

# INTEGRATED ENVIRONMENTAL IMPACT ASSESSMENT: PROPOSED EXPANSION OF ASH DISPOSAL FACILITY, KRIEL POWER STATION, MPUMALANGA



## *Summary Document for the Scoping Report*

*Eskom Holdings SOC Limited (Eskom) is proposing to expand the existing Ash Disposal Facility at the Kriel Power Station, Mpumalanga, for the disposal for coarse and fine ash produced by the burning coal for the generation of electricity, for the remaining operational life of the power station.*

### **HOW DOES THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS WORK?**

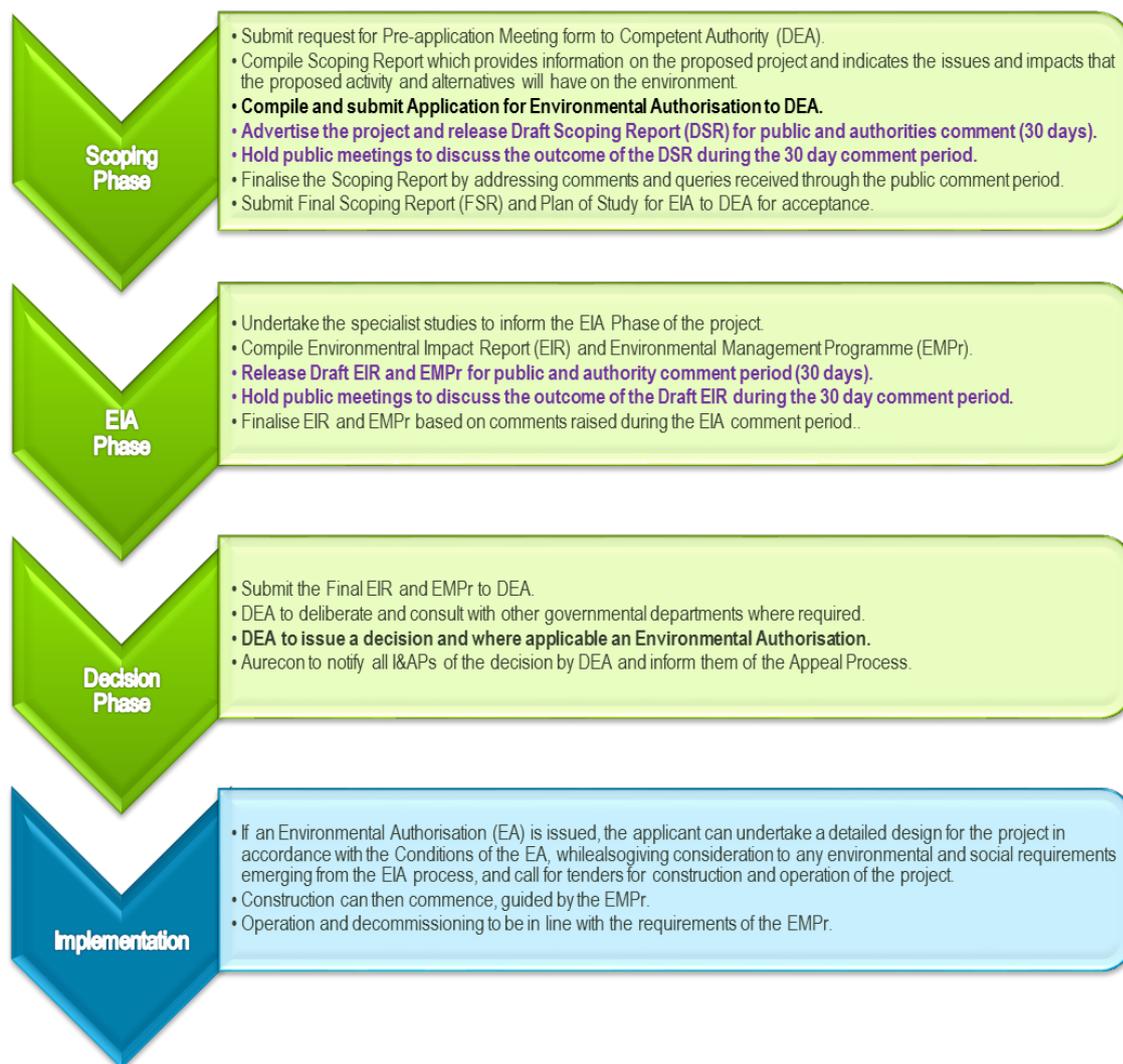
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An Environmental Impact Assessment (EIA) is a process that is undertaken in terms of the requirements of the National Environmental Management Act (Act 107 of 1998) (NEMA), as amended, and its associated regulations (i.e. Government Notice Regulation (GN R.) 982, 983, 984 and 985). The purpose of the EIA process is to evaluate the environmental and socio-economic characteristics of the proposed project and the consequences of the project on the environment and the people living in the area that would be affected by the proposed project activities. Where negative impacts are likely to result from the project, measures can be recommended to avoid or reduce these impacts to a level where the impacts are considered acceptable from an environmental and social perspective. Where positive impacts are likely to result from the project, measures can be recommended to increase these impacts. The EIA process also provides Interested and Affected Parties (I&APs) with an opportunity to comment on the proposed project and to be kept informed about decisions that may impact on them or the environment. The various stages of the process are shown in Figure A below.

This Summary Document includes the following information:

- An introduction to the proposed project and an overview of the environmental legislative requirements;
- Description of the proposed Ash Disposal Facility and the alternatives being considered;
- An overview of the approach to the EIA describing the public participation process;
- Potential impacts identified for detailed assessment by specialists in the EIA Phase; and
- The way forward.

***This Summary Document cannot replace the comprehensive Scoping Report and it is recommended that the Scoping Report is reviewed for more detailed information.***



**Figure A: EIA process to be followed for the proposed Kriel Ash Disposal Facility**

#### WHAT IS PROPOSED AND WHERE?

The construction of Kriel Power Station was completed in 1979 and it was considered to be the largest coal-fired power station in the southern hemisphere at the time. The 37 year old power station with an installed capacity of 3 000 MW (Eskom, 2010) is situated about 7 km west of the small town of Kriel (also known as Ga-nala ) in the Mpumalanga Province. Through the process of electricity generation coarse and fine ash is produced by burning coal. At full capacity, each of the six boilers can produce up to 740 000 tonnes/year of coarse ash/ boiler bottom ash (approximately 20% of total ash produced) ash and 2 960 000 tonnes/year of fly ash/ precipitator fly ash (approximately 80% of total ash produced).

The Kriel Power Station makes use of a wet ashing process to dispose of its ash. Coarse ash is transferred with a small volume fine ash (fly ash, to limit pipeline wear) from the Power Station to sumps from where it is pumped as a slurry mixture to the ash dams. The fine ash is transported separately to the existing ash dam complex via two conveyors that are located south-east of Kriel Power Station. The three existing ash dams will reach a limiting

Rate of Rise (RoR) by end July 2021. Eskom is thus proposing to expand its existing ash disposal facility by constructing and commissioning an additional Ash Disposal Facility before the existing ash dams reach their limiting RoR in 2021. The ~~new~~ expanded dams would fulfil the ash disposal requirements for the Power Station's extended operational life, with decommissioning of the six generating units planned to commence in 2036. A five year contingency has been allowed for, thus it's assumed that the Power Plant will be operated for an additional five years at full load from 2036 to 2040, with final decommissioning date proposed for 2045.

In order to expand the Power Station's ash disposal facility, the following components are required:

- An Ash Disposal Facility that would have sufficient capacity to store ash volumes produced up to 2045;
- Ash Water Return dam from where decant and drained water will be pumped back to the power station for re-use;
- Ash Water Return transfer dam;
- Delivery and return infrastructure, including conveyor belts and/ or pipelines, transfer houses, pump stations;
- Clean and dirty water channels;
- Powerlines; and
- Access roads.

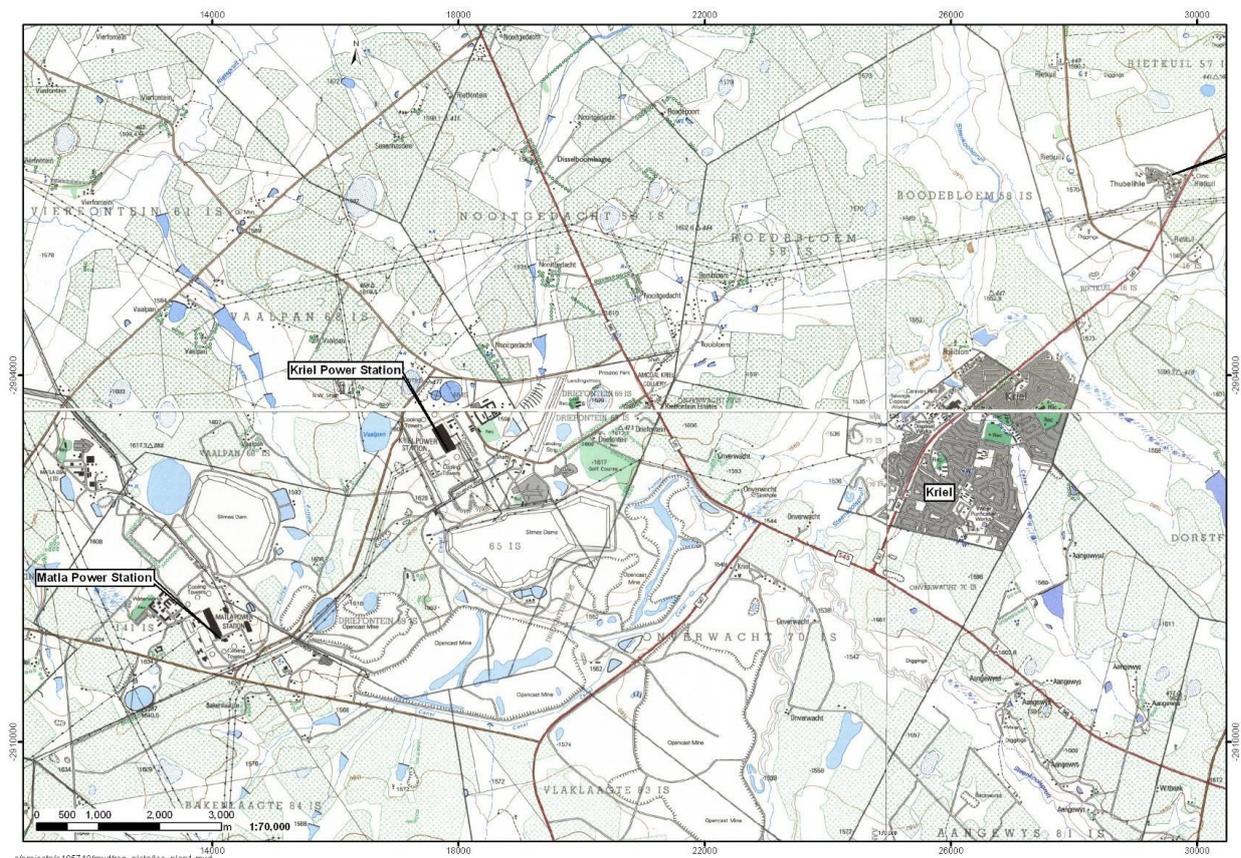


Figure B: Location of the Kriel Power Station

## WHAT ALTERNATIVES ARE BEING CONSIDERED?

NEMA requires that feasible alternatives are considered during the EIA process. An important function of the Scoping Phase is to screen potential alternatives to derive a list of feasible alternatives that need to be assessed in further detail in the EIA Phase. An alternative is defined as a possible course of action, in place of another, that would meet the same purpose and need (DEAT, 2004). Preferred alternatives and main reasons for their preference are given in the tabel below.

<u>Preferred alternative</u>	<u>Reason for preferred alternative</u>
<ul style="list-style-type: none"> <li>■ <u>Location alternative</u> <ul style="list-style-type: none"> <li>– <u>Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.</u></li> </ul> </li> </ul>	<p>Various site locations were considered within a 12km radius of the Kriel Power Station for the proposed extended Ash Disposal Facility as described in Chapter 2 of this report. One site, i.e. Site 10, was identified as being the most suitable for the proposed extended Ash Disposal Facility for the following reasons:</p> <ul style="list-style-type: none"> <li>■ <u>located close to the Kriel Power Station and therefore requires less capital costs;</u></li> <li>■ <u>located on a brown field site within the disturbance footprint of the existing Ash Disposal Facility;</u></li> <li>■ <u>limited visual footprint due to its proximity to the existing Ash Disposal Facility;</u> and</li> <li>■ <u>predominantly located on Eskom owned land.</u></li> </ul>
<ul style="list-style-type: none"> <li>■ <u>Site layout alternative</u> <ul style="list-style-type: none"> <li>– <u>Ash dam 4 layout, consisting of only AD 4.1 and 4.2 (Error! Reference source not found.).</u></li> </ul> </li> </ul>	<p>Three potential layout alternatives have been considered for the preferred site (see Section 3.3.3):</p> <ul style="list-style-type: none"> <li>■ <u>2014 ash dam layout (Error! Reference source not found.);</u></li> <li>■ <u>2016 ash dam layout, consisting of three ash dams (Error! Reference source not found.); and</u></li> <li>■ <u>2016 ash dam layout, consisting of only AD 4.1 and 4.2 (Error! Reference source not found.).</u></li> </ul> <p>The main aspect that influenced the design layouts relate to potential geotechnical issues due to subsidence. It was however determined that the proposed extended ash dams 4.1 and 4.2 do <b>not</b> hold any <b>potential geotechnical issues</b> since the backfilled mined area (located beneath AD 4.3) is avoided, resulting in the remaining two layout alternatives to be screened out as feasible options.</p>
<ul style="list-style-type: none"> <li>■ <u>Activity alternative</u> <ul style="list-style-type: none"> <li>– <u>Wet ashing.</u></li> </ul> </li> </ul>	<p>Two methods for ash disposal was considered:</p> <ul style="list-style-type: none"> <li>■ <u>Wet ashing; and</u></li> <li>■ <u>Dry ash stacking.</u></li> </ul> <p>As described in Section 3.3.4, wet ashing is considered to be <b>financially the best</b> practical option in comparison to dry ash stacking which would require a change in the station's current <b>design</b>, and would entail considerable <b>costs</b> to change the existing wet ashing infrastructure and systems at Kriel Power Station. Furthermore, even though dry ash stacking would require less water than the wet ashing option, the water that is used for the current (and proposed) wet ashing operations is recycled wastewater from the power station's cooling system (see <b>Error! Reference source not found.</b>). Lastly, the footprint requirements for a dry ash dump is larger</p>

<u>Preferred alternative</u>	<u>Reason for preferred alternative</u>
	<u>than for a wet ash dam and would thus increase the disturbance footprint of the Kriel Power Station.</u>
■ <u>No-go alternative</u>	<u>NEMA requirement against which all alternative should be measured.</u>

The above categories and preferences of alternatives are the ones most pertinent to this EIA process, and are explored in Chapter 3 of the Scoping Report.

## WHAT ENVIRONMENTAL APPROVALS ARE REQUIRED?

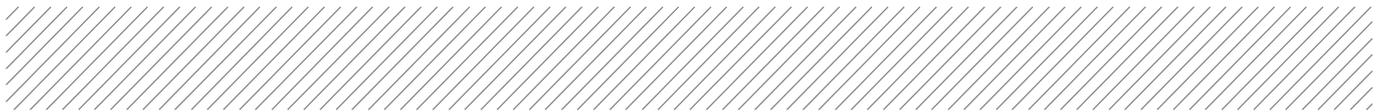
In terms NEMA, the proposed development triggers a suite of activities, which require authorisation from the competent environmental authority before they can be undertaken. Furthermore, the National Environmental Management: Waste Act (Act 59 of 2008) (NEMWA) provides various measures for the prevention of pollution and ecological degradation, as well as for ecologically sustainable development in order to protect human health and the environment. In this regard, NEMWA identifies and lists certain activities which require environmental authorisation through the NEMA EIA and waste management licensing processes, prior to commencement of those activities. In addition, a Water Use Licence would be required in terms of the National Water Act (Act 36 of 1998) (NWA). This application process is however undertaken by Eskom, separate to this EIA process.

Eskom appointed Aurecon South Africa (Pty) Ltd, an independent company, to conduct an integrated EIA process to evaluate the potential biophysical and socio economic impacts of the proposed project and undertake the required waste licensing processes. Since Eskom is a State Owned Enterprise (SOE), and Kriel Power Station is in the Eskom Generation fleet, the competent authority is the national Department of Environmental Affairs (DEA). DEA's decision will be based on the outcome of this EIA process.

## WHAT IMPACTS ARE EXPECTED?

The proposed Ash Disposal Facility could potentially result in a range of environmental and socio-economic impacts during the construction and operational phases as identified during this Scoping Phase. The following potential impacts have been identified:

<b>Construction Phase (biophysical &amp; social)</b>	<b>Operational Phase (biophysical)</b>	<b>Operational Phase (social)</b>
<ul style="list-style-type: none"> <li>■ Disturbance of flora and fauna;</li> <li>■ Sedimentation and erosion of water ways;</li> <li>■ Increase in traffic volumes;</li> <li>■ Disposal of hazardous substances on site;</li> <li>■ Increased risk of fire;</li> <li>■ Pollution (noise, air and water); and</li> <li>■ Dust impacts.</li> </ul>	<ul style="list-style-type: none"> <li>■ Impacts on the terrestrial fauna and flora;</li> <li>■ Impacts on aquatic flora and fauna;</li> <li>■ Impacts on groundwater resources; and</li> <li>■ Impact on air quality.</li> </ul>	<ul style="list-style-type: none"> <li>■ Visual impacts;</li> <li>■ Impact on heritage resources;</li> <li>■ Noise impacts;</li> <li>■ Impacts on the local economy;</li> <li>■ Impacts on agriculture and other land uses in the study area;</li> <li>■ Impacts on traffic;</li> <li>■ Impacts on existing infrastructure and services; and</li> </ul>



Construction Phase (biophysical & social)	Operational Phase (biophysical)	Operational Phase (social)
		<ul style="list-style-type: none"> <li>■ Impacts on health and safety of workers and others in the area.</li> </ul>

During the EIA Phase, the following team of specialists will assess the significance of the potential impacts:

Study	Consultant and Organisation
Terrestrial ecology impact assessment	Dr Brian Colloty, Scherman Colloty and Associates
Aquatic ecology impact assessment	Dr Brian Colloty & Dr Patsy Sherman, Scherman Colloty and Associates
Groundwater assessment	Mr Louis Stroebel, Aurecon
Air quality impact assessment	Ms Renee von Gruenewaldt, Airshed Planning Professionals
Visual impact assessment	Mr Johan Goosen, Aurecon
Heritage impact assessment	Mr Polke Birkholtz, Professional Grave Solutions: Heritage Unit
Noise impact assessment	Mr Derek Cosijn, Jongens Keet Associates
Agricultural / land capability and economic impact assessment	Mr Paul Vermaak, Sole Proprietor & Mr F Botha, Eco-Soils
Traffic impact assessment	Mr Werner Heyns, Aurecon

This is done by means of specific methodology developed for assessment of significance of impacts, based on the specific characteristics of the site and the proposed Ash Disposal Facility. The findings of these studies will be presented in the EIA Report which will be made available for public review. ***For more detail on the Plan of Study for the EIA Phase, please refer to Chapter 6 of the EIA Report.***

#### WHAT IS PUBLIC PARTICIPATION AND HOW DO YOU GET INVOLVED?

Public participation is an important part of the EIA process, as it allows the public to get information about the proposed project, to view documentation, to make input and voice any concerns.

I&APs have been afforded a 30-day public comment period on the Scoping Report from **26 October to 28 November 2016**. I&APs have been notified of the availability of the Scoping Report which will be lodged at:

- Kriel Public Library
- Kriel Power Station

The reports were made available electronically on the following websites:

- Aurecon website:

– <http://www.aurecongroup.com/en/public-participation.aspx>; and

■ Eskom website:

– [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)) and potential.

Public meetings were held during the 30-day public comment period to allow I&APs the opportunity to engage directly with Aurecon regarding the proposed project and any issues or concerns:

Venue	Date	Format	Time	Address
Thubelihle Community Hall	2 November 2016	Open House	14:00 to 17:00	Thubelihle Community Hall, Next to clinic, Kriel Drive
Methodist Church Hall, Kriel	2 November 2016	Open House	18:00 to 19:00	Methodist Church Hall, Kriel 65 Springbok Crescent and corner of Flamingo Avenue
		Presentation	19:00 to 20:00	

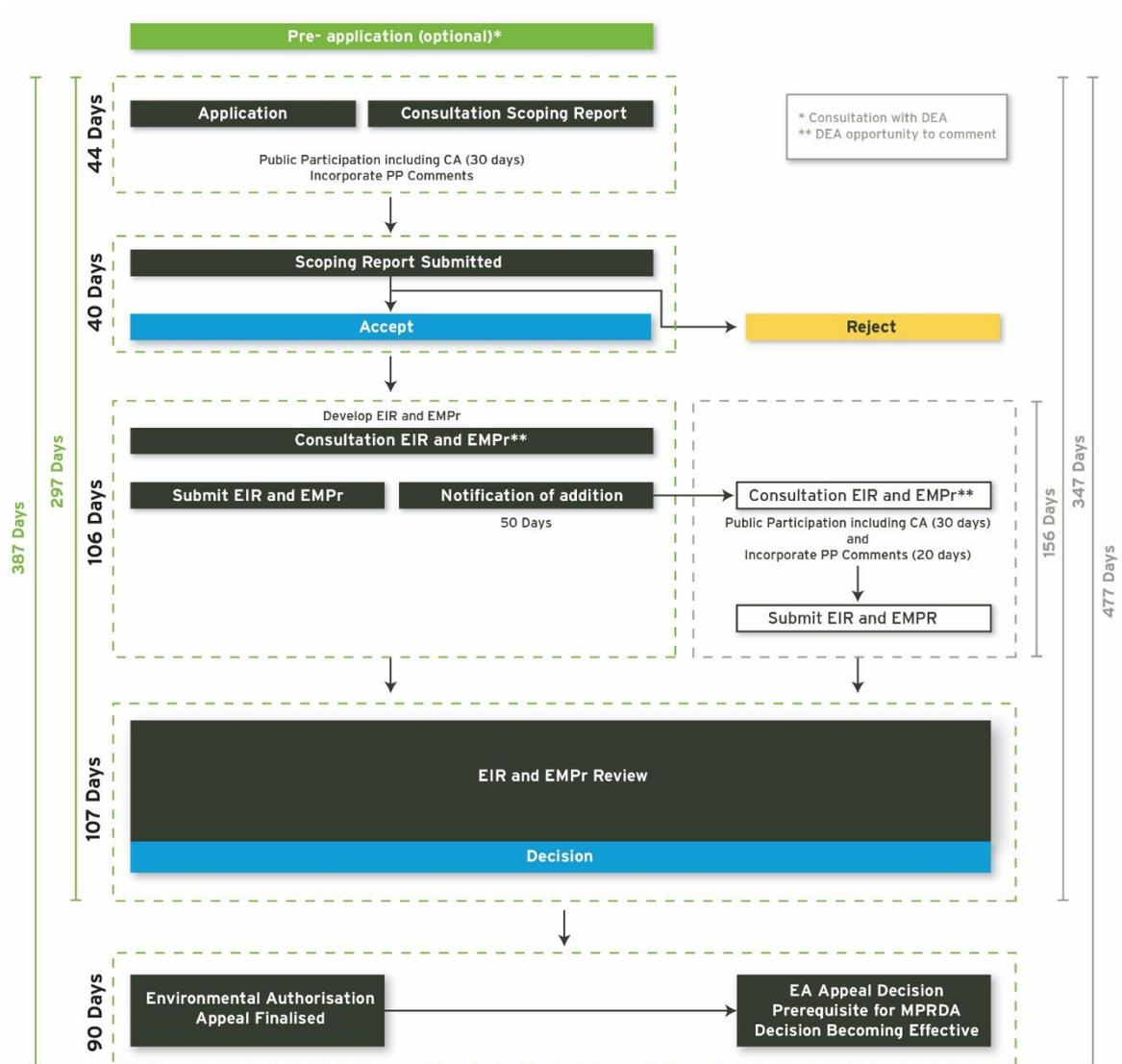
All I&APs were encouraged to submit written comments/ issues/ concerns on the proposed Ash Disposal facility by **28 November 2016** at the latest. Comments can be submitted via email, mail or fax and must be directed to Mr Dirk Pretorius or Ms Franci Gresse as indicated below.

EIA Project Team:	Dirk Pretorius	Franci Gresse
Telephone Number:	021 – 526 6012	021 – 526 6022
Fax Number:	021 – 526 9500	021 – 526 9500
Email Address:	Dirk.Pretorius@aurecongroup.com	Franci.Gresse@aurecongroup.com
Postal Address:	PO Box 494, Cape Town, 8000	PO Box 494, Cape Town, 8000

*For a detailed description on the public participation process undertaken to date and going forward, please refer to Chapter 4 of the Scoping Report.*

## PROPOSED WAY FORWARD

Cognisance have been taken of all comments in compiling the Scoping Report, and the comments, together with the Environmental Assessment Practitioner’s (EAP) and Applicant’s responses thereto, were included in the final report as a Comments and Response Report (CRR). Where appropriate, the report was updated accordingly.



The Scoping Report, including the CRR, will be completed and submitted to the DEA for review (see diagram above). The DEA must, within 43 days of receipt of the Final Scoping Report consider it, and in writing –

- Accept the report and advise the EAP to proceed with the tasks contemplated in the Plan of Study for EIA; or
- Refuse Environmental Authorisation
  - If the proposed activity is in conflict with a prohibition contained in legislation; or
  - If the Scoping Report does not substantially comply with the objectives and content requirements for scoping reports in terms of the 2014 EIA Regulations and the applicant cannot ensure compliance with these regulations within the prescribed timeframe.



**INTEGRATED ENVIRONMENTAL IMPACT ASSESSMENT:  
PROPOSED EXPANSION OF ASH DISPOSAL FACILITY, KRIEL POWER STATION,  
MPUMALANGA**

**SCOPING REPORT**

DEA:14/12/16/3/3/3/217

**aurecon**  
CONSULTANT

9 January 2017

Revision:1

Reference:

113084 / 11081

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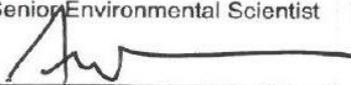
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<b>Client</b>		Eskom Holdings Ltd			
<b>Client contact</b>		Tobile Bokwe	<b>Client reference</b>		Kriel EIA
<b>Rev</b>	<b>Date</b>	<b>Revision details/status</b>	<b>Author</b>	<b>Reviewer</b>	<b>Approver</b>
0	21 October 2016	Aurecon revision draft	Dirk Pretorius	Franci Gresse	Andries van der Merwe
1	<u>9 January 2017</u>	<u>Aurecon revision Final</u>	<u>Dirk Pretorius</u>	<u>Franci Gresse</u>	<u>Andries van der Merwe</u>
<b>Current revision</b>		1			

Approval			
Author signature		Reviewer signature	
Name	Dirk Pretorius	Name	Franci Gresse
Title	Senior Environmental Scientist	Title	Senior Environmental Practitioner
Approver signature			
Name	Andries van der Merwe		
Title	Technical Director		

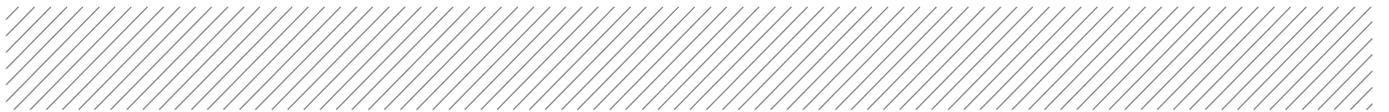
**NOTE:** All material changes made to this document since the scoping public comment period are denoted by a dot-dash underline, as used here to allow the reader to easily identify any amendments made between the draft and final scoping reports. Text deleted have been crossed out.

This report is to be referred to in bibliographies as: AURECON, 2017. Integrated Environmental Impact Assessment Process: Proposed Expansion of Ash Disposal Facility, Kriel Power Station, Mpumalanga: Scoping Report. Report No. 11081/113084



# Contents

<b>NEMA requirements with reference to relevant sections of this report</b>	<b>i</b>
<b>Glossary of terms</b>	<b>i</b>
<b>Abbreviations</b>	<b>i</b>
<b>1 Introduction and Background</b>	<b>1</b>
1.1 Introduction	1
1.2 Legal requirements	5
1.3 Terms of reference and Scope of the EIA	14
1.4 Approach to the project	14
1.5 Assumptions and limitations	16
1.6 Independence	16
<b>2 Site Selection Process</b>	<b>18</b>
2.1 Background	18
2.2 2016 Site selection process and way forward	19
2.3 Conclusion	24
<b>3 The Proposed Development</b>	<b>25</b>
3.1 The need for the proposed activity	25
3.2 Description of the proposed project	34
3.3 Consideration of alternatives	36
<b>4 The Public Participation Process</b>	<b>43</b>
4.1 Introduction	43
4.2 Comments received to date	46
4.3 Ensuing review and decision period	46
<b>5 Description of Affected Environment and Potential Impacts</b>	<b>47</b>
5.1 Introduction	47
5.2 Description of the affected Biophysical and Socio-economic environment	47
5.3 Construction phase impacts on biophysical and social environments	59
5.4 Operational phase impacts on the biophysical environment	61
5.5 Operational phase impacts on the social environment	62
<b>6 Plan of Study for EIA</b>	<b>67</b>
6.1 Purpose of the Plan of Study for EIA	67
6.2 Description of the activity	67
6.3 Feasible project alternatives recommended from the scoping processes	67
6.4 Description of tasks to be performed	68
6.5 Need for detailed investigations: Specialist studies	72
6.6 Ash Disposal Facility Environmental Impact Assessment Report (EIR)	76
6.7 Public participation process	77
6.8 Proposed programme	77



6.9	Personnel	78
<b>7</b>	<b>Conclusions and Way Forward</b>	<b>79</b>
7.1	Conclusions	79
7.2	The way forward	81
<b>8</b>	<b>References</b>	<b>82</b>
8.1	General references	82
8.2	Electronic resources	83

## Annexures

<b>Annexure A</b>	
Annexure A.1	
Details of the expertise of the EAP, including a curriculum vitae	
Annexure A.2	
Application form, including EAP affirmation	
<b>Annexure B</b>	
Annexure B.1	
Process followed to reach the proposed preferred activity, site and location	
<b>Annexure C</b>	
Annexure C.1	
2010 Site selection process	
<b>Annexure D</b>	
Annexure D.1	
Ash Dam 4 Concept 2016 preferred alternative, consisting of only AD 4.1 and 4.2	
<b>Annexure E</b>	
Annexure E.1	
List of potential I&APs	
Annexure E.2	
Proof of public participation	
Annexure E.3	
Comment Response Report	

## Figures

Figure 1-1   Location of the Kriel Power Station	3
Figure 1-2   Aerial photograph of the Kriel Power Station and existing ash dam complex	4
Figure 1-3   EIA process to be followed for the proposed Kriel Ash Disposal Facility	6
Figure 2-1   Summary of site selection process followed from 2006 to 2016	19
Figure 2-2   Map indicating the mining activities around Kriel	21
Figure 2-3   Sensitive land units identified by the 2014 Mpumalanga Biodiversity Sector Plan at the Site 10	23
Figure 2-4   Sensitive land units identified by the 2014 Mpumalanga Biodiversity Sector Plan at site 16N	23
Figure 3-1   Location of the Kriel Power Station and current ash dam complex	25
Figure 3-2   Waste hierarchy	32
Figure 3-3   Flow chart of the operation showing inputs and outputs of the process at Kriel Power Station (including the Ash Disposal Facility in red)	35
Figure 3-4   Ash Dam 4 Concept 2014 (Jones & Wagener, 2014)	37
Figure 3-5   Ash Dam 4 Concept 2016, consisting of three ash dams (Jones & Wagener, 2016)	38
Figure 3-6   Ash Dam 4 Concept 2016 preferred alternative, consisting of only AD 4.1 and 4.2 (Jones & Wagener, 2016)	39
Figure 3-7   Upstream development of ash dam (Chamber of mines, 1996)	40
Figure 3-8   Possible dry stacking configurations considered	41
Figure 5-1   Geology of the sites and surrounding areas	51
Figure 5-2   Sensitivity of Site 10 in terms of the MBCP (2007) on left and MBSP (2014) on the right	53
Figure 5-3   Sensitivity of Site 10 MBSP (2014)	54
Figure 5-4   Land uses within the 12 km radius area from the Kriel power station	57
Figure 5-5   Wetlands and rivers located on the site and surrounding areas as well as quarternary catchments	58
Figure 5-6   Infrastructure around the Kriel Power Station	65
Figure 6-1   The EIA process in terms of the NEMA 2014 EIA Regulations	72

## Tables

Table 1   EIA Regulations (GN No. 982 of 2014) requirements for Scoping Reports	i
Table 1-1   Listed activities in terms of NEMA GN R983, R984 and R985, December 2014, to be authorised for the proposed Ash Disposal Facility	7
Table 1-2   Listed activities in terms of NEMWA, List of waste management activities that have, or are likely to have, a detrimental effect on the environment	11
Table 2-1   Weightings of 2016 site alternatives	24
Table 2-2   Site ranking matrix	24
Table 3-1   Capacity details of the three ash dams	25
Table 3-2   Expanded Kriel Ash Disposal Facility Design Ash Production	26
Table 3-3   Summary of needs	27
Table 3-4   Summary of desirability	30
Table 3-5   Mineral Contents of Kriel Pulverised Coal-fired boiler ash (Zitholele Consulting, 2016)	33
Table 4-1   Summary of the proposed EIA PPP	44
Table 5-1   Properties on which infrastructure for Site 10 is proposed to be constructed	47
Table 5-2   Properties directly adjacent to properties on which Site 10 is proposed to be constructed	48
Table 5-3   Location information for development	48
Table 5-4   The cadastral units around Kriel site	49
Table 6-1   Preferred alternatives and main reasons for their preference	67
Table 6-1   Assessment criteria for the evaluation of impacts	70
Table 6-2   Definition of significance ratings	70
Table 6-3   Definition of probability ratings	71
Table 6-4   Definition of confidence ratings	71
Table 6-5   Definition of reversibility ratings	71
Table 6-6   Proposed EIA programme	77
Table 7-1   Preferred alternatives and main reasons for their preference	79

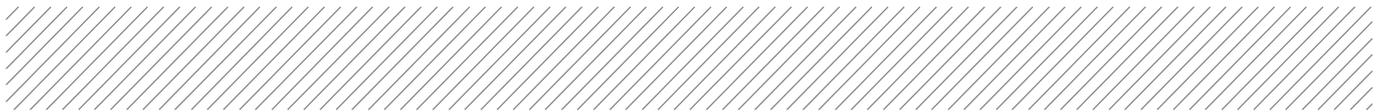
## NEMA REQUIREMENTS WITH REFERENCE TO RELEVANT SECTIONS OF THIS REPORT

The Environmental Impact Assessment (EIA) process undertaken to date has culminated in the production of this Scoping Report (SR), which provides detailed information relevant to the project.

Table 1 illustrates how the structure of the SR addressed applicable requirements for information in terms of National Environmental Management Act (Act No. 107 of 1998) (NEMA).

