

PROPOSED COAL STOCKYARD ON MEDUPI ASH DUMP SITE, LIMPOPO PROVINCE

DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr): ADDENDUM TO THE ENVIRONMENTAL MANAGEMENT PLAN FOR THE MEDUPI COAL-FIRED POWER STATION IN THE LEPHALALE AREA, LIMPOPO PROVINCE

EIA Reference Number: 14/12/16/3/3/1/531

Revision 1, July 2022

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Definitions and Terminology

Alternatives: Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the 'do nothing' alternative.

Cumulative impacts: Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period and can include both direct and indirect impacts.

Direct impacts: Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g. noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable

'**Do nothing' alternative**: The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

Endangered species: Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

Endemic: An "endemic" is a species that grows in a particular area (is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

Environment: the surroundings within which humans exist and that are made up of:

- i. The land, water and atmosphere of the earth;
- ii. Micro-organisms, plant and animal life;
- iii. Any part or combination of (i) and (ii) and the interrelationships among and between them; and
- iv. The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

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Environmental impact: An action or series of actions that have an effect on the environment.

Environmental impact assessment: Environmental Impact Assessment (EIA), as defined in the NEMA EIA Regulations and in relation to an application to which scoping must be applied, means the process of collecting, organising, analysing, interpreting and communicating information that is relevant to the consideration of that application.

Environmental management: Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

Environmental management programme: An operational plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its ongoing maintenance after implementation.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act of 2000).

Indigenous: All biological organisms that occurred naturally within the study area prior to 1800

Indirect impacts: Indirect or induced changes that may occur as a result of the activity (e.g. the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.

Interested and affected party: Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups, and the public.

Rare species: Taxa with small world populations that are not at present Endangered or Vulnerable, but are at risk as some unexpected threat could easily cause a critical decline. These taxa are usually localised within restricted geographical areas or habitats or are thinly scattered over a more extensive range. This category was termed Critically Rare by Hall and Veldhuis (1985) to distinguish it from the more generally used word "rare."

Red data species: Species listed in terms of the International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species, and/or in terms of the South African Red Data list. In terms of the South African Red Data list, species are classified as being extinct,

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endangered, vulnerable, rare, indeterminate, insufficiently known or not threatened (see other definitions within this glossary).

Significant impact: An impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.

1. PURPOSE & OBJECTIVES OF THE EMP ADDENDUM

An Environmental Management Programme (EMP) is defined as "an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented or mitigated, and that the positive benefits of the projects are enhanced". The objective of this Environmental Management Programme is to provide consistent information and guidance for implementing the management and monitoring measures established in the permitting process and help achieve environmental policy goals. The purpose of an EMP is to help ensure compliance with recommendations and conditions specified through an EIA process, as well as to ensure continuous improvement of environmental performance, reducing negative impacts and enhancing positive effects during the construction and operation of the facility. An effective EMP is concerned with both the immediate outcome as well as the long-term impacts of the project.

An EMP provides a link between the impacts predicted and mitigation measures recommended within the Basic Assessment Report, and the implementation activities of a project to ensure that these activities are managed and mitigated so that unnecessary or preventable environmental impacts do not result. The EMP provides specific environmental guidance for the construction and operation phases of a project, and is intended to manage and mitigate construction and operation activities so that unnecessary or preventable environmental impacts do not result. These impacts range from those incurred during start up (site clearing and site establishment) through those incurred during the construction activities themselves (erosion, noise, dust) to those incurred during site rehabilitation (soil stabilisation, re-vegetation) and operation. The EMP also defines monitoring requirements in order to ensure that the specified objectives are met.

Eskom have an approved EMP in place for the construction, operation and maintenance activities associated with the Medupi Power Station (refer to the EMP (EIA Reference Number: 12/12/20/695, April 2007)). This EMP is currently successfully utilised and in force at the Medupi Power Station (a 4800 MW coal-fired power station) currently under construction in the Lephalale area. Regular compliance audits to the EMP requirements are undertaken by the Environmental Control Officer and an external auditor. As such, it is not deemed necessary to reiterate all the specifications of this approved EMP which are currently being applied to all components of the bigger Medupi Power

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Station project, and therefore this addendum to the approved EMP has been prepared to specifically address the potential impacts resulting from construction and operation of the coal stockyard.

1.1 Purpose of the EMP and associated Addendum

The purpose of the Medupi Power Station EMP (EIA Reference Number: 12/12/20/695, April 2007) as well as this addendum to the approved EMP is to assist in ensuring continuous improvement of environmental performance, reducing negative impacts and enhance positive effects during the construction and operation of the project. An effective EMP is concerned with both the immediate outcome as well as the long-term impacts of the project.

The EMP has the following objectives:

- » To outline mitigation measures, and environmental specifications which are required to be implemented for the planning, construction, rehabilitation, and operation/maintenance phases of the project in order to minimise the extent of environmental impacts, and to manage environmental impacts associated with the project.
- » To identify measures that could optimise beneficial impacts.
- » To ensure that the construction and operation phases do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- » To ensure that all environmental management conditions and requirements as stipulated in the Environmental Authorisation (once issued) are implemented throughout the project life cycle.
- » To ensure that all relevant legislation (including national, provincial and local) is complied with during the construction and operation phases.
- To identify entities who will be responsible for the implementation of the measures and outline functions and responsibilities.
- » To propose mechanisms for monitoring compliance and preventing long-term or permanent environmental degradation.
- » To facilitate appropriate and proactive response to unforeseen events or changes in project implementation that were not considered in the Basic Assessment Process.

This addendum to the approved EMP has been developed as a set of environmental specifications (i.e. principles of environmental management) which are appropriately contextualised to provide clear guidance in terms of the implementation of these specifications for the proposed project.

