal is an ad hoc bulk materials storage and handling operation/facility. The materials stored on-site could include sulfur, fertilizer (all types), iron skulls/pig iron (all grades), iron ore (hematite), iron ore (magnetite), metcoke, petcoke, clinker, chromium (all grades), manganese ore, rutile, zircon, chloride slag, blast furnace slag, copper concentrate, granite, ilmenite, vermiculite and salt. The facility has been used for this purpose since 2001.

Since the Sea Munye Terminal can store above 100 000 tons of ore and coal, the facility requires an atmospheric emission licence (AEL), in terms of the National Environmental Management Air Quality Act, 2004 (Act 39 of 2004) (NEM:AQA), and an environmental authorisation (EA) in terms of the EIA Regulations, 2014, published under the NEMA.

For more information, please see the attached notification letter.

Kind regards,



Public Participation Office

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WSP Group Africa (Pty) Ltd, Registered Office: Building C, Knightsbridge, 33 Sloane Street, Bryanston, 2191, South Africa Registered Number: 1999/008928/07 South Africa

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Disclaimer

Email Legal Notice: <https://policy.rbcaa.org.za/>



E-mail: [REDACTED] Web Site: www.rbcaa.org.za

31 October 2024

WSP
Building C
Knightsbridge, 33 Sloane Street
Bryanston
2191

Attention: P [REDACTED] M [REDACTED]
Public Participation Office

email: [REDACTED]
email: gld.PP@wsp.com

Dear Ms Mashau

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT
GRINDROD TERMINALS SECTION 24G FOR THE SEAMUNYE TERMINAL
EDTEA Reference Number: DC28/SECTION 24G/0001/2022**

The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA) review the above Draft Environmental Impact Assessment Report ((DEIAR), dated September 2024 and prepared by WSP.

AIR QUALITY

The **Atmospheric Impact Report (AIR)** is outdated (July 2022) and is not representative of the current air quality issues relating to dust emissions.

In the RBCAA's submission dated 27 September 2022 on the above AIR, the RBCAA submitted that:

*"The AIR has not assessed **cumulative impacts** which in the opinion of the RBCAA is a significant shortcoming.*

The author states that "cumulative impacts were not assessed as the addition of background measurements would double account for emissions from the facility". The Specialist must adjust the model inputs to account for this.

The contribution of emissions from the Seamunye facility to the overall pollution load needs to be demonstrated and can only be quantified by means of a cumulative impact assessment."

The above comments submitted by the RBCAA stand.

[REDACTED]

Furthermore;

Cumulative Impact Assessment Deficiency: The report's statement that "*cumulative impacts were not assessed as the addition of background measurements would double count emissions from the facility*" is a **critical oversight**.

There are established methods for estimating facility-specific contributions and modifying models to prevent or mitigate double-counting. At a minimum, satellite data could be utilized to establish an accurate background baseline.

TRAFFIC IMPACTS (TIA)

The DEIAR has **NOT** assessed traffic impacts, which in our opinion is a substantive **flaw** in the assessment of impacts.

The impacts associated with truck volumes and movement to and from the site are significant, and include impeding traffic flow, road surface destruction, blocking entrances to other business premises and dust generation.

The significance of the impacts beyond the site boundary are self-evident when visiting the area.

The DEIAR states that;

- **Traffic Impact Assessment:** The proposed project is only anticipated to generate very minimal traffic during the construction phase. Therefore, this assessment was deemed not applicable. However, it should be noted that a Traffic Impact Assessment has been undertaken for the parallel re-zoning application process by the Applicant, this study has been moderately incorporated into the SIA.

The statement that a TIA was not applicable due to "*minimal traffic during the construction phase*" is not relevant to this application as the site is already operational.

The statement brings to light a parallel re-zoning application, which the RBCAA is not aware of.

In our engagement with WSP it was confirmed that the Seamunye facility will not be utilised for the storage of coal. However, it has been brought to the attention of the RBCAA that Grindrod coal trucks are still making use of the weighbridge at the Seamunye facility.

This practice has significant impacts on traffic flow, access to other premises and dust emissions. Grindrod should be requested to cease with such activities, if they are in fact taking place.

STAKEHOLDER NOTIFICATION

The Stakeholder Database appears to not include all neighbouring businesses.

The RBCAA has confirmed that two businesses in close proximity to the Seamunye facility are not aware of this application.

RECOMMENDATIONS:

The RBCAA recommends that;

1. The **Air Quality Impact Assessment** be revised using a current data set and must include the assessment of cumulative impacts.

The AIR should incorporate PM10 and PM2.5 monitoring data from 2022 and 2023 to substantiate the draft Environmental Impact Assessment (EIA) findings. This data is pertinent to understanding current conditions and is referenced in the draft EIA.

2. A **Traffic Impact Assessment** must be undertaken.

Thank you for affording the Richards Bay Clean Air Association the opportunity to comment.

Kind regards,



S C [redacted]
CHAIRMAN EIA COMMITTEE