**Table 1 | EIA Regulations (GN No. 982 of 2014) requirements for Scoping Reports**

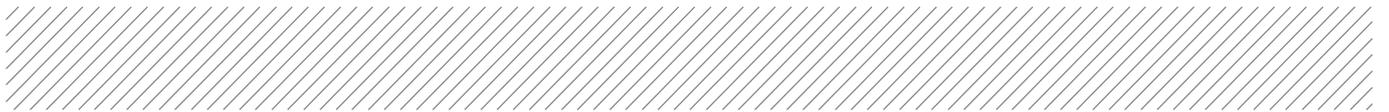
Appendix 2	Content as required by NEMA	Section /Annexure
2(a)	(i) Details of the Environmental Assessment Practitioner (EAP) who prepared the report; and (ii) Details of the expertise of the EAP, including a curriculum vitae.	Section 1.6 Annexure A
2 (b)	The location of the activity, including: (i) The 21 digit Surveyor General code of each cadastral land parcel; (ii) Where available, the physical address and farm name; (iii) Where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	Section 5.2.1  N/A
2 (c)	A plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is- (i) A linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or (ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken;	Figure 1-1  NA
2 (d)	A description of the scope of the proposed activity, including: (i) All listed and specified activities triggered; (ii) A description of the activities to be undertaken, including associated structures and infrastructure;	Table 1-1 and Table 1-2  Section 3
2 (e)	A description of the policy and legislative context within which the development is proposed, including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	Section 1.2
2 (f)	A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	Section 3.1.1
2 (h)	A full description of the process followed to reach the proposed preferred activity, site and location within the site, including: (i) Details of all the alternatives considered; (ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; (iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; (iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated; (vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; (vii) Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 2 and 3.3  Section 4  <del>To be included in final Scoping Report to DEA- Section 4.2</del>  Section 2, 3.3 and 5  Annexure B  Section 5



Appendix 2	Content as required by NEMA	Section /Annexure
	(viii) The possible mitigation measures that could be applied and level of residual risk;	Annexure B
	(ix) The outcome of the site selection matrix;	Section 4
	(x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and	NA
	(xi) A concluding statement indicating the preferred alternatives, including preferred location of the activity;	Section 3.3.5
2 (i)	A plan of study for undertaking the EIA process to be undertaken, including: (i) A description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; (ii) A description of the aspects to be assessed as part of the EIA process; (iii) Aspects to be assessed by specialists; (iv) A description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists; (v) A description of the proposed method of assessing duration and significance; (vi) An indication of the stages at which the competent authority will be consulted; (vii) Particulars of the public participation process that will be conducted during the EIA process; and (viii) A description of the tasks that will be undertaken as part of the EIA process; (ix) Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.	Section 6
2 (j)	An undertaking under oath or affirmation by the EAP in relation to: (i) The correctness of the information provided in the report; (ii) The inclusion of comments and inputs from stakeholders and interested and affected parties; and (iii) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties;	Annexure A.2
2 (k)	An undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the EIA;	Annexure A.2
2 (l)	Where applicable, any specific information required by the competent authority; and	No specific information required by the competent authority has been requested to date.
2 (m)	Any other matter required in terms of section 24(4)(a) and (b) of the Act.	N/A

## GLOSSARY OF TERMS

<b>Boiler Bottom Ash (BBA)</b>	BBA is the larger ash particles that cannot rise and falls down into a pan below the boiler where it is quenched in water. The ash is therefore captured wet. The ash and water forming a slurry can be thickened to an optimal density before it is transported to site by means of pumping. BBA constitutes approximately 10-20% of the coal ash.
<b>Environment</b>	The surroundings (biophysical, social and economic) within which humans exist and that are made up of <ul style="list-style-type: none"> <li>i. the land, water and atmosphere of the earth;</li> <li>ii. micro-organisms, plant and animal life;</li> <li>iii. any part or combination of (i) and (ii) and the interrelationships among and between them; and</li> <li>iv. the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and wellbeing.</li> </ul>
<b>Environmental Impact Assessment (EIA)</b>	A study of the environmental consequences of a proposed course of action.
<b>Environmental Impact Report Assessment (EIR)</b>	A report assessing the potential significant impacts as identified during the Scoping phase.
<b>Environmental impact</b>	An environmental change caused by some human act.
<b>Environmental Management Programme (EMP)</b>	A document that provides procedures for mitigating and monitoring environmental impacts, during the construction, operation and decommissioning phases.
<b>Expansion</b>	<u>"Expansion" means the modification, extension, alteration or upgrading of a facility, structure or infrastructure at which an activity takes place in such a manner that the capacity of the facility or the footprint of the activity is increased.</u>
<b>General waste</b>	"General waste" means waste that does not pose an immediate hazard or threat to health or to the environment, and includes: (a) domestic waste; (b) building and demolition waste; (c) business waste; (d) inert waste; or (e) any waste classified as non-hazardous waste in terms of the regulations made under section 69, and includes non-hazardous substances, materials or objects within the business, domestic, inert or building and demolition wastes.
<b>Hazardous waste</b>	"Hazardous waste" means any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment and includes hazardous substances, materials or objects within the business waste, residue deposits and residue stockpiles.
<b>Lagoon</b>	"Lagoon" means the containment of waste in excavations and includes evaporation dams, earth cells, sewage treatment facilities and sludge farms
<b>Pulverised Fuel Ash (PFA)</b>	PFA rises with the furnace gasses and is collected by electrostatic precipitators in, or before the stacks or chimneys of the power station. The ash is therefore captured dry and is commonly referred to as fly ash. The ash can be conditioned by adding small amounts of moisture to ease handling by mechanical means and to reduce dust before it is transported to the deposition facility usually by troughed conveyors. PFA constitutes approximately 80% to 90% of the coal ash.
<b>Public Participation Process</b>	A process of involving the public in order to identify needs, address concerns, in order to contribute to more informed decision making relating to a proposed project, programme or development.
<b>Scoping</b>	A procedure for determining the extent of and approach to an EIA, used to focus the EIA to ensure that only the significant issues and reasonable alternatives are examined in detail.
<b>Scoping Report</b>	A report describing the issues identified.



<b>Supernatant water</b>	Clear water that lies above a sediment or precipitate.
<b>Waste</b>	<p>(a) any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, by the holder of the substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to this Act; or</p> <p>(b) any substance, material or object that is not included in Schedule 3 that may be defined as a waste by the Minister by notice in the Gazette, but any waste or portion of waste, referred to in paragraph (a) and (b) ceases to be a waste -</p> <ul style="list-style-type: none"><li>(i) once an application for its re-use, recycling or recovery has been approved or, after such approval, once it is, or has been re-used, recycled or recovered;</li><li>(ii) where approval is not required, once a waste is or has been re-used, recycled or recovered;</li><li>(iii) where the Minister has, in terms of section 74, exempted any waste or a portion of waste generated by a particular process from the definition of waste; or</li><li>(iv) where the Minister has, in the prescribed manner, excluded any waste stream or a portion of a waste stream from the definition of waste.</li></ul>



## ABBREVIATIONS

<b>CRR</b>	Comments and Responses Report
<b>DALA</b>	Department of Agriculture and Land Administration
<b>DARDLA</b>	Department of Agriculture Rural Development and Land Administration
<b>DEA</b>	Department of Environmental Affairs
<b>DEA&amp;DP</b>	Department of Environmental Affairs and Development Planning
<b>DEAT</b>	Department of Environmental Affairs and Tourism
<b>DWS</b>	Department of Water and Sanitation
<b>EAP</b>	Environmental Assessment Practitioner
<b>EAPSA</b>	Environmental Assessment Practitioner of South Africa
<b>EIA</b>	Environmental Impact Assessment
<b>EIR</b>	Environmental Impact Assessment Report
<b>EMP</b>	Environmental Management Programme
<b>GA</b>	General Authorisation
<b>GN</b>	Government Notice
<b>HIA</b>	Heritage Impact Assessment
<b>I&amp;APs</b>	Interested and Affected Parties
<b>IDP</b>	Integrated Development Plan
<b>IWULA</b>	Integrated Water Use License Application
<b>Mamsl</b>	Meters above mean sea level
<b>MBCP</b>	Mpumalanga Biodiversity Conservation Plan
<b>MBSP</b>	Mpumalanga Biodiversity Sector Plan
<b>Mtons</b>	Metric tons
<b>NEMA</b>	National Environmental Management Act (No. 107 of 1998) (as amended)
<b>NEMWA</b>	National Environmental Management: Waste Act (No. 59 of 2008)
<b>NHRA</b>	National Heritage Resources Act (No. 25 of 1999)
<b>NWA</b>	National Water Act (No. 36 of 1998)
<b>SAHRA</b>	South African Heritage Resources Agency
<b>SDF</b>	Spatial Development Framework
<b>SR</b>	Scoping Report
<b>ToR</b>	Terms of Reference

# 1 INTRODUCTION AND BACKGROUND

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*The purpose of this Chapter is to introduce the project and describe the relevant legal framework within which the project takes place. Other applicable policies and guidelines are also discussed. The Terms of Reference, for the Environmental Impact Assessment (EIA), scope of and approach to the Environmental Impact Assessment are described and assumptions and limitations are stated.*

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## 1.1 Introduction

The construction of Kriel Power Station (owned by Eskom Holdings SOC Limited (Eskom)) was completed in 1979 and it was considered to be the largest coal-fired power station in the southern hemisphere at the time (see Figure 1-1). The 37 year old power station with an installed capacity of 3 000 MW (Eskom, 2010) is situated about 7 km ~~east~~ west of the small town of Kriel (also known as Ga-nala<sup>1</sup>) in the Mpumalanga Province. Through the process of electricity generation coarse and fine ash is produced by burning coal. At full capacity, each of the six boilers can produce up to 740 000 tonnes/year of coarse ash/ boiler bottom ash (approximately 20% of total ash produced) ash and 2 960 000 tonnes/year of fly ash/ precipitator fly ash (approximately 80% of total ash produced). The Kriel Power Station makes use of a wet ashing process to dispose of its ash. Coarse ash is transferred with a small volume fine ash (fly ash, to limit pipeline wear) from the Power Station to sumps from where it is pumped as a slurry mixture to the ash dams. The fine ash is transported separately<sup>2</sup> to the existing ash dam complex *via* two conveyors<sup>3</sup> that are located south-east of Kriel Power Station. All the water collected from the Kriel ash dams are stored in the ash water return (AWR) dam. From the AWR dams the water gravitates to a manifold and is then pumped back to a High Level AWR dam. From there the water gravitates to the borrow pits and to Swartpan. The power station then pumps water from Swartpan for re-use by the Power Station for ashing purposes (Kriel Power Station, 2016).

The three existing ash dams will reach a limiting Rate of Rise (RoR) by end July 2021 (see Figure 1-2). Eskom is thus proposing to expand its existing ash disposal facility by constructing ~~and commission~~ an additional Ash Disposal Facility before the existing ash dams reach their limiting RoR in 2021. The expanded new ~~new~~ dams (see Figure 3-6) would fulfil the ash disposal requirements for the Power Station's extended operational life, with decommissioning of the six generating units planned to commence in 2036. A five year contingency has been allowed for, thus it's assumed that the Power Plant will be operated for an additional five years at full load from 2036 to 2040, with final decommissioning date proposed for 2045. The total ash stream to be accommodated on the existing and expanded new dams from 2021 to 2045 is 71.5 metric tons (Mtons). Available proposals for the establishment of the additional Ash Disposal Facility include expanding the existing ash dam complex to include a fourth Ash Disposal Facility.

The project requires the following components:

- An Expanded Ash Disposal Facility that would have sufficient capacity to store ash volumes produced up to 2045;
- An AWR dam from where decant and drained water will be pumped back to the power station for re-use;
- An AWR transfer dam;
- Delivery and return infrastructure, including conveyor belts and/ or pipelines, transfer houses, pump stations;
- Clean and dirty water channels;
- Powerlines; and
- Access roads.

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<sup>1</sup> Kriel name change to Ga-nala in accordance to Government Notice No.113, 10 February 2006

<sup>2</sup> The moisture content of water to fly ash is 10:1.

<sup>3</sup> One conveyor belt is normally in service with one on standby.

In terms of the National Environmental Management Act (No. 107 of 1998) (as amended) (NEMA), the proposed development triggers a suite of activities, which require authorisation from the competent environmental authority before they can be undertaken. Furthermore, the National Environmental Management: Waste Act (No. 59 of 2008) (NEMWA) provides various measures for the prevention of pollution and ecological degradation, as well as for ecologically sustainable development in order to protect human health and the environment. In this regard, NEMWA identifies and lists certain activities which require environmental authorisation through the NEMA EIA and waste management licensing processes, prior to commencement of those activities. Eskom appointed Aurecon South Africa (Pty) Ltd, an independent company, to conduct the EIA process required, to evaluate the potential biophysical and socio economic impacts of the proposed project and undertake the required waste licensing processes.

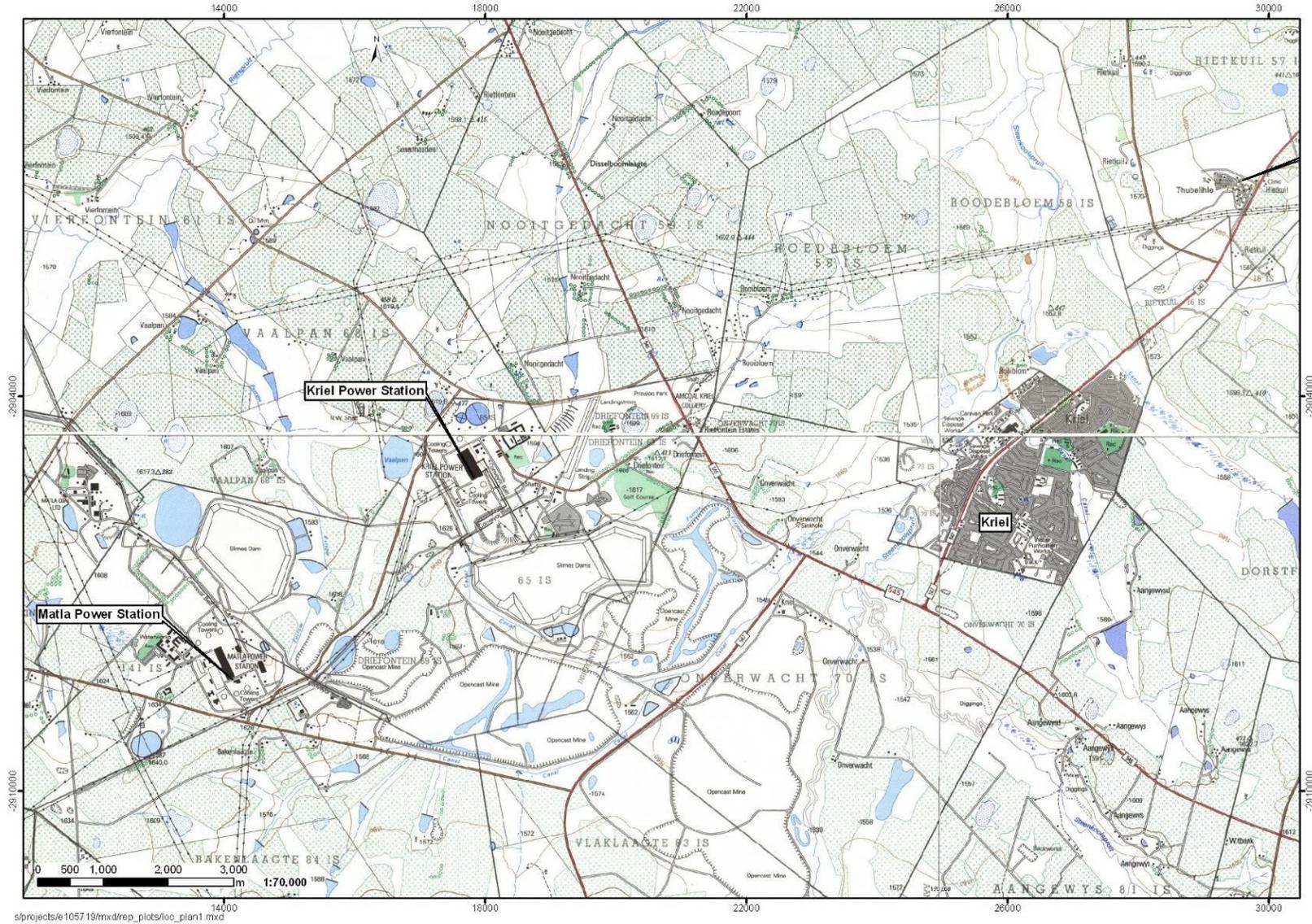


Figure 1-1 | Location of the Kriel Power Station



**Figure 1-2 | Aerial photograph of the Kriel Power Station and existing ash dam complex**

As this proposed project triggers a number of listed activities in terms of NEMA and NEMWA, it accordingly requires environmental authorisation and a waste management licence, thus an Integrated Environmental Authorisation process will be followed. Since Eskom is a State Owned Enterprise (SOE), and Kriel Power Station is in the Eskom Generation fleet, the competent authority is the national Department of Environmental Affairs (DEA). DEA's decision will be based on the outcome of this EIA process.

This report serves to document the Scoping Phase of the EIA process Figure 1-3. The EIA process will integrate the requirements for both the environmental authorisation and waste management licensing in order to obtain a streamlined decision-making process.

The purpose of this Scoping Report is to provide the background and outline the scope of work proposed to be undertaken in the EIA Report (EIR) phase. Accordingly, the Scoping Report:

- **Chapter 1 Introduction and Background**

The purpose of this Chapter is to introduce the project and describe the relevant legal framework within which the project takes place. Other applicable policies and guidelines are also discussed. The Terms of Reference, for the EIA, scope of and approach to the EIA are described and assumptions and limitations are stated.

- **Chapter 2 Site selection process**

The purpose of this chapter is to document and describe the process and rationale by which the proposed sites were identified and selected. It describes the regional boundaries within which the sites were identified and the criteria used to identify potential sites.

- **Chapter 3 The Proposed Development**

This chapter considers the need for the proposed project, briefly outlines the nature of the proposed activities and then considers and screens the various project alternatives in order to focus the EIA Phase on the most feasible alternatives.

■ **Chapter 4 The public participation process**

The purpose of this Chapter is to provide an outline of the Public Participation Process, a summary of the process undertaken to date, and the way forward with respect to public participation throughout the EIA process for this project. This Chapter also provides a summary of the key issues that have been raised to date.

■ **Chapter 5 Description of affected environment and potential impacts**

The purpose of this Chapter is to provide a description of the affected environment and the potential impacts that could result from the proposed project. Where additional information is required for detailed assessment in the EIR, the ToR for specialist studies are provided.

■ **Chapter 6 Plan of study for EIA**

The purpose of this Chapter is to detail the Plan of Study for the EIA Phase to ensure that this EIA process satisfies the requirements of NEMA.

■ **Chapter 7 Conclusions and way forward**

The purpose of this Chapter is to summarise and conclude the Scoping Report and describe the way forward.

■ **Chapter 8 Reference**

Reference material and literature used to inform report.

## 1.2 Legal requirements

### 1.2.1 The Constitution Act (No 108 of 1996)

Section 24 of the Constitution relates to environmental rights and states that: Everyone has the right

1. to an environment that is not harmful to their health or well-being; and
2. to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:
  - a. prevent pollution and ecological degradation;
  - b. promote conservation; and
  - c. secure ecologically sustainable development and use of natural resources, while promoting justifiable economic and social development.

The current environmental laws in South Africa concentrate on protecting, promoting, and fulfilling the Nation's social, economic and environmental rights; while encouraging public participation, implementing cultural and traditional knowledge and benefiting previously disadvantaged communities.

Section 27 of the Constitution states that:

1. Everyone has the right to have access to
  - a. health care services, including reproductive health care;
  - b. sufficient food and water; and
  - c. social security, including, if they are unable to support themselves and their dependants, appropriate social assistance.
2. The state must take reasonable legislative and other measures, within its available resources, to achieve the progressive realisation of each of these rights.

Furthermore, cognisance should also be taken of chapters and sections in the Constitution Act (No 108 of 1996):

- Chapter 2 Bill of Rights;
- Section 25 Rights in property;

- Section 32 Administrative justice; and
- Section 33 Access to information.

### 1.2.2 National Environmental Management Act, No. 107 of 1998

NEMA, as amended, establishes the principles for decision-making on matters affecting the environment. Section 2 sets out the National Environmental Management Principles which apply to the actions of organs of state that may significantly affect the environment. Furthermore, Section 28(1) states that “every person who causes 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”. If such pollution cannot be prevented then appropriate measures must be taken to minimise or rectify such pollution.

Eskom has the responsibility to ensure that the proposed activity as well as the EIA process conforms to the principles of NEMA. In developing the EIA process, Aurecon has been cognisant of this need, and accordingly the EA process has been undertaken in terms of NEMA and the EIA Regulations promulgated on 4 December 2014, see Figure 1-3 below.

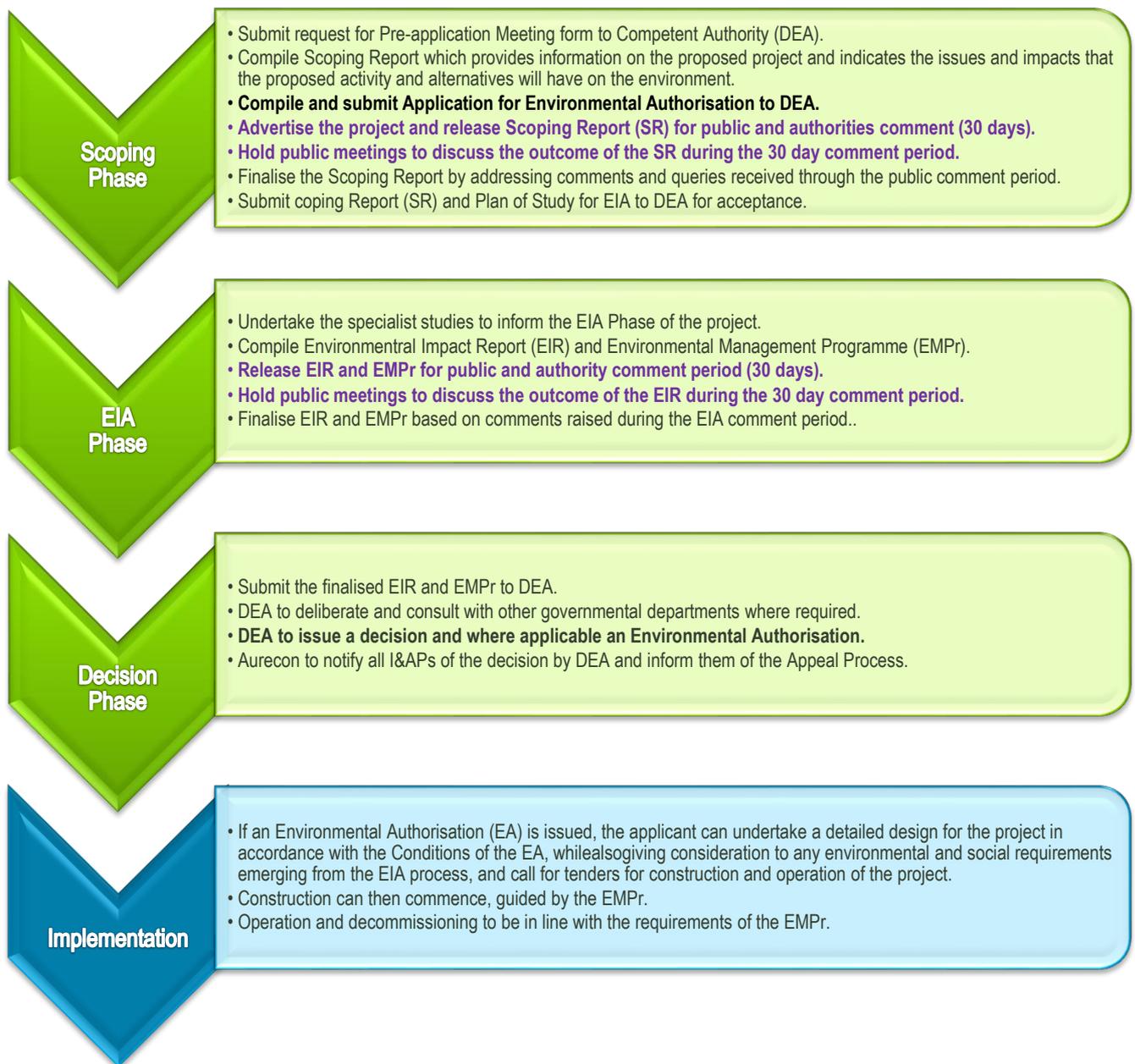


Figure 1-3 | EIA process to be followed for the proposed Kriel Ash Disposal Facility

In terms of the EIA regulations, certain activities are identified, which require authorisation from the competent environmental authority, in this case DEA, before commencing. Listed activities in Government Notice Regulation (GN R.) 984 require Scoping and EIA, whilst those in GN R. 983 and 985 require Basic Assessment (unless they are being assessed under an EIA process). The activities being applied for in this EIA process are listed in

Table 1-1.

**Table 1-1 | Listed activities in terms of NEMA GN R983, R984 and R985, December 2014, to be authorised for the proposed Ash Disposal Facility**

Listed activity as described in GN R. 983, GN R. 984 and GN R.985	Description of project activity that may trigger the listed activity
<p><b>GN R.983 Item 10</b></p> <p>The development and related operation of infrastructure exceeding 1000 metres in length for the bulk transportation of sewage, effluent, <b>process water, waste water, return water, industrial discharge</b> or slimes</p> <p>(i) with an internal diameter of 0,36 metres or more; or</p> <p>(ii) with a peak throughput of <b>120 litres per second</b> or more;</p>	<p>The proposed <u>expanded</u> Kriel Ash Disposal Facility would make use of various pipelines to transport process water, waste water, return water and water which contains waste from, or which has been heated in, any industrial or power generation process to and from the ash facility.</p> <p>The transfer dam pump station and pipeline will pump 480m<sup>3</sup>/hr (<b>133.3 litres per second</b>) process and storm water to the AWR dam through a 350mm diameter pipeline.</p> <p><b>Slurry delivery system</b></p> <ul style="list-style-type: none"> <li>Two 400mm diameter pipes.</li> </ul> <p><b>The decant system pipes consisting of:</b></p> <ul style="list-style-type: none"> <li>Permanent penstock steel outfall pipes, 10mm thick flanged on top of leachate collection layer of between <b>650mm-750mm diameter</b>; and</li> <li>Temporary penstock <b>750mm diameter</b>.</li> </ul> <p><b>Ash Deposition System</b></p> <ul style="list-style-type: none"> <li>Pipeline to ash dam up to <b>500 mm diameter</b></li> </ul>
<p><b>GN R.983 Item 12</b></p> <p>The development of -</p> <p>(i) canals exceeding 100 square metres in size;</p> <p>(ii) channels exceeding 100 square metres in size;</p> <p>(iv) dams, where the dam, including infrastructure and water surface area, exceeds 100 square metres in size;</p> <p>(xii) infrastructure or structures with a physical footprint of 100 square metres or more;</p> <p>where such development occurs-</p> <p>(a) within a watercourse;</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p>	<p>A silt trap and transfer dam is proposed to be constructed in a depression, which could be classified as a watercourse and would thus trigger the activity being infrastructure within a watercourse. There would also be clean and dirty water containment systems, which would constitute canals, channels and retention dams.</p>
<p><b>GN R.983 Item 19</b></p> <p>The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from-</p> <p>(i) a watercourse</p>	<p>A silt trap and transfer dam would be located in a depression, which could be classified as a watercourse and would thus trigger the activity because more than 5m<sup>3</sup> of material would be infilled and removed within a watercourse.</p>
<p><b>GN R.983 Item 24</b></p> <p>The development of-</p> <p>(ii) a road with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</p>	<p>Internal roads of wider than 8m may be constructed to provide access to <u>expanded</u> Ash Disposal Facility infrastructure.</p>

Listed activity as described in GN R. 983, GN R. 984 and GN R.985	Description of project activity that may trigger the listed activity
<p><b>GN R.983 Item 34</b></p> <p>The expansion or changes to existing facilities for any process or activity where such expansion or changes will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions or pollution, excluding-</p> <p>(i) where the facility, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; or</p> <p>(ii) the expansion of or changes to existing facilities for the treatment of effluent, wastewater or sewage where the capacity will be increased by less than 15 000 cubic metres per day.</p>	<p>The expansion of the Ash Disposal Facility would require the amendment of the Air Emissions Licence and Water Use Licence for the facility.</p>
<p><b>GN R.983 Item 45</b></p> <p>The expansion and related operation of infrastructure for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes where the existing infrastructure-</p> <p>(i) has an internal diameter of 0,36 metres or more; or</p> <p>(ii) has a peak throughput of 120 litres per second or more; and</p> <p>(a) where the facility or infrastructure is expanded by more than 1000 metres in length; or</p> <p>(b) where the throughput capacity of the facility or infrastructure will be increased by 10% or more;</p>	<p>This activity adds on to the infrastructure listed under GN R.983 Item 10.</p> <p>Because the proposed activity relates to the construction and operation of an <u>expanded new</u> ash dam, which would <u>increase expand</u> the footprint of the current ash dam complex, the activity triggers the development, operation and expansion of infrastructure in this case pipeline infrastructure.</p>
<p><b>GN R.983 Item 48</b></p> <p>The expansion of -</p> <p>(i) canals where the canal is expanded by 100 square metres or more in size;</p> <p>(ii) channels where the channel is expanded by 100 square metres or more in size;</p> <p>(iv) dams, where the dam, including infrastructure and water surface area, is expanded by 100 square metres or more in size;</p> <p>(vi) bulk storm water outlet structures where the bulk storm water outlet structure is expanded by 100 square metres or more in size; or</p> <p>where such expansion or expansion and related operation occurs-</p> <p>(a) within a watercourse;</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p>	<p>The silt trap no.2, transfer dam and permanent effluent trench (channel) is proposed to be constructed in a depression, which could be classified as a watercourse and would thus trigger the activity</p>
<p><b>GN R.983 Item 49</b></p> <p>The expansion of -</p> <p>(v) infrastructure or structures where the physical footprint is expanded by 100 square metres or more;</p> <p>where such expansion or expansion and related operation occurs-</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback; or</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p>	<p>The expansion of infrastructure including silt trap no.2, transfer dam and permanent effluent trench (channel) is proposed to be constructed in a depression, which could be classified as a watercourse and would thus trigger the activity.</p>
<p><b>GN R.983 Item 56</b></p>	<p>Internal roads of wider than 8 meters might be lengthened by more than 1km.</p>

Listed activity as described in GN R. 983, GN R. 984 and GN R.985	Description of project activity that may trigger the listed activity
The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre- (i) where the existing reserve is wider than 13,5 meters; or (ii) where no reserve exists, where the existing road is wider than 8 metres;	
<b>GN R.984 Item 15</b> The clearance of an area of 20 hectares or more of indigenous vegetation.	The footprint of the proposed <u>expanded</u> Ash Disposal Facility would be approximately 172ha. Of this are it's likely that more than 150 hectares of vegetation be cleared. Of this 150ha it's very likely that more than 20ha of vegetation could cumulatively constitute as natural and thus this activity is triggered. This vegetation mainly consists of natural grasses.
<b>GN R.984 Item 16</b> The development of a dam where the highest part of the dam wall, as measured from the outside toe of the wall to the highest part of the wall, is 5 metres or higher or where the high water mark of the dam covers an area of 10 hectares or more.	The new starter dam walls are proposed to have a height of 11m (AD4.1) and 11m (AD4.2) respectively.  The AWR dam will have an outer wall height of 17.2m.
<b>GN R.985</b> <b>None of the geographic areas trigger.</b> <b>The proposed site is mapped as heavily to moderately modified Mpumalanga Biodiversity Sector Plan (MBSP, 2014).</b> <b>Please refer to Figure 4 to 9 under additional information.</b>	

### 1.2.3 National Environmental Management: Waste Act, No. 59 of 2008

NEMWA seeks to reform the law on waste management by making provision for various measures for the prevention of pollution and ecological degradation, as well as ecologically sustainable development in order to protect communities and the environment through waste management. In this regard, NEMWA provides for national norms and standards for regulating waste management in all spheres of government and provides for the licensing and control of waste management activities, as well as the remediation of contaminated land.

The objectives of NEMWA include minimising the consumption of natural resources; avoiding and minimising the generation of waste; reducing, re-using, recycling and recovering waste; treating and safely disposing of waste as a last resort; promoting and ensuring the effective delivery of waste services; remediating land where contamination presents or may present a significant risk of harm to health or the environment; and achieving integrated waste management reporting and planning. Generally, the Act seeks to ensure that people are aware of the impact of waste on their health, well-being and the environment and to give effect to the constitutional right in order to secure an environment that is not harmful to one's health or well-being.

The proposed project triggers activities listed under NEMWA and therefore a waste management licence is required. The activities in terms of NEMWA, GN No. 921 of 29 November 2013, Category B, being applied for in this EIA process is listed in Table 1-2. These triggers depend on the classification of the ash in terms of NEMWA.

**Table 1-2 | Listed activities in terms of NEMWA, List of waste management activities that have, or are likely to have, a detrimental effect on the environment**

NO.	LISTED ACTIVITY	
<b>Category A</b>		
1	The storage of general waste in lagoons.	Storage of ash water in AWR dams. Depending on waste classification.
<b>Category B</b>		
1	Storage of hazardous waste (1) The storage of hazardous waste in lagoons excluding storage of effluent, wastewater or sewage.	Storage of ash return water in AWR dams. Depending on waste classification.
7	The disposal of any quantity of hazardous waste to land.	Disposal of ash in ash dams. Depending on waste classification.
8	The disposal of general waste to land covering an area in excess of 200m <sup>2</sup> and with a total capacity exceeding 25 000 tons.	Disposal of ash return water in AWR dams Disposal of ash to ash dams.
10	The construction of a facility for a waste management activity listed in Category B of this Schedule (not in isolation to associated waste management activity).	Activity 1 and 7.

#### 1.2.4 National Heritage Resources Act, No. 25 of 1999

In terms of the National Heritage Resources Act (No. 25 of 1999) (NHRA), any person who intends to undertake “any development ... which will change the character of a site exceeding 5 000 m<sup>2</sup> in extent”, “the construction of a road...powerline, or pipeline...exceeding 300 m in length” must at the very earliest stages of initiating the development notify the responsible heritage resources authority, namely the South African Heritage Resources Agency (SAHRA) or the relevant provincial heritage agency. These agencies would in turn indicate whether or not a full Heritage Impact Assessment (HIA) would need to be undertaken.

Section 38(8) of the NHRA specifically excludes the need for a separate HIA where the evaluation of the impact of a development on heritage resources is required in terms of an EIA process. Accordingly, since the impact on heritage resources would be considered as part of the EIA process outlined here, no separate HIA would be required. SAHRA or the relevant provincial heritage agency (Mpumalanga Heritage Resources Authority) would review the EIA reports and provide comments to DEA, who would include these in their final environmental authorisation decision. However, should a permit be required for the damaging or removal of specific heritage resources, a separate application would have to be submitted to SAHRA or the relevant provincial heritage agency for the approval of such an activity, if Eskom obtains authorisation and makes the decision to pursue the proposed project further.

