



REFERENCE: 19/4/4/1/BC5/H- Macassar WWTW

ENQUIRIES: Palesa Mothiba/Etienne Roux

For Attention: Ms Corlie Steyn

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COMMENT ON THE THE BASIC ASSESSMENT REPORT (BAR) AND CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) FOR THE PROPOSED CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT AT MACASSAR WASTEWATER TREATMENT WORKS (WWTW), WESTERN CAPE

The above-mentioned documentation, as received on 15 October 2024 by the Department of Environmental Affairs and Development Planning (DEA&DP), Directorate: Air Quality Management (D: AQM), has reference.

The Directorate has reviewed the documentation and has the following comments in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA):

1. DUST CONTROL MANAGEMENT

- 1.1. Dust generated from all the phases of the proposed activities must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.
 - 1.1.1. These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.
- 1.2. It is noted that dust generation is anticipated on site during the construction phase of the proposed project.
- 1.3. D: AQM recommends that:
 - 1.3.1. Dust suppression measures to monitor and control fugitive dust must be implemented and included in the CEMP and;

- 1.3.2. wind conditions be considered prior to the commencement of daily construction activities, and for activities that could lead to excessive dust to be suspended during periods of high wind speeds.

2. NOISE CONTROL MANAGEMENT

- 2.1. Noise generated on site from the proposed activities must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.
- 2.2. D:AQM notes that activities in the construction and operations phases could potentially generate noise.
- 2.3. D:AQM recommends that:
- 2.3.1. measures to monitor and prevent significant noise impacts should be included in, and adhered to strictly in the CEMP.

3. ODOUR MANAGEMENT

- 3.1. Due to the nature of the proposed development, an odour impact associated with various aspects of the project during the operations phase, could be anticipated.
- 3.2. It is noted an odour control system at the inlet and sludge dewatering system, which is included in the existing environmental authorisation, is planned to remain as part of the proposed amendments (page 75, point 5 in BAR).
- 3.2.1. D:AQM requests clarity regarding the details of the above-mentioned odour control system, and the control efficiency thereof.
- 3.2.2. D:AQM also recommends that all measures to mitigate the impact of odours be included in the CEMP.

4. GENERAL

- 4.1. Kindly be advised that the Air Quality Officer (AQO) in the City of Cape Town Metropolitan Municipality (CCT), Mr Ian Gildenhuys, must also be engaged regarding the proposed activity as it falls within their jurisdictional area. Mr Gildenhuys may be reached at 021 444 8364 or Ian.Gildenhuys@capetown.gov.za.
- 4.2. The Department would like to draw the applicant's attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" which states that:
"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."

- 4.3. Please note that the above-mentioned recommendations do not pre-empt the outcome of the application.
- 4.4. No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation:
- 4.4.1. That additional information or documents will not be requested;
- 4.4.2. or of the outcome of any application submitted to the authorities.
- 4.5. Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.

Please contact Ms Palesa Mothiba (palesa.mothiba@westerncape.gov.za) or Mr Etienne Roux (etienne.roux@westerncape.gov.za) should you have any further queries in this regard.

Please note that D: AQM has a dedicated email address reserved for all EIA related correspondences, DEADP.AQM@westerncape.gov.za. Kindly use this email for any future correspondence.

Yours faithfully,

**Etienne
Roux**

Digitally signed by
Etienne Roux
Date: 2024.11.29
13:04:42 +02'00'

Etienne Roux

Head of Component: Air Quality Regulatory Services