This addendum to the approved EMP (for the proposed coal stockyard on the authorised Medupi Power Station ash dump site) has been compiled in accordance with Section 33 of the EIA

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Regulations and will be further developed in terms of specific requirements listed in any authorisations issued for the proposed project. It should be noted that since this addendum to the EMP is part of the Basic Assessment Process undertaken for the proposed project, it is important that this document be read in conjunction with the Basic Assessment Report (March 2012). In addition, this addendum to the approved EMP must be read in conjunction with the relevant sections and appendices of the Medupi Power Station EMP (EIA Reference Number: 12/12/20/695, April 2007).

2. PROJECT DETAILS

As a result of to the delays experienced in the construction of the Medupi Power Station due to various factors, Eskom proposes to establish a coal stockyard to accommodate coal which is to be supplied to the power station from Exxaro's Grootegeluk Mine from May 2012. This coal stockyard would be able to accommodate the volume of coal provided during the period the power station is not in full commercial operation. The coal stockyard is proposed to be on the Farm Eenzaamheid 687 LQ. The Farm Eenzaamheid 687 LQ has already been assessed within the EIA undertaken for the Medupi Power Station (DEA Ref No 12/12/20/695; completed by Bohlweki Environmental in May 2006), and the establishment of the ash dump associated with Medupi Power Station was authorised for this property. The following is relevant for this proposed development:

- The coal stockyard is proposed to be established within the footprint of the already authorised ash dump (DEA Ref No 12/12/20/695 and Waste Management Licence Ref. No. 12/9/11/L210323092918/5R)
- » It is expected that approximately 38 million tonnes of coal would be stockpiled at this site up until 2028.
- » The area required for the stockyard is approximately 2.5 km x 2.5 km in extent.
- Associated infrastructure would include coal conveyors between Grootegeluk Mine and the coal stockpile, as well as between the coal stockpile and Medupi Power Station. It is proposed that use be made of the already authorised conveyor systems with slight alterations. The conveyor system will cross the authorised ash dump, therefore any slight alteration impacts have already been taken into account in the previous Environmental Authorisation (DEA Ref No 12/12/20/695). There will be associated roads that will run alongside these coal conveyors. The impacts in this regard have already been identified and assessed within the EIA for the power station.
- » The proposed holding dams will collect Run off water to be recycled for ash dump operation

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Design Concept

Liner Earthworks and Design

The liner earthworks will include constructing the conveyor terracing & liner installation, secondary liner, leakage detection layer, primary liner, and leachate collection layer.

The liner will be as per the Minimum Requirement Standard Specification (DWAF, 1998), Hazardous which is low to medium.

The Functions of the different layers for the lining on the coal stockyard is as follows (refer to Figure 1):

- Leachate Collection system Leachate could result in high leachate head, possible clogging from pioneer layer.
- Primary Clay composite system The main barrier and high probability to damage than the secondary
- Leak detection system Has a two-fold function, i.e. detecting and collection. It is the first indication of leakage.
- Secondary compacted clay The final containment layer.



Figure 1: The different lining layers of the construction of the coal stock yard.

Holding Dam

The holding dam (including the coal stock yard) has been designed as a zero liquid effluent discharge (ZLED) site. A liner system has been allowed for underneath the coal stock yard to prevent seepage to the underground.

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Seepage and dirty run- off from the coal stockyard area will collect in the holding dam from where the dirty water will evaporate. Should it be required, this water can be used for dust suppression. A leakage detection system is part of the holding dam. The basin of the dam is sloped in such way that any leakage water will migrate towards a leakage detection sump.

The layers above the liner will be deeper than the normal liner for ash to allow mobile plant to move on the site without damaging the liner.

Site Preparation

Site preparation activities will include clearance of vegetation at the infrastructure footprint, some levelling of the land and terracing and establishment of site accessibility for vehicles and conveyors. These activities will require the stripping of topsoil, which will need to be appropriately stockpiled for use in rehabilitation.

Site Access

The proposed coal stockyard development site falls within the larger footprint for the Medupi Power Station. Access to the site has been established as part of the construction phase of the power station. This existing access will be used during the construction and operation of the coal stockyard. In addition, the conveyor servitude is designed to allow road access on either side of the conveyor for conveyor maintenance requirements.

2.1 Environmental Study Requirements

In terms of sections 24 and 24D of the National Environmental Management Act (NEMA; Act No. 107 of 1998), as read with the Environmental Impact Assessment (EIA) Regulations of Government Notice R543 – R546, a Scoping and EIA process is required to be undertaken for the proposed project. However, based on a motivation supplied to the National Department of Environmental Affairs in terms of Regulation 20(4) of Government Notice R543, a downscaling from a full EIA to a Basic Assessment Process has been approved for the proposed project and therefore a Basic Assessment Process is being undertaken. This is based on the fact that the site under investigation for the proposed coal stockyard has been previously assessed and the issues associated with development thereon are known.

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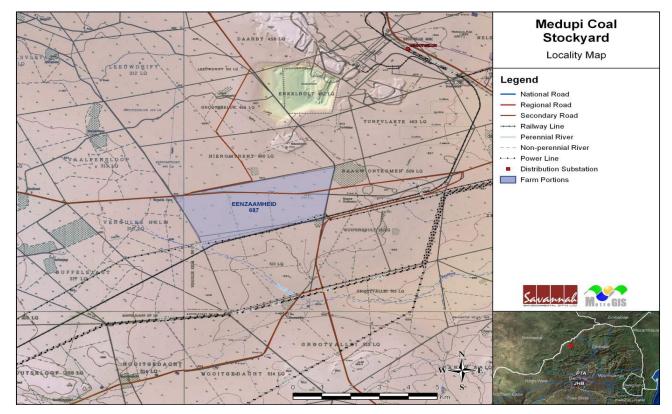


Figure 2.1: Locality Map showing the Farm Eenzaamheid 687 where the proposed coal stockyard is proposed to be established

Savannah Environmental has been appointed as the independent environmental consultant to undertake the Environmental Basic Assessment to identify and assess any potential environmental impacts. As part of these environmental studies, interested and affected parties (I&APs) have been actively involved through a public involvement process.