#### 1.2.5 Other applicable legislation and policies

##### A. National Water Act, No. 36 of 1998

The National Water Act (No. 36 of 1998) (NWA) protects and conserves water resources (i.e. rivers, wetlands, estuaries and groundwater), provides absolute water rights for basic human needs and aims to secure ecological sustainable development and use of South Africa’s water resources. In terms of Section 21 of the NWA, the taking of water from a water resource; storing of water; impounding or diverting the flow of water in a water course; altering the bed, bank, course or characteristics of a watercourses; disposing of waste in a manner which may impact on a water resource and the disposal of water which contains waste or which has been heated through a power generation process are all considered water uses, which in general must be licensed, unless permitted as a Schedule 1 activity, or permissible in

terms of a General Authorisation (GA) under Section 39 of the Act. Schedule 1 activities relate mostly to small scale domestic usage of water and would therefore not be applicable to the proposed project.

Eskom's Environmental Department: Water has applied for the requisite license, on behalf of the Kriel Power Station, as part of an Integrated Water Use License Application (IWULA) from the Department of Water and Sanitation (DWS). Information from the IWULA will be incorporated into the EIA and public participation process where relevant.

### **B. Conservation of Agricultural Resources Act, No. 43 of 1983**

The Conservation of Agricultural Resources Act (No. 43 of 1983) (CARA) makes provision for the conservation of the natural agricultural resources of South Africa through maintaining the production potential of land, combating and preventing erosion, preventing the weakening or destruction of the water sources, protecting vegetation and combating weeds and invader plants. In terms of Regulation 7 of CARA no land user may drain or cultivate a vlei, marsh or water sponge, except with written permission from the Department of Agriculture. However, this regulation is only relevant if the land is zoned for agriculture.

### **C. National Environmental Management: Air Quality Act, No. 39 of 2004**

The National Environmental Management: Air Quality Act, No. 39 of 2004 (NEMAQA), National Dust Control Regulations, 2013 (Government Notice R827 of 1 November 2013) makes provision for dust fall standards, the control of dust and prevention of nuisance by dust in addition to measures for the control of dust. During the construction and operation of the Ash Disposal Facility, dust must be prevented by taking the requisite control measures. Furthermore, section 35 of NEMAQA relates to the control of offensive odours to ensure that offensive odours are limited by any of the activities of Eskom in constructing and operation of the Ash Disposal Facility.

An Atmospheric Emission License (AEL) (No. 17/4/AEL/MP312/11/09) was issued to Kriel Power Station by the Mpumalanga MEC on 6 June 2013, in terms of Section 47(1) of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEMAQA) in respect of Scheduled Process No. 29 (Power Generation) and Scheduled Process No. 59 (Bulk Storage and Handling of Ore or Coal). An amended AEL was issued on 10 September 2013. The AEL is valid until 20 May 2017 and replaces the APPA Registration Certificate. The AEL specifies permissible stack emission concentrations for Particulate Matter, Sulphur dioxide (SO<sub>2</sub>) and oxides of Nitrogen (NO<sub>x</sub>). It also specifies a number of compliance conditions as well as conditions for emission monitoring, management of abnormal releases and management of fugitive dust resulting from coal handling and storage.<sup>4</sup>

### **D. Occupational Health and Safety Act, No. 85 of 1993**

In terms of Occupational Health and Safety Act, No. 85 of 1993 (OHSA) specifically GN R1179 (GG 16536 of 25 August 1995 – Hazardous Chemical Substances Regulations) the regulations contain provisions regarding the handling of hazardous substances primarily aimed at the occupational hygiene side thereof, including the assessment of potential exposure, medical surveillance, PPE, etc. Eskom use fuels, oils, solvents, etc. and these regulations need to be taken cognizance of in terms of the transport, storage, handling and disposal thereof.

### **E. National Environmental Management: Protected Areas Act, No 57 of 2003**

The National Environmental Management: Protected Areas Act, No 57 of 2003 (NEM: PA) came into operation on 1 November 2004. The aim of the NEM: PA, as amended, is to provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity, natural landscapes and seascapes. In 2004, the National Environmental Management: Protected Areas Amendment Act 31 of 2004 was promulgated to amend Act 57 of 2003 with regard to the application of that Act to national parks and marine protected areas. The proposed Kriel Ash Disposal Facility will not be situated in or near any protected areas. However, NEMPA was considered during initial site considerations for the expansion of the Ash Disposal Facility.

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<sup>4</sup>Atmospheric Impact Report in support of Eskom's application for postponement of the minimum emission standards compliance timeframes for the Kriel Power Station. December 2013. UMoya-NILU Consulting (Pty) Ltd.

#### **F. Hazardous Substances Act, No. 15 of 1973**

In terms of the Hazardous Substances Act, No. 15 of 1973 Eskom must identify the various groups of hazardous substances which will be used in terms of the expansion of the ash disposal facilities. These substances should be classed in terms of SANS10228 to ensure that they are properly stored and that the Material Safety Data Sheets are in place in the event of a spill.

#### **G. Explosives Act, No. 26 of 1956 and R1604 of September 1972**

The Explosives Act, No. 26 of 1956 and R1604 of September 1972 will be applicable to the development in the event that blasting will take place during construction. The Act relates to the use, handling, transport, storage and disposal of explosives. It's not possible to conclude if blasting will take place at this stage because the EIA is done at feasibility level and therefore this act remains relevant until ascertained otherwise.

#### **H. Spatial Planning and Land Use Management Act, No. 16 of 2013 (SPLUMA)**

The land parcels on which the current and proposed expansion of the Ash Disposal Facility is planned are currently zoned as agricultural. Eskom Real Estate is currently in a process to get the station to be correctly rezoned to either industrial or commercial or public services infrastructure. The rezoning category will depend on the decision from the Emalahleni Local Municipality planning department. Construction of the facility cannot occur until a) a rezoning application for the change in zoning/land use of the land is submitted to and approved by the Emalahleni Local Municipality in terms of SPLUMA, or b) a Consent Use is granted by the Emalahleni Local Municipality in terms of the Emalahleni Town Planning Scheme.

#### **I. National Road Traffic Act, No. 93 of 1996 (as amended) (NRTA)**

Certain vehicles and loads cannot be moved on public roads without exceeding the limitations in terms of the dimensions and/or mass as prescribed in the Regulations of the NRTA. Although abnormal loads are not anticipated, Mpumalanga Department of Public Works, Roads & Transport will be provided with an opportunity to comment on the proposed project.

#### **J. Guidelines**

This EIA process is informed by the series of national Environmental Guidelines<sup>5</sup> where applicable and relevant:

- Integrated Environmental Information Management, Information Series 2: Scoping (Department of Environmental Affairs and Tourism. (DEAT), 2002).
- Integrated Environmental Information Management, Information Series 3: Stakeholder Engagement. (DEAT, 2002).
- Integrated Environmental Information Management, Information Series 4: Specialist Studies. (DEAT, 2002).
- Integrated Environmental Management, Information Series 11: Criteria for determining Alternatives in EIA. (DEAT, 2004).
- Integrated Environmental Information Management, Information Series 12: Environmental Management Plans (DEAT, 2004).
- Integrated Environmental Information Management, Information Series 3: General Guide to the EIA Regulations. (DEAT 2006).
- Integrated Environmental Information Management, Information Series 4: Public Participation in support of the EIA regulations (DEAT 2006).
- Integrated Environmental Information Management, Information Series 5: Assessment of Alternatives and Impacts (DEAT 2006).
- Integrated Environmental Management Guideline Series, Guideline 7: Detailed Guide to Implementation of the EIA Regulations. Unpublished (DEAT, 2007).
- Guideline on Need and Desirability, Integrated Environmental Management Guideline Series 9 (DEA, 2010).

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<sup>5</sup> Note that these Guidelines have not yet been subjected to the requisite public consultation process as required by Section 74 of R385 of NEMA.

- Public Participation 2010, Integrated Environmental Management Guideline Series 7 (DEA, 2010).
- Guidelines to minimise the impact on birds of Solar Facilities and Associated Infrastructure in South Africa (Smit, 2012).
- Guideline on Need and Desirability, EIA Guideline and Information Document Series (Department of Environmental Affairs and Development Planning (DEA&DP), 2013).
- Guideline on Alternatives, EIA Guideline and Information Document Series (DEA&DP 2013).

In particular, in 1998, DWAF (now DWS) published a Waste Management Series consisting of Minimum Requirements (DWAF, 1998) that represent the lowest acceptable standards for:

- The handling, classification and disposal of hazardous waste; and
- The monitoring of water quality at waste management facilities.

However the DEA's Waste Classification and Management Regulations (August 2013) is currently the official waste classification system, thus previous ash samples classified in terms of the DWS Minimum Requirements as was the applicable system at the time of the initial Ash Classification study (2011) is no longer relevant. The ash will be reclassified as part of the EIA in terms of NEMWA.

## **K. Relevant Policies**

The following policies, although not directly applicable to the proposed project, were also considered:

- Policies regarding greenhouse gas and carbon emissions;
- White Paper on the Energy Policy of the Republic of South Africa (1998);
- National Integrated Resource Plan (IRP) (2010) and Update Report (2013); and
- The National Development Plan 2030 (2012).

## **1.3 Terms of reference and Scope of the EIA**

In November 2009, Eskom appointed Aurecon to undertake an EIA process for the proposed construction of an Ash Disposal at the Kriel Power Station in Mpumalanga (DEA EIA Ref. No: 12/12/20/1837 / DEA WML Ref No. 12/9/11/L514/6). In 2011 the EIA process was stopped after the Final Scoping phase to allow detailed geotechnical investigation to be undertaken at Site 10 to ensure that the proposed ash disposal infrastructure would be supported by the underlying backfilled excavations located at this site. In 2016 the geotechnical investigations undertaken by Jones & Wagener were concluded and Eskom could proceed with the EIA process. Due to the time lapsed and numerous legislative changes since 2011 the DEA requested that the EIA process be started from anew in terms of the 2014 EIA regulations. Although five years have lapsed since the process was stopped, much of the scoping undertaken in terms of the previous process is still relevant and therefore this scoping is fundamentally a refinement and update of the previous scoping exercise. An Integrated Environmental Authorisation and a Waste Management Licence are being sought for the proposed project in terms of NEMA and NEMWA. Eskom is in the process of applying for a Water Use Licence for the proposed project in terms of NWA.

## **1.4 Approach to the project**

There are three distinct phases in the EIA process namely the Scoping, EIA and decision making phases. The EIA process is diagrammatically represented in Figure 1-3. This report covers the Scoping Phase of the EIA process. The Scoping Phase will be followed by the EIA Phase, which will culminate in a comprehensive document, the EIR.

### **1.4.1 The Scoping Phase**

Scoping in the EIA process is the procedure used for determining the extent of, and approach to, the EIA Phase and involves the following key tasks:

- Further identification and involvement of relevant authorities and Interested and Affected Parties (I&APs) in order to elicit their interest in the project;
- Identification and selection of feasible alternatives to be taken through to the EIA phase;
- Identification of significant issues/ impacts associated with each alternative to be examined in the EIR, and mitigation measures that can be applied.
- Determination of specific Terms of Reference (ToR) for any additional specialist studies required in the EIR Phase (i.e. the Plan of Study for the EIR).

Various methods and sources were utilised to identify the potential social and environmental aspects associated with the proposed project and to develop the ToR for the specialist studies. The sources of information for the preparation of this report include, amongst others, the following:

- Collection of information regarding the project, as provided by Eskom:
  - Project description;
  - Methodology for construction of the various project components;
  - Methodology during operations;
  - Expected time table for project development;
  - Maps and figures, outlining the proposed facilities; and
  - Technical information relating to design.
- Other relevant EIRs;
- Environmental baseline surveys for this site and surrounding areas;
- Consultation with the project team; and
- Consultation with I&APs, including authorities.

The applicant has 44 days to submit Scoping Report (SR) after receipt of application. During the Scoping Phase, the SR must be subjected to at least a 30-day PPP. Therefore, the SR will be made available for public comment and review, from 26 October 2016 to 28 November 2016. On completion of the public comment period, the SR will be updated and finalised, taking cognisance of any comments received or issues raised by I&APs.

Once the SR has been completed it will be submitted to the DEA for review. The DEA must within 43 days of receipt of the SR, consider it, and in writing –

- (a) Accept the report and advise the EAP to proceed with the tasks contemplated in the Plan of Study for EIA;
- (b) Refuse Environmental Authorisation if
  - (i) The proposed activity is in conflict with a prohibition contained in legislation, or
  - (ii) If the Scoping Report does not substantially comply with the objectives and content requirements for scoping reports in terms of the 2014 EIA Regulations and the applicant cannot ensure compliance with these regulations within the prescribed timeframe.

#### **1.4.2 The EIR Phase**

The Scoping Phase will be followed by the EIR Phase, which will be informed by the specialist investigations. The applicant has 106 days to submit the (EIR) after acceptance of this SR. This phase will culminate in a comprehensive EIR that documents the outcome of the impact assessments.

#### **1.4.3 The Public Participation Process (PPP)**

The PPP will be undertaken to ensure participatory consultation with members of the public are undertaken in a manner that provides the public an opportunity to comment on the proposed project. Consultation with the public forms an integral component of this investigation and enables I&APs (e.g. directly affected landowners, authorities,

environmental groups, civic associations and communities), to identify their issues and concerns, relating to the proposed activities, which they feel should be addressed in the EIA process. Comments on the scoping report, EIR and decision by DEA will be solicited from the public. The objectives of public participation are to provide information to the public, identify key issues and concerns at an early stage, respond to the issues and concerns raised, provide a review opportunity, and to document the process properly.

## 1.5 Assumptions and limitations

### 1.5.1 Assumptions

In undertaking this investigation and compiling the Scoping Report, the following has been assumed:

- The strategic level investigations undertaken by Eskom prior to the commencement of the EIA process are technologically acceptable and robust.
- The information provided by the applicant and specialists is accurate and unbiased.
- The scope of this investigation is limited to assessing the environmental impacts associated with the proposed expansion of the Ash Disposal Facility, and associated infrastructure, at the Kriel Power Station.
  - The EIA does not assess any other waste streams (except that of the ash created by the burning of coal) or materials generated at the Kriel Power Station.
  - The EIA does not assess the merit of coal fired electricity or associated impacts.
- The IWULA is not part of this EIA process, as Eskom's Environmental Department: Water is currently applying for the license in a separate process.
- No ash dams will be constructed over backfilled areas, but associated infrastructure that does not pose potential subsidence risk may be constructed over these areas.

### 1.5.2 Gaps in knowledge

This Scoping Report has identified the potential environmental impacts associated with the proposed activities. However, the scope of impacts presented in this report could change, should new information become available during the EIA Phase. The purpose of this section is therefore to highlight gaps in knowledge when the Scoping phase of the project was undertaken.

The planning for the proposed Ash Disposal Facility and its associated infrastructure is at a feasibility level and therefore some of the specific details are not available at this stage of the EIA process. This EIA process forms a part of the suite of feasibility studies, and as these studies progress, more information will become available to inform the EIA process. This will require the various authorities, and especially DEA, to issue their comments and ultimately their environmental decision to allow for the type of refinements that typically occur during these feasibility studies and detailed design phase of projects. Undertaking the EIA process in parallel with the feasibility study does however have a number of benefits, such as integrating environmental aspects into the layout and design and therefore ultimately encouraging a more environmentally sensitive and sustainable project.

## 1.6 Independence

The requirement for independence of the environmental consultant is aimed at reducing the potential for bias in the environmental process. Neither Aurecon nor any of its sub-consultants are subsidiaries of Eskom. Furthermore, all these parties do not have any interests in secondary or downstream developments that may arise out of the authorisation of the proposed project.

Mr **Andries van der Merwe**, the Project Director, is appropriately qualified and registered with the relevant professional bodies. Mr van der Merwe is a professionally registered Environmental Engineer registered with the Engineering Council of South Africa (Pr. Eng.) and holds a B. Eng. (Civil) degree. Mr van der Merwe has over 14 years' experience in the field of impact assessment.

Miss **Franci Gresse**, the Project Leader, is a Senior Environmental Practitioner at Aurecon's Cape Town office with eight years' experience in the field. Miss Gresse has a Bachelor of Science (Honours) degree in Conservation Ecology and has been involved in a number of energy related projects in the Western and Northern Cape provinces.

Mr **Dirk Pretorius**, one of the project staff, is a Senior Environmental Practitioner at Aurecon's Cape Town office with six years' experience in the field. Mr Pretorius is registered as a Professional Natural Scientist at the Natural Scientific Professions Act, 2003 (Act 27 of 2003) and has a Bachelor of Science (Honours) degree in Conservation Ecology. He has been involved in a number of energy related projects in the Western, Eastern and Northern Cape provinces of South Africa as well as East Africa.

## 2 SITE SELECTION PROCESS

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*The purpose of this chapter is to document and describe the process and rationale by which the proposed sites were identified and selected. It describes the regional boundaries within which the sites were identified and the criteria used to identify potential sites.*

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### 2.1 Background

As outlined in section 1.1 of Chapter 1, the need to develop additional disposal facilities for ash produced by Kriel Power Station, has resulted in Eskom initiating an EIA process in 2009 for the development of an expanded new Ash Disposal Facility that would have sufficient capacity for the remaining operational life of the power station until 2039 plus a five year contingency. While the initial focus, from a logistical/ operational perspective, was on an area identified by Jones and Wagener Consulting Engineers J&W)<sup>6</sup> in 2006 to the immediate south of the Kriel Power Station and the existing ash dams, it was recognised that the EIA process requires the applicant to consider all reasonable and feasible alternatives thoroughly. As part of the EIA process, the Aurecon EIA team, assisted by Eskom and J&W, undertook the identification of potential sites within a 12 km radius (see Section 2.2 for more detail) of the Kriel Power Station in 2009 and 2010, in order to ensure that the EIA process could commence from a robust and defensible starting point.

The process of identifying potential sites within the 12 km radius included a site visit to the Kriel Power Station, various discussions with relevant Eskom personnel, as well as a number of internal project team meetings and workshops. The Department of Water Affairs' (now DWS) guideline on minimum requirements for waste disposal for landfill sites (2<sup>nd</sup> edition, 1998) was also taken into consideration during the screening process. The criteria discussed in the aforementioned document was used to identify potential environmental impacts and to inform specialist investigations. This criteria included: potential to pollute surface and ground water resources, stability issues, sensitive environmental features, landscape characteristics, surrounding land use, air quality, distance of site from waste source and visual aesthetics.

Based on the outcome of this site selection process, J&W was appointed to undertake an extensive geotechnical investigation during 2010/11 (report JW196/11/C779) for Site 10 (i.e. the area immediately south and adjacent to the existing ash dams).

Figure 2-1 below provides a visual illustration of the process that was followed since 2006 to identify a potential site(s). For more detail on the site selection process that was followed in 2009/2010, please refer to Annexure C. Note that the sections below will be focusing on the latest available information and how this affects the outcome of the original site selection process. Process.

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<sup>6</sup> Kriel Power Station Ash Dam Feasibility Investigation, September 2006. Report No: JW127/06/A407

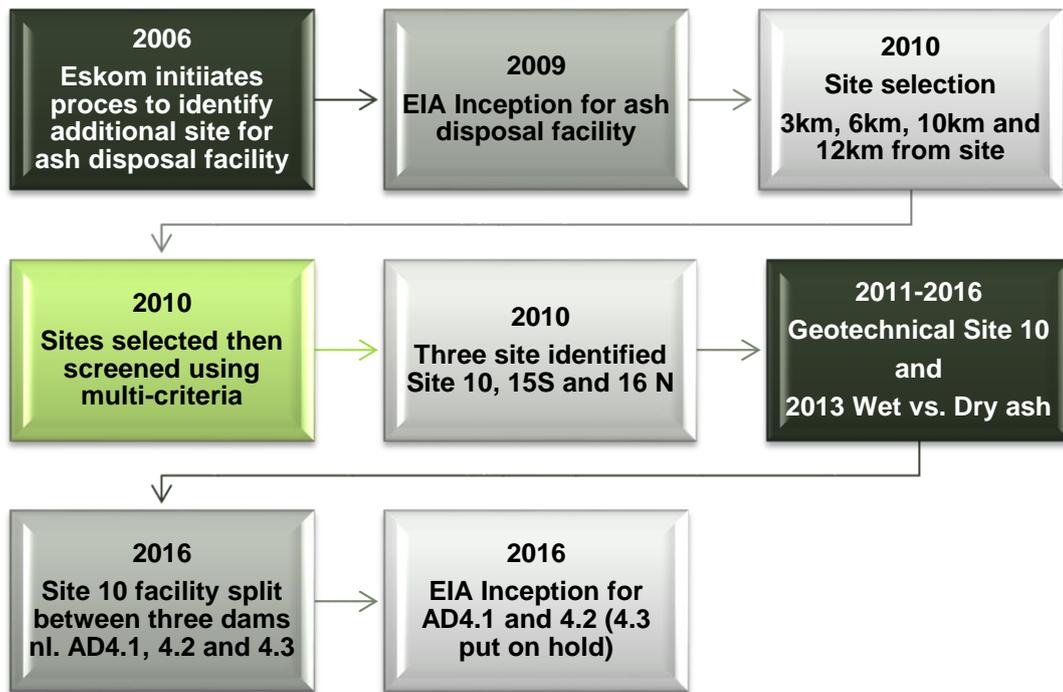


Figure 2-1 | Summary of site selection process followed from 2006 to 2016

## 2.2 2016 Site selection process and way forward

As mentioned above, J&W was appointed to undertake an extensive geotechnical investigation during 2010/11 (report JW196/11/C779). The report focused on establishing the founding conditions of Site 10 (i.e. the preferred site based on distance from the plant) and evaluating the depth of the backfilled pit. The report furthermore recommended a large scale Monitoring Trial Embankment (MTE) be constructed to calibrate the geotechnical design parameters derived from the investigation. The purpose of the MTE would be to verify, by direct measurement, whether the expanded new ash dam can be successfully constructed with the incorporation of a liner, as required by the authorities, over the backfilled pit. It was concluded that the trial embankment to investigate pit backfill settlement will only be needed for Ash dam 4.3 (AD4.3) of the new proposed ash dam<sup>7</sup>.

Further to the geotechnical investigation during 2010/2011 other investigations done for Kriel Power Station relating to the feasibility of Site 10 (i.e. these reports all informed the 2016 Kriel Power Station Ash Dam 4 – Site 10 Concept Design Update Report No.: JW044/16/E821) includes:

- 2006: Initial Concept Study – J&W Report no. JW127/06/A407;
- 2010: Site Selection Inputs – J&W Report no. JW71/10/A407;
- 2011: Geotechnical Site Investigation – J&W Report no. JW196/11/C779;
- 2013: Concept Study (Wet vs. Dry) – J&W Report no. JW164/13/D379;
- 2014: Step-In and Go Higher Geotechnical Investigation and Stability Assessment – Preliminary Report – J&W Report no. JW129/15/F015.

After taking the above listed information into account together with recent changes to the landscape and biodiversity, it was determined that the following three criteria needs to be reconsidered as discussed in the sections below:

- Locality of coal resources and undermined areas;
- Geotechnical considerations; and
- Sensitive biodiversity features.

<sup>7</sup> The MTE and AD4.3 does not form part of this EIA and will be investigated at a later stage if deemed necessary.

### **2.2.1 Locality of coal resources and undermined areas**

In addition to the locality of coal resources and undermined areas identified in the 2010 site selection process the Kriel Lifex projects (see Figure 2-2) were also investigated for future mining. The Lifex projects included Block F (underground) and Pits 11 and 13 (opencast) and associated mini-pits which have been investigated and authorised for future mining (SRK, 2014) (DEA reference number: 14/12/16/3/3/1/987). These mining properties include:

- Vlaklaagte 83 IS;
- Bakenlaagte 84 IS;
- Driefontein 69 IS;
- Driefontein 69 IS; and
- Kriel Power Station 65 IS.

The latest update on the Lifex projects is that they have been placed on hold indefinitely. This however does not affect the preferred Site 10 alternative which is a depleted open cast mine or Site 16, which is proposed to be located just north east of the proposed Pit 11.

Although it was concluded by Eskom that the relocation of primary infrastructure was not a fatal flaw to locating an Ash Disposal Facility (unlike the sterilisation of coal reserves), Site 10 provided an opportunity to both avoid relocation of primary infrastructure as well as sterilisation of coal reserves. Furthermore, at Site 10 the possibility of retaining the existing delivery and return infrastructure system with expansions as required would result in significant cost savings.

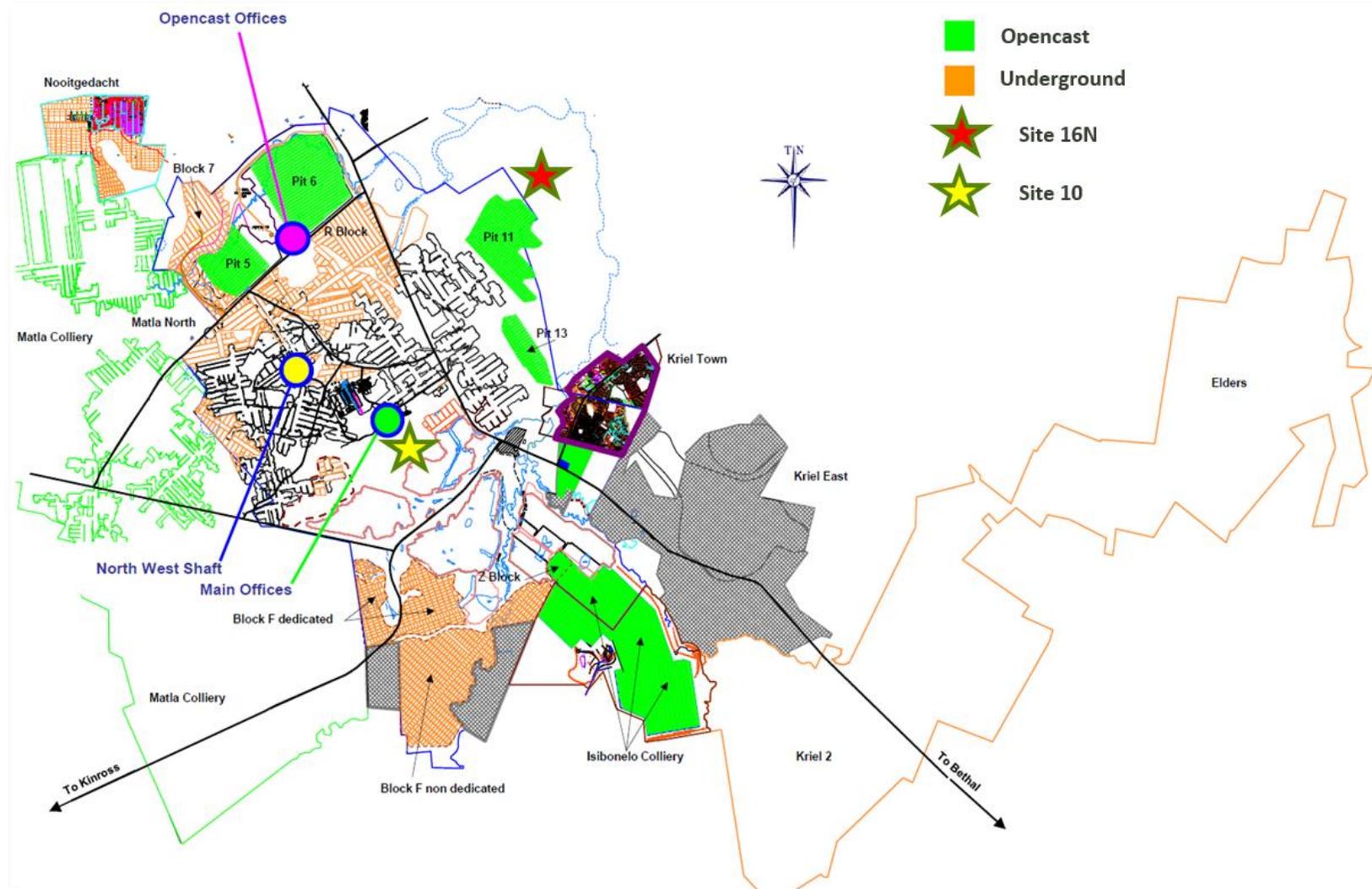


Figure 2-2 | Map indicating the mining activities around Kriel<sup>8</sup>

<sup>8</sup> Source: [www.sacollierymanagers.org.za/docs/MAP%20to%20Kriel%20operations.pdf](http://www.sacollierymanagers.org.za/docs/MAP%20to%20Kriel%20operations.pdf)

### 2.2.2 Geotechnical considerations

An extensive geotechnical investigation was undertaken by J&W during 2010/11, resulting in report (No.: JW196/11/C779), issued in May 2012. The Site 10 area that was subject to the geotechnical investigations consists of the No. 4 Seam, mined in Pit 1 and Kriel Pit 1 (Block 4). The general methods of working, opencast mining operations tend to leave areas where there may be relatively loose fill materials of considerable thickness, which can undergo significant settlement. This is exacerbated by the fact that the backfill is normally of a heterogeneous nature, composed of a wide range of materials including silty sandy & clayey soils, fragments of sandstone, siltstone, mudstone, shale and coal debris. To complicate the situation further, there is considerable variation in the dimensions of the contained fragments, from clay-sized up to several meters across. Replacement of these spoils in the excavation, even with controlled compaction, produces the potential for large differential settlement. A benefit of dragline operations is the well-mixed nature of the cast spoils. End-tipping operations typically result in segregation as the larger particles roll to the toe of the heap. As a result of the nature of the methods of operation and because of the double handling and weathering effects between initial excavation and final rehabilitation, the siltstone/mudstone/shale components in the spoils backfill can break down and behave as a cohesive material. The harder sandstone components are more durable and remain as cohesion less gravel and boulder inclusions. Therefore the 2016 Kriel Power Station Ash Dam 4 Report (No.: JW044/16/E821) indicated that based on geotechnical stability the Site 10, Dams 4.1 and 4.2 would meet geotechnical requirements. Only dam 4.3 would need the MTE construction to indicate the technical viability of this option (see Figure 3-5).

### 2.2.3 Sensitive biodiversity features

The MBCP (Ferrar & Lötter, 2007) has been updated with the 2014 Mpumalanga Biodiversity Sector Plan (Lötter, Cadman, & Lechmere-Oertel, 2014). The change in planning for the area does however not change the land use viability for Site 10 or 16N (see Figure 2-3 and Figure 2-4). It was however determined that the vegetation types<sup>9</sup> identified for both sites are no longer considered to be Endangered and have been rated as Vulnerable in terms of Government Notice 1002 of 9 December 2012 of the National Environmental Management Biodiversity Act (Act 10 of 2004). For more information on the potential impact on the biophysical environment due to this development, please refer to Chapter 6.

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<sup>9</sup> Eastern Highveld Grassland (Gm 12) and Soweto Highveld Grassland (Gm8)

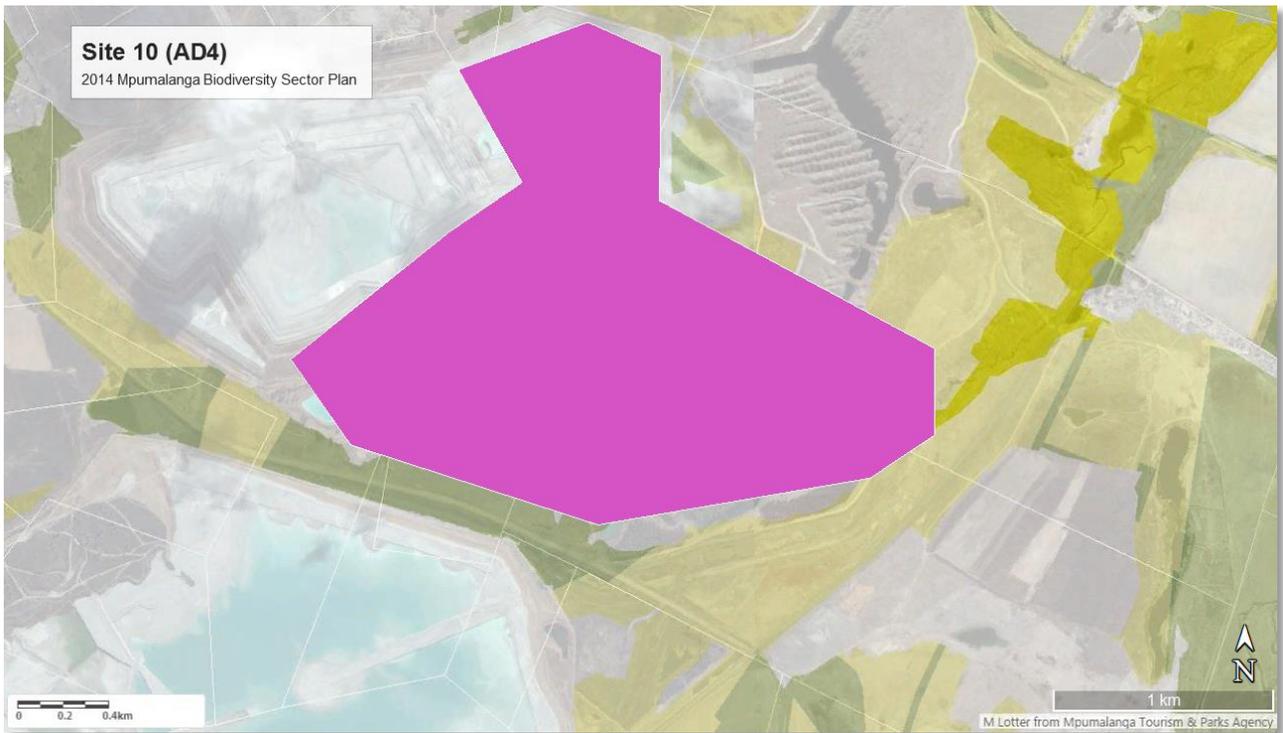


Figure 2-3 | Sensitive land units identified by the 2014 Mpumalanga Biodiversity Sector Plan at the Site 10



Figure 2-4 | Sensitive land units identified by the 2014 Mpumalanga Biodiversity Sector Plan at site 16N

## 2.2.4 Ranking of potential sites identified

Taking into account the new information that has become available since 2010, it is necessary to re-evaluate the rankings of the three sites that were initially identified in 2010 as depicted in Table 2-1 and Table 2-2 below.

Table 2-1 | Weightings of 2016 site alternatives

Site	Design/ operating requirements	Cost <sup>10</sup>	Geotechnical stability	Groundwater pollution	Other sensitive environmental features (e.g. Critical Areas, arable land)
10	2	3	2	2	3
15S	2	3	1	1	2
16N	1	1	3	3	1

The results of the 2016 site ranking process for the three identified sites are presented in Table 2-2.

Table 2-2 | Site ranking matrix

Site	Design/ operating requirements	Cost	Geotechnical stability	Groundwater pollution	Other sensitive environmental features (e.g. Critical Areas, arable land)	Total
Weighting	20	15	25	25	15	100
10	13.3	15	16.7	16.7	15	76.7
15S	13.3	15	8.3	8.3	10	54.9
16N	6.7	5	25	25	5	66.7

Based on the above it is apparent that Site 15S is least favoured with regards to groundwater and geotechnical characteristics. In addition, Site 15S has been indicated as the least favourable option mainly due to the fact that the site has been rehabilitated and includes a wetland area. Furthermore, both Site 15S and 16N are located further away from the Power Station than Site 10 and would thus have a higher visual impact on the surrounding landscape.

