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Ref ENV19\_L275

Dear Dr T Khumalo

**SUBMISSION OF APPLICATIONS FOR SUSPENSION AND/OR ALTERNATIVE LIMITS OF THE MINIMUM EMISSIONS STANDARDS (MES) AS WELL AS ASSOCIATED AIR EMISSION LICENCES (AELs) VARIATION REQUESTS FOR SOME OF ESKOM'S COAL AND GAS POWER STATIONS**

Eskom Holdings (SoC) Limited hereby submits applications for suspension, alternative limits and/or postponement of the Minimum Emissions Standards (MES) for Acacia and Port Rex Peaking gas power stations as well as for Grootvlei, Matimba and Medupi coal-fired power stations

In terms of the National Environmental Management Air Quality Act, 2004 (Act No 39 of 2004) (NEMAQA), all of Eskom's coal and liquid fuel-fired power stations are required to meet the Minimum Emission Standards (MES) contained in GNR 893 as amended by GNR 1207 (31 October 2018) which was promulgated in terms of Section 21 of the NEMAQA. These regulations provide arrangements in respect of inter alia a once off postponement with the compliance of minimum emissions for new plant for five years from the date of issue, no once off postponement will be valid beyond 31 March 2025, a once off suspension for plants being decommissioned by 31 March 2030, and that the National Air Quality Officer may grant an alternate emission limit or emission load if certain conditions are met. The application for any of these requests must be submitted by 31 March 2019. The MES amendments in October 2018 have necessitated Eskom to submit these additional unplanned 5 applications. The relatively late publication of these MES amendments, in conjunction with SOE procurement processes, resulted in Eskom applying and receiving (in October 2019) a condonation from the Minister for the late submission of these

applications with a requirement for submission by November 2019. These applications are submitted in compliance with this requirement. The applications will be supplemented with supporting documentation which is anticipated will be provided by the end of May 2020 (revised AIRs and further Public Consultation) – as it was not practically possible to prepare these documents by March 2019.

It is Eskom's considered view that the applications and current supporting documentation clearly indicates that the approval of these applications will result in limited health impacts on affected communities and that these applications are not only reasonable, but that they also stand in the national interest due to techno-socio economic reasons. It is anticipated that the revised AIRs and further public participation to support these additional 5 applications will not change the outcomes of the applications.

The table below indicates a summary of Eskom's 2019 MES Applications in terms of the GNR 1207 (31 October 2018)

**Table 1: A summary of Eskom's November 2019 MES applications**

PowerStation	Pollutant (limits presented) in mg/Nm <sup>3</sup>		
<b>Coal-fuelled - mg/Nm<sup>3</sup> under normal conditions of 10% O<sub>2</sub>, 273 Kelvin and 101,3 kPa.</b>			
	Particulate Matter	Nitrogen Oxide	Sulphur Dioxide
<b>Grootvlei</b>	None- Eskom will comply	Suspension of the MES 'new plant' limits	Suspension of the MES 'new plant' limits
<b>Matimba</b>	Alternate <u>monthly</u> limit of 50 mg/Nm <sup>3</sup> from 2020 until decommissioning	Alternate <u>monthly</u> limit of 750 mg/Nm <sup>3</sup> from 2020 until decommissioning	Alternate <u>monthly</u> limit of 4000 mg/Nm <sup>3</sup> from 2020 until decommissioning
<b>Medupi</b>	None- Eskom will comply	None- Eskom will comply	Alternate <u>monthly</u> limit of 4000 mg/Nm <sup>3</sup> from 2020 until 31 March 2030 Thereafter (from 1 April 2031) Alternate <u>monthly</u> limit of 1000 mg/Nm <sup>3</sup> until decommissioning
<b>Gas/liquid fuelled - mg/Nm<sup>3</sup> under normal conditions of 15% O<sub>2</sub>, 273 Kelvin and 101,3 kPa.</b>			
	Particulate Matter	Nitrogen Oxide	Sulphur Dioxide
<b>Acacia</b>	None- Eskom will comply	Suspension of the MES 'new plant' limits	None- Eskom will comply
<b>Port Rex</b>	Suspension of the MES 'new plant' limits	Suspension of the MES 'new plant' limits	None- Eskom will comply

Included herewith is the following

MES Applications and supporting documentation for Matimba, Medupi, Grootvlei, Port Rex and Acacia Power Stations, and;

Annexure 1 – A Health impact focused cost benefit Analysis (Highveld MES applications 2019)

Annexure 2 – Eskom's summary Atmospheric Impact Report (Highveld MES applications 2019)


Annexure 3 – Summary report of Eskom's MES Applications in March 2019

Annexure 4.1 – Public Participation report as at Feb 2019 (Highveld MES applications 2019)

Annexure 4.2 – Final Issues and Response report as at Feb 2019 (Highveld MES applications 2019)

Eskom believes the applications are sufficient for decision making purposes at this stage. Should the Department (the NACA) have queries or requires any additional information or clarification on any of the documents regarding these Applications, please do not hesitate to contact Mr Bryan McCourt or myself

Yours sincerely



Deidre Herbst

**ESKOM ENVIRONMENTAL MANAGER**