In terms of the findings of the Basic Assessment, various planning, construction, and operation-related environmental impacts were identified, including:

- The overall impact on ecology is likely to be of medium significance. The vegetation in the study area is the same as the regional area. Aspects that will affect the ecological sensitivity status of the habitat units include the confirmed presence of protected tree species of the medium floristic and faunal status of the study area and adequate connectivity to areas of adjacent natural habitat (low fragmentation factor). Eskom has already obtained the necessary tree permits for this property.
- The suitability of Eenzaamheid, in terms of general red data fauna requirements, is considered Medium-Low due to available habitat being considered moderately suited to the general habitat

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requirements of red data fauna species that could potentially occupy the area. Impacts of some

destruction of natural habitat; and

* destruction of protected tree species and associated habitat.

significance that should be taken into consideration include:

- The overall heritage impact is likely to be of low significance as no sites, features or objects of cultural heritage significance were identified in the study area. However, should any artefacts be uncovered during the construction period, the necessary permits will need to be obtained.
- The overall impact on soil and agricultural potential is expected to be low as a result of the low agricultural potential of the soils on the site due to their sandy nature, increased susceptibility to wind erosion and excessively free drainage.
- The overall impact on ground water contamination potential is expected to be of low significance. The proposed coal stockyard site will include an appropriate liner. This would prevent the contamination of the ground water. The liner system also consists of a Leachate Collection system and Leak detection system. By monitoring these two systems, any source of contamination would be timeously identified. In addition, the coal stockyard would be managed by constructing a clay base, separating clean and dirty runoff; installing and maintain surface water controls; sloping topography to prevent ponding; and monitoring groundwater levels and quality.
- The overall social impact in terms of positive and negative impacts is likely to be of a low significance. Due to the type of the proposed development, most of the operations on site would entail mechanical operations and thus no permanent employment is envisaged.
- The overall visual impacts for the coal stockyard are of low significance and not expected to have a regional or long distance visual impact due to the fact that it is either not visible or not recognisable from great distances.
- » The overall **air** impacts are of low significance. The coal stock yard is located near the Medupi and Matimba Power stations. The effects from the coal stock yard are expected to be minor.

The Addendum to the EMP has been developed based on the findings of the Basic Assessment, and must be implemented (together with the approved EMP for the Medupi Power Station) to protect sensitive on-site and off-site features through controlling construction and operation activities that could have a detrimental effect on the environment, and through avoiding or minimising potential impacts.

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» Main Activity/ Project Component	» Components of Activity	» Details
	Planning	
» Construct Conveyor belts	» Design, supply, install and commission a system of conveyors and stacker rec- claimer to meet the specifications.	» There will be eight steel conveyor belts of varying lengths and a bucket stacker-reclaimer machine.
» Conduct technical surveys	» Site survey and confirmation of the infrastructure.	» All surveys are to be undertaken prior to initiating construction.
	Construction	
Undertake site preparation	 Clearance of vegetation at the infrastructure footprint Some levelling of the land and terracing Establishment of site accessibility for vehicles and conveyors 	These activities will require the stripping of topsoil, which will need to be appropriately stockpiled for use in rehabilitation.
Construction of access roads	» Access to the site has been established as part of the construction phase of the power station.	The existing access roads within the site will be used during the construction and operation of the coal stockyard. In addition, the conveyor servitude is designed to allow road access on either side of the conveyor for conveyor maintenance requirements.
Transport of components and equipment to site	 Trucks will be used to transport all components to site: * The normal civil engineering construction equipment for the civil works (e.g. trucks, graders, 	The equipment will be transported to the site using appropriate routes, and the dedicated access/haul road to the site itself.

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	compaction equipment, cement mixers, etc.)	
Coal Stockyard	 Liner earthworks (conveyor terracing & liner installation), secondary liner, leakage detection layer, primary liner, leachate collection layer. The site will be lined with 200 mm HDPE. Holding dam 	 The following process will be followed in the lining of the site: The liner earthworks will include constructing the conveyor terracing & liner installation, secondary liner, leakage detection layer, primary liner, and leachate collection layer. The liner will be as per the Minimum Requirement Standard Specification (DWAF, 1998), Hazardous H:h; which is low to medium. The Functions of the different layers for the lining on the coal stockyard is as follows: Leachate Collection system - Leachate could result in high leachate head, possible clogging from pioneer layer. Primary Clay composite system - The main barrier and high probability to damage than the secondary Leak detection system - Has a twofold function, i.e. detecting and collection. It is the first indication of leakage.

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		 Secondary compacted clay The final containment layer. A liner system has been allowed for underneath the coal stock yard to prevent seepage to the underground A leakage detection system is part of the holding dam. The basin of the dam is sloped in such way that any leakage water will migrate towards a leakage detection sump.
Construct Conveyor belts	» Design, supply, install and commission a system of conveyors and stacker rec- claimer to meet the specifications.	» There will be eight steel conveyor belts of varying lengths and a bucket stacker-reclaimer machine.
Undertake site rehabilitation	 Remove all construction equipment from the site. Rehabilitation of temporarily disturbed areas where practical and reasonable. 	» On full commissioning of the facility (or a phase thereof), any access points to the site which are not required during the operation phase will be closed and prepared for rehabilitation.
	Operation	
Operation	Coal stock yardConveyorsAssociated infrastructure	 The operational phase is proposed to extend until 2017, with a total of 38 million tonnes being stored over the lifetime of the facility. During this time full maintenance, supervision, and monitoring teams will be required on site.

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		» The leachate detection system will be in place.
Maintenance & Security	» Maintenance during the life cycle of the facility.	» This would include emergency repairs, routine maintenance, and maintenance of the site.
	Decommissioning	
Site preparation	 Preparation of the site for inclusion within the ash dump. Mobilisation of decommissioning equipment. 	The site is to be designed to cater for both coal storage and later for ash dumping (long-term use after 2028) with minimum changes to the overburden above the liner. It will not be necessary to remove the liner after the coal at the stockyard is exhausted. At this point, the over burden will be skimmed to remove any coal remnants in readiness for ash dumping. The layers above the liner will be deeper than the normal liner for ash to allow mobile plant to move on the site without damaging the liner.