With regards to Site 16N, it was considered to be “more favourable” than Site 10 during the 2010 site screening exercise in terms of geotechnical stability and groundwater pollution risks, yet as explained in the above section this is no longer the case. It is also considered to be “least favourable” in terms of design / operating requirements (reasons described in Section Annexure C), cost and sensitive environmental features as it would extend the environmental disturbance footprint of the power station and its associated infrastructure into Greenfields.

The additional geotechnical studies undertaken for Site 10, did however show that a fourth ash dam next to the existing Ash Disposal Facility is a feasible option despite the initial concerns in 2010 regarding potential subsidence. This site would limit the impact of the proposed expansion on the environment and would also be more cost effective compared to Sites 15S and 16N.

## 2.3 Conclusion

To conclude this Chapter it was initially proposed in 2010 to take Sites 10 and 16N forward into the EIA Report stage for detailed assessment. However, since further geotechnical studies have been undertaken by J&W (2016) it has become apparent that Site 10 (AD 4.1 and AD4.2) is technically feasible for the proposed development and therefore only Site 10 will be taken forward for detailed assessment in the EIA phase.

<sup>10</sup>Excludes rehabilitation (including water treatment facility), mitigation and maintenance costs. These would be required for the approved site.

### 3 THE PROPOSED DEVELOPMENT

This chapter considers the need for the proposed project, briefly outlines the nature of the proposed activities and then considers and screens the various project alternatives in order to focus the EIA Phase on the most feasible alternatives.

#### 3.1 The need for the proposed activity

Kriel Power Station ash dam complex consists of three ash dams of different sizes (Table 3-1). All three ash dams are located adjacent to each other with Ash Dam 1 on the western border, Ash Dam 2 in the middle and Ash Dam 3 located at the eastern end of the ash dam complex (Figure 1-2).

Table 3-1 | Capacity details of the three ash dams

Dam	Footprint (ha)	Upper Surface Area (ha)	Maximum Height (m) (J&W, 2016)	Maximum Elevation (above MAMSL) (J&W, 2016)
1	44.4	16.38	90	1675
2	129.77	70.73	90	1675
3	73.7	50.78	72	1651



Figure 3-1 | Location of the Kriel Power Station and current ash dam complex

The ash dams are constructed through the “day wall” method. This method makes use of fly ash to construct a wall during the day that is used to impound coarse ash and a mixture of coarse ash and fly ash during the night. Each dam is equipped with gravity penstocks to remove supernatant<sup>11</sup> water. Decant and drain water is diverted to three return water dams from where it is pumped to the power station for re-use. Seepage and surface water runoff is also collected *via* stormwater canals at the perimeter of the ash dams which feeds into the return water dams. This water is then re-used by the power station to transport ash to the ash dams, thereby limiting their need for “raw” water uptake.

Based on the design ash load the existing Ash Disposal Facility will reach its capacity around 2025 (maximum height), but this could be extended to 2045 if ash loads are lowered and an expanded new Ash Disposal Facility is built. Eskom thus proposes to construct an additional Ash Disposal Facility that would fulfil ash disposal requirements for the remainder of the power station’s operational life, i.e. until 2039 plus a five year contingency. During this period approximately 71.5Mtonsof ash will be produced (see Table 3-2).

**Table 3-2 | Expanded Kriel Ash Disposal Facility Design Ash Production**

Description	Amount	Unit
Maximum Power Station Ash Production	3 700 000	tonnes/year
No. of Units	6	Unit
Maximum Unit Ash Production	616 667	tonnes/year/unit
Fly Ash (80%)	2 960 000	tonnes/year
BBA (20%)	740 000	tonnes/year
Fly Ash Sold	329 000	tonnes/year
BBA Sold (uncertain)	0	tonnes/year

### 3.1.1 Need and desirability

The consideration of “need and desirability” in EIA decision-making requires the consideration of the strategic context of the development proposal along with the broader societal needs and the public interest. The government decision-makers, together with the environmental assessment practitioners and planners, are therefore accountable to the public and must serve their social, economic and ecological needs equitably. This requires a long-term approach to decision-making in order to ensure that limits are not exceeded and that the proposed actions of individuals are measured against the long-term public interest. Sustainable development therefore calls for the simultaneous achievement of the triple bottom-line.

While the concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what is the most sustainable use of land.

Specific need and desirability questions raised by the need and desirability guideline are addressed Table 3-3 and Table 3-4 below.

<sup>11</sup> Definition: Clear water that lies above a sediment or precipitate.

Table 3-3 | Summary of needs

NEED (TIMING) Question	Response
<p>1. Is the land use (associated with the activity being applied for) considered within the timeframe intended by the existing approved Spatial Development Framework (SDF) agreed to by the relevant environmental authority i.e. is the proposed development in line with the projects and programmes identified as priorities within the Integrated Development Plan (IDP)?</p>	<p>The area proposed for the Ash Disposal Facility (Site 10) is currently zoned for agriculture, with underground and opencast coalmines surrounding the proposed site. The proposed development is an expansion of existing infrastructure to an area which is essentially limited to the type of use because of the adjacent infrastructure to the north, backfilled mine cuts to the east and south and access road to the facility on the west (the adjacent Matla Ash Disposal Facility is also situated immediately adjacent the access road to the west). The Emalahleni Spatial Development Framework (SDF) of 2015 recognises that the southern parts of the Emalahleni Municipality form part of the region referred to as the Energy Mecca of South Africa, due to its rich deposits of coal reserves and power stations. It furthermore identifies the rich coal deposits, coal mines and power stations throughout the southern extents of the municipal area as the most dominant structuring elements having a major influence on settlement development and expansion trends.</p> <p>It's important to note the strategic level importance of the Ash Disposal Facility at Kriel Power Station as it forms a pivotal part of the facilities functioning. No Ash Disposal Facility means no coal fired power station, which means no efficient energy supply and no employment for the current staff at Kriel. Leading on to this the Emalahleni SDF (2015) recognises that one of its strengths is the rich coal reserves, creating major economic development opportunities in the mining and electricity sectors.</p> <p>Strategic Objective 4 of the Emalahleni SDF (2015) is to build a diverse, efficient and resilient local economy and to optimise the spatial distribution of conflicting economic sectors, specifically highlighting the conflicting demand between mining, energy and agriculture industries. This demand will be further assessed in the EIR.</p> <p>One of the strategic objectives highlighted by the Emalahleni Draft Integrated Development Plan (2015/16) (IDP) is to ensure efficient infrastructure and energy supply that will contribute to the improvement of quality of life for all citizens within Emalahleni. More specifically the Emalahleni IDP (2015) indicates the history of the Kriel, which was established by Eskom in 1973 as a residential area for the workers at the Kriel Power Station, which was constructed in 1975 to 1979. The town experienced rapid growth during 1982 to 1989 and was declared as a municipality in 1990. Accordingly most of the residents in Kriel and Thubelihle are employed at the power stations and the mines in the area underpinning the importance to sustain economic viability of these towns.</p>
<p>2. Should development, or if applicable, expansion of the town/ area concerned in terms of this land use (associated with the activity being applied for) occur at this point in time?</p>	<p>Yes, If the Ash Disposal Facility is not constructed the knock-on effect will be significant, the activity is in line with the Emalahleni Municipality Vision and Mission statement, which is focussed on efficient service delivery, participative planning, and creating a climate conducive to social development and economic growth. It also recognises the need for an economy that will create more jobs. The expansion of the Ash Disposal Facility will ensure that economic growth is continuous, as electricity is the main driver of economic growth (this development will not necessary create direct jobs but will ensure that jobs created will be maintained until closure of the facility or end of life for the facility). No Ash Disposal Facility means no coal fired power station which means significant job losses. According to J&amp;W studies construction of the first phase of the <u>expanded</u> Ash Disposal Facilities need to be complete by 2021 to ensure sufficient ash disposal capacity.</p> <p>As pointed out in the answer to question one above, the proposed development is an expansion of existing infrastructure to an area which is essentially limited to the type of use because of the adjacent infrastructure and therefore best practical use of the area.</p>

NEED (TIMING) Question	Response
<p>3. Does the community/area need the activity and the associated land use concerned (is it a societal priority)? This refers to the strategic as well as local level (e.g. development is a National priority, but within a specific local context it could be inappropriate).</p>	<p>Yes. The Emalahleni (which means the “place of coal”) Municipality has a total population of about 495 000 of which a large percentage is either directly or indirectly dependent on the electricity generation industry. Kriel was established by Eskom in 1973 as a residential area for the workers at the Kriel Power Station, which was constructed in 1975 to 1979. Still today most of the working residents in Kriel and Thubelihle (7.2% of the municipality’s population) are employed at the power stations and the mines in the area. The local community thus is in direct need of the activity. The Ash Disposal Facility as key infrastructure for the Kriel Power Station is of National priority as it form part of the Department of Energy’s Strategic Plan 2015-2020 in that it makes up part of electricity derived from coal.</p> <p>The proposed Ash Disposal Facility is thus important to society from the most localised level i.e. the staff at Kriel Power Station and their dependents to the most extensive level of community in South Africa as electricity generated at Kriel Power Station feeds in to the national grid.</p> <p>It should be noted that the merits of coal fired power as energy source is not considered here as the application is for an Ash Disposal Facility. Furthermore, it’s noted that it is a societal priority that cleaner technologies that will reduce the adverse environmental impact associated with greenhouse gas (GHG) emissions be adopted. According to the Emalahleni IDP (2015) the Green energy can be considered a priority to reduce the environmental impact of coal generated energy in and around Emalahleni.</p>
<p>4. Are the necessary services with appropriate capacity currently available (at the time of application), or must additional capacity be created to cater for the development?</p>	<p>No additional capacity from the municipality will be required.</p>
<p>5. Is this development provided for in the infrastructure planning of the municipality, and if not, what will the implication be on the infrastructure planning of the municipality (priority and placements of services)?</p>	<p>The proposed Ash Disposal Facility is not specifically provide for in the infrastructure planning of the municipality. The expansion of the Ash Disposal Facility will have little bearing on the infrastructure planning of the municipality and will be situated on land owned by Eskom.</p>
<p>6. Is this project part of a national programme to address an issue of national concern or importance?</p>	<p>Yes. The establishment of the proposed Ash Disposal Facility would maintain Eskom’s mandate to ensure efficient supply of electricity to service the South African economy and society. In 2015 South Africa again (after the power crisis of early 2008) experienced serious energy constraints which are a barrier to economic growth and is a major inconvenience to everyone in the country. According to South Africa’s Integrated Resource Plan for Electricity (IRP) 2010-2030 (Update Report 2013) there are several options to potentially extend the economic life of the existing Eskom coal fleet which includes upgrading and expanding of infrastructure.</p>
<p>7. How will this development and its separate elements/aspects) impact on the ecological integrity of the area?</p>	<p>The proposed Ash Disposal Facility is located on land zoned as agricultural and of which a large portion was previously used for mining activities. The land is currently used for agriculture with un arable areas separating the cultivated lands and other features on the proposed development property i.e. the current Ash Disposal Facility and backfilled pits of the Kriel Colliery.</p> <p>Because it’s a brownfield site and due to the disturbed nature of the areas investigated, the likelihood of impact on the ecological integrity of the area very low. The Ash Disposal Facility also utilises special liners to ensure that fluids from the facility do not permeate into the groundwater systems which might impact the ecological integrity of the greater area. This aspect of ecological integrity will be further explored during the EIA phase.</p>

NEED (TIMING) Question	Response
<p>8. How were the following integrity considerations taken into account?</p> <p>8.1 Threatened ecosystems</p> <p>8.2 Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs)</p> <p>8.3 Environmental Management Framework</p> <p>8.4 Spatial Development Framework (SDF).</p>	<p>According to the Emalahleni SDF of (2015) generally, Emalahleni has a few threatened fauna and flora species, with only five Red Data species having been recorded in the municipal area. The only conservation area in the Emalahleni Municipality is the Witbank Nature Reserve, which was originally established as a recreation resort around the Witbank Dam. The proposed Ash Disposal Facility is located on land zoned as agricultural the area was also used previously for mining activities and is currently partly under cultivation. The majority of the area surrounding the power station (including the proposed development Site 10) does not fall within a CBA or ESA (MBSP 2014). The Environmental Management Framework for the Olifants and Letaba Rivers Catchment Area (EMF) highlights policies and aligns different governmental mandates in a way that will streamline decision-making to improve cooperative governance and guide future developments in an environmentally responsible manner. The specific objectives of the EMF include encouraging sustainable development. The existing environmental management priorities will not be compromised, an EIA process will be undertaken for the construction of the proposed Ash Disposal Facility. The environmental impacts and their proposed mitigation measures will be provided in the Environmental Management Plan (EMP) at the end of the EIA phase. The Emalahleni SDF of 2015 indicates that the area is used for agriculture and does not specifically earmark the proposed development Site 10 for any specific future use.</p>
<p>9. How will this development pollute/ degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>The alternatives to waste management and incorporation of the waste hierarchy i.e. measures to avoid (prevention) waste and where impacts could not be avoided what measures to minimise (reduce) is discussed in section 3.1.2. The most feasible alternatives came down to reuse of water and recycling ash through selling it to available markets.</p>
<p>10. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. dematerialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</p>	<p>The proposed development of the Ash Disposal Facility will ensure that electricity supply is maintained, this will also impact on the economic growth, as electricity is the main driver of economic growth. The proposed development will increase the dependency on natural resources because it makes use of a non-renewable resource. This is an existing Ash Disposal Facility thus the need to build new facilities is abated by prolonging the life of this one. As discussed in section 3.1.2 Eskom is making efforts to reduce the amount of ash that goes to the facility by selling of ash, but due to the large quantities of ash produced and limited active markets the most feasible solution to dispose of the ash to land.</p>
<p>11. Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</p>	<p>The proposed development of the Ash Disposal Facility will ensure that current employment is kept which translates in to stable household incomes within the local area. It's vital to look at the proposed expansion from the perspective of what will happened if it is not constructed in which case we will see significant socio-economic impacts of not only the local area in terms of job losses and issue sprouting from reduced employment, but also at national level where it would mean reduced electricity production proliferation Eskom and South Africa's electricity delivery woes.</p>
<p>12. Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?</p>	<p>Considering that the Kriel Power Station is responsible for a large percentage of the local employment it suffices to say that it is the largest socio-economic driver in the immediate area, including the town of Kriel and Thubelihle. The Emalahleni LED (2011-2016) strategy aims to create an industrial hub of the Mpumalanga Province by 2016 through sustainable, efficient and effective economic growth, development and empowerment of the community forms part of. The Emalahleni LED strategy also aims to grow the economy of Emalahleni by 4% per annum through targeted sectors and ensure sustainable growth and development within the 2011-2016 period by creating employment opportunities in line with new growth path targets; and halve poverty in line with Millennium Development Goals. Furthermore, it aims to address all economic infrastructure and basic service delivery backlogs and new requirements within five years, for quality living standards for all. The proposed development of the Ash Disposal Facility will sustain job opportunities and contribute to economic growth which is aligned to the LED strategy.</p>
<p>13. What measures were taken to ensure the participation of all interested and affected parties (I&amp;APs)?</p>	<p>The Public Participation Process (PPP) will be undertaken in terms of NEMA and is described in full in chapter 4.</p>

Table 3-4 | Summary of desirability

DESIRABILITY (PLACING) Question	Response
1. Is the development the best practicable environmental option (BPEO) for this land/ site?	Yes. The property on which the development is proposed is situated is currently used for the activity applied for i.e. the existing Ash Disposal Facility is situated directly adjacent to where the expansion of the facility is proposed. The section of the property proposed for the development is currently being used for agriculture. The proposed development is located relatively close to the Kriel Power Station and therefore requires lower capital costs than an alternative further away. Furthermore, it is a brownfields site with limited future land use (due to the nature of the adjacent activities) and located on Eskom owned land.
2. Would the approval of this application compromise the integrity of the existing approved Municipal IDP and SDF as agreed to by the relevant authorities?	No. The activity is not explicitly planned for in the Emalahleni Municipality SDF or IDP, but it also does not compromise any of the plans described in these strategic documents.
3. Would the approval of this application compromise the integrity of the existing environmental management priorities for the area (e.g. as defined in Environmental Management Framework (EMF)), and if so, can it be justified in terms of sustainability considerations?	No. The proposed development site falls in the area covered by the 2010 Environmental Management Framework for the Olifants and Letaba Rivers Catchment Area. The existing environmental management priorities will not be compromised since the construction at the proposed site will be the best practicable environmental option. This is supported by the fact that the proposed Site 10 is not located on a CBA, ESA, NPEAS or any other priority environmental area.
4. Do location factors favour this land use (associated with the activity applied for) at this place?	Yes. As discussed above (answer to question 1) the land use will be an expansion of an activity that currently takes place on the proposed development property.
5. How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/ natural environment)?	The MBSP (2014) mapped the area surrounding the proposed development site as heavily modified, moderately modified (old lands) and other natural areas. The proposed development site and surrounding area has been disturbed through agriculture, the power industry and mining operations. The proposed activities is typical of the area and people in the area will be accustomed to seeing similar activities, especially because the proposed expansion is adjacent the existing Ash Disposal Facility. Site 10 is adjacent to the existing Kriel Ash Disposal Facility and as such could limit the visual footprint of the proposed ash facility at this site. Since potential heritage material is buried, it is often only found during the construction phase of a project, due to the historical disturbances at the sites (construction of the power station, rehabilitated opencast mine, ash dam and agricultural practices) it is unlikely that archaeological or cultural material of value would be found on site and thus reducing alterations to the sense of being of the area.
6. How will the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	The area surrounding the Kriel Power Station is located at some 1,600 m above mean sea level and is gently undulating as such, the power station is visible for many kilometres in the surrounding area, the proposed development of the Ash Disposal Facility will alter the visual characteristics of the area but likely not the sense of place seeing that the proposed development is an expansion of an existing activity. The area surrounding the power station includes the Kriel Colliery and Matla Power Station and associated infrastructure including its vast ash dams. The communities in the surrounding area will be familiar with these land uses but may be impacted by the noise generated on the site.
7. Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	No. The proposed facility is an expansion of an existing Ash Disposal Facility therefore it is not anticipated that it will have an unacceptable opportunity cost. It is foreseen that the impacts on agriculture which is the current land use will not be unacceptable.
8. Will the proposed land use result in unacceptable cumulative impacts?	Due to the many other Ash Disposal Facilities in the region the cumulative impacts of these facilities might have a significant bearing at a regional scale. The cumulative impacts will be assessed in the EIA phase.
9. In terms of location, describe how the placement of the proposed development will: 9.1 Result in the creation of residential and employment opportunities in close proximity to or integrated with each other. 9.2 Be in line with the planning for the area 9.3 Encourage environmentally sustainable land development practices and processes.	It is unlikely that any new job opportunities would be created during the operational phase, as employees working currently at the existing Ash Disposal Facility would only move to the new expanded facility. The area proposed is currently zoned for agriculture, but does not oppose any planning in the Emalahleni SDF and IDP. Due to the proposed site being situated adjacent the existing Ash Disposal Facility and the transformed nature of the area (specifically the proposed site) it means that the alternatives that could have a greater negative effect on the environment and land development practices and processes do not have to be developed.

DESIRABILITY (PLACING) Question	Response
10. What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?	The proposed development makes use of old technology and known energy source which has been used since 1979. The strategic level investigations undertaken by Eskom prior to the commencement of the EIA process are accepted to be technologically acceptable and robust.
11. What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	The potential health and safety impacts have been identified. The proposed Ash Disposal Facility will be managed according to the existing health and safety requirements of the Kriel Power Station. The contract for the construction and operation of the facility will go out on tender following receipt of the requisite regulatory approvals and the selected operator will be required to operate the facility in terms of the Operational plan as well as various conditions of approval. The potential health and safety mitigation measures will be included in the construction and operational EMP, which would be guided by the findings and recommendations of the EIA specialists.
12. How will this development use and/or impact on non-renewable natural resources?	The proposed development of the Ash Disposal Facility will deplete the coal resource for the duration of the development lifecycle until 2045. Once the resource has been depleted the facility will be decommissioned and rehabilitated.
13. How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	Electricity is a basic human need. The proposed development of the Ash Disposal Facility will ensure that electricity supply is maintained, this meets the developmental interests of the relevant communities. The social needs of the relevant communities will be met by provision of jobs and income.
14. What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?	Given the need to develop additional disposal facilities for ash produced by the coal-fired Kriel Power Station, Eskom initiated an EIA process for the development of a new Ash Disposal Facility that would have sufficient capacity for the remaining operational life of the power station. For the proposed development of the <u>expanded</u> Ash Disposal Facility potential candidate areas within the study area were identified by considering a range of technical, financial and environmental criteria. These included inter alia locality of coal resources and undermined areas, existing infrastructure, groundwater/ hydrological features, geotechnical considerations and sensitive biodiversity features.
15. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?	Heritage resources are expected to occur within the vicinity of the potential sites and would need to be assessed <i>via</i> a HIA, which aims to locate, identify, evaluate and document sites, objects and structures of cultural significance found within the area of the proposed development and to assess the significance thereof and to consider alternatives and plans for the mitigation of any adverse impacts. The impacts and their proposed mitigation will be provided in the Environmental Management Plan (EMP) at the end of the EIA phase. It should be noted that due to the historical disturbances at the sites (construction of the power station, rehabilitated opencast mine, ash dam and agricultural practices) it is unlikely that archaeological or cultural material of value would be found on site
16. Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?	Ecosystem services will be investigated throughout this EIA. The transformed nature of the site and restricted access means that valuable ecosystem services is most likely not of high significance for the site in terms of a local context.
17. Describe how the development will impact on job creation in terms of, amongst other aspects:	The decommissioning of the Kriel Power Station due to insufficient ash disposal capacity would result in the loss of jobs. It is unlikely that any <u>significant</u> new job opportunities would be created during the operational phase, as employees working currently at the existing Ash Disposal Facility would move to the <u>expanded</u> facility.
20. Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	The EMP will describe all reasonable and feasible mitigation measures and address long-term environmental management. The decommissioning of the facility will have to be dealt with once the Kriel Power Station has come to its end of life.
21. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives / targets / considerations of the area?	The facility will function as an end point of the coal life cycle where ash is disposed of in a manner that is prescribed by legislation, directed by findings of this EIA and managed through an EMP specifically for the proposed <u>expanded</u> Ash Disposal Facility .

### 3.1.2 Ash Disposal Facility waste management alternatives

When considering viable options for waste management it's pertinent that the waste management hierarchy be implemented in a way that prevents waste disposal as far as possible by reducing, reusing and recycling the potential waste product, see Figure 3-2. The waste hierarchy is a globally accepted guide used to prioritise waste management alternatives and aims to optimise environmental outcomes. The proposed Ash Disposal Facility as the names states comes in at the very bottom of the waste hierarchy i.e. disposal. Below we briefly explore the proposed viability options in terms of the waste hierarchy in context<sup>12</sup> of the proposed facility.



Figure 3-2 | Waste hierarchy

#### A. Prevention

The most favoured measures in terms of the waste hierarchy relates to **prevention**. Prevention in the context of electricity generation would mean that another technology i.e. renewable energy is used which does not create waste. Consequently prevention is not a viable alternative for the Kriel Power Station seeing that ash is an inherent residual of the coal burning process and therefore this option will not be further explored.

#### B. Minimisation

The next level of the waste hierarchy refers to **minimisation**. In order to consider the minimisation of ash one has to consider the technology used to burn the ash producing coal and the quality of the coal. Since the technology at Kriel Power Station is dictated by the existing infrastructure this option does not provide room for alterations. When it comes to quality, most of the South African coal has been found to be of low quality with a low heat value and containing a significant amount of inorganic (incombustible) contaminants (see Table 3-5 for mineral contents of Kriel pulverised coal-fired boiler ash), i.e. producing high ash content as a result of coal burning process (Zitholele Consulting, 2016). Most of the inorganic material is not removed prior to burning from the coal and is thus part of

<sup>12</sup> Energy recovery is not discussed because the process of burning coal inherently involves extracting energy which means an effective process would see the optimised extraction of energy leaving no viable energy to be recovered.

the fuel fed to the boiler during the power generation process. The incombustible materials result in the ash volume for disposal. Since the coal quality will not increase and removing the incombustible materials is not a viable option, minimising the ash produced is not currently a viable option. The only scenario where less ash will be produced is if the facility lowers the Generating Load Factor (GLF). The GLF essentially translates to the amount of ash produced as a function of the amount of coal that is burnt, i.e. less coal burnt, the lower the GLF percentage. This will consequently translate to lower amounts of energy generated and is not an option for consideration in this EIA.

**Table 3-5 | Mineral Contents of Kriel Pulverised Coal-fired boiler ash (Zitholele Consulting, 2016)**

Constituents	SiO <sub>2</sub>	AL <sub>2</sub> O <sub>3</sub>	FE <sub>2</sub> O <sub>3</sub>	TiO <sub>2</sub>	P <sub>2</sub> O <sub>5</sub>	CaO	MgO	Na <sub>2</sub> O	K <sub>2</sub> O	SO <sub>3</sub>	MnO
Percentage	48.84	26.60	3.23	1.55	0.98	10.54	2.20	0.15	0.72	4.04	0.06

Kriel Power Station and the associated Ash Disposal Facility minimises their use of water through an integrated recycling system. Kriel Power Station uses wet cooling systems which generates a lot of waste water. This waste water is recycled and used for ash slurring. Once the slurry is deposited in the ash dams the residual water is once again recycled through the return water system (consisting of the AWR and transfer dams) and fed back to the Power Station for use thereby minimising the use of raw water from other sources. The same reuse system is proposed to be used at the expanded Ash Disposal Facility and will be further assessed during the EIR.

### C. Reuse and recycling

Coal-fired power stations provide a challenge to the waste hierarchy because of the constituency of the ash created during the burning of coal. Since August 2013 ash had to be classified or re-classified in terms of the NEMWA Waste Classification and Management Regulations (GN R. 634 of 2013) and transitional arrangements were set in place for a period of three years from the date of commencement of these regulations i.e. August 2013.

In April 2016 Eskom lodged a motivation for the application for exemption of waste management activity licences for specific uses of pulverised coal fired boiler ash in terms of GN R. 634 with DEA<sup>13</sup>. This report presented information required in Section 9 of GN R. 634 of 23 August 2013 to acquire exemption from the requirement of waste management licences as it relates to activities for the downstream use of pulverised coal fired boiler ash in brick making, soil amelioration, road construction and mine backfilling.

It's important to consider the recycling of ash at the appropriate geographical scale, which is underpinned by the cumulative contribution of other facilities (coal fired power stations) that also produce ash. Eskom currently operates 14 coal-fired power stations within the Mpumalanga, Free State and Limpopo Provinces, all yielding high ash content as a result of coal burning processes. In the 2015 financial year 34.4 million tons of ash was generated in South Africa of which only about 2.41 million (7%) was sold (Zitholele Consulting, 2016). This is a very low percentage considering international benchmarks such as China utilises more than 65% of their ash (Zitholele Consulting, 2016).

Considering the cumulative volumes of ash produced in South Africa and the legislative framework pertaining to the use of ash it is evident that the recycling of the ash is an issue that must be resolved at a strategic level. Therefore Eskom has started a process to increase the beneficial utilisation of ash produced through the electricity generation process at its coal fired power stations, including Kriel. At this stage Eskom is in the process to motivate to the Minister of Environmental Affairs to exempt specific waste management activities from the requirements of a waste management licence in terms of section 19 of the NEMWA as well as the associated regulations in order to realise beneficial uses such as brick and block making, road construction, mine backfilling, and use in soil amelioration. Nevertheless, a significant portion, about 329 000 tonnes (Jones and Wagner, 2016) of fly ash, is being sold per year

<sup>13</sup> Zitholele Consulting (Pty) Ltd, April 2016 Report No : 16005-41-Rep-001-Eskom Ash GN R 634 Application-Rev2

by Eskom. Ulula Ash (Pty) Ltd is currently contracted at Kriel Power Station to facilitate the selling of class<sup>14</sup> N and S ash which is used for concrete. This ash is however removed at the plant itself and does not form part of this EIA. This option will not be further assessed as part of the EIA process.

#### **D. Disposal**

The Kriel Ash Disposal Facility forms an integral part of the handling, re-use and disposal of water and waste at the Kriel Power Station operations. In case of the ash that is not sold (as discussed in the section above), disposal is currently the most feasible alternative for the Kriel Power Station and thus forms the basis for this EIA application process.

### **3.2 Description of the proposed project**

The Kriel Power Station proposes to expand the existing Ash Disposal Facility to include a fourth Ash Disposal Facility. The Ash Disposal Facility is a final disposal mechanism at the end of the energy generation process as illustrated in Figure 3-3. The project requires the following components:

- An expanded Ash Disposal Facility that would have sufficient capacity for the remaining operational life of the power station until 2039 plus a five year contingency to 2045;
- An AWR dam from where decant and drained water would be pumped back to the power station for re-use;
- An AWR transfer dam;
- Delivery and return infrastructure, including pipelines, transfer houses, pump stations;
- Powerlines;
- Access roads; and
- Clean and dirty water collection channels/trenches.

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<sup>14</sup> SANS 50450---1:2011 Fly Ash for Concrete (Siliceous Fly Ash)

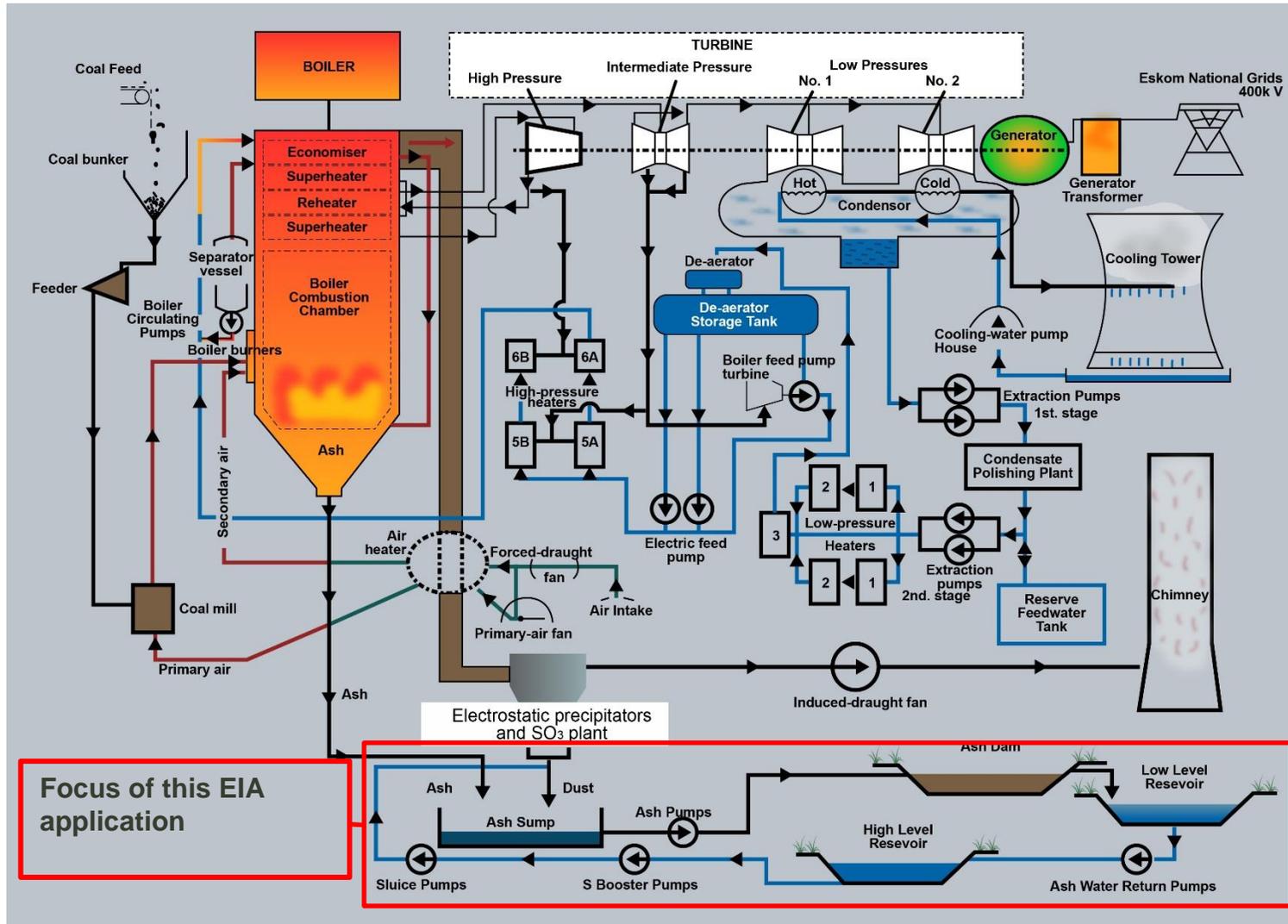


Figure 3-3 | Flow chart of the operation showing inputs and outputs of the process at Kriel Power Station (including the Ash Disposal Facility in red)

### 3.3 Consideration of alternatives

#### 3.3.1 Introduction

NEMA requires that feasible alternatives are considered during the EIA process. An important function of the Scoping Phase is to screen potential alternatives to derive a list of feasible alternatives that need to be assessed in further detail in the EIA Phase. An alternative is defined as a possible course of action, in place of another, that would meet the same purpose and need (DEAT, 2004). Alternatives could include, amongst others, the following:

- **Location alternatives** - alternative locations for the entire project proposal or for components of the project proposal.
- **Site layout alternatives** - site layout alternatives permit consideration of different spatial configurations of an activity on a particular site.
- **Activity alternatives** - also referred to as project alternatives. Requires a change in the nature of the proposed activity. This category of alternatives is most appropriate at a strategic decision-making level.

The above categories of alternatives are the ones most pertinent to this EIA process, and their relevance is explored in detail below. The purpose of this section of the report is to identify (scope) and describe all potential alternatives and determine which alternatives should be carried through to the EIA Phase of the project for further assessment.

#### 3.3.2 Site location alternatives

Once the need for the proposed Ash Disposal Facility was established, an extensive site screening process was undertaken to identify potential sites within a 12 km radius of the Kriel Power Station (**see Chapter 2 of this document**). Based on this exercise Site 10 (i.e. AD 4.1 and 4.2) was identified as being the most suitable for the proposed Ash Disposal Facility for the following reasons:

- located relatively close to the Kriel Power Station and therefore requires less capital costs;
- located on a brown field site within the disturbance footprint of the existing Ash Disposal Facility ;
- limited visual footprint due to its proximity to the existing Ash Disposal Facility ; and
- Predominantly located on Eskom owned land.

#### **Recommended option:**

**Based on the above, it is recommended that only Site 10 be assessed in the EIA phase.**

#### 3.3.3 Site layout alternatives

Site layout alternatives permit consideration of different spatial configurations of an activity on a particular site. Since Site 10 was proven to be technically feasible, Eskom in conjunction with J&W have been working on concept designs for the proposed expanded ash dams and other infrastructure. In 2014 the first concept design for Site 10 was undertaken by Jones & Wagener. The boundaries of the Site 10 is defined by the existing Ash Disposal Facility to the north, the Cut 2 void to the south, the property boundary to the east and access road to the west. The Cut 2 void is seen as a boundary, because the cut is deep and the earthworks and liner in this area will be excessively costly. Figure 3-4 illustrates the 2014 concept design which consists of two compartments. What should be noted is that a large portion of compartment (ash dam) one and a small portion of compartment two would overlay the backfilled Pit 1 of Kriel Colliery. The proposal to build over the backfilled area raised concern due to the impact that differential settlement could have on the different design aspects of the proposed ash dams.

