

**Reference:** 19/2/5/3/A3/39/WL0244/24

Director/s  
Zutari (Pty) Ltd.,  
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**GEORGE**  
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Email: [Corlie.Steyn@Zutari.com](mailto:Corlie.Steyn@Zutari.com)

**For attention:** Mr./Ms. Corlie Steyn

**COMMENT ON THE BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXTENSION OF THE MACASSAR WASTEWATER TREATMENT WORKS, ON ERF NO. 1205 MACASSAR, CAPE TOWN.**

1. The documentation dated April 2024, as received electronically by the Department of Environmental Affairs and Development Planning: Waste Management (hereafter, "the Department") on 29 November 2024, refers.
2. It is the understanding of this Department that the proponent proposes to upgrade the Macassar WWTW as per the project scope provided on page 5 of the draft BAR. The development was previously authorised in 2016; however, a new design alternative is being proposed.
3. The Department has reviewed the proposal. As per Government Notice No. 921 of 29 November 2013, please note that the waste management activity, Category B 4, relating to treatment of wastewater is not triggered due to the exclusion which reads, "The treatment of hazardous waste in excess of 1 ton per day calculated as a monthly average; using any form of treatment excluding the treatment of effluent, wastewater or sewage."
4. The Department generally supports the development as it's aware of the current sewage management issues experienced in the areas being serviced by the WWTW, particularly False Bay and Strand.
5. The Directorate notes that the waste generated waste by the proposed development may be both general and hazardous in nature. The two waste streams must under no circumstance be mixed. Should this occur, the entire volume of waste will be classified as hazardous.
6. The waste generated must be efficiently managed in accordance with the waste hierarchy. It must be stressed that disposal must be seen as the last option. Waste must be disposed of in appropriately licensed disposal facilities.

7. Refer to page 20 of the draft BAR and page 10 of the EMPr, both reports state that "treated effluent from the plant is discharged into the Eerste River and a small portion is also recycled for both off-site and on-site use." Further information is requested regarding the recycled effluent, please include information on storage, transportation, volumes, use, destination in your description.
8. Please replace the words such as "shall, should, will" in the proposed mitigation measures with "must" to make the mitigation measure enforceable.
9. Refer to page 37 of the EMPr, it is stated that "Drip trays to collect waste oil and other lubricants shall be provided in any areas of the Site where such maintenance takes place." Maintenance must only take place at one designated area, and it must have an impermeable surface and away from environmentally sensitive areas.
10. Any significant event resulting in the spill or leak of hydrocarbons (e.g. petrol, diesel or oil) or any other hazardous solvents into the ground and/or water courses must be reported to all relevant authorities, including the Directorate: Pollution and Chemicals Management, within 14 (fourteen) days. This requirement is in terms of section 30 (10) of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA), that pertains to the control of emergency incidents and should include the reporting, containment and clean-up procedure of such incident and the remediation of the affected area. All necessary documentation must be completed and submitted within the prescribed timeframes. Containment, clean-up and remediation must commence immediately in the case of NEMA section 30 incidents.
11. Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
12. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely,

**Lance McBain-Charles**

Digitally signed by Lance McBain-Charles  
Date: 2024.12.03 11:23:09 +02'00'

**Lance McBain-Charles**

Control Environmental Officer (Grade B)  
Head: Waste Management Licensing

**Date: 2024/12/03**

**Cc:** Mr. Keith Olsen (applicant)

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