3. STRUCTURE OF THIS EMPr

Several procedures are necessary for Eskom to achieve environmental compliance for the Medupi Power Station. These are described in detail within the Medupi Power Station EMP (EIA Reference Number: 12/12/20/695, April 2007). In order to ensure site-specific compliance associated with the proposed coal stockyard, this EMP addendum includes the statement of an over-arching environmental **goal**, as well as lists a number of **objectives** in order to meet this goal. The management programme has been structured in table format in order to show the links between the goals for each phase and their associated objectives, activities/risk sources, mitigation actions monitoring requirements and performance indicators. A specific environmental management

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programme table has been established for each environmental objective. The information provided within the EMP table for each objective is illustrated below:

OBJECTIVE: Description of the objective, which is necessary in order to meet the overall goals; these take into account the findings of the environmental impact assessment specialist studies

Project component/s	List of project components affecting the objective, i.e.:	
, ,	» Coal stockyard and ancillary structures	
Potential Impact	Brief description of potential environmental impact if objective is not met	
Activity/risk source	Description of activities which could impact on achieving objective	
Mitigation: Target/Objective	Description of the target; include quantitative measures and/or dates of completion	

Mitigation: Action/control	Responsibility	Timeframe
List specific action(s) required to meet the mitigation target/objective described above.	Who is responsible for the measures	Time periods for implementation of measures

Performance Indicator	Description of key indicator(s) that track progress/indicate the effectiveness of the management Programme.
Monitoring	Mechanisms for monitoring compliance; the key monitoring actions required to check whether the objectives are being achieved, taking into consideration responsibility, frequency, methods and reporting.

The objectives and EMP tables are required to be reviewed and possibly modified whenever changes, such as the following, occur:

- » Planned activities change (i.e. in terms of the components and/or layout of the facility).
- » Modification to or addition to environmental objectives and targets.
- » Relevant legal or other requirements are changed or introduced.

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» Significant progress has been made on achieving an objective or target such that it should be re-examined to determine if it is still relevant, should be modified, etc.

4. MANAGEMENT PROGRAMME FOR THE COAL STOCKYARD: PLANNING & DESIGN

4.1 Goal for Planning and Design

Overall Goal for Planning and Design: Undertake the planning and design phase of the coal stockyard in a way that:

- Ensures that the design of the facility responds to the identified environmental constraints and opportunities.
- » Ensures that adequate regard has been taken of any landowner concerns and that these are appropriately addressed through design and planning (where appropriate).
- » Ensures that the best environmental options are selected for the project.
- Enables the coal stockyard construction activities to be undertaken without significant impacts on the environment.

This addendum to the approved EMP must be read in conjunction with the relevant sections and appendices of the Medupi Power Station EMP (EIA Reference Number: 12/12/20/695, April 2007) and subsequent approved revisions.

4.2 Objectives

In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

OBJECTIVE: Ensure that the design of the facility responds to the identified environmental constraints and opportunities

The Farm Eenzaamheid 687 LQ has already been assessed within the EIA undertaken for the Medupi Power Station (DEA Ref No 12/12/20/695; completed by Bohlweki Environmental in May 2006), and the establishment of the ash dump associated with Medupi Power Station was authorised for this property. From the studies undertaken for the Medupi Power Station (including the proposed coal stockyard development site), no absolute 'no go' areas were identified.

Project	Project components affecting the objective:	
component/s	» Coal stockyard and ancillary structures	

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Potential Impact	Design fails to respond optimally to the identified environmental considerations
Activity/risk source	Site layout
Mitigation: Target/Objective	To ensure that the design of the facility responds to the identified environmental constraints and opportunities

Mitigation: Action/control	Responsibility	Timeframe
Compile a comprehensive storm water management	Eskom Holdings	Design Phase
plan as part of the final design of the project.	(SOC) Limited	
Balance technical and financial considerations	Eskom Holdings	Tender design, and
against environmental constraints and opportunities	(SOC) Limited	design review stage
in finalising the design of key elements.		
Undertake necessary surveys to determine presence	Eskom Holdings	Pre-construction
of protected trees and fauna species (such as the	(SOC) Limited	
Baboon spider). If present, ensure necessary		
permits are in place for impacting on these species.		

Performance	» Design meets objectives and does not degrade the environment.		
Indicator	» Design and layouts respond to the mitigation measures and		
Monitoring	Ensure that the design implemented meets the objectives and mitigation measures in the Basic Assessment report through review of the design by the Project Manager, and ECO prior to the commencement of construction.		

5. MANAGEMENT PROGRAMME FOR COAL STOCKYARD: CONSTRUCTION

5.1 Overall Goal for Construction

Overall Goal for Construction: Undertake the construction phase of the coal stockyard in a way that:

- Ensures that construction activities are properly managed in respect of environmental aspects and impacts.
- » Enables the coal stockyard construction activities to be undertaken without significant impacts on the environment.

This addendum to the approved EMP must be read in conjunction with the relevant sections and appendices of the Medupi Power Station (refer to the EMP (EIA Reference Number: 12/12/20/695, April 2007). This addendum relates only to activities associated with the coal stockyard.

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Environmental specifications and guidelines included within the approved EMP are not repeated here.

5.2 Roles and Responsibilities for the Construction Phase of the Coal Stockyard

As the Proponent, Eskom must ensure that the implementation of the coal stockyard complies with the requirements of all environmental authorisations and permits, and obligations emanating from other relevant environmental legislation. This obligation is partly met through the development of the EMP, and the implementation of the EMP through its integration into the contract documentation. Eskom will retain various key roles and responsibilities during the construction of the construction of the coal stock yard. These are outlined below. Specific environmental roles and responsibilities are detailed in the approved EMP for Medupi Power Station.

5.3 Objectives

In order to meet the goal detailed in Section 5.1 above, the following objectives have been identified, together with necessary actions and monitoring requirements.