In order to address design issues (particularly differential settlement) identified in J&W 2014, the concept design was amended in 2016 to include three ash dams namely, AD4.1, AD4.2 and AD4.3 as shown in Figure 3-5. Importantly it should be noted that AD4.1 and AD4.2 was designed to avoid the backfilled Pit 1 of Kriel Colliery. Only AD4.3 was proposed to overlay the backfilled area.

Based on extensive geotechnical investigation undertaken by J&W during 2010/11, which focused on establishing the founding conditions of Site 10 it was recommended that a large scale Monitoring Trial Embankment (MTE) be constructed to calibrate the geotechnical design parameters derived from previous investigation. The purpose of the MTE would be to verify, by direct measurement, whether AD4.3 can be successfully constructed with the incorporation of a liner, as required by GN.R.636, over the backfilled pit. Construction of the embankment has however not yet started and therefore information with regard to the expected settlement is not available to be used for the feasibility design (liner requirements and best suited deposition method) of AD4.3. Subsequently the proposed establishment of AD4.3 has been put on hold until it has been technically proven. As a result AD4.3 has been scoped out of this EIA process and only AD4.1 and 4.2 and ancillary infrastructure is applied for as illustrated in Figure 3-4.

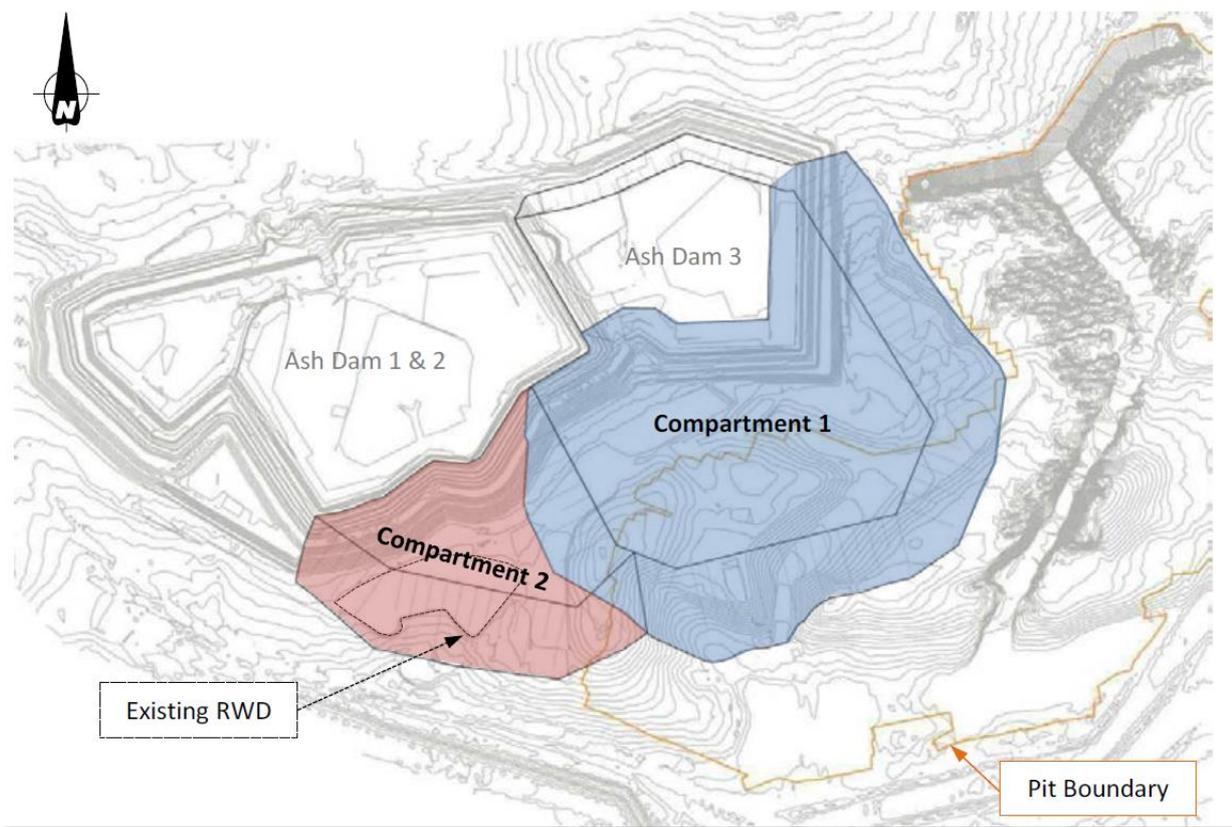


Figure 3-4 | Ash Dam 4 Concept 2014 (Jones & Wagener, 2014)

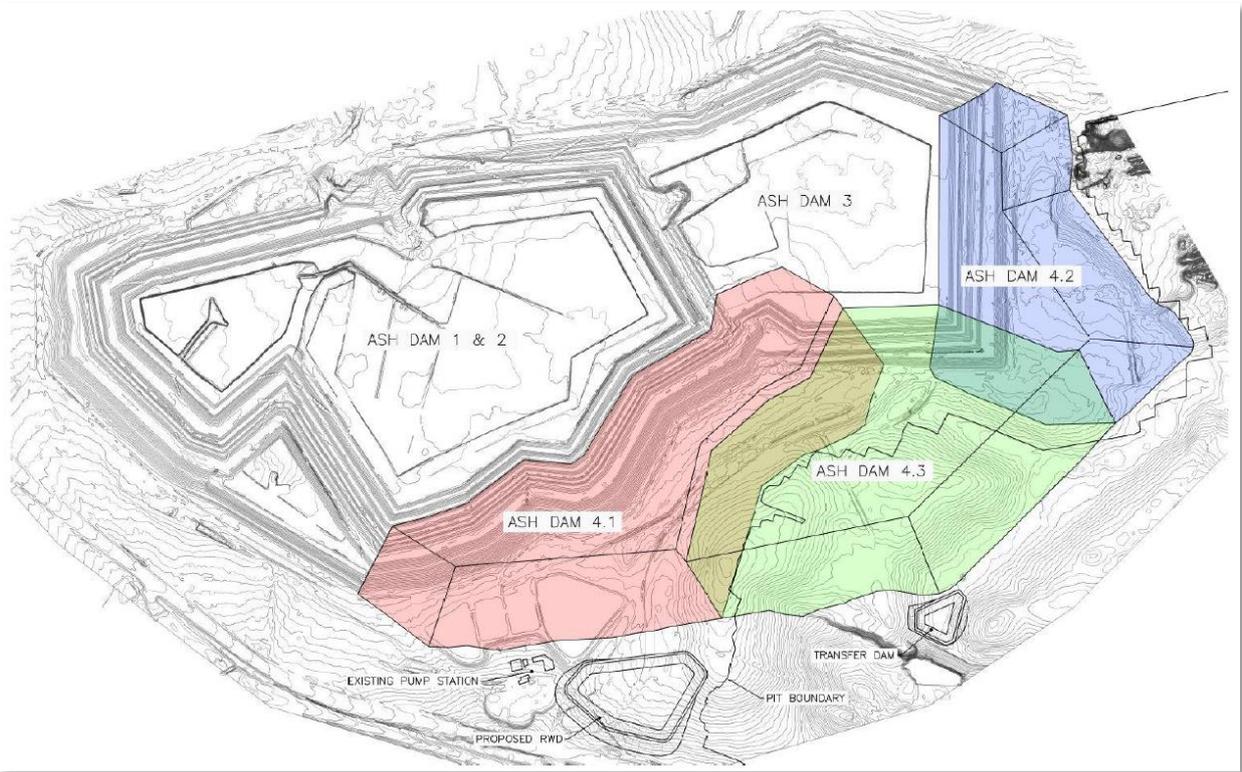
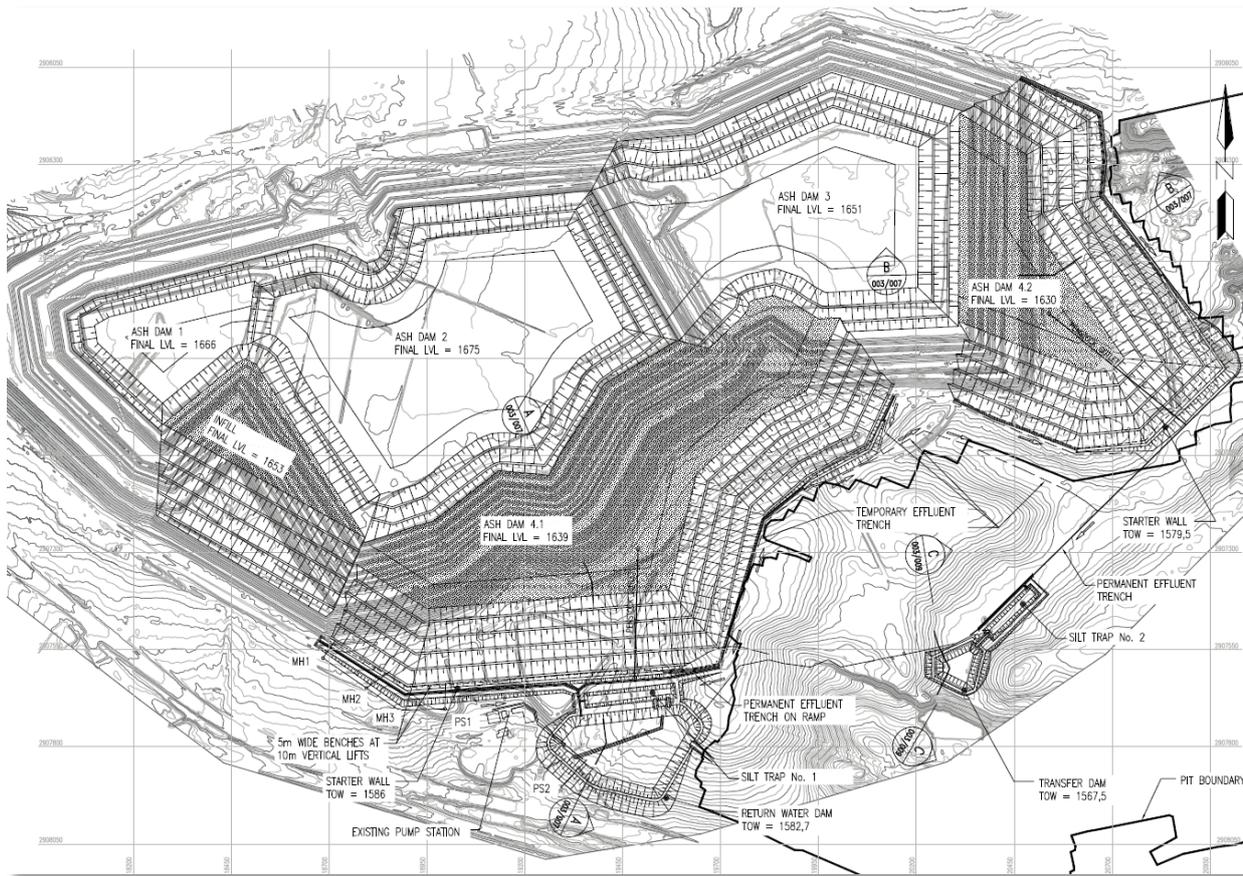


Figure 3-5 | Ash Dam 4 Concept 2016, consisting of three ash dams (Jones & Wagener, 2016)



**Figure 3-6 |** Ash Dam 4 Concept 2016 preferred alternative, consisting of only AD 4.1 and 4.2 (Jones & Wagener, 2016)

The site layout presented in Figure 3-6 will be further developed and assessed during the EIA Phase for the recommended site based on *inter alia* the following criteria:

- Technical constraints
  - Topographical constraints;
  - Spatial orientation requirements of the Ash Disposal Facility and associated infrastructure; and
  - Layout relative to other existing infrastructure, such as power lines and roads.
- Environmental constraints
  - Surface and groundwater pollution;
  - Aquatic and terrestrial constraints (presence of wetlands, rivers, protected plant communities);
  - Dust pollution;
  - Aesthetics; and
  - Community safety and social elements.

The draft layout is presented in Figure 3-6 is attached at a larger scale in Annexure D. It should be noted that because the EIA is only at scoping phase the layout may still change significantly in response to the results from the specialist assessments.

### 3.3.4 Activity alternatives

Fundamentally different alternatives for achieving the project's objective<sup>15</sup> are normally assessed at a strategic level. In this regard, two options were investigated regarding the method of disposal of ash: 1) wet ashing and 2) dry ash stacking as described below. These ashing technologies each have their own associated transportation infrastructure alternatives and have been comparatively assessed by Jones & Wagener for specifically the Site 10 in 2014 (Report No.: JW164/13/D379 – Rev 0, August 2014). The information given below is a summary from this report.

#### Option 1 – Wet Ashing (current ashing option, preferred)

Option 1 proposes the continued use of wet ashing at the power station.

The majority of wet ash dams in South Africa are constructed by means of development in an upstream direction as shown in Figure 3-7 below of which the most common method is the daywall system.

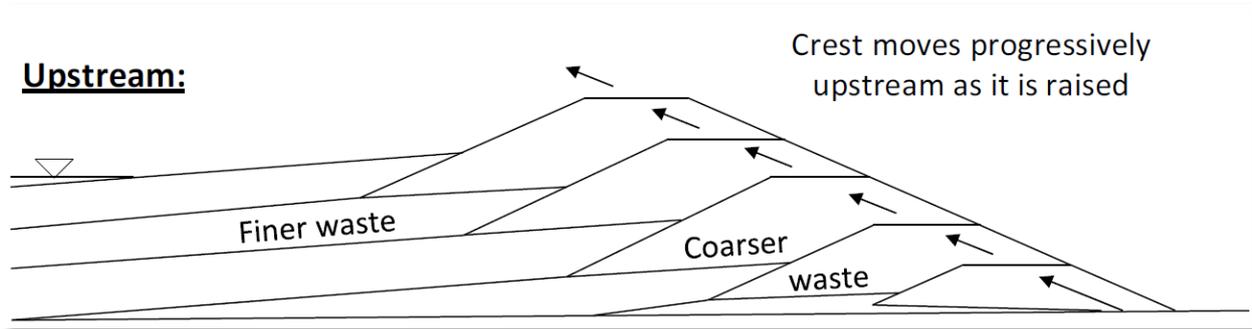


Figure 3-7 | Upstream development of ash dam (Chamber of mines, 1996)

Prior to deposition of ash a starter wall is built. The toe of the dam is defined by using starter walls, which contain the initial deposition. Thereafter construction of the ash dam in an upstream direction starts through the daywall system which separates the ash dam into two areas. The one area is dedicated to day deposition of ash along the perimeter of the dam to form a wall, hence the name daywall. The other areas is dedicated to night deposition into the basin of the dam. The daywall method allows for construction of paddocks to contain the ash and build freeboard<sup>16</sup> thereby impounding the ash deposited during the night.

At present the Pulverised Fuel Ash (PFA) is deposited at a single point (*via* conveyor) where it is slurried<sup>17</sup> and allowed to gravitate along the daywall, whereas the coarse ash is pumped and deposited by open-ended deliveries at a few selected positions around the dam. Option 1 will be a continuation of the ring main delivery system that was installed in 2014. This system consists of a large ring main delivery line with multiple deposition points around the dam.

As the dam fills with ash deposition the walls are raised to contain the incoming ash slurry. This deposition continues until the dam reaches its maximum height. Water is drained from the surface of the dam and piped to the return water dams. Water that seeps through the dam is collected by a leachate system and piped to the return water

<sup>15</sup> Alternative liner systems were not assessed because the obligatory liner system is prescribed by GN. R. 636 of 2013 based on the Waste Classification. The proposed Site 10 ash dams will make use of a Class C liner as described in GN. R. 636 of 2013.

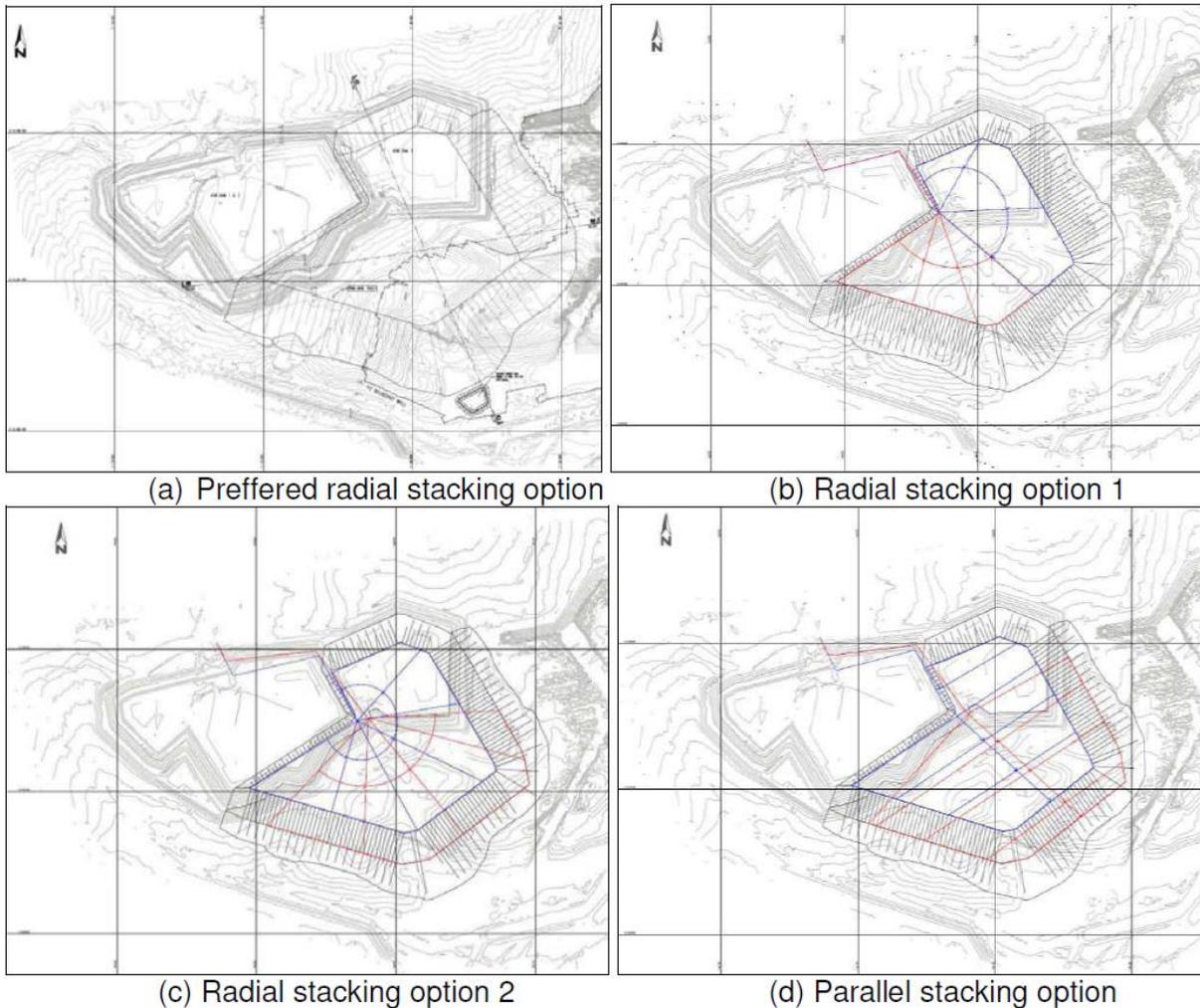
<sup>16</sup>Freeboard is defined as the vertical distance measured from the non-overflow crest (NOC) down to the pool level. The purpose of having freeboard is to ensure a margin of safety if the water levels were to rise and/or wave run-up occurred that the NOC is not overtopped.

<sup>17</sup>A slurry or slurried material is a thin sloppy fluid mixture of a pulverized (reduce to fine particles) solid with a liquid in this case water, used as a convenient way of handling solids in bulk.

dam. This water is then pumped to the power station and re-used by mixing it with the ash for transportation to the ash dams, as slurry.

### Option 2 – Dry Ash Stacking

Option 2 considers the use of dry stacking ash at the power station. The method of dry stacking utilises conveyors and stackers to transport and deposit the coarse and fine ash in a conditioned state. The method adopted for this concept is radial stacking (opposed to parallel stacking<sup>18</sup>) whereby the conveyors rotate about one central point as the advancing face progresses from the start to finish points of the facility (see Figure 3-8).



**Figure 3-8 | Possible dry stacking configurations considered**

Contaminated run-off and supernatant water from the disposal areas would be detained in a return water dam. The dry stacking method contains only a small amount of process water to condition thrash (i.e. 10-20% by weight of the ash) that needs to be accounted for along with the storm water in a return water dam. Dry ash stacking requires less water than the wet ashing option and would improve the water balance significantly. However, Kriel has wet cooling so it generates a lot of wastewater which is used for ash slurring. Dry ashing would require this water to be treated, which would require different infrastructure requirements.

<sup>18</sup>Parallel stacking was eliminated as the final shiftable conveyors become too short and the time to complete shifts or the time between shifting operations would be as little as 2 months (Jones and Wagener, 2014).

The wet ashing option places some fly ash on Dams 1-3. If no more ash is placed on Dams 1-3 then a larger dry ash dump (and lining) would be required for the ash. However, the geometry of the site with dams 4.1 & 4.2 being built before 4.3 also does not lend itself to building with dry ashing practically.

The method of dry stacking is already in use at the newer Eskom power stations and was thus considered as a worthy option to consider at Kriel Power Station. However, this option would require a change in the station's design, and would entail considerable costs to change the existing wet ashing infrastructure and systems at Kriel Power Station.

### **Option 3– “No-go” alternative**

In terms of the EIA Regulations GN. No. R982 of 4 December 2014, the option of not proceeding with a proposed activity must be considered as an alternative. As such the “no-go” alternative comprises of Option 3. The “no-go” alternative will be assessed against the preferred alternative in EIR as per 2014 EIA regulations.

### **Conclusion of site alternatives**

#### **Recommended option:**

The need to investigate alternative ash disposal systems has been acknowledged, to confirm which technology is the most-efficient for future use.

The Dry Ash Stacking is scoped out on basis of the following:

- It would require substantial modification in plant.
- It is substantially more expensive (nearly three times the cost) than that of the wet ashing option according to the net present value calculated in 2014.
- The Dry Ash Stacking option would require further investigation into a number of other concerns raised by the 2014 investigation, including:
  - Stability of the advancing face on the liner system. Due to the steep declines in natural ground, the angle of the repose slope that the stacker forms would be unstable and needs to be buttressed by placing a layer of ash that is trucked and placed into position.
  - Differential settlement of the advancing face as the liner is loaded and the front stack develops over the soft pit backfill spoils.
  - Complex arrangement of the mechanical stacking equipment due to the irregular shape of the site.
  - Little flexibility exists to extend ash deposition beyond the current life of the power plant. This is due to the fact that the in-situ density of the dry ash is approximately 20% less than the wet ash.

Given that a wet ashing facility is in line with the station's design and current operations and the significant cost implications of changing to Dry Ash Stacking (at three times the cost of wet ashing technology), it is recommended that wet ashing be the only activity alternative assessed further during the EIA phase.

### **3.3.5 Summary of recommended alternatives**

To summarise, the feasible alternatives which are recommended to be assessed in the EIAR include the following:

- Location alternatives
  - Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.
- Site layout alternatives:
  - Ash Dam 4.1 and 4.2. One layout for Site 10 ashing facility and associated infrastructure.
- Activity alternatives:
  - Wet ashing.
- No-go alternative (NEMA requirement against which all alternatives must be measured)

Please refer to Chapters 2 and 5 of this report for more information on the advantages and risks associated with the site, as well as the impacts that require detailed assessment during the EIA phase.

## 4 THE PUBLIC PARTICIPATION PROCESS

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*The purpose of this Chapter is to provide an outline of the Public Participation Process, a summary of the process undertaken to date, and the way forward with respect to public participation throughout the EIA process for this project. This Chapter also provides a summary of the key issues that have been raised to date.*

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### 4.1 Introduction

In terms of Section 41 of the EIA Regulations (2014) a call for open consultation with all I&APs at defined stages of the EIA process are required. This entails participatory consultation with members of the public and authorities (including DEA and the Department of Economic Development, Environment and Tourism) by providing an opportunity to comment on the proposed project. Consultation with the public forms an integral component of this investigation and enables I&APs (e.g. directly affected landowners, national-, provincial- and local authorities, environmental groups, civic associations, and communities), to identify their issues and concerns, relating to the proposed activities, which they feel should be addressed in the EIA process. The PPP as laid out in Table 4-1 has thus been structured to provide I&APs with an opportunity to gain more knowledge about the proposed project, to provide input through the review of documents/reports, and to voice any issues of concern at various stages throughout the EIA process.

The EIA for the proposed development which was initiated in 2009 and stopped in 2011 undertook a rigorous public participation process and therefore many of the potential issues have been identified and subsequently addressed where still applicable<sup>19</sup>. However, due to the time elapsed since the initial PPP was undertaken between 2009 and 2011, and the fact that there have been important changes in the legislative process, a new PPP will be undertaken.

The objectives of public participation are to:

- Provide project information to the public;
- identify key issues and concerns at an early stage, and continuously;
- respond to the issues and concerns raised;
- to document the EIA process properly; and
- provide a review opportunity for the process and EIA documentation developed.

The PPP will be managed to meet these objectives throughout the EIA process. The initial advertising campaign will be broad, thorough and invite members of the public to register as I&APs. Thereafter, the remainder of the communications will be focused on registered I&APs. The PPP to be undertaken for the EIA is summarised in Table 4-1.

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<sup>19</sup> Note that many of the previous issues such as building ash dams over backfilled areas and consequent issues are not applicable anymore because of design changes.

Table 4-1 | Summary of the proposed EIA PPP <sup>20</sup>

Task	Details	Date
<b>I&amp;AP notification (relevant authorities and I&amp;APs)</b>		
I&AP identification	An I&AP database was initially developed during 2009-2011 with consideration of the contemporary EIA regulations (NEMA, 2010). During the inception of the EIA process in 2016 the previous I&AP database was updated for the project by establishing the jurisdiction of organisations, individuals and businesses in proximity to the project site or within an interest of the proposed development. The database of I&APs includes the landowner, the adjacent landowners, relevant district and local municipal officials, relevant national and provincial government officials, and organisations. This database will be augmented via chain referral during the EIA process and continually updated as new I&APs are identified throughout the EIA process. The current list of potential I&APs is attached in Annexure E.	2009 to 2011 and August 2016
Site notices	Site notices with a size of 600 mm x 420 mm will be placed to inform the general public of the proposed projects and the public participation process. Site notices will be erected at the access roads to Kriel Power Station and Kriel town (i.e. the R545 to Bethal), as well as the: <ul style="list-style-type: none"> <li>• Canteen, reception, workshop and employee entrance at Kriel Power Station;</li> <li>• Reception and employee entrance at Matla Power Station;</li> <li>• Local municipal offices;</li> <li>• Mica (local hardware store); and</li> <li>• Kriel Colliery and the Exxaro offices at Matla.</li> </ul>	26 October 2016
<b>Notification of and comment on Scoping Report</b>		
Notify I&APs and authorities of availability of Scoping Report	All potential I&APs will be informed of the availability of the SR by means of post and/or email. Relevant government departments as listed in Annexure E will be notified of the report and requested to submit comments. I&APs will have 30 days within which to submit comments or raise any issues or concerns they may have with regard to the proposed project or EIA process. The public commenting period will be from 26 October 2016 to 28 November 2016. <u>Copies of the SR will be made available for review at the following locations:</u> <ul style="list-style-type: none"> <li>• Kriel Public Library</li> <li>• Kriel Power Station</li> </ul> Furthermore, a digital version of the SR will be uploaded onto the Aurecon and Eskom websites for perusal and download: <ul style="list-style-type: none"> <li>• Aurecon: <a href="http://www.aurecongroup.com/en/public-participation.aspx">http://www.aurecongroup.com/en/public-participation.aspx</a></li> <li>• Eskom: <a href="http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx">http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx</a></li> </ul>	26 October to 28 November

<sup>20</sup> Proof of public participation is saved as attached as Annexure E

Proposed Expansion of Ash Disposal Facility at Kriel Power Station, Mpumalanga: Scoping Report

Task	Details	Date												
Addressing comments received	All comments received on the SR will be collated into the Comments and Responses (CRR). The responses to these comments from the applicant and the EAP will be provided in the CRR and will be included as Annexure to the Scoping Report that goes to DEA. The Scoping Report will be updated to respond to submissions in the CRR, as may be necessary.	29 November 2016												
Advertisements	An advertisement will be placed in the Die Beeld (Regional) and The Ridge Times and The Echo (Local) during the comment period to notify I&APs of the availability of the SR, as well as scheduled public meetings.													
Public Meeting	All registered I&APs will be invited to attend the scheduled public open house meetings at the following venues: <table border="1" data-bbox="383 437 1861 603"> <thead> <tr> <th>Venue</th> <th>Date</th> <th>Time</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>Methodist Church Hall, Kriel</td> <td>9 November 2016</td> <td>18:00 – 20:00</td> <td>Springbok Crescent, Kriel, 2271 and Methodist Church Hall, Kriel</td> </tr> <tr> <td>Thubelihle Hall</td> <td>9 November 2016</td> <td>14:00 – 17:00</td> <td>Thubelihle Hall</td> </tr> </tbody> </table>	Venue	Date	Time	Address	Methodist Church Hall, Kriel	9 November 2016	18:00 – 20:00	Springbok Crescent, Kriel, 2271 and Methodist Church Hall, Kriel	Thubelihle Hall	9 November 2016	14:00 – 17:00	Thubelihle Hall	9 November 2016
Venue	Date	Time	Address											
Methodist Church Hall, Kriel	9 November 2016	18:00 – 20:00	Springbok Crescent, Kriel, 2271 and Methodist Church Hall, Kriel											
Thubelihle Hall	9 November 2016	14:00 – 17:00	Thubelihle Hall											
<b>Notification of and comment on EIA Report</b>														
Notify I&APs and authorities of availability of EIR	All I&APs will be informed of the availability of the EIR by means of post and/or email. Relevant government departments as listed in Annexure E will be notified of the report and requested to submit comments. I&APs will be 30 days within which to submit comments or raise any issues or concerns they may have had with regard to the proposed project or EIA process. The public commenting period will be from 20 January to 22 February 2017. <u>Copies of the EIR will be made available for review at the following locations:</u> <ul style="list-style-type: none"> <li>Kriel Public Library</li> <li>Kriel Power Station</li> </ul> Furthermore, a digital version of the EIR will be uploaded onto the Aurecon and Eskom websites for perusal and download at the following location: <ul style="list-style-type: none"> <li>Aurecon: <a href="http://www.aurecongroup.com/en/public-participation.aspx">http://www.aurecongroup.com/en/public-participation.aspx</a></li> <li>Eskom: <a href="http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx">http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx</a></li> </ul>	January to February 2017												
Addressing comments received	All comments received on the EIR will be collated into the CRR. The responses to these comments from the applicant and the EAP will be provided in the CRR and will be included as an Annexure to the EIR Report. The Environmental Impact Report will be updated to respond to submissions in the CRR, as may be necessary.	March 2017												
<b>Notification of and opportunity to appeal decision on EIA by DEA</b>														
Notify I&APs and authorities of outcome of the EIA	All I&APs will be informed of the outcome of the EIA process and their right to appeal the outcome or aspects of the outcome by means of post and/or email. Furthermore, a digital version of the decision will be uploaded onto the Aurecon and Eskom websites at the following location: <ul style="list-style-type: none"> <li>Aurecon: <a href="http://www.aurecongroup.com/en/public-participation.aspx">http://www.aurecongroup.com/en/public-participation.aspx</a></li> <li>Eskom: <a href="http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx">http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx</a></li> </ul>	July 2017												

## 4.2 Comments received to date

~~Public participation has not commenced and therefore no comments have been received to date in terms of the new 2016 EIA process.~~

~~The public comment period for the scoping report was open from 26 October 2016 to 28 November 2016. No substantive comments were received up until 13 December 2016 upon finalisation of this report. The lack of comment can potentially be attributed to:~~

- ~~■ The scoping phase public participation has been undertaken previously for the same proposed development.~~
- ~~■ The development taking place on Eskom property only.~~
- ~~■ The proposed development is an expansion of the existing facility and therefore the perceived impact on the community is minor.~~
- ~~■ There are numerous other developments and EIAs being undertaken in the area and stakeholder fatigue / disinterest is likely.~~

~~A CRR is attached as Annexure E.3.~~

## 4.3 Ensuing review and decision period

I&APs will be afforded a 30-day public comment period on the SR from 26 October to 28 November 2016. I&APs will be notified of the availability of the report and the SR will be lodged at the Kriel Public Library, Kriel Power Station and on the:

- Aurecon website:  
<http://www.aurecongroup.com/en/public-participation.aspx>; and
- Eskom website:  
[http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)) and potential.

Cognisance will be taken of all comments in compiling the final report, and the comments, together with the EAP and Applicant's responses thereto, will be included in the final report. Where appropriate, the report will be updated accordingly.

The SR, including the CRR, will be completed and submitted to the DEA for review. The DEA must, within 43 days of receipt of the FSR, consider it, and in writing –

- (a) Accept the report and advise the EAP to proceed with the tasks contemplated in the Plan of Study for EIA; and
- (b) Refuse Environmental Authorisation
  - (i) If the proposed activity is in conflict with a prohibition contained in legislation; or
  - (ii) If the Scoping Report does not substantially comply with the objectives and content requirements for scoping reports in terms of the 2014 EIA Regulations and the applicant cannot ensure compliance with these regulations within the prescribed timeframe.

## 5 DESCRIPTION OF AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

*The purpose of this Chapter is to provide a description of the affected environment and the potential impacts that could result from the proposed project. Where additional information is required for detailed assessment in the EIR, the ToR for specialist studies are provided.*

### 5.1 Introduction

The description of the affected environment provided below draws on existing knowledge from published data, previous studies, site visits to the area and discussions with various role-players. The identification of potential impacts which may occur as a result of the proposed activities described in Chapter 3 of this report is broad, to cover the operational phase as well as the construction phase of the project. Impacts of lesser importance are also screened out in this Chapter, with reasons provided, to ensure that the EIR is focused on the potentially significant impacts. These impacts and their proposed mitigation will be provided in the Environmental Management Plan (EMP) at the end of the EIA phase.

### 5.2 Description of the affected Biophysical and Socio-economic environment

#### 5.2.1 Description of the site

Site 10 is located south to southwest directly adjacent to the existing Ash Disposal Facility at the Kriel Power Station and approximately 5 km to the east of the town of Kriel. The site is approximately 359 ha in extent of which about 172 ha will be affected by the proposed expansion of the Ash Disposal Facility and is zoned agricultural. The proposed Site 10 is located on properties as indicated in Table 5-1. These are the properties will be directly impacted by the project footprint. The properties indicated in Table 5-2 are directly adjacent those affected by the proposed Site 10 development. Table 5-3 provides the general location information for the proposed development site.