OBJECTIVE: Management of possible ground and surface water contamination

The proposed development site is underlain by Waterberg Group sandstone. Approximately 3 m of permeable sandy soil covers ± 4 m of weathered sandstone. Red hard competent sandstone is intersected below the shallow weathering.

Project	Coal stockyard and ancillary infrastructure				
component/s					
Potential Impact	Contamination (potential acid generation) that may impact on the groundwater or surface water from the coal stock yard.				
Activity/risk source	 Areas of artificial recharge, which include the raw water dam and the ash dump toe dam. Areas of artificial recharge with poor quality water, which are recognised as the sewage plant and dams, the evaporation dams, and the ash dump (including brine deposits from the de-ionised water system). Recharge and contamination from the recovery / surface water run-off dams, through seepage, spillage, and overflow 				
Mitigation:	To ensure that ground water and/ or surface water is not contaminated.				
Target/Objective					

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Mitigation: Action/control								sibility	Timeframe
The coal stockyard should be managed by E		Eskom	Holdings	Duration of contract					
const	ructing	g a clay base	e, installir	ıg a l	iner; separa	ting	(SOC)	Limited	
clean and dirty runoff; minimising coal stockpiles and							and cont	tractor	
size of yard; installing and maintain surface water									
controls; sloping topography to prevent ponding; and									

Performance	Results from the water quality monitoring should be within the accepted
Indicator	levels.
Monitoring	Groundwater to be monitored as per the approved Medupi Power Station EMP.

OBJECTIVE: Management of dust and emissions to air

During the construction phase, limited gaseous or particulate emissions are anticipated from exhaust emissions from construction vehicles and equipment on-site, as well as vehicle entrained dust from the movement of vehicles.

Project	Cc	nstruction	and	establishmen	t activities	associated	with	the
component/s	es	tablishment	of the	coal stockyard	and ancillary	y infrastructure	•	
Potential Impact	>>	Dust and p	articul	lates from vehic	le movemen	t to and on-site	, tempo	orary
		stockpiles	stockpiles, and vegetation clearing affecting the surrounding residents.					
	>>	Release o	f mino	r amounts of ai	r pollutants (for example No	D2, CO	and
		SO2) from	vehic	es and constru	ction equipm	ent.		
» Activity/risk source	*	Clearing o	Clearing of vegetation and some topsoil.					
	>>	Excavation	Excavation, grading, scraping.					
	»	Transport	Transport of materials, equipment, and components on access roads.					
	»	Re-entrainment of deposited dust by vehicle movements.						
	»	Wind eros	ion fro	m topsoil and s	poil stockpile	s and unseale	d roads	and
		surfaces.						
	»	Fuel burni	ng veh	icle engines.				

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minimised, where possible,

Mitigation:	» To ensure emissions from all vehicles are
Target/Objective	for the duration of the construction phase.

» To minimise nuisance to	the community from	dust emissions and to
comply with workplace hea	alth and safety requir	ements for the duration
of the construction phase.		
Mitigation: Action/control	Responsibility	Timeframe
Appropriate dust suppressant must be applied on all	Contractor	Duration of contract
exposed areas and stockpiles as required to		
minimise/control airborne dust.		
Haul vehicles moving outside the construction site	Contractor	Duration of contract
carrying material that can be wind-blown must be		
covered with tarpaulins.		
Speed of construction vehicles must be restricted, as	Contractor, and	Duration of contract
defined by the ECO.	ECO	
Construction vehicles and equipment must be	Contractor	Duration of contract
maintained in a road-worthy condition at all times.		
If monitoring results or complaints indicate inadequate	Contractor	Duration of contract
performance against the criteria indicated, then the		
source of the problem must be identified, and existing		
procedures or equipment modified to ensure the		
problem is rectified.		

Performance	» No complaints from affected residents or community regarding dust or
Indicator	vehicle emissions from construction activities.
	» Dust suppression measures implemented for all heavy vehicles that require such measures during the construction phase.
	» Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed.
	» Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis.
Monitoring	Monitoring must be undertaken as per the approved Medupi Power Station EMP

OBJECTIVE: Control of impacts on Ecology

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The Savannah biome is characterised by a grassy ground layer and a distinct upper layer of woody plants. Mixed Bushveld represents a great variety of plant communities, with many variations and transitions. The vegetation varies from a dense, short bushveld to a rather open tree savannah.

The floristic species diversity of the study area is considered relatively poor (i.e. the site investigation revealed the presence of approximately 120 plant species). This relatively low diversity reflects the general absence of topographical and environmental diversity that cause changes to the land surface resulting in the formation of varying communities and hence diverse species composition.

There are four (4) protected tree species within the proposed development site was confirmed i.e. Acacia erioloba (Camel thorn), Adansonia digitata (Baobab), Boscia albitrunca (Shepherd's tree) and Combretum imberbe (Leadwood). The removal of these trees would require a tree permit. Eskom is already in possession of a valid Tree Permit for the proposed development site.

No red data fauna species were recorded on the farm Eenzaamheid during the EIA undertaken for the power station. Likely, impacts resulting from the proposed construction activity are expected to result in animal species migrating from this property to nearby areas that is suited to their breeding, general habitat or territorial requirements.

The Baboon Spider has been recorded on site during the construction of the Medupi Power Station and there is therefore a possibility that this species could occur in the area proposed for the coal stockyard.