**Table 5-1 | Properties on which infrastructure for Site 10 is proposed to be constructed**

ID	Major region	Parcel No.	Portion	Parent farm name
T0IS000000000 065 00000	IS	65	0	Kriel Power Station
T0IS00000000006900015	IS	69	15	Driefontein
T0IS00000000006900030	IS	69	30	Driefontein
T0IS00000000006900003	IS	69	03	Driefontein
T0IS00000000006900019	IS	69	19	Driefontein
T0IS000000000070 00009	IS	70	9	Onverwacht
T0IS000000000070 00011	IS	70	11/RE	Onverwacht
T0IS000000000070 00023	IS	70	23	Onverwacht

Table 5-2 | Properties directly adjacent to properties on which Site 10 is proposed to be constructed

ID	Major region	Parcel No.	Portion	Parent farm name
T0IS000000000 059 00008	IS	59	8	Nooitgedacht
T0IS000000000 068 00003	IS	68	3	Vaalpan
T0IS000000000 068 00009	IS	68	9	Vaalpan
T0IS000000000 069 00000	IS	68	0	Driefontein
T0IS000000000 069 00001	IS	69	1	Driefontein
T0IS000000000 069 00008	IS	69	8	Driefontein
T0IS000000000 069 00013	IS	69	13	Driefontein
T0IS000000000 069 00017	IS	69	17	Driefontein
T0IS000000000 069 00020	IS	69	20	Driefontein
T0IS000000000 069 00021	IS	69	21	Driefontein
T0IS000000000 069 00022	IS	69	22	Driefontein
T0IS000000000 069 00025	IS	69	25	Driefontein
T0IS000000000 069 00026	IS	69	26	Driefontein
T0IS000000000 069 00031	IS	69	31	Driefontein
T0IS000000000 069 00032	IS	69	32	Driefontein
T0IS000000000 070 00005	IS	70	05	Onverwacht
T0IS000000000 070 00007	IS	70	7	Onverwacht
T0IS000000000 070 00012	IS	70	12	Onverwacht
T0IS000000000 070 00015	IS	70	15	Onverwacht
T0IS000000000 070 00016	IS	70	16	Onverwacht
T0IS000000000 070 00019	IS	70	19	Onverwacht
T0IS000000000 070 00020	IS	70	20	Onverwacht
T0IS000000000 070 00021	IS	70	21	Onverwacht
T0IS000000000 070 00026	IS	70	26	Onverwacht
T0IS000000000 083 00002	IS	83	2	Vlaklaagte
T0IS000000000 141 00000	IS	141	0	Matla Power Station

Table 5-3 | Location information for development

Physical Address where the development will take place	Kriel Power Station, between the towns of Kriel and Ogies in Mpumalanga Postal code 2271
Site centre point	26°16'31.86"S 29°12'1.88"E
Local Municipality	Emalahleni Local Municipality
District Municipality	Nkangala District Municipality

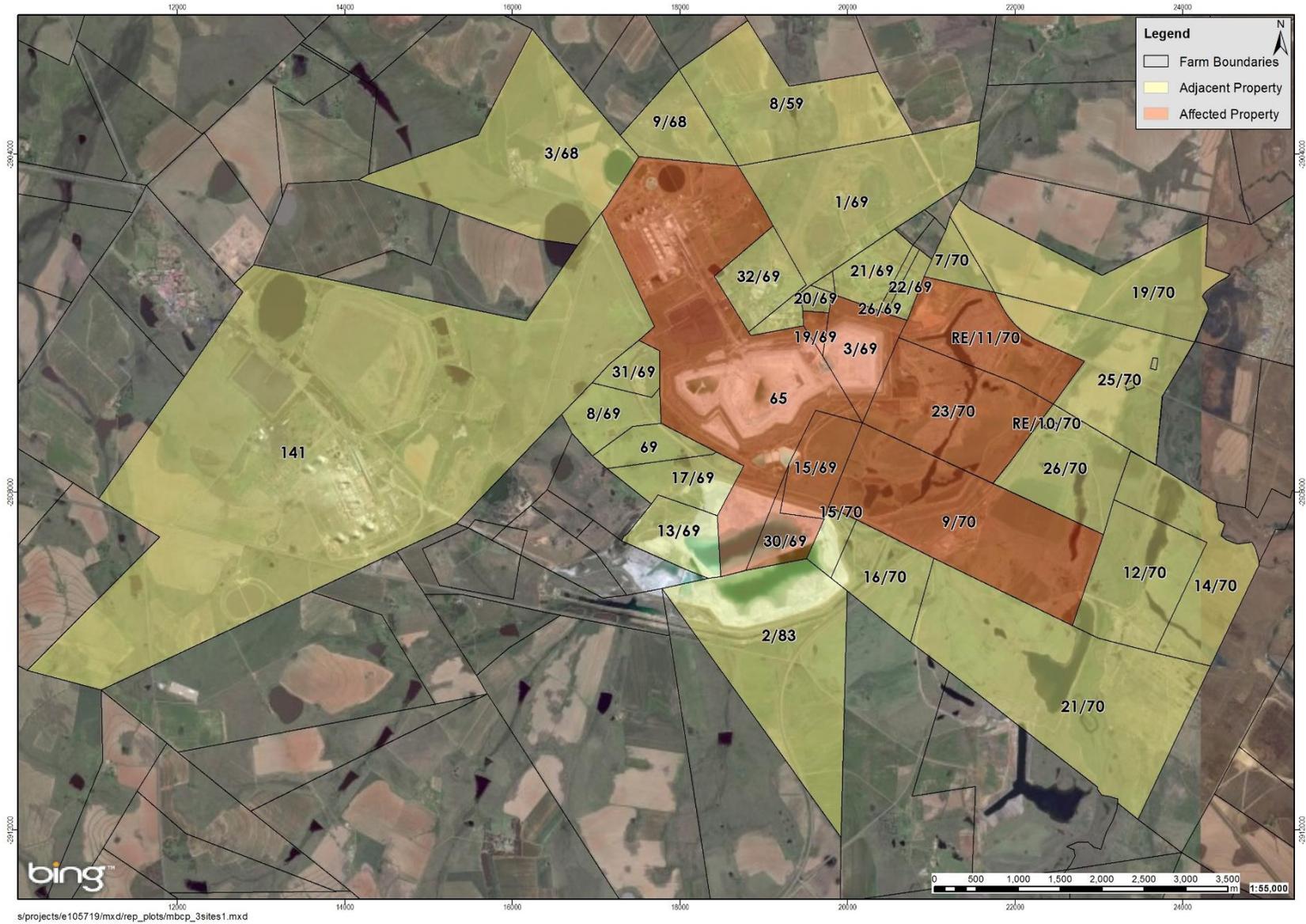


Table 5-4 | The cadastral units around Kriel site

## 5.2.2 Climate

The broad municipal area is situated in a Highveld climate zone and receives rain during summer months from October to March, mainly through thunderstorms. Throughout the region, 65% of the rainfall occurs during the summer months (December to February) and on average ranges between 601 - 700 mm per annum. The average temperature for the broad municipal area is moderate (average 24.5°C) with frost occurring on average 30 days per annum. Northerly and easterly winds are dominant during the summer months, while easterly winds occur mostly in the autumn months and westerly winds in the winter months (Emalahleni LM, 2009; Airshed, 2010).

## 5.2.3 Topography and geology

The municipal area is approximately 1 600 m above sea level on the Highveld plateau and is characterised by an undulating landscape with slopes less than 1:30 (Emalahleni LM, 2009). The general surface area surrounding the Kriel Power Station is characterised by mine dumps and open cast mines.

The Kriel Power Station is located within the Great Karoo Basin that contains sediments that were deposited in fluvial floodplains and shallow shelves over a period extending from the late Carboniferous Period (290 million years ago) to the early Jurassic Period (190 million years ago) before the separation of southern Africa from Gondwanaland (see Figure 5-1). Dolerites, a prominent feature of the Karoo Basin, intruded after sedimentation in the basin had nearly ceased due to the intrusion of Drakensberg basalt. These dolerite dykes and sills intruded the Karoo sediments along planes of weakness in the older sedimentary. In the vicinity of Kriel, few dolerite intrusions occur apart from a few narrow sub-vertical dykes (J&W, 2010).

The Karoo basin has been subjected to several cycles of erosion, which resulted in weathering at great depths. Rocky outcrops are rare in the Kriel area and are often covered by transported soils. Weathering in the area is largely dependent on climatic conditions with disintegration occurring in the dryer regions and decomposition in the wetter regions. The Kriel area is located within a wetter region and as a result experience decomposition of clay minerals where water is available. Furthermore, Kriel is underlain by the Vryheid Formation (Ecca Group) that contains sediments consisting of sandstones and sub-ordinate gravels and mudrocks with exploitable coal seams. These sedimentary rocks are predominantly horizontally bedded or have very gentle dips. The Karoo sediments are dominated by sandstones and are most often closely intercalated with siltstones and shales/mudrocks (J&W, 2010).

With regards to coal resources, the power station is located on the Kriel Coalfield, which forms part of the Highveld Coalfield and covers an area of more than 25 000 ha. This coalfield is underlain by Dwyka and Middle Ecca strata that are located on an undulating floor containing felsites, granites and diabase that is generally associated with the Bushveld Complex. Coal occurring in fault-margins is often burned and is therefore not mined (Buchan, et al., 1980).

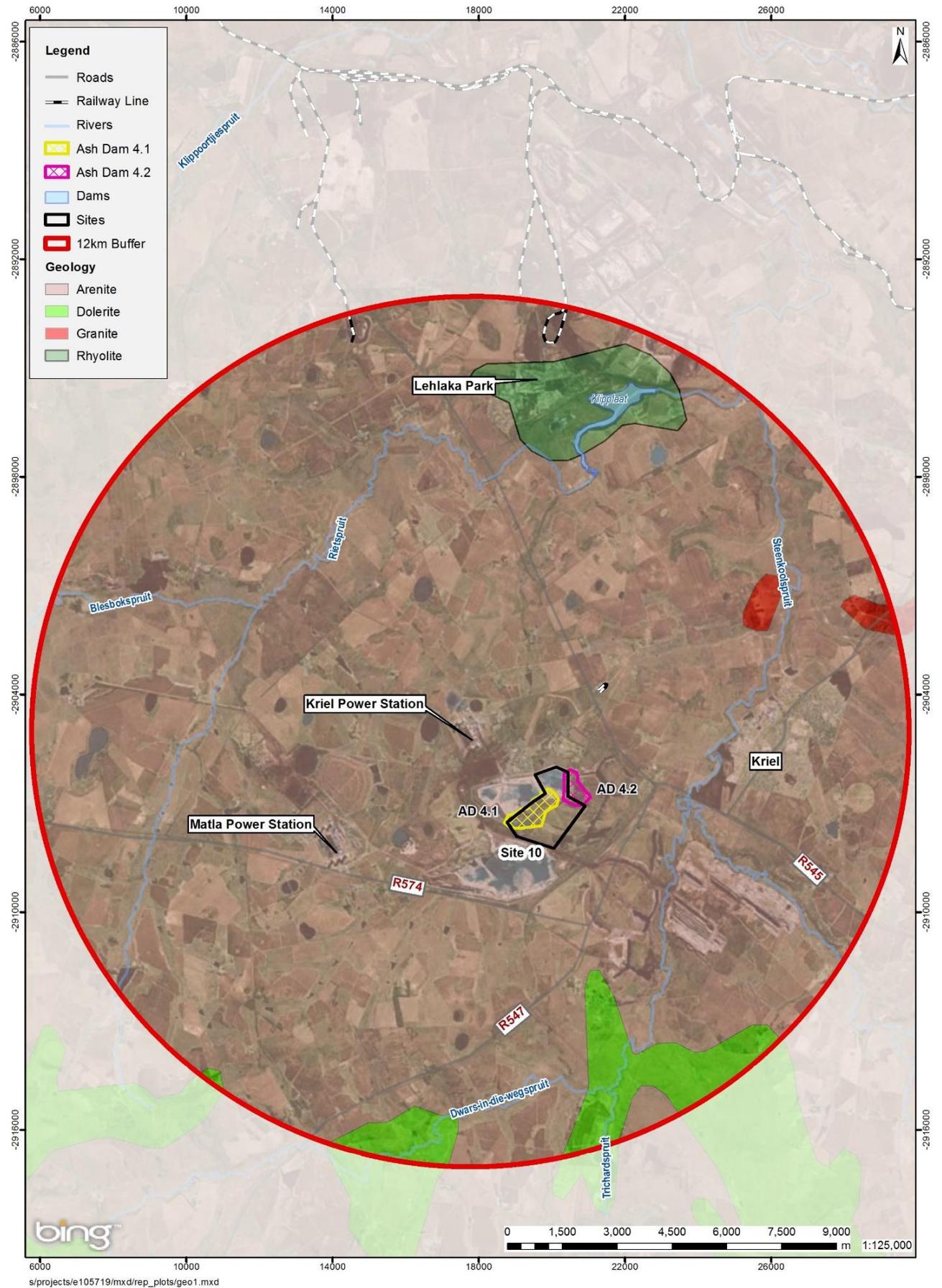


Figure 5-1 | Geology of the sites and surrounding areas

#### 5.2.4 Fauna and flora

The Kriel Power Station is located within the Mesic Highveld Grassland Bioregion as defined by Mucina and Rutherford (2006). The dominant vegetation type found in the vicinity of the power station and surrounding areas is Eastern Highveld Grassland. This vegetation type occurs on plains at a general altitude of 1 520 – 1 780 m, but also as low as 1,300 m, within the Mpumalanga and Gauteng Provinces. The landscape is characterized by slightly to moderately undulating plains as well as low hills with intermittent pan depressions which supports short, dense grassland dominated by general Highveld grass species such as *Aristida*, *Digitaria*, *Eragrostis*, *Themeda* and *Tristachya*. These pan depressions are considered to be important as they provide critical important foraging habitat to two “Near-threatened” Flamingo species (Scherman Colloty & Associates, 2010). Small scattered rocky outcrops that are characterized by wiry, sour grasses and some woody species also occur within this area. Eastern Highveld Grassland is a vulnerable vegetation type with only a handful of patches conserved (SANBI, 2013). The conservation target is 24% (Mucina, 2006). The majority of the vegetation has been transformed due to cultivation, plantations, mining, urbanization and dams (Scherman Colloty & Associates, 2010).

The majority of the area surrounding the power station was considered to be areas of ‘No Natural Habitat Remaining’ in terms of the MBCP(2007) (see Figure 5-2) this mapping was refined in the MBSP(2014)(see Figure 5-2 and Figure 5-3), which mapped the surrounding area as heavily modified, moderately modified (old lands) and other natural areas. A few areas are marked as ‘Important and Necessary’ and ‘Least Concern’. The MBCP is intended to guide conservation and land-use decisions in support of sustainable development in Mpumalanga. The MBCP areas indicated as ‘Irreplaceable’, ‘Highly Significant’ and ‘Important and Necessary’ should remain unaltered and should be managed for biodiversity by various means.

Wetland areas that are considered to be “Important and Necessary” in terms of the spatial planning frameworks occur within the area of investigation. These wetlands provide important dispersal and ephemeral foraging habitats to faunal species. Furthermore, an important endorheic pan is also located to the northeast of the power station which provides foraging and roosting habitat for “Near-threatened” taxa such as Servals (*Leptailurus serval*) and Flamingos (*Phoenicopterus spp*). Amphibians that are of conservation concern are not expected to occur, however 14 Red listed avifauna species are likely to utilize the area. An estimate of at least 14 reptile taxa (9 snakes and 5 lizard species) are expected to occur within the area, however the species richness is most likely underestimated due to a lack of distributional data. Of these, at least three species are considered to be rare. With regards to invertebrates, the moist grasslands and wetland features could potentially provide suitable habitat for the Marsh Sylph butterfly (*Metisella meninx*) which is considered to be “Vulnerable” (Scherman Colloty & Associates, 2010).



Figure 5-2 | Sensitivity of Site 10 in terms of the MBCP (2007) on left and MBSP (2014) on the right

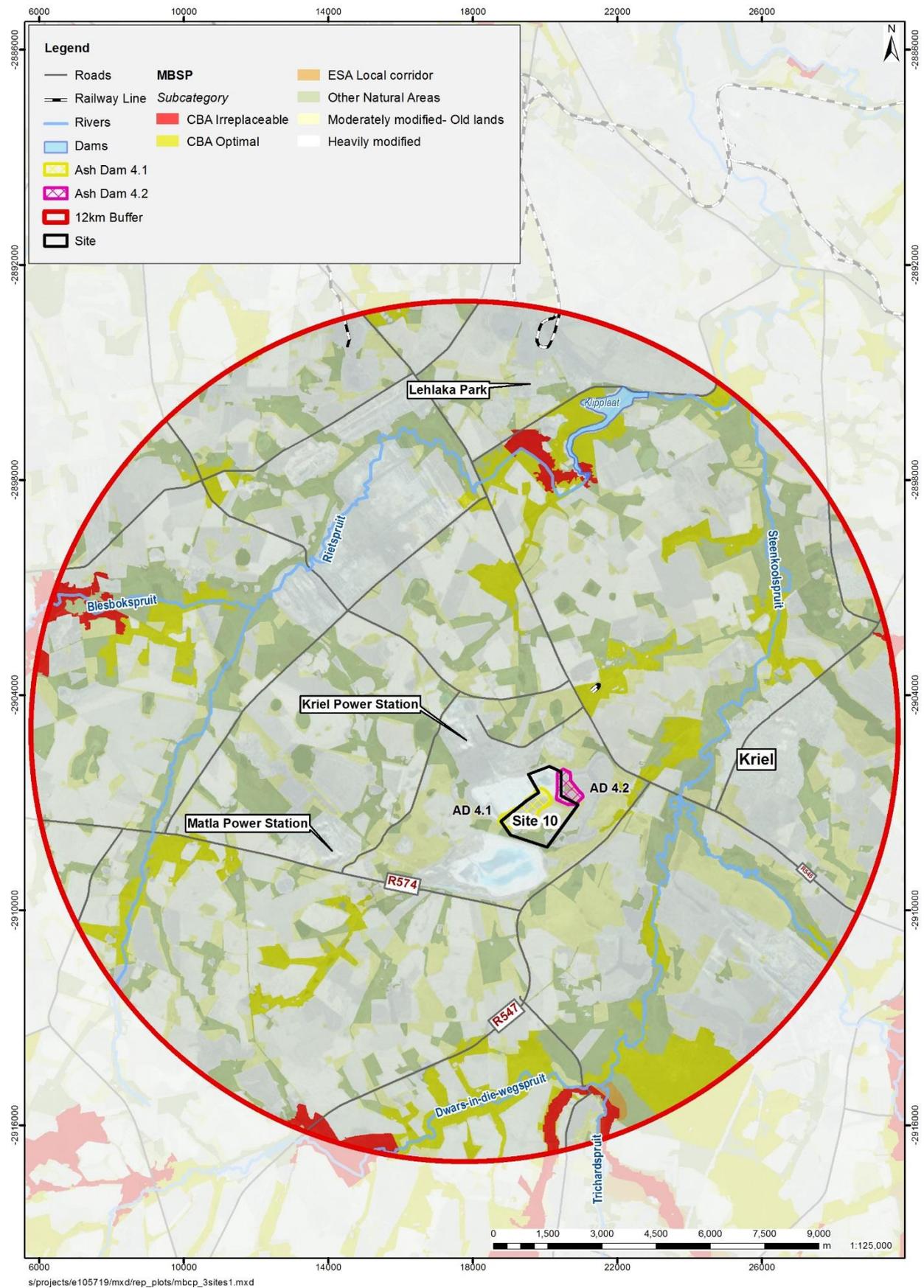


Figure 5-3 | Sensitivity of Site 10 MBSP (2014)

## 5.2.5 Surface and groundwater

The Emalahleni Local Municipality falls within the Olifants River primary catchment with the Klein-Olifants, Olifants, Wilge, Rietspruit, Steenkoolspruit and Brugspruit being the main rivers in the municipal area. Major dams include the Rietspruit, Doringpoort and Emalahleni Dams (Emalahleni LM, 2009).

The Rietspruit flows to the north of the Kriel Power Station into the Rietspruit Dam from where water enters the Steenkoolspruit, which is located to the southeast of the power station. Both rivers are perennial and fall within the B11E and B11D quaternary catchments, respectively (Figure 5-5). The Rietspruit and Steenkoolspruit both have a Present Ecological Status (PES) of Class C: Moderately Modified and are considered to be Critically Endangered (Aurecon, 2010).

The Kriel area is underlain by sediments of the Vryheid formation. These sediments were deposited in a fluvio-deltaic environment where swamps and marshes existed and peat accumulated. Interlayered shales, mudstones, siltstones and sandstones constitute the bulk of the formation. Furthermore, coal seams are interrupted by numerous minor faults of which many are water bearing. Small fracture zones which are generally associated with the upper and lower contacts of sills (usually water bearing) also occur throughout the power station area<sup>21</sup> (Aurecon, 2010).

Previous investigations in the area suggest that multiple aquifer types are represented at Kriel. These include:

- Unconfined aquifers within soil horizons that developed within colluvial and alluvial environments and the weathered upper levels of Ecca Formation sediments (generally perched on less permeable underlying in situ sediments);
- Unconfined aquifers along dolerite dykes which may also act as recharge points for confined aquifers within the Ecca Formation; and
- Semi-confined aquifers within the Ecca Formation which could be recharging seasonally.

Furthermore, groundwater monitoring data from Site 10 indicated that the site aquifer has been contaminated with elevated SO<sub>4</sub> concentrations and has a high pH that range from 7.17 to 10.2<sup>22</sup>, making the water unfit for human consumption (Aurecon, 2010).

## 5.2.6 Population demographics

The Kriel Power Station is located within the Nkangala District Municipality and Emalahleni Local Municipality. Emalahleni Local Municipality has a total population of 495 000, the Emalahleni LM accounts for the majority of the population within the Nkangala District municipality which stands at 35.4% (Nkangala District Municipality IDP, 2011). Of the 495 000 total population 8.3 % is located in rural areas and 91.7% are urban. The total population comprises 81.3% Black, 15.7% White, 1.7% coloured and 0.9% Indian and Asian people (Emalahleni SDF, 2015).

Employment status is a good indication of the economic environment of a Municipality. The labour force consists of 72.7% of the population which is employed and economically active and 27.3% is unemployed. Emalahleni has a relatively high unemployment rate (27.3%) which surpasses the national unemployment rate of 25.2% (as recorded for the fourth quarter of 2014). Emalahleni LM is characterised by a strong economically active population segment, representing more than half (52.2%) of the total population. Large proportion of individuals within the local municipality (51.2%) have at least a secondary (Grade 8-12) level of education, the total number of individuals with a higher education stands at 11.0%, 21.0% have primary education levels (grade 1- 7) while the number of people with no schooling stands at 4.8% (Emalahleni SDF, 2015).

According to the Emalahleni LM SDF (2015), the economy is dominated by four sectors in terms of employment, namely mining (35%), followed by Electricity (14.4%) and finance (14.4%) and then community, social and personal services (10.4).

The occupation structure of the employed people shows that the majority of employed people are concentrated in trade (representing 21.1% of job opportunities), followed by mining (20.6%) and then manufacturing (14.2%).

<sup>21</sup>Prior investigations have identified a near surface, slightly weathered to fresh dolerite sill of which the extent is unknown.

<sup>22</sup>This information was obtained from three monitoring boreholes of which two are located within Site 10 and one directly adjacent to this site. The highest pH value was obtained from a borehole located within Site 10.

### **5.2.7 Land uses in the surrounding area**

The surrounding land use is mainly agricultural, including maize and cattle farming and mining (see Figure 5-4). The power station is located adjacent to the Kriel Colliery, which is dedicated to the Kriel power station and the Matla power station, approximately 5 km to the southeast. The town of Kriel is approximately 7 km to the east of the power station, as well as a small informal settlement approximately 5 km to the southeast. The Thubelihle Township is approximately 11 km to the northeast. The power station also has a small housing development for employees approximately 1 km to the southeast. The Matla Power Station (also coal fired) is situated 4.5 km to the south west of the Kriel Power Station, with the prior's ash dams expanding towards the south. The Exxaro Matla mines (three underground mines) are situated to the east of Kriel with the main facilities about 5.7 km to the east of the Kriel Power Station. A small airfield is located approximately 1 km to the east of the power station and the Kriel Golf Club is approximately 2 km to the southeast. The residential developments Rietstroom Park and Lehlaka Park are approximately 9 km to the north.

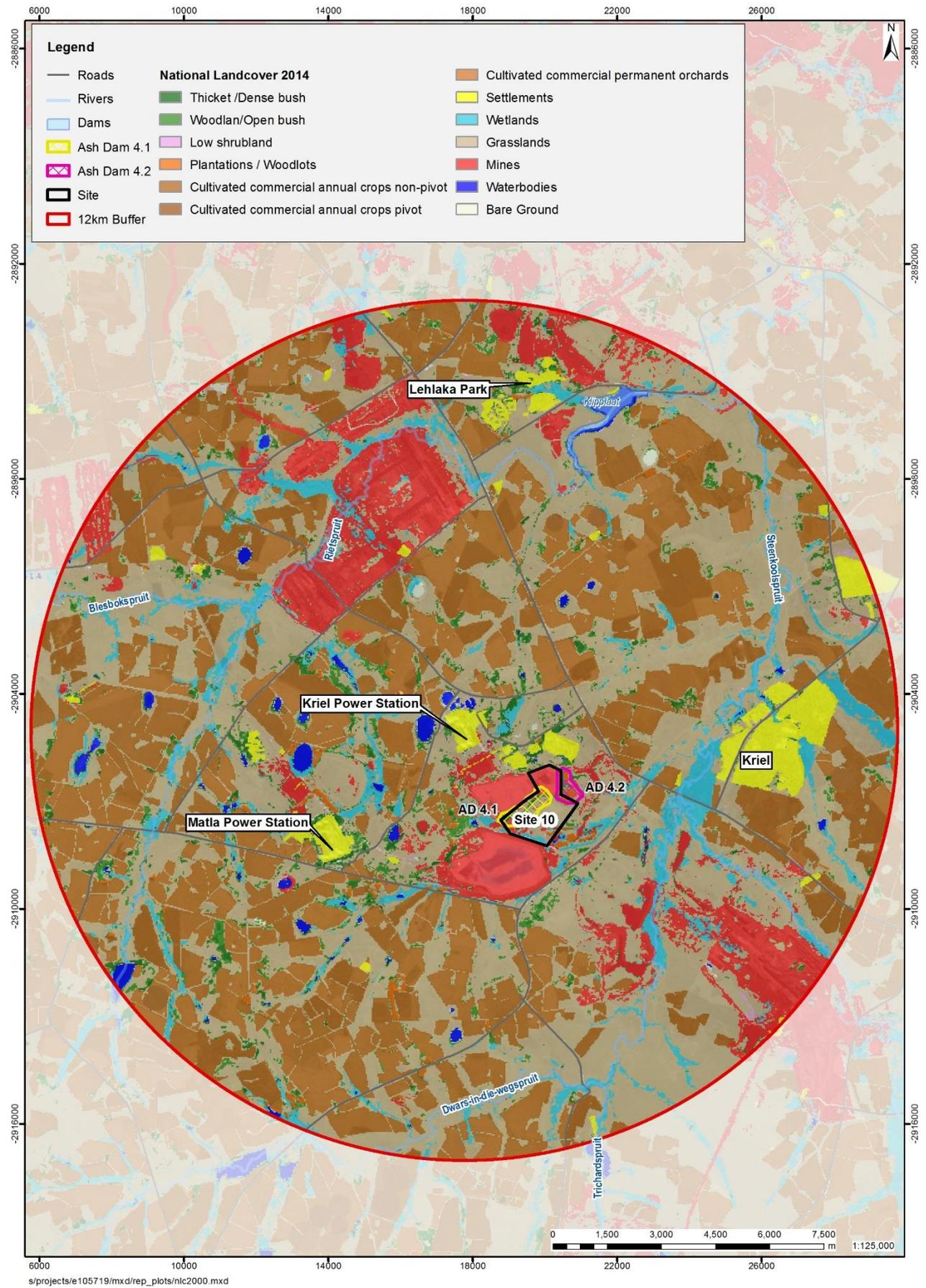


Figure 5-4 | Land uses within the 12 km radius area from the Kriel power station

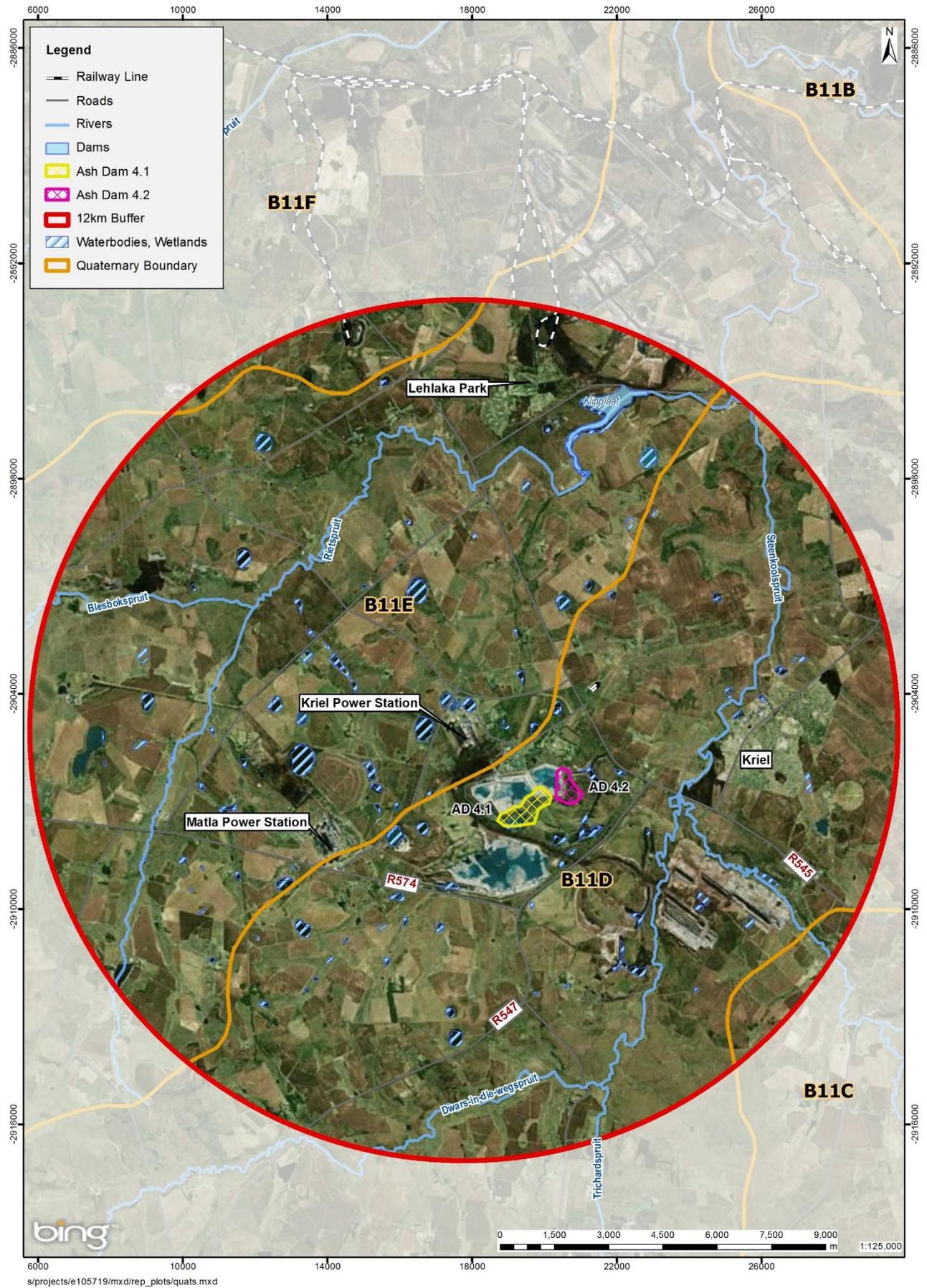


Figure 5-5 | Wetlands and rivers located on the site and surrounding areas as well as quaternary catchments

### 5.3 Construction phase impacts on biophysical and social environments

The construction phase is likely to result in a number of potential negative impacts on the biophysical and the social environment. These could potentially include:

- Disturbance of flora and fauna;
- Sedimentation and erosion of watercourses;
- Increase in traffic volumes;
- Disposal of hazardous<sup>23</sup> substances on site;
- Increased risk of fire;
- Noise pollution; and
- Dust pollution.

The significance of construction phase impacts is likely to be limited by their relatively short duration. Many of the construction phase impacts could be mitigated through the implementation of an appropriate EMP. During the EIA Phase, the construction phase impacts on the biophysical and socio-economic environment will be assessed, in terms of the methodology outlined in the Plan of Study for EIA (see Section 6). Furthermore, an EMP will be compiled as part of the EIA process, and submitted as part of the EIR, to provide mitigation and ascribe responsibilities for many of the construction phase impacts.

#### 5.3.1 Disturbance of flora and fauna

This impact considers impacts beyond the permanent footprint impacts of the proposed ash facility. Alien plant seeds could be introduced with construction material such as sand or other materials, with any disturbed areas being particularly vulnerable.

Any affected fauna would generally be largely mobile and would relocate during the construction phase and are likely to recolonise the area, once the construction phase has been completed and the disturbed areas rehabilitated.

#### 5.3.2 Sedimentation and erosion

The sediment loads of any drainage depressions and wetlands may increase due to the excavations on the site, the laying of linear infrastructure across drainage lines and other construction related activities. This would be exacerbated during the wet season and during intense rainfall events if not properly managed.

#### 5.3.3 Increase in traffic volumes

Construction vehicles are likely to make use of the existing roads, including the R545, to transport equipment and material to the construction site. Construction related traffic could impact negatively on the traffic flow in the vicinity and on the integrity of the affected roads. This may exacerbate the risk of vehicular accidents.

#### 5.3.4 Storage of hazardous substances on site

As at any construction site, various hazardous substances are likely to be used and stored on site. These substances include amongst other; diesel, curing compounds, shutter oil and cement. Utilisation of such substances in close proximity to the aquatic environment such as wetlands and rivers is of greater concern than when used in a terrestrial environment.

Use of hazardous substances at a construction site is controlled by various pieces of legislation. The management and protection of the environment would however be achieved through the implementation of an EMP, which would *inter alia* specify the storage details of hazardous compounds and the emergency procedures to follow in the event of a spillage.

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<sup>23</sup>Note that an ash classification process is underway and will be reported on in the EIA Phase.

### **5.3.5 Increased risk of fire**

Temperatures in the Highveld can rise to 40°C in summer. Furthermore, the grassland vegetation is prone to fires started by lightning strikes in summer. Construction activities onsite may increase the risk of fire in the area in both the wet summer months and the dry winter months. The outbreak of fire at the construction site could have serious safety, economic and ecological implications. The risk of fire would be managed through the EMP, which would include mitigation measures for dealing with emergency situations such as fires.

### **5.3.6 Noise pollution**

An increase in noise pollution would be expected from the operation of heavy machinery during the construction period, as well as due to the increased traffic. The severity of this impact is likely to be reduced due to the low number of people in close proximity to the site, and the existing background noise of the power station. This impact will be assessed as part of the noise impact investigation.

### **5.3.7 Dust impacts**

Construction vehicles are likely to make use of the existing roads, including the R545 and roads to the ash facility, to transport equipment and material to the construction site. Earthworks would also be undertaken. These activities would worsen dust especially in the dry winter months. The dust impact would be managed through the EMP, which would include mitigation measures for dealing with dust pollution events including watering of roads, etc.

## 5.4 Operational phase impacts on the biophysical environment

This section of the report describes the biophysical environment and considers the long-term or operational phase impacts on the biophysical environment that may be associated with the proposed activities, including the following:

- Impact on the terrestrial fauna and flora;
- Impact on aquatic flora and fauna;
- Impact on groundwater resources; and
- Impact on air quality.

Operational impacts on the socio-economic environment are described in **Section 5.5**, while the construction phase impacts are outlined in **Section 5.3**.

### 5.4.1 Impact on terrestrial fauna and flora

The vegetation type found in the vicinity of the Kriel Power Station, Eastern Highveld Grassland, is considered to be vulnerable (SANBI, 2013). Areas within the vicinity of the proposed Site 10 are marked as 'Important and Necessary', 'Least Concern' and 'No Natural Habitat Remaining' in terms of the MBCP (2007) / MBSP (2014). While the majority of the site is used for agricultural purposes, grasslands do occur within the area between the power station and the proposed site. The potential occurrence of Red Data listed mammal, avifauna, reptile and invertebrate taxa to occur on Site 10 is low.

Given that the proposed project could disturb vulnerable Eastern Highveld grassland, and/or patches of 'Important and Necessary' areas of land in terms of the MBCP (2007) / MBSP (2014), it is recommended that a specialist terrestrial ecology assessment be undertaken, which focuses on the potentially suitability of the site.

### 5.4.2 Impact on aquatic flora and fauna

As noted in Section 0 and indicated in Figure 5-5 the Steenkoolspruit and Rietspruit are located within the area surrounding the Kriel Power Station. Furthermore, a number of wetlands and pans are shown to be located in the surrounding areas of the sites.

South Africa recognises the importance of its wetlands as sensitive ecosystems that require conservation, and accordingly has become a signatory to the international Convention on Wetlands of International Importance (also known as the Ramsar Convention). While there are no Ramsar listed wetlands in the vicinity of the sites, the importance of wetland conservation is noted.

Concerns have been raised by the groundwater and ecological specialists that seepage from an ash facility without a liner system could pollute groundwater resources. This would have a negative impact on biodiversity within the Steenkoolspruit and Rietspruit as well as potentially impact on wetlands and pans.

Given the importance of the conservation of water resources in South Africa, specifically wetlands, it is recommended that an aquatic ecology assessment be undertaken.

### 5.4.3 Impact on groundwater resources

Confined and semi-confined aquifers are present in the area and there is a possibility that seepage from the proposed ash facility at Sites 10 may pollute groundwater resources. Ash from power stations is usually composed of alumina, silica, lime and iron oxides and seepage often contains high concentrations of dissolved salts and potentially elevated concentrations of certain trace elements such as arsenic, boron, manganese, nickel, lead, selenium, molybdenum and fluoride and could contaminate soils and groundwater. In addition, the high pH of ash water (pH12.6) could result in the solution and mobilisation of complex trace metal compounds. However, exposure to the atmosphere, anaerobic microbial action or the mixing of ash water with acidic groundwater would generally lower the pH. Under neutral and acidic conditions the soluble metal complexes and carbonates would precipitate and increase the potential for pollution (J&W, 2006). Groundwater pollution would not only have a negative impact on the water resources, fauna and flora, but could

also potentially impact on agricultural productivity and income. Therefore, a groundwater impact assessment is necessary to determine, *inter alia*, the potential and impact of groundwater pollution on a local and district level.

#### 5.4.4 Impact on air quality

While the industrial sector, including power generation, is very important to the Mpumalanga Highveld region it has been identified as one of the main emission sources that are contributing to the poor ambient air quality. Other important contributors include vehicle tailpipe emissions, household fuel combustion and biomass burning. Industrial sources include stack, vent and fugitive emissions which release criteria pollutants such as SO<sub>2</sub>, NO<sub>x</sub>, CO and particulates, volatile organic compounds, semi-volatile organic compounds, greenhouse gases and various heavy metals (Airshed, 2010).

A number of coal fired power stations are located close to the Kriel Power Station. These include the Matla Power Station (± 2-4.5 km to the west), Kendal Power Station (± 29 km to the northwest), Duvha Power Station (± 36 km to the northeast) and Hendrina Power Station (± 46 km to the northeast). These power stations emit emissions at an elevated height which have the potential to impact on the air quality of the immediate surroundings. The proposed ash facility has the potential to create airborne particulates (PM10) through wind erosion from the ash facilities and fugitive emissions from operational activities. Furthermore, the impact on air quality from the proposed ash facilities would be additional to the existing poor ambient air quality of the region, as well as sensitive receptors such as the town of Kriel and surrounding settlements. A specialist study is therefore recommended to assess the impact of the proposed ash facilities on the ambient air quality and surrounding environment (Airshed, 2010).

### 5.5 Operational phase impacts on the social environment

This section of the report describes the socio-economic environment and considers the long-term or operational phase impacts on the social environment that may be associated with the proposed ash facilities, including the following:

- Visual impacts;
- Impact on heritage resources;
- Noise impacts;
- Impact on the local economy;
- Impact on agriculture and other land uses in the study area;
- Impact on traffic;
- Impact on existing infrastructure and services; and
- Impact on health and safety of workers and others in the area.

#### 5.5.1 Visual impacts

The area surrounding the Kriel Power Station is located at some 1 600 m above mean sea level and is gently undulating.

The landscape is covered in grassland with a few sparse trees. As such, the power station is visible for many kilometres in the surrounding area. Site 10 is adjacent to the existing Kriel Ash Disposal Facility and, as such, could limit the visual footprint of the proposed ash facility at this site. It is therefore recommended that a visual impact assessment is undertaken for all three sites.

#### 5.5.2 Impact on heritage resources

Heritage resources include archaeological material (e.g. rock paintings, stone tools), palaeontological material (e.g. fossilised materials) and cultural heritage material (e.g. old graveyards, fences or ruins of buildings). Since some potential heritage material is buried, it is often only found during the construction phase of a project.

Due to the historical disturbances at the sites (construction of the power station, rehabilitated opencast mine, ash dam and agricultural practices) it is unlikely that archaeological or cultural material of value would be found on site. However, the potential remains that the ash facilities, and associated pipelines, could impact on heritage resources. Furthermore,

as noted in **Section 1.2.4**, the construction of a pipeline of over 300 m in length or any development which exceeds 5000 m<sup>2</sup> in extent and will be changing the landscape character, must be subjected to heritage study in terms of NHRA, and be approved prior to the commencement of the construction process.

### 5.5.3 Noise impacts

The area surrounding the power station consists predominantly of undulating grazing lands. However it also includes the Kriel Colliery and Matla Power Station located to the west of Kriel Power Station. The colliery and power stations are the largest sources of noise pollution in the area, together with the ash conveyance systems and other activities on site. The potential exists for noise from the operations of the proposed ash facility to have a negative effect on surrounding communities.

### 5.5.4 Impact on local economy

In Emalahleni LM 190 662 people are economically active (employed or unemployed but looking for work), and of these 27.3% are unemployed. Of the 101 062 economically active youth (15 to 34 years) in the area, 36.0% are unemployed.<sup>24</sup>

The decommissioning of the Kriel Power Station due to insufficient ash disposal capacity would result in the loss of jobs. It is unlikely that any significant new job opportunities would be created during the operational phase, as employees working currently at the existing Ash Disposal Facility would only move to the expanded ~~new~~ facility.

### 5.5.5 Impact on agriculture and other land uses in the study area

The proposed ash facility is likely to impact on the following surrounding land uses: agriculture, power generation and coal mining. With regards to power generation and coal mining, the ash facility is unlikely to have a significant negative impact (but arguably is important in the continuation of these activities in the area). However, the impact of having an ash facility on productive agricultural land is likely to impact on the livelihood security of affected farmers and farm workers. It is therefore recommended that an agricultural potential assessment be undertaken to determine the agricultural potential of the candidate sites, and the potential impact on agricultural activities due to the subsequent loss of land, should it be necessary.

### 5.5.6 Impact on traffic

The proposed project is likely to result in a limited increase in traffic volumes during the construction and operational phase of the project. However, the proposed conveyor system route would need to cross road(s) in some places and could potentially be routed beneath the road, thus allowing the continued use of the existing roads.

### 5.5.7 Impact on existing infrastructure and services

Existing infrastructure and services in the surrounding area of the Kriel Power Station includes numerous tarred and dirt roads, for example the R545 to the south of the power station, the R547 to the southwest, the R580 to the northwest Figure 5-6. Other infrastructure in the area includes pipelines, power lines, canals, mineshafts, rivers and the Komati Water Scheme Pipeline. It is not expected that the proposed ash facility would impact on any of these infrastructure or services.

However, the possibility of collapse settlements in the foundations at Sites 10 potentially poses significant risks in terms of environmental (groundwater in particular) pollution and operation of the ashing facility and surrounding mines, which includes health and safety concerns. These opencast mines were backfilled with a mixture of transported and residual soils and excavated rock overburden with a particle size that ranges from 2 µm to large rock boulders in excess of 2 m in length. Settlement of backfilled areas under the weight of an ash facility can be significant and is of concern for the following reasons:

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<sup>24</sup>[http://www.statssa.gov.za/?page\\_id=993&id=emalahleni-municipality-2](http://www.statssa.gov.za/?page_id=993&id=emalahleni-municipality-2), accessed 2016-09-14

- Reduced efficiency of surface draining on the surface and embankments of the facility over the long term;
- Reduction in the freeboard should significant differential settlement occur;
- Development of a sinkhole in the facility should saturation cause localised collapsing of the foundation; and
- Formation of large cracks in the embankment wall which in turn increases the risk of failure and seepage contamination.

Importantly, whilst the infrastructure currently proposed falls within the area of the originally assessed Site 10, the ash dam footprints will not be over the backfilled areas and therefore the above issues is not foreseen by the technical (J&W, 2016) teams designing the facility.

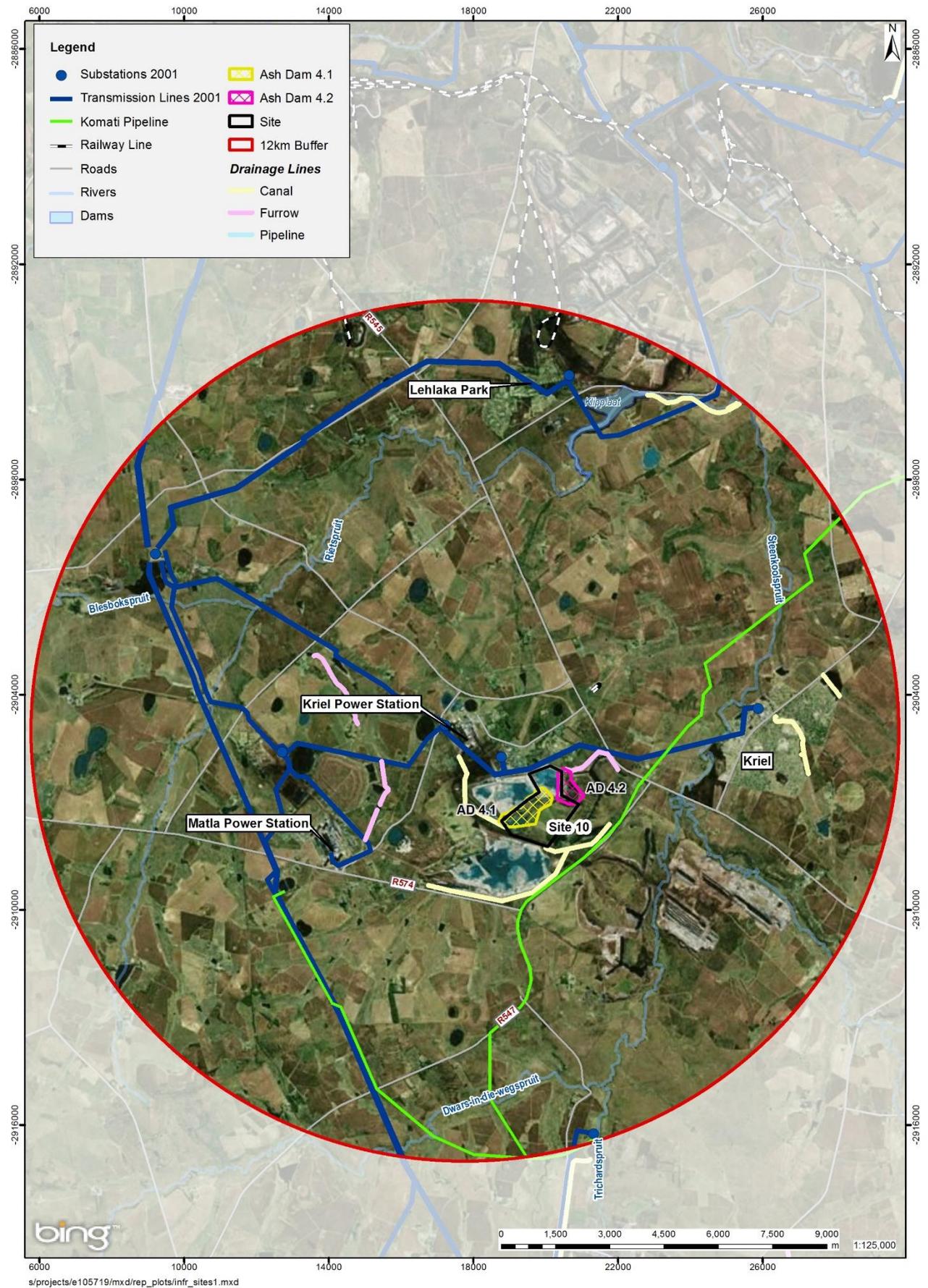


Figure 5-6 | Infrastrucure around the Kriel Power Station

### 5.5.8 Impact on health and safety of workers and others in the area

The proposed Ash Disposal Facility will be constructed in terms of the final detailed design<sup>25</sup>, which would be informed by various technical, financial and environmental criteria, including the recommendations made by the EIA specialists. In particular, the geotechnical specialist needs to determine the stability of the site (AD4.3) and suggest appropriate design measures that guarantee the operational safety of the future ash facility as discussed in **Section 5.5.8**.

Furthermore, the proposed ash facility will be managed according to the existing health and safety requirements of the Power Station. The contract for the construction and operation of the facility<sup>26</sup> will go out on tender following receipt of the requisite regulatory approvals and the selected operator will be required to operate the facility in terms of the Operational plan as well as various conditions of approval. This would include implementation of the specifications included in the Operational EMP, which would be guided by the findings and recommendations of the EIA specialists.

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<sup>25</sup>The conceptual design is currently (2016-09-14) being revised by Jones and Wagener.

<sup>26</sup>The Kriel ash disposal facility is currently being operated by Roshcon.

## 6 PLAN OF STUDY FOR EIA

*The purpose of this Chapter is to detail the Plan of Study for the EIA Phase to ensure that this EIA process satisfies the requirements of NEMA.*

### 6.1 Purpose of the Plan of Study for EIA

The Scoping process has been documented in this report, which has identified various potential environmental impacts and project alternatives that require further detailed assessment in the EIA phase. This Plan of Study for EIA is the culmination of the Scoping Phase and its purpose is to ensure that the EIA Phase satisfies the requirements of NEMA and NEMWA. Accordingly, this Plan of Study for EIA outlines the anticipated process and products for the EIA Phase.

This Plan of Study for EIA has been compiled in terms of NEMA GN R. 982 of 4 December 2014 and NEMWA, GN R. 921 of 29 November 2013 and will be submitted to DEA for their consideration.

### 6.2 Description of the activity

The nature of the activity is described in detail in **Chapter 3**. The developmental infrastructure would be constructed includes the following:

- An expanded Ash Disposal Facility that would have sufficient capacity for the remaining operational life of the power station until 2039 plus a five year contingency to 2045;
- An AWR dam from where decant and drained water would be pumped back to the power station for re-use;
- An AWR transfer dam;
- Delivery and return infrastructure, including pipelines, transfer houses, pump stations;
- Powerlines;
- Access roads; and
- Clean and dirty water collection channels/trenches Ash Disposal Facility.

### 6.3 Feasible project alternatives recommended from the scoping processes

**Chapter 3** reviewed a range of project alternatives associated with the proposed activities. Pursuant to this Scoping exercise, which was based on input from various specialists, a shortlist of feasible project alternatives provided in Table 6-1 has been identified for further, more detailed investigation during the EIA Phase. ~~namely:~~

**Table 6-1 | Preferred alternatives and main reasons for their preference**

<u>Preferred alternative</u>	<u>Reason for preferred alternative</u>
<ul style="list-style-type: none"> <li>■ <u>Location alternative</u> <ul style="list-style-type: none"> <li>– <u>Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.</u></li> </ul> </li> </ul>	<p><u>Various site locations were considered within a 12km radius of the Kriel Power Station for the proposed extended Ash Disposal Facility as described in Chapter 2 of this report. One site, i.e. Site 10, was identified as being the most suitable for the proposed extended Ash Disposal Facility for the following reasons:</u></p> <ul style="list-style-type: none"> <li>■ <u>located close to the Kriel Power Station and therefore requires less capital costs;</u></li> <li>■ <u>located on a brown field site within the disturbance footprint of the existing Ash Disposal Facility;</u></li> <li>■ <u>limited visual footprint due to its proximity to the existing Ash Disposal Facility;</u> <u>and</u></li> <li>■ <u>predominantly located on Eskom owned land.</u></li> </ul>

Preferred alternative	Reason for preferred alternative
<ul style="list-style-type: none"> <li>■ <u>Site layout alternative</u> <ul style="list-style-type: none"> <li>– <u>Ash dam 4 layout, consisting of only AD 4.1 and 4.2 (Figure 3-6).</u></li> </ul> </li> </ul>	<p>Three potential layout alternatives have been considered for the preferred site (see Section 3.3.3):</p> <ul style="list-style-type: none"> <li>■ <u>2014 ash dam layout (Figure 3-4);</u></li> <li>■ <u>2016 ash dam layout, consisting of three ash dams (Figure 3-5); and</u></li> <li>■ <u>2016 ash dam layout, consisting of only AD 4.1 and 4.2 (Figure 3-6).</u></li> </ul> <p>The main aspect that influenced the design layouts relate to potential geotechnical issues due to subsidence. It was however determined that the proposed extended ash dams 4.1 and 4.2 do not hold any potential geotechnical issues since the backfilled mined area (located beneath AD 4.3) is avoided, resulting in the remaining two layout alternatives to be screened out as feasible options.</p>
<ul style="list-style-type: none"> <li>■ <u>Activity alternative</u> <ul style="list-style-type: none"> <li>– <u>Wet ashing.</u></li> </ul> </li> </ul>	<p>Two methods for ash disposal was considered:</p> <ul style="list-style-type: none"> <li>■ <u>Wet ashing; and</u></li> <li>■ <u>Dry ash stacking.</u></li> </ul> <p>As described in Section 3.3.4, wet ashing is considered to be financially the best practical option in comparison to dry ash stacking which would require a change in the station's current design, and would entail considerable costs to change the existing wet ashing infrastructure and systems at Kriel Power Station. Furthermore, even though dry ash stacking would require less water than the wet ashing option, the water that is used for the current (and proposed) wet ashing operations is recycled wastewater from the power station's cooling system (see Figure 3-3). Lastly, the footprint requirements for a dry ash dump is larger than for a wet ash dam and would thus increase the disturbance footprint of the Kriel Power Station.</p>
<ul style="list-style-type: none"> <li>■ <u>No-go alternative</u></li> </ul>	<p>NEMA requirement against which all alternative should be measured.</p>

- ~~Location alternatives~~
  - ~~Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.~~
- ~~Site layout alternatives~~
  - ~~Ash Dam 4.1 and 4.2. One layout for Site 10 ashing facility and associated infrastructure.~~
- ~~Activity alternatives~~
  - ~~Wet ashing.~~
- ~~No-go alternative (NEMA requirement against which all alternative should be measured)~~

## 6.4 Description of tasks to be performed

### 6.4.1 Potential environmental impacts identified during Scoping

Chapter 5 has reviewed the range of potential environmental impacts associated with the proposed Ash Disposal Facility for the Kriel Power Station in Mpumalanga. Pursuant to this Scoping exercise, which was based on available literature, a detailed screening exercise, I&APs and various specialists, a shortlist of potentially significant environmental impacts was identified for further, more detailed assessment during the EIA Phase. Specifically the following potential environmental impacts have been identified:

- Construction phase impacts on the biophysical and social environments:
  - Disturbance of flora and fauna;
  - Sedimentation and erosion of water ways;
  - Increase in traffic volumes;

- Disposal of hazardous<sup>27</sup> substances on site;
- Increased risk of fire;
- Pollution (noise, air and water); and
- Dust impacts.
- Operational phase impacts on the biophysical environment:
  - Impacts on the terrestrial fauna and flora;
  - Impacts on aquatic flora and fauna;
  - Impacts on groundwater resources; and
  - Impact on air quality.
- Operational phase impacts on the social environment:
  - Visual impacts;
  - Impact on heritage resources;
  - Noise impacts;
  - Impacts on the local economy;
  - Impacts on agriculture and other land uses in the study area;
  - Impacts on traffic;
  - Impacts on existing infrastructure and services; and
  - Impacts on health and safety of workers and others in the area.

#### 6.4.2 Method of assessing the significance of potential environmental impacts

This section outlines the proposed method for assessing the significance of the potential environmental impacts outlined above. As indicated, these include both operational and construction phase impacts.

For each impact, the **EXTENT** (spatial scale), **MAGNITUDE** and **DURATION** (time scale) would be described. These criteria would be used to ascertain the **SIGNIFICANCE** of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The mitigation described in the EIR would represent the full range of plausible and pragmatic measures but does not necessarily imply that they would be implemented

The tables on the following pages show the scale used to assess these variables, and defines each of the rating categories.

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<sup>27</sup>Note that an ash classification process is underway and will be reported on in the EIA phase.

Table 6-2 | Assessment criteria for the evaluation of impacts

Criteria	Category	Description
Spatial influence of impact	Regional	Beyond a 10 km radius of the candidate site.
	Local	Between 100m and 10 km radius of the candidate site.
	Site specific	On site or within 100 m of the candidate site.
Magnitude of impact (at the indicated spatial scale)	High	Natural and/ or social functions and/ or processes are <i>severely</i> altered
	Medium	Natural and/ or social functions and/ or processes are <i>notably</i> altered
	Low	Natural and/ or social functions and/ or processes are <i>slightly</i> altered
	Very Low	Natural and/ or social functions and/ or processes are <i>negligibly</i> altered
	Zero	Natural and/ or social functions and/ or processes remain <i>unaltered</i>
Duration of impact (temporal)	Construction period	From commencement up to 2 years of construction
	Short Term	Between 2 and 5 years after construction
	Medium Term	Between 5 and 15 years after construction
	Long Term	More than 15 years after construction

The **SIGNIFICANCE** of an impact is derived by taking into account the temporal and spatial scales and magnitude. The means of arriving at the different significance ratings is explained in Table 6-3.

Table 6-3 | Definition of significance ratings

Significance ratings	Level of criteria required
<b>High</b>	<ul style="list-style-type: none"> <li>High magnitude with a regional extent and long term duration</li> <li>High magnitude with either a regional extent and medium term duration or a local extent and long term duration</li> <li>Medium magnitude with a regional extent and long term duration</li> </ul>
<b>Medium</b>	<ul style="list-style-type: none"> <li>High magnitude with a local extent and medium term duration</li> <li>High magnitude with a regional extent and construction period or a site specific extent and long term duration</li> <li>High magnitude with either a local extent and construction period duration or a site specific extent and medium term duration</li> <li>Medium magnitude with any combination of extent and duration except site specific and construction period or regional and long term</li> <li>Low magnitude with a regional extent and long term duration</li> </ul>
<b>Low</b>	<ul style="list-style-type: none"> <li>High magnitude with a site specific extent and construction period duration</li> <li>Medium magnitude with a site specific extent and construction period duration</li> <li>Low magnitude with any combination of extent and duration except site specific and construction period or regional and long term</li> <li>Very low magnitude with a regional extent and long term duration</li> </ul>
<b>Very low</b>	<ul style="list-style-type: none"> <li>Low magnitude with a site specific extent and construction period duration</li> <li>Very low magnitude with any combination of extent and construction or short term duration</li> </ul>
<b>Neutral</b>	<ul style="list-style-type: none"> <li>Zero magnitude with any combination of extent and duration</li> </ul>

Once the significance of an impact has been determined, the **PROBABILITY** of this impact occurring as well as the **CONFIDENCE** in the assessment of the impact, would be determined using the rating systems outlined in Table 6-4 and Table 6-5, respectively. It is important to note that the significance of an impact should always be considered in concert with the probability of that impact occurring. Lastly, the **REVERSIBILITY** of the impact is estimated using the rating system outlined in Table 6-6.

**Table 6-4 | Definition of probability ratings**

Probability ratings	Criteria
Definite	Estimated greater than 95 % chance of the impact occurring.
Probable	Estimated 5 to 95 % chance of the impact occurring.
Unlikely	Estimated less than 5 % chance of the impact occurring.

**Table 6-5 | Definition of confidence ratings**

Confidence ratings	Criteria
Certain	Wealth of information on and sound understanding of the environmental factors potentially influencing the impact.
Sure	Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact.
Unsure	Limited useful information on and understanding of the environmental factors potentially influencing this impact.

**Table 6-6 | Definition of reversibility ratings**

Reversibility ratings	Criteria
Irreversible	The activity will lead to an impact that is in all practical terms permanent.
Reversible	The impact is reversible within 2 years after the cause or stress is removed.

#### 6.4.3 Stages at which the competent authority will be consulted

The competent authority was consulted during the pre-application meeting (21 September 2016, in Pretoria at DEAs Arcadia offices). Furthermore, the DEA as competent authority will be consulted during the 30day scoping phase public participation period and the 30 day EIA phase public participation period. The DEA will also be consulted if *ad hoc* scenarios arise which require their input. The NEMA 2014 EIA diagram, Figure 6-1 below indicates the stages at which the DEA will be consulted or provided opportunity to comment on the EIA.

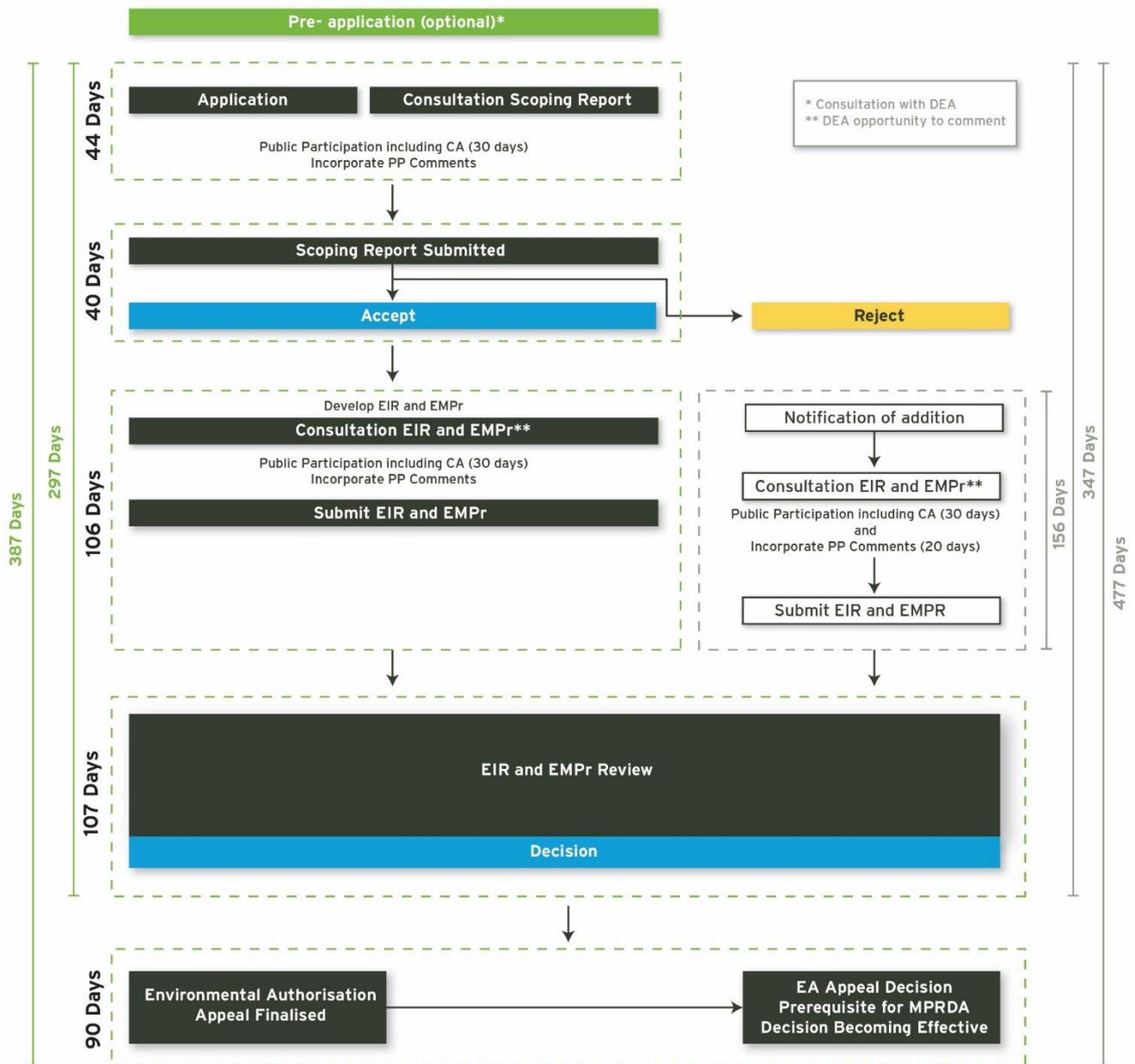


Figure 6-1 | The EIA process in terms of the NEMA 2014 EIA Regulations

### 6.5 Need for detailed investigations: Specialist studies

In reviewing the potential environmental impacts, all impacts initially identified during the Scoping Phase have been identified as being of concern and requiring further investigation. Accordingly, the following specialist studies will be undertaken to address a suite of potential environmental impacts:

Study	Consultant and Organisation
Terrestrial ecology impact assessment	Dr Brian Colloty, Scherman Colloty and Associates
Aquatic ecology impact assessment	Dr Brian Colloty & Dr Patsy Sherman, Scherman Colloty and Associates
Groundwater assessment	Mr Louis Stroebel, Aurecon
Air quality impact assessment	Ms Renee von Gruenewaldt, Airshed Planning Professionals
Visual impact assessment	Mr Johan Goosen, Aurecon
Heritage impact assessment	Mr Polke Birkholtz, Professional Grave Solutions: Heritage Unit
Noise impact assessment	Mr Derek Cosijn, Jongens Keet Associates
Agricultural / land capability and economic impact assessment	Mr Paul Vermaak, Sole Proprietor & Mr F Botha, Eco-Soils

Study	Consultant and Organisation
Traffic impact assessment	Mr Werner Heyns, Aurecon

The ToR for these investigations as well as a short summary of the various specialist consultants is given below. CVs are available upon request.

### 6.5.1 Terrestrial ecology impact assessment

Scherman Colloty & Associates, represented by **Dr Brian Colloty**, was appointed to undertake the terrestrial and aquatic assessments in 2009 and was reappointed to undertake both the terrestrial and aquatic studies, inclusive of summertime monitoring. Dr Colloty is an ecologist with a BSc (Hons) degree in Zoology and a doctorate in botany and has extensive knowledge of the region and experience in undertaking assessments and has been involved in various terrestrial and wetland assessment of the Steenkoolspruit / upper Olifants River systems in the past five years. Dr Colloty has also presented at various wildlife conferences and/or for societies.

The proposed ToR for terrestrial fauna and flora impact assessment is as follows:

- Conduct an ecological and floristic assessment to determine the present state of the environment on the sites and to identify potential impacts that could be caused by the proposed activity. The report must address the following:
  - Flora
    - Description of general floristic species diversity and community composition;
    - Identification of rare and endangered species (Red data species);
    - Physiognomic units based on floristic relevés; and
    - Ecological condition (successional stage) of predetermined physiognomic units.
  - Terrestrial fauna
    - Detailed faunal assessment, including a small mammal trapping session and nocturnal surveys;
    - Avifaunal assessment; and
    - Evaluation of the occurrence of the Marsh Sylph butterfly (*Metiselle mininx*) due to its conservation status.
  - Rank sites according to the significance of the site's impact on terrestrial fauna and flora;
  - Identify and describe ecosystem services;
  - Recommendation of mitigation measures to reduce or eliminate potential impacts on the terrestrial ecological environment.

### 6.5.2 Aquatic ecology impact assessment

**Dr Patsy Sherman** of Scherman Colloty and Associates is an ecologist with extensive experience in wetland and river ecology. Dr Sherman has previously undertaken assessments on the Olifants River catchment in terms of water quality impacts and is currently reviewing the water quality aspects of a number of IWULA s submitted by various collieries in the Witbank / Middleburg region.

The proposed ToR for this aquatic ecology impact assessment is as follows:

- Undertake a wetland and river assessment, which entails the following tasks:
  - Delineation and classification of the wetlands within the proposed sites;
  - Identification and mapping of suitable buffer zones;
  - Identify and describe ecosystem services;
  - Assessment of the status of observed faunal and floral populations;
  - Assessment of potential impacts on the drainage area's water quality and quantity;
  - Rank sites according to the significance of the site's impact on aquatic fauna and flora; and
  - Identification of possible recommendations for mitigation.

### 6.5.3 Groundwater assessment

**Mr Louis Stroebel** is a qualified geohydrologist with more than 15 years' experience in several geohydrological investigations. His extensive field experience combined with report writing, project management, etc. associated with

rural water supply activities and Environmental Management Reports have led to the development of a good understanding of the fundamentals of geohydrology. Mr Stroebel also gained international experience in the clean-up of land and marine based organic contaminants during an 8 month secondment in Europe. He obtained his accreditation with the South African Council for Natural Scientific Professions in 2002, when he was registered as a Professional Environmental Scientist (No. 400027/02).

The ToR for the groundwater assessment is as follows:

- Undertake a hydrocensus and geophysical survey of the sites to better understand the characteristics of the aquifer and groundwater flow patterns;
- Undertake aquifer testing to obtain a reliable estimate of hydraulic conductivity of the aquifers receiving groundwater from the ash facility;
- Develop a numerical flow and transport model to identify and quantify impacts that the ash facility could have on the groundwater environment;
- ~~Rank sites according to the significance of the site's impact on groundwater resources;~~
- Provide recommendations for mitigating the impacts; and
- Compile technical documents for Eskom's water use license application which will include results from the hydrocensus, interpretation of the geophysical survey, drilling and borehole results, aquifer classification, a hydro geochemical description, the outcome of the numerical flow and transport model and a prediction of the impact of the proposed ash facility on the geohydrological environment as a function of time, as the facility grows in height.

#### 6.5.4 Air quality impact assessment

**Ms Renee von Gruenewaldt** has more than 10 years' experience in the field of air pollution impact assessment and air quality management. Ms von Gruenewaldt has undertaken numerous air pollution impact studies and has provided extensive guidance to both industry and government on air quality management practices.