Project	Coal stockyard and ancillary infrastructure.
	bodi stookyara aria ariomary iriirastruotare.
component/s	
Potential Impact	Irreversible habitat alteration of an area of relatively poor floristic species
	diversity.
» Activity/risk source	Construction activities, maintenance activities.
Mitigation:	Minimise impacts on the environment.
Target/Objective	

Mitigation: Action/control	Responsibility	Timeframe
Prevent impacts on any surface water as a result of	ECO, Contractor,	Construction,
hazardous materials, contamination, unnecessary	Contractor	Operational phases
crossing by vehicles or personnel, extraction, drinking		
The removal or picking of any protected or	ECO, Contractor	Construction,
unprotected plants shall not be permitted and no		operational phases
horticultural specimens (even within the demarcated		

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No painting or marking of rocks or vegetation to	ECO, Contractor	Construction,
identify locality or other information shall be allowed		operational phases
Make use of existing access roads, ensuring proper	Contractor	Construction,
upgrade/ construction/ maintenance in order to limit		operational phases
Use of branches of trees and shrubs for fire making	ECO, Contractor	Construction,
purposes is strictly prohibited.		operational phases
Prevent open fires; provide demarcated fire-safe	ECO, Contractor	Construction,
zones, facilities, and fire control measures.		operational phases
Fire fighting equipment shall be made available on all	ECO, Contractor	Construction,
vehicles and at various suitable points within the		operational phases
No animal may be hunted, trapped, or killed for any	ECO, Contractor	Construction,
purpose whatsoever.		operational phases
In the event that animals are present that may pose a	ECO, Contractor	Construction,
risk to human safety, a suitable animal handler must		operational phases
Ensure adequate surface restoration and resloping in	ECO, contractor	Construction phase
order to prevent erosion, taking cognisance of local		
In the event of Baboon spiders being present, obtain	Contractor	Construction
the necessary permits to relocate these.		

Performance	» Necessary tree permits are in place.			
Indicator	» Necessary permits to impact on baboon spiders (if present) are in place			
Monitoring	Implement a monitoring programme of which the aims and objectives should be to monitor:			
	» Compliance to the approved EMP and addendum to the approved EMP;			

OBJECTIVE: Control runoff, soil erosion & degradation, and the prevention of contamination of surface water

A set of strictly adhered to mitigation measures are required to effectively limit the impact on the environment. Erodibility is not a problem in flat areas, such as the existing terrain, but if the stored topsoil was to be used for rehabilitation in sloping areas (for example on the sides of the ash dump), great care should be taken to ensure that erosion does not occur. Soils on site are sandy, have an increased susceptibility to wind and excessive free drainage, and therefore not deemed of high agricultural potential.

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A borrow pit or man-made depression that has filled with water is located on site. However, this appears to be at the top end of a drainage valley. This may be the reason the hole has filled with water (close to the water table / ground water level). The site must be maintained in such a manner as to minimise impacts on any downstream watercourses to which this area may be linked.

Ground water monitoring is required to determine if there is any contamination from the stockyard.

Project	Coal stockyard and ancillary infrastructure.
component/s	
Potential Impact	» Soil erosion.
	» Surface and ground water contamination.
» Activity/risk source	» Water and wind erosion of cleared and excavated areas.
	» Excavation, mixing, dumping, stockpiling, and compaction of soil.
	Concentrated discharge of water from construction activity.
	» Site preparation and earthworks.
	» Foundations, liner or plant equipment installation.
	» Mobile construction equipment movement on site.
	Siltation during filling of the depression.
Mitigation:	» Minimise degradation of soil by construction activity.
Target/Objective	Conserve topsoil by stockpiling and re-using in disturbance areas.
	» Minimise erosion of soil from site during construction.
	» Minimise deposition of soil into drainage lines.
	» Prevent siltation of downstream areas due to in filled depression area.

Mitigation: Action/control	Responsibility	Timeframe
Erosion features must be stabilised with appropriate erosion control measures, if they develop and monitored to check for their efficacy.	Contractor	Construction
Stockpile topsoil for re-use in rehabilitation phase. Maintain stockpile shape and protect from erosion. Limit the height of stockpiles as far as possible to reduce compaction.	Contractor	During site establishment, and any activity related to earthworks as well as the duration of construction
Rehabilitate any disturbed areas adequately after construction in that area is complete in order to	Contractor	Post-construction
Ensure that the slope of stockpiled material is such that surface runoff is minimal.	Contractor	Duration of contract

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Erosion control measures: run-off attenuation on	Contractor/ ECO	Erection: before
slopes (sandbags, logs), silt fences, stormwater catch-		construction
pits, shade nets, or temporary mulching over denuded		Maintenance:
areas. Surface structures such as swales and berms		duration of contract
can also be used. Paddocks on top of the excess coal		
stockyard as outlined in the Design Report		
Ref: E009-00 REP 01 r0 djbfJM ECSY Phase 2 dated		
29 May 2015 should be established to minimise		
suspended solids from running off the footprint and		
into the stormwater drainage system.		
Vehicular traffic must be controlled during	Contractor	Duration of contract
construction, confining access and roadways, where		
possible, to proposed or existing road alignments.		
As far as possible, access to the facility construction	Contractor	Duration of contract
site should be restricted to a controlled access point.		
Movement of vehicles on-site is to be on approved and	Contractor/ECO	Duration of contract
formalised access roads only, which shall be adequately		Duration of contract
maintained throughout construction. Where temporary		
tracks are required these are to be ripped and		
rehabilitated as soon use of the track in an area is no		
longer required. Any access in such areas must be		
approved by the ECO and rehabilitation done to the		
satisfaction of the ECO.		

Performance	>>	Acceptable level of soil erosion around site, as approved by ECO.
Indicator	 Acceptable level of increased siltation in drainage lines, as approved 	
		ECO.
	>>	Acceptable level of soil degradation, as approved by ECO.
	>>	Acceptable state of excavations, as approved by ECO.
Monitoring	»	Ongoing monitoring of area by ECO during construction.
	»	An incident reporting system will record non-conformances.

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OBJECTIVE: Protection of sites of heritage value

Although no sites, features or objects of cultural heritage significance were identified in the study area, it may possible that sites will be uncovered during excavation activities associated with construction. If at any stage during the construction phase any archaeological artefact is observed, it would be vital to stop the work immediately and report this occurrence to the South African Heritage Resources Agency and/or a professional archaeologist as soon as possible so that appropriate mitigation measures can be implemented.

Project	Coal stockyard and ancillary infrastructure.		
component/s			
Potential Impact	Heritage objects or artefacts found on site are inappropriately managed or		
	destroyed.		
Activity/risk source	» Site preparation and earthworks.		
	» Foundations or plant equipment installation.		
	» Mobile construction equipment movement on site.		
Mitigation:	To ensure that any heritage objects found on site are treated		
Target/Objective	appropriately and in accordance with the relevant legislation.		
	To create awareness amongst contractor staff of procedures related to		
	the protection of cultural and heritage issues as well as procedures to		
	follow in the event of a find.		

Ν	fitigation: Action/control	Respor	sibility	Timeframe
>>	If a heritage object is found, work in that area must	Eskom	Holdings	Duration of contract
	be stopped immediately, the ECO consulted and	(SOC)	Limited,	
	appropriate specialists brought in to assess to site,	ECO,	contractor,	
	notify the administering authority of the item/site,	and	heritage	
	and undertake due/required processes.	special	ist	

>>

Performance Indicator	» »	All heritage items located are dealt with as per the legislative guidelines. A record is kept of all instances of accidental disturbance of heritage material, as well as post construction review of impacts on landscape context.
» Monitoring	»	Supervision of the clearing and earthworks for this project by the ECO/or a suitably qualified person function throughout construction phase.

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5.4 Detailing Method Statements

OBJECTIVE: Ensure all construction activities/practices/procedures are undertaken with the appropriate level of environmental awareness to minimise environmental risk, in line with the specifications of the EMP

The environmental specifications are required to be underpinned by a series of Method Statements, within which the Contractors and Service Providers are required to outline how any identified environmental risks will practically be mitigated and managed for the duration of the contract, and how specifications within this EMP will be met. That is, the Contractor will be required to describe how specified requirements will be achieved through the submission of written Method Statements to the Site Manager and ECO prior to any activities taking place.

A Method Statement is defined as "a written submission by the Contractor in response to the environmental specification or a request by the Site Manager, setting out the plant, materials, labour and method the Contractor proposes using to conduct an activity, in such detail that the Site Manager is able to assess whether the Contractor's proposal is in accordance with the Specifications and/or will produce results in accordance with the Specifications". The Method Statement must cover applicable details with regard to:

- » Construction procedures;
- » Materials and equipment to be used;
- » Getting the equipment to and from site;
- » How the equipment/material will be moved while on-site;
- » How and where material will be stored:
- The containment (or action to be taken if containment is not possible) of leaks or spills of any hazardous liquid or material that may occur;
- » Timing and location of activities;
- » Compliance/non-compliance with the Specifications, and
- » Any other information deemed necessary by the Site Manager.

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Site Manager or his delegate, except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

The Contractor may not commence the activity covered by the Method Statement until it has been approved by the Site Manager/ECO (or as per the reporting structures in the Medupi Power Station EMP) in writing, except in the case of emergency activities and then only with the consent of the Site Manager. Approval of the Method Statement will not absolve the Contractor from their obligations or responsibilities in terms of their contract.

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6. MANAGEMENT PROGRAMME FOR THE COAL STOCKYARD

6.1 Overall Goal of Operation and Maintenance

Overall Goal for Operation: To ensure that the operation and maintenance of the coal stockyard does not have unforeseen impacts on the environment and to ensure that all impacts are monitored and the necessary corrective action taken in all cases. In order to address this goal, it is necessary to operate the proposed project in a way that:

- » Ensures that construction activities are properly managed in respect of environmental aspects and impacts.
- Enables the coal stockyard operation activities to be undertaken without significant impacts on the environment.

This addendum to the approved EMP must be read in conjunction with the relevant sections and appendices of the Medupi Power Station (refer to the EMP (EIA Reference Number: 12/12/20/695, April 2007). This addendum relates only to activities associated with the coal stockyard. Environmental specifications and guidelines included within the approved EMP are not repeated here.

6.2 Objectives for Operation and Maintenance

In order to meet the goal for operation and maintenance, the following objectives have been identified, together with necessary actions and monitoring requirements.

OBJECTIVE: Management of possible ground and surface water contamination

The proposed development site is underlain by Waterberg Group sandstone. Approximately 3 m of permeable sandy soil covers ± 4 m of weathered sandstone. Red hard competent sandstone is intersected below the shallow weathering.

Project	Coal stockyard and ancillary infrastructure.		
component/s			
Potential Impact	Contamination (potential acid generation) that may impact on the groundwater or surface water from the coal stock yard.		

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Activity/risk source	Areas of artificial recharge, which include the raw water dam and the ash dump toe dam. Areas of artificial recharge with poor quality water, which are recognised as the sewage plant and dams, the evaporation dams, and the ash dump (including brine deposits from the de-ionised water system). Recharge and contamination from the recovery / surface water run-off dams, through seepage, spillage, and overflow.	
Mitigation: Target/Objective	To ensure that ground water and/ or surface water is not contaminated.	

Mitigation: Action/control	Responsibility	Timeframe	
Ensure the integrity of the liner installed below the coal	Eskom Holdings	Duration of operation	
stockyard through the continual monitoring of the	(SOC) Limited		
leakage detection system and the results of	and contractor		
groundwater monitoring in the surrounding area.			
Ensure the maintenance of the systems in place for	Eskom Holdings	Duration of operation	
the separation of clean and dirty runoff; surface water	(SOC) Limited		
controls; sloping topography to prevent ponding; and	and contractor		
monitoring groundwater levels and quality.			
Paddocks on top of the excess coal stockyard as			
outlined in the Design Report Ref: E009-00 REP 01 r0			
djbfJM ECSY Phase 2 dated 29 May 2015 should be			
established to minimise suspended solids from			
running off the footprint and into the stormwater			
drainage system.			

>>

Performance	» Results from the water quality monitoring should be within the accepted
Indicator	levels.
Monitoring	» Undertake surface and groundwater monitoring as per the approved
	Medupi Power Station EMP.
	» Groundwater monitoring shall take place on a three-monthly basis, in
	accordance with "The minimum requirements for water monitoring at
	waste management facilities" (Department of Water and Sanitation,
	1998).