The ToR for the air quality impact assessment is as follows:

- Identification and quantification of all sources of atmospheric emissions associated with the ash facilities expansion;
- Simulation of ground level PM10 concentrations and dust fallout through a dispersion model to determine and predict zones of maximum incremental ground level impacts from all sources;
- Evaluation of potential impact on human health and the environment; and
- Development of a Dust Management Plan.

#### 6.5.5 Visual impact assessment

**Mr Johan Goosen** is employed as an environmental planner and landscape architect and at Aurecon. He has more than 15 years' experience in landscape architecture and environmental planning in a wide variety of sectors. His expertise includes urban open space planning and regional environmental planning frameworks, end land use planning for mining and waste facilities and brownfields site re-development. He has further been involved in numerous projects requiring environmental screening, impact assessment/permitting, construction monitoring and visual impact assessment (VIA) for linear infrastructure such as roads, rail, bulk water, urban and rural property developments and the mining and metals sector. Johan holds a Bachelor in Landscape Architecture, which he obtained from the University of Pretoria (UP) in 1998, and completed a Graduate Diploma in Environmental Engineering from the Witwatersrand University (WITS) in 2014. He is a member of both the International Association of Impact Assessment (IAIA) and the Institute for Landscape Architecture in South Africa (ILASA). He is also a Registered Professional Landscape Architect with the South African Council for Landscape Architectural Professionals (SACLAP).

The ToR for the visual impact assessment is as follows:

- Undertake a review of baseline information, describe the receiving environment; and establish a view of the catchment area, view corridors, viewpoints, receptors and identification of potential lighting impacts at night;

- Undertake an assessment of the visual impacts at the candidate sites, in terms of the scale of impact (local, regional, national), magnitude of impact (low, medium or high) and the duration of the impact (construction, up to 10 years after construction and and more than 10 years after construction);
- Rank sites according to the significance of the sites' visual impact; and
- Identify mitigation measures to reduce or eliminate the potential visual impacts identified.

#### 6.5.6 Heritage impact assessment

**Mr Polke Birkholtz** from Professional Grave Solutions (Pty) Ltd (PGS Heritage Unit) was appointed to undertake the requisite Heritage Impact Assessment in 2009 and has been appointed to update this study. Mr Birkholtz has been involved in heritage related studies and grave relocations since 1997. Mr Birkholtz has acted as project manager on numerous heritage impact assessments throughout South Africa, as well as Phase 2 Mitigation in Mpumalanga, Limpopo, the North West Province and Gauteng. He has also been involved in projects in Swaziland and Botswana. Mr Birkholtz is a member of the Association of Southern African Professional Archaeologists.

The ToR for the heritage impact assessment is as follows:

- Undertake field work to verify results of desktop investigation;
- Document (GPS coordinates and map) all heritage sites, objects and structures identified on the site;
- Compile a report which would contain the following:
  - Identification and mapping of heritage resources in the area of investigation;
  - Assessment of significance of these resources in terms of the heritage assessment criteria;
  - Assess impact of the proposed ash facilities on these heritage resources;
  - Consider alternatives;
  - Rank sites according to the significance of the site's impact on heritage resources; and
  - Identify mitigation measures for construction and operational impacts.

#### 6.5.7 Noise impact assessment

**Mr Cosijn** is a partner with Jongens Keet Associates and Calyx Environmental cc. He is a professional engineer registered with the Engineering Council of South Africa (ECSA), a Fellow of SAICE, a Member of the Southern African Acoustics Institute (SAAI) and is also certified as an Environmental Assessment Practitioner of South Africa. His area of special expertise is environmental noise (acoustical engineering) and has 45 years of professional experience over a wide range of civil engineering, transportation planning, environmental and acoustic engineering projects.

The ToR for the noise impact assessment is as follows:

- Establish the existing noise climate of the site;
- Undertake a detailed quantitative and qualitative assessment on the impact of the proposed ash facilities on the area of influence in terms of the nature, magnitude, extent and implications thereof;
- Assess potential impacts in terms of construction and operational phases, as well as cumulative impacts;
- Rank sites according to the significance of the site's noise impact; and
- Identify appropriate noise mitigation measures.

#### 6.5.8 Agricultural / land capability and economic impact assessment

**Mr Paul Vermaak** was appointed to undertake an assessment of the land uses in the surrounding landscape, as well as the land capability rating of the properties investigated in 2009. He has been reappointed to update the Agricultural Impact Assessment. Mr Vermaak is a Geologist and Pedologist with over 13 years of experience in the Earth and Natural Sciences sectors and had been involved in providing solutions to EPCM turn-key projects in the mining and minerals industry. He has also gained work experience through projects in and throughout Southern Africa (Swaziland, Mozambique, Malawi, Zimbabwe, Botswana and the Democratic Republic of the Congo) and has developed a broad and diverse experience base. **Mr F Botha** of Eco-Soils was commissioned to provide information in terms of the chemical and

physical nature of the soils (which would not have changed significantly in the last 5 years) and to provide an economic analysis of the agricultural potential of the properties. Mr Botha has been involved in numerous soil classification and land capability studies, as well as economic and agronomic feasibility studies. The economic analysis of the agricultural potential will be recalculated and assessed during this EIA process.

The ToR for the agricultural impact assessment is as follows:

- Undertake a literature review and collection of baseline data, to establish the status quo of agricultural practices and resources within the study areas and on a national level (detailed grids will not be undertaken);
- Undertake fieldwork to gather additional data and to determine soil potential and describe soil characteristics, both physical and chemical;
- Interpret soil chemical analysis for soil fertility purposes;
- Interpret soil physical features such as texture, structure, drainage, etc.;
- Determine the land capability and land use of the sites (crop and grazing potential), including economic analysis;
- Provide a clearly mapped distinction of the agricultural potential of the land;
- Undertake an assessment to predict the potential impacts on agricultural potential;
- ~~Rank sites according to the significance of the impact on land use / agricultural potential;~~ and
- Identify mitigation measures that could reduce or eliminate the identified impacts.

#### 6.5.9 Traffic impact assessment

**Dr Werner Heyns** of Aurecon has been appointed to undertake the traffic impact assessment. Werner is a technical director specialising in transport planning and traffic engineering working in the Tshwane office. He has more than 17 years' collective experience in transport/development planning and highway maintenance and design. He has worked on projects promoting sustainable development requiring technical input through the delivery of transport impact assessments, feasibility studies, master planning, policy formation studies, green travel plans and parking and traffic studies. In the past Werner provided input into SEA's and EIA's, cost benefit analysis for roads and transport user benefit assessments of selected projects, strategic modelling, public transport infrastructure and service audits. Werner has sound transport planning and traffic engineering skills, knowledge and capabilities, enabling clients to realise their land and transport planning aspirations. Werner is a professional planner registered with SACPLAN, a member of the Institute of Highways and Transportation and a Chartered Member of the Institute of Logistics and Transport. He holds a PhD in Transport Planning from the North-West University in South Africa.

The ToR for the traffic impact assessment is as follows:

- Assess the current traffic situation with regards to intersections capacity, road network capacity, public transport and other traffic engineering related aspects relevant to the area;
- Assess the impact of the proposed ash facility on the current traffic situation;
- ~~Provide preference on sites in this regard;~~ and
- Identify appropriate mitigation measures where relevant.

## 6.6 Ash Disposal Facility Environmental Impact Assessment Report (EIR)

Should the DEA approve this Plan of Study and the project proceeds to the EIA Phase, an EIR will be produced. The purpose of the EIR would be to present a comparative assessment of the relative significance of the potential environmental impacts for the proposed ash facility, location and layout alternatives. The EIR would thus include the following:

- A description of potential environmental impacts and reasonable alternatives identified during the scoping investigation.
- Key findings of the various specialist studies as they pertain to the affected environment.
- An overview of the public participation process conducted during the compilation of the EIR.

- A detailed assessment of the significance of the potential environmental impacts for the various project alternatives. This assessment, which would use the methodology outlined in Section 6.4.2, would be informed by the findings of the specialist studies, and professional judgement.
- The full range of mitigation measures including an indication of how these would influence the significance of any potential environmental impacts, together with a Construction and Operational EMPr. The mitigation measures would be informed by the specialist studies, professional experience and comment received from I&APs.

## 6.7 Public participation process

The purpose of the public participation process is to provide I&APs with adequate opportunity to have input into the EIA process. The public participation process during the EIA Phase would include the following:

### 6.7.1 Public comment on the EIR

Following the completion of the EIR (refer to **Section 4** above), it will be lodged at the Kriel Public Library and the security centre at Kriel Power Station, as well as on the Eskom and Aurecon websites:

- **Eskom:** [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)
- **Aurecon:** <http://www.aurecongroup.com/en/public-participation.aspx>

Registered I&APs will be notified of the lodging by means of letters (mailed and/or emailed), and given 30 days in which to comment on the report. If the need arises or if requested<sup>28</sup> a public meeting would be held during the comment period in Kriel and Thubelihle during which the EIA team would present the findings of the ~~draft~~ EIR and provide I&APs with the opportunity to provide feedback on the ~~draft~~ report. Registered I&APs will be notified of the meeting by way of the letters used to inform the I&APs of the lodging of the EIR. Any necessary Focus Group discussions will also be arranged.

All written correspondence would be in English. The public meeting would be presented in English, but translations to Afrikaans and/or any other dominant local language will be available on request.

The public comments would be consolidated into an annexure of the EIR. This will take the form of a CRR, which would summarise the issues and concerns raised and provide the Project Team's responses thereto. The report will also be revised in light of feedback from the public, where necessary. The document will be submitted to DEA for their decision making process.

### 6.7.2 Opportunity for appeal

All registered I&APs would be notified in writing of the receipt of the authorities' decision and will be provided with an opportunity to submit an appeal, if allowed for in the decision. They would be reminded of their right to appeal against DEA's decision in terms of NEMA and NEMWA.

## 6.8 Proposed programme

A summary of the proposed programme is given in the table below.

Table 6-7 | Proposed EIA programme

Activity	Proposed date	Deliverable
<b>1<sup>st</sup> round of public engagement:</b>		
• Letter to I&APs & adverts	26/10/2016	Informed I&APs
• Lodge SR in public venues and with Authorities	26/10/2016	SR in libraries, websites etc.
• Open day and public meeting	09/11/2016	Public engagement

<sup>28</sup> Public meetings were held at Kriel and Thubelihle during the scoping phase. Based on the lack of attendance it is not deemed pivotal that public meetings be held during the EIA phase unless the need arises or they are requested.

Activity	Proposed date	Deliverable
• Public comment period ends	28/11/2016	Updated CRR
Submit SR (incl. Plan of Study for EIA) to environmental authority	<u>07/12/2016</u>	Approved SR & Plan of Study EIA
Specialist studies	<u>03/02/2017</u>	Specialist reports
<b>2nd round of public engagement:</b>		
• Letter to I&APs & adverts	22/02/2017	Informed I&APs
• Lodge EIR in public venues	22/02/2017	EIR in libraries, website etc.
• Public comment period ends	28/03/2017	Updated CRR
Submit EIR to DEA	<u>14/04/2017</u>	Decision from DEA
<b>3rd round of public engagement:</b>		
• Letter to I&APs to notify them on DEA decision	<u>07/08/2017</u>	Authorities' decision.

## 6.9 Personnel

As for the Scoping phase, Aurecon's Andries van der Merwe provides strategic guidance to the EIA process and Franci Gresse undertakes the management of the EIA process and, together with Dirk Pretorius, the requisite reporting. A short summary of these consultants is given below. CVs are available upon request.

**Mr Andries van der Merwe**, the Project Director, is appropriately qualified and registered with the relevant professional bodies. Mr van der Merwe is a professionally registered Environmental Engineer registered with the Engineering Council of South Africa (Pr. Eng.) and holds a B. Eng. (Civil) degree. Mr van der Merwe has over 14 years' experience in the field of impact assessment

**Ms Franci Gresse**, the Project Leader, is a Senior Environmental Practitioner in the Cape Town Office with eight years' experience in the field. She completed a Bachelor of Science and Honours Degree in Conservation Ecology at the University of Stellenbosch. Ms Gresse has been involved in a variety of projects, including a 24G application, basic and full EIAs, environmental management plans, maintenance management plans, wetland rehabilitation plans and pre-feasibility and feasibility studies. Specifically, Ms Gresse has been involved with numerous renewable energy projects in South Africa and Namibia, as well as water related projects such as the national Working for Wetlands Rehabilitation Programme. She has also been involved with the proposed expansion of the Kriel Ash Disposal Facility project since 2009.

**Mr Dirk Pretorius**, one of the project staff, is a Senior Environmental Practitioner at Aurecon's Cape Town office with six years' experience in the field. Mr Pretorius is registered as a Professional Natural Scientist at the Natural Scientific Professions Act, 2003 (Act 27 of 2003) and has a Bachelor of Science (Honours) degree in Conservation Ecology. He has been involved in a number of energy projects in the Western, Eastern and Northern Cape provinces of South Africa as well as several energy related projects in East Africa.

## 7 CONCLUSIONS AND WAY FORWARD

The purpose of this Chapter is to summarise and conclude the Scoping Report and describe the way forward.

### 7.1 Conclusions

As per the requirements of NEMA, this Scoping investigation has reviewed a range of project alternatives and contemplated the array of potential environmental impacts associated with the following proposed activities in Mpumalanga:

- Construction of an expanded Ash Disposal Facility that would have sufficient capacity for the remaining operational life of the power station until 2039 plus a five year contingency.
- Associated infrastructure that would also be established includes the following:
  - An expanded Ash Disposal Facility that would have sufficient capacity to store ash volumes produced to 2045;
  - An AWR dam from where decant and drained water will be pumped back to the power station for re-use;
  - An AWR transfer dam;
  - Delivery and return infrastructure, including conveyor belts and/ or pipelines, transfer houses, pump stations;
  - Clean and dirty water channels;
  - Powerlines; and
  - Access roads.

The following preferred alternatives in Table 7-1 will be given consideration in the EIR against the “No-go” alternative:

**Table 7-1 | Preferred alternatives and main reasons for their preference**

<u>Preferred alternative</u>	<u>Reason for preferred alternative</u>
<ul style="list-style-type: none"> <li>■ <u>Location alternative</u> <ul style="list-style-type: none"> <li>– <u>Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.</u></li> </ul> </li> </ul>	<p><u>Various site locations were considered within a 12km radius of the Kriel Power Station for the proposed extended Ash Disposal Facility as described in Chapter 2 of this report. One site, i.e. Site 10, was identified as being the most suitable for the proposed extended Ash Disposal Facility for the following reasons:</u></p> <ul style="list-style-type: none"> <li>■ <u>located close to the Kriel Power Station and therefore requires less capital costs;</u></li> <li>■ <u>located on a brown field site within the disturbance footprint of the existing Ash Disposal Facility ;</u></li> <li>■ <u>limited visual footprint due to its proximity to the existing Ash Disposal Facility ; and</u></li> <li>■ <u>predominantly located on Eskom owned land.</u></li> </ul>
<ul style="list-style-type: none"> <li>■ <u>Site layout alternative</u> <ul style="list-style-type: none"> <li>– <u>Ash dam 4 layout, consisting of only AD 4.1 and 4.2 (Figure 3-6).</u></li> </ul> </li> </ul>	<p><u>Three potential layout alternatives have been considered for the preferred site (see Section 3.3.3):</u></p> <ul style="list-style-type: none"> <li>■ <u>2014 ash dam layout (Figure 3-4);</u></li> <li>■ <u>2016 ash dam layout, consisting of three ash dams (Figure 3-5); and</u></li> <li>■ <u>2016 ash dam layout, consisting of only AD 4.1 and 4.2 (Figure 3-6).</u></li> </ul> <p><u>The main aspect that influenced the design layouts relate to potential geotechnical issues due to subsidence. It was however determined that the proposed extended ash dams 4.1 and 4.2 do not hold any potential geotechnical issues since the backfilled mined area (located beneath AD 4.3) is avoided, resulting in the remaining two layout alternatives to be screened out as feasible options.</u></p>

<u>Preferred alternative</u>	<u>Reason for preferred alternative</u>
<ul style="list-style-type: none"> <li>■ <u>Activity alternative</u> <ul style="list-style-type: none"> <li>– <u>Wet ashing.</u></li> </ul> </li> </ul>	<p><u>Two methods for ash disposal was considered:</u></p> <ul style="list-style-type: none"> <li>■ <u>Wet ashing; and</u></li> <li>■ <u>Dry ash stacking.</u></li> </ul> <p><u>As described in Section 3.3.4, wet ashing is considered to be financially the best practical option in comparison to dry ash stacking which would require a change in the station's current design, and would entail considerable costs to change the existing wet ashing infrastructure and systems at Kriel Power Station. Furthermore, even though dry ash stacking would require less water than the wet ashing option, the water that is used for the current (and proposed) wet ashing operations is recycled wastewater from the power station's cooling system (see Figure 3-3). Lastly, the footprint requirements for a dry ash dump is larger than for a wet ash dam and would thus increase the disturbance footprint of the Kriel Power Station.</u></p>
<ul style="list-style-type: none"> <li>■ <u>No-go alternative</u></li> </ul>	<p><u>NEMA requirement against which all alternative should be measured.</u></p>

- ~~Activity alternatives:~~
  - ~~Wet ashing.~~
- ~~Location alternatives~~
  - ~~Site 10 for the proposed Ash Disposal Facility and associated conveyor system alignments.~~
- ~~Site layout alternatives:~~
  - ~~Ash Dam 4.1 and 4.2. One layout for Site 10 ashing facility and associated infrastructure.~~
- ~~No-go alternative (NEMA requirement against which all alternative should be measured)~~

Specifically the following potential environmental impacts have been identified for further consideration in the EIR:

- Construction phase impacts on the biophysical and social environments:
  - Disturbance of flora and fauna;
  - Sedimentation and erosion of water ways;
  - Increase in traffic volumes;
  - Disposal of hazardous substances on site;
  - Increased risk of fire;
  - Pollution (noise, air and water); and
  - Dust impacts.
- Operational phase impacts on the biophysical environment:
  - Impact on the terrestrial fauna and flora;
  - Impact on aquatic flora and fauna;
  - Impact on groundwater resources; and
  - Impact on air quality.
- Operational phase impacts on the social environment:
  - Visual impacts;
  - Impact on heritage resources;
  - Noise impacts;
  - Impact on the local economy;
  - Impact on agriculture and other land uses in the study area;
  - Impact on traffic;
  - Impact on existing infrastructure and services; and
  - Impact on health and safety of workers and others in the area.

The following specialist studies and specialists will be commissioned to provide more detailed information on those environmental impacts which have been identified as potentially being of most concern, and/or where insufficient information is available, namely:

Study	Consultant and Organisation
Terrestrial ecology assessment	Dr Brian Colloty, Scherman Colloty and Associates
Aquatic ecology assessment	Dr Brian Colloty & Dr Patsy Sherman, Scherman Colloty and Associates
Groundwater assessment	Mr Louis Stroebel, Aurecon
Air quality impact assessment	Ms Renee von Gruenewaldt, Airshed Planning Professionals
Visual impact assessment	Mr Johan Goosen, Aurecon
Heritage impact assessment	Mr Polke Birkholtz, Professional Grave Solutions: Heritage Unit
Noise impact assessment	Mr Derek Cosijn, Jongens Keet Associates
Agricultural / Land capability and economic impact assessment	Mr Paul Vermaak, Sole Proprietor & Mr F Botha, Eco-Soils
Traffic impact assessment	Dr Werner Heyns, Aurecon

The rationale for these specialist investigations and the ToR has been outlined under the PoS for EIA in **Chapter 6** of this report.

## 7.2 The way forward

Following the 30-day period (i.e. until 28 November 2016) in which I&APs ~~are~~ were afforded an opportunity to submit comment on the Scoping Report to Aurecon, the scoping report ~~will~~ was ~~be~~ updated incorporating all comments. The SR and comments will be submitted to the DEA for their consideration. DEA will either reject the report or instruct the applicant to proceed to the EIA Phase, either as proposed in the Plan of Study for EIR, or direct that amendments are made before continuing. All registered I&APs will be kept informed throughout the EIA process of

## 8 REFERENCES

### 8.1 General references

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- A.A. and Lötter, M.C. 2007. Mpumalanga Biodiversity Conservation Plan Handbook. Mpumalanga Tourism & Parks Agency, Nelspruit.
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## 8.2 Electronic resources

Eskom - Kriel Power Station: [http://www.eskom.co.za/live/content.php?Item\\_ID=177](http://www.eskom.co.za/live/content.php?Item_ID=177) (accessed 16/03/2010)

Mpumalanga Provincial Government Department of Agriculture and Land Administration (DALA): <http://www.mpu.agric.za/Web/index.htm> (accessed 21/04/2010)

South African National Botanical Institute BGIS: <http://bgis.sanbi.org/index.asp?screenwidth=1280> (accessed 21/04/2010)

<http://www.thefreedictionary.com/supernatant>(accessed in November 2010)

[http://www.steinmuller.co.za/index.php/sm/company/company\\_history](http://www.steinmuller.co.za/index.php/sm/company/company_history)(accessed in November 2010)

## **Annexure A**

### **Annexure A.1**

**Details of the expertise of the EAP, including a curriculum vitae**



## Franci Gresse

Franci is a senior environmental practitioner in Aurecon's Cape Town office. She has been involved in various environmental investigations, including environmental impact assessments (EIA's), environmental management plans (EMP's), environmental management programmes (EMP's), rehabilitation plans maintenance management plans (MMP's) and fatal flaw analysis.

Franci has been involved with the Working for Wetlands rehabilitation programme for the past five years, of which she has been acting as the Team Leader for the environmental assessment practitioners (EAP's) for the last three years. The Working for Wetlands project won the 2012 Aurecon Chairman's Award for its positive contribution to the natural and social environment. In addition, Franci has also been involved with a number of projects in the renewable energy sector.

Franci served on the committee of the South African affiliate of the International Association for Impact Assessment (IAIA) for the Western Cape Branch from 2009 to 2011, and remains a member. She completed a Bachelor of Science and an Honours Degree in Conservation Ecology at the University of Stellenbosch (South Africa).

### Qualifications

BSc (Hons) Conservation Ecology

Member, International Association of Impact Assessment (IAIA)

### Specialisation

Environmental Impact Assessment Practitioner

### Years in industry

8.08

## Experience

### **Working for Wetlands plan 2016 - 2018, Regional South Africa, Department of Environmental Affairs: Natural Resource Management Directorate, 06/2016 - Date, Project Leader**

The Natural Resource Management Directorate of the Department of Environmental Affairs appointed Aurecon to provide environmental and engineering services for the Working for Wetlands Programme which is a national wetland rehabilitation programme. Responsibilities include the management and coordination of the overall project, management of the environmental authorisation component of the project, as well as the compilation of basic assessment reports (BAR) for the country. Other responsibilities include the compilation of wetland rehabilitation plans for the Western Cape, Northern Cape and Limpopo Provinces, liaison with authorities and the public (public participation process) and management of wetland specialists.

### **Integrated Environmental Impact Assessment (EIA) for the proposed extension of the Ash Dam facility at Kriel power station, Mpumalanga Province, South Africa, Eskom Holdings, 06/2016 - date, Project Leader**

Appointed by Eskom to conduct an integrated environmental impact assessment (EIA) for the proposed construction of a fourth ash dam facility at the Kriel power station. Responsible for the general project management and finances, authority liaison and the compilation and review of the EIA documentation.

### **Amended Environmental and Socio-Economic Impact Assessment for a concentrated solar plant facility near Arandis in the Erongo Region, 02/2016 – 10/2016, Project Leader**

Aurecon was appointed by the NamPower to amend the Environmental Clearance Certificate (ECC) issued for the Erongo Coal-fired Power Station at Arandis, to a Concentrated Solar Plant. Responsibilities included project management (programme, finances and client expectations), liaison with authorities and relevant stakeholders, review of specialist reports and the compilation and review of the Amendment Report.



## Franci Gresse Senior Environmental Impact Assessment Practitioner

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### **Table Mountain Group (TMG) Aquifer feasibility study and pilot project, Western Cape Province, South Africa, City of Cape Town, 2015 - date, Environmental Consultant**

The TMG Aquifer Feasibility Study and Pilot Project was initiated in 2002 and is a long term planning initiative to investigate the groundwater potential of the TMG Aquifer as a water source to augment Cape Town's water supply. Given the recommendations in the Exploratory Phase report, and the fact that the TMG Aquifer has since been utilised as a water resource in areas such as Hermanus and Oudtshoorn, the City of Cape Town decided to omit the Pilot Phase and rather proceed with an extended Exploratory Phase, which would include limited pump testing. Aurecon was appointed to undertake the extended Exploratory Phase work. Responsibilities include the compilation of Environmental Management Plans for the additional test sites, liaison with the relevant authorities and landowners and management of the Environmental Control Officers on the project.

### **Implementation of the Hoekplaas environmental authorisation (EA), Northern Cape Province, South Africa, Mulilo Renewable Energy, 11/2013 - 05/2015, Project Leader**

Aurecon assisted the holder of the environmental authorisation (EA) for the 100 MW photovoltaic (PV) facility in De Aar with the implementation of the environmental conditions to ensure compliance to all relevant environmental legislation. Responsible for the management of tasks and review of all documentation. Also assisting client with questions on the environmental impact assessment (EIA) process.

### **Environmental impact assessment and compilation of an environmental management plan (EMP) for the Swakopmund-Mile 7 Water Supply, Phase 2, Swakopmund, Namibia, NamWater, 11/2013 - 10/2015, Project Leader**

NamWater appointed Aurecon to assist with the environmental impact assessment process for the proposed construction of a new bulk water pipeline between Swakopmund and Mile 7. Responsible for the management and review of the environmental impact assessment (EIA) reports and processes, as well as the project's finances.

### **Working for Wetlands plan 2014 - 2016, Regional South Africa, South African National Biodiversity Institute (SANBI), 06/2013 – 05/2016, Task Leader**

The South African National Biodiversity Institute (SANBI) appointed Aurecon to provide environmental and engineering services for the Working for Wetlands Programme which is a national wetland rehabilitation programme. Responsible for the management of the environmental authorisation component of the project, as well as the compilation of basic assessment reports (BAR) for the country. Other responsibilities include the compilation of wetland rehabilitation plans for the Western Cape, Northern Cape, North West and Limpopo Provinces, liaison with authorities and the public (public participation process) and management of wetland specialists.



## Franci Gresse Senior Environmental Impact Assessment Practitioner

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### **Maintenance management plans (MMP's) for flood damaged road infrastructure, Western Cape Province, South Africa, Western Cape Provincial Government Department of Transport and Public Works, 06/2013 - Date, Project Staff**

The project entails the compilation of maintenance management plans (MMP's) for two local municipal areas (Laingsburg and Worcester), as well as obtaining the necessary permits/ water use authorisations. Personally involved during the project commencement with regards to strategy development, meetings with the relevant authorities and assistance with the development of the MMP's.

### **Environmental impact assessment (EIA) for the expansion of approved solar energy facilities located near Prieska and De Aar, Northern Cape Province, South Africa, Mulilo Renewable Energy, 03/2013 - 09/2015, Phase Leader**

Mulilo Renewable Energy decided to expand the approved solar energy facilities on the farms Hoekplaas and Klipgats in Prieska, as well as on the farms Badenhorst Dam and Du Plessis Dam in De Aar. The expansion of Hoekplaas farm in Prieska includes ten additional 75 MW photovoltaic (PV) facilities and six additional PV units at Klipgats Pan farm. The expansion at Badenhorst Dam farm includes four additional 75 MW PV facilities and three additional PV units at Du Plessis Dam farm. Responsible for the management and review of the environmental impact assessment (EIA) reports and processes, as well as the project's finances.

### **Fatal flaw study for two potential Wind Energy Facility (WEF) sites, Northern and Western Cape Provinces, South Africa, Juwi Renewable Energies (Pty) Ltd, 03/2013 - 04/2013, Environmental Practitioner**

The study entailed a fatal flaw analysis of two potential wind energy facility (WEF) sites in the Northern and Western Cape Provinces. Responsible for the assessment of the sites and compilation of the fatal flaw report.

### **Richtersveld wind energy facility (WEF), Northern Cape Province, South Africa, TRE Tozzi Renewable Energy S.p.A and Guma Group, 07/2012 - 09/2013, Environmental Practitioner**

The project entailed a due diligence of the proposed wind energy facility (WEF) to review compliance with the requirements of the Department of Energy's independent power producer (IPP) process. Responsible for the review of the environmental reports and compilation of the due diligence report.

### **Three photovoltaic (PV) energy facilities near Copperton, Northern Cape Province, South Africa, Mulilo Renewable Energy (MRE), 09/2011 - 05/2015, Environmental Practitioner**

The project entailed three environmental impact assessments (EIA's) for three photovoltaic (PV) energy facilities comprising 75 MW to 150 MW, located near Copperton. Responsible for the management the EIA process and project specialists, compilation of scoping and EIA reports and liaison with authorities.

### **Fatal flaw study for four potential wind energy facility (WEF) sites, Northern and Western Cape Provinces, South Africa, Mainstream Renewable Power South Africa, 11/2011 - 05/2012, Environmental Practitioner**

The study entailed a fatal flaw analysis of four potential wind energy facility (WEF) sites across the Northern and Western Cape Provinces. Responsible for the management of specialists, review of reports, assessment of the sites and compilation of the fatal flaw report.



## Franci Gresse Senior Environmental Impact Assessment Practitioner

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### **Implementation of the Klipgats Pan environmental authorisation (EA), Northern Cape Province, South Africa, Mulilo Renewable Energy, 09/2011 - 05/2015, Project Leader**

Aurecon was appointed to undertake three environmental impact assessments (EIA's) for three proposed photovoltaic (PV) solar energy plants near Copperton. The first PV solar energy plant will generate around 100 MW (preferred alternative) or 150 MW (alternative) on the Hoekplaas Farm (Farm 146/RE). The proposed PV plant will cover approximately 300 ha (preferred alternative) or 450 ha (alternative). The second includes a PV solar energy plant to generate roughly 100 MW on the farm Klipgats Pan (Farm 117/4) near Copperton in the Northern Cape. The proposed PV plant will cover an estimated 300 ha. An alternative site for a 100 MW PV plant with a 300 ha footprint is also being considered. The third comprises a PV solar energy plant to generate about 100 MW (preferred alternative) or 300 MW (alternative) on the farm Struisbult (Farm 104, portion 1) which will cover 300 ha to 900 ha. Responsible for managing tasks and reviewing all documentation for updating the environmental management plan (EMP) and implementing the environmental authorisation (EA). Also assisted client with questions on the EIA process.

### **Proposed rehabilitation of Wetlands as part of the Working for Wetlands, Regional, South Africa, South African National Biodiversity Institute (SANBI), 08/2011 - 09/2013, Environmental Practitioner**

Appointed by the South African National Biodiversity Institute (SANBI) to conduct environmental impact assessments (EIA's) for the rehabilitation of specific wetlands in all provinces of South Africa over a five year period. Responsible for the compilation of basic assessment reports (BAR) and Wetland Rehabilitation Plans for the Western Cape, Northern Cape, Gauteng and Limpopo Provinces. Other responsibilities included liaison with authorities, public participation process, management of specialists and general project management of the environmental component of the project.

### **Repair of flood damage to road structures in the Eden District Municipality, Western Cape Province, South Africa, Western Cape Provincial Department of Transport and Public Works, 01/2011 - Date, Environmental Practitioner**

The project entails the compilation of maintenance management plans (MMP) for seven areas within the Eden District Management Area to repair. Responsible for compilation of MMP's, review of reports and liaison with stakeholders and authorities.

### **Environmental impact assessment (EIA) for the proposed extension of the Ash Dam facility at Kriel power station, Mpumalanga Province, South Africa, Eskom Holdings, 11/2009 - 12/2015, Environmental Practitioner**

Appointed by Eskom to conduct an environmental impact assessment (EIA) for the proposed construction of a fourth ash dam facility at the Kriel power station. Responsible for the general project management and finances, screening process, compilation of the scoping and EIA reports, public participation and the compilation of a waste management licence application.



## Franci Gresse Senior Environmental Impact Assessment Practitioner

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### **Environmental impact assessment (EIA) for proposed relocation of solar energy facility, Onder Rietvlei Farm, Aurora, Western Cape Province, South Africa, Solaire Direct Southern Africa, 2010 - 2011, Project Leader**

Appointed by Solaire Direct to undertake a basic environmental impact assessment (EIA) process for the proposed relocation of an approved, but not yet constructed 10 MW solar energy facility. Responsible for the management and review of the EIA process and finances.

### **Environmental impact assessment (EIA) for proposed solar energy facility, Onder Rietvlei Farm, Western Cape Province, South Africa, Solaire Direct Southern Africa, 07/2010 - 02/2012, Environmental Practitioner**

Appointed by Solaire Direct to undertake a basic environmental impact assessment process for the proposed construction of a 10 MW solar energy facility. Responsible for the compilation of the draft and final reports, public participation process, management of specialists and general project management.

### **Proposed Paarl Mountain and Ysterbrug pumping main upgrades, Western Cape Province, South Africa, Drakenstein Municipality, 06/2010 – 12/2015, Environmental Advisor**

The Drakenstein Municipality appointed Aurecon's engineers to investigate and plan the proposed upgrade of the Paarl Mountain and Ysterbrug Pumping Scheme. The upgrading of the pipelines feeding the Meulwater Water Treatment Works from the Bethel and Nantes dams, also part of this scheme, was also investigated. Responsible for providing advice on environmental processes required. Other responsibilities included the management of the independent environmental assessment practitioner and the review of all environmental impact assessment (EIA) documentation.

### **Environmental sensitivity study (ESS) for a proposed solar energy facility on a farm Near Aurora, Western Cape Province, South Africa, Solaire Direct Southern Africa, 2010, Environmental Practitioner**

Appointed to provide an environmental sensitivity study (ESS) which inter alia highlights the potential constraints ('red flags') and opportunities presented by the site from an environmental perspective. Responsible for the compilation of the ESS.

### **Proposed remediation, rehabilitation and restoration of the Spruit, Krom, Leeu and Palmiet Rivers, Western Cape Province, South Africa, Drakenstein Municipality, 2009 - 2010, Environmental Practitioner**

Appointed by the Drakenstein Municipality to undertake the requisite environmental impact assessment (EIA) process for the rehabilitation, remediation and stabilisation of four rivers in Paarl and Wellington. Responsible for the EIA and public participation processes.

### **Proposed construction of a new pipeline from Bovlei Winer to Withoogte Dam, Wellington, Western Cape Province, South Africa, Drakenstein Municipality, 2009 - 2010, Environmental Practitioner**

The Drakenstein Municipality proposed to replace a section of the existing pipeline extending from the Withoogte Dam to the Welvanpas Reservoir near Wellington as part of the municipality's water master plan in order to improve the overall water supply. Responsible for the compilation of the environmental impact assessment (EIA) report, management of specialists and the public participation process.



## **Franci Gresse Senior Environmental Impact Assessment Practitioner**

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### **Proposed erection of Eskom communication sirens and public announcement (PA) systems, Blaauwberg, Western Cape Province, South Africa, Eskom, 2009 - 2010, Environmental Practitioner**

The project entailed three environmental impact assessment (EIA) processes for the (a) erection of 10 new sirens in the Parklands area, (b) the relocation of one siren in Bloubergstrand, and (c) the upgrade