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OBJECTIVE: Management of dust and emissions to air

As at the existing Matimba Power Station, sources of atmospheric emission associated with the proposed power station will include stack emissions in addition to fugitive dust releases arising as a result of coal and ash handling, wind entrainment from the ash dump, and recovery and use of topsoil material. These issues are already addressed within the application for the Air Emissions License for the power station. Construction of the coal stockyard will require an amendment to this air emissions license as the coal storage is a listed activity in terms of the National Environmental Management: Air Quality Act.

Project	Coal stockyard and ancillary infrastructure.		
component/s			
Potential Impact	Release of dust from the coal stockpile.		
Activity/risk source	» Fugitive dust releases arising as a result of coal handling.		
	» Wind entrainment from the coal stockyard.		
Mitigation:	Ensure that emissions are as stipulated in the Air Emissions License		
Target/Objective			

Mitigation: Action/control	Responsibility	Timeframe
Submit an application to amend the Air Emissions	Eskom	Operation
license issued for the power station to include the coal		
stockyard.		
Monitoring of the air and emissions to air as per Air	Eskom	Operation
Emissions License.		
All activities on-site must comply with the provisions of	Eskom	Operation
the National Environment Management: Air Quality		
Act, Act 39 of 2004.		

>>

Performance	*	No complaints from affected residents or community regarding dust or		
Indicator		pollution from the ash or coal.		
Monitoring	*	Monitoring must be undertaken as per the approved Medupi Power		
		Station EMP to ensure emissions are not exceeding the prescribed levels		
		in the Air Emissions Licence		

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OBJECTIVE: Visual impact on surrounding impacts

The coal stockyard (expected to be up to 30 m in height) is not expected to have a regional or longdistance visual impact due to the fact that it is either not visible or not recognisable from great distances. It does, however, have the potential to create short distance visual impacts due to its close proximity to secondary roads in the area, as well as to adjacent landowners.

Project	Coal stockyard and ancillary infrastructure.
component/s	
Potential Impact	Visual impacts on local roads and surrounding landowners.
Activity/risk source	Short distance visual impacts due to its close proximity to secondary roads
	in the area
Mitigation:	Prevent the visual impact of degradation and perceived poor management.
Target/Objective	

Mitigation: Action/control	Responsibility	Timeframe
Timely maintenance and the general surrounds of the	Eskom	Operation
property can prevent the visual impact of degradation		
and perceived poor management.		

Performance	>>	No complaints from affected residents or community regarding the visual	
Indicator		impact.	
Monitoring	>>	Monitoring of the maintenance of the surrounding property on a weekly	
		basis.	

7. MANAGEMENT PROGRAMME FOR THE COAL STOCKYARD: DECOMMISSIONING

The coal stockyard will have a lifespan of approximately 15 years. Thereafter, the site will be incorporated into the Medupi Power Station ash dump.

The site is to be designed to cater for both coal storage and later for ash dumping (long-term use after 2028) with minimum changes to the overburden above the liner. It will not be necessary to remove the liner after the coal at the stockyard is exhausted. At this point, the over burden will be skimmed to remove any coal remnants in readiness for ash dumping. The layers above the liner will be deeper than the normal liner for ash to allow mobile plant to move on the site without damaging the liner.

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In order to minimise impacts on the environment during these activities, the following objectives are recommended.

OBJECTIVE: Management of dust and emissions to air

During the decommissioning phase, limited gaseous or particulate emissions are anticipated from exhaust emissions from construction vehicles and equipment on-site, as well as vehicle entrained dust from the movement of vehicles.

Project	Decommissioning activities associated with the skimming of the			
component/s	overburden on the coal stockyard site.			
Potential Impact	» Dust and particulates from vehicle movement to and on-site.			
	Release of minor amounts of air pollutants (for example NO2, CO and			
	SO2) from vehicles and construction equipment.			
Activity/risk source	» Excavation, grading, scraping/skimming.			
	Transport of materials, equipment, and components on access roads.			
	Re-entrainment of deposited dust by vehicle movements.			
	Fuel burning vehicle engines.			
Mitigation:	» To ensure emissions from all vehicles are minimised, where possible,			
Target/Objective	for the duration of the construction phase.			
	To minimise nuisance to the community from dust emissions and to			
	comply with workplace health and safety requirements for the duration			
	of the construction phase.			

Mitigation: Action/control	Responsibility	Timeframe
Haul vehicles moving outside the construction site	Contractor	Duration of contract
carrying material that can be wind-blown must be		
covered with tarpaulins.		
Speed of construction vehicles must be restricted, as	Contractor, and	Duration of contract
defined by the Eskom	Eskom	
Construction vehicles and equipment must be	Contractor	Duration of contract
maintained in a road-worthy condition at all times.		

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If monitoring results or complaints indicate inadequate	Contractor	Duration of contract
performance against the criteria indicated, then the		
source of the problem must be identified, and existing		
procedures or equipment modified to ensure the		
problem is rectified.		

Performance Indicator	 No complaints from affected residents or community regarding dust or vehicle emissions from construction activities. Dust suppression measures implemented for all heavy vehicles that require such measures during the construction phase. Drivers made aware of the potential safety issues and enforcement of strict speed limits when they are employed. Road worthy certificates in place for all heavy vehicles at outset of construction phase and up-dated on a monthly basis.
Monitoring	» Monitoring must be undertaken in accordance with the approved Medupi Power Station EMP.

8. FINALISATION OF THE ENVIROPNMENTAL MANAGEMENT PROGRAMME

The EMP is a dynamic document, which must be updated when required. It is considered critical that this draft EMP be updated to include site specific information and specifications as the project progresses. This will ensure that the construction and operation activities are planned and implemented in such a way that impacts on the environment are minimised.

9. REVISIONS

Date	Rev.	Compiler	Remarks
July 2022	1	Sakutanya Mamabolo	Include additional stormwater mitigation measures
November 2013	0	Jo-Anne Thomas	Savannah Environmental Pty) Ltd (Compilers)
		Umeshree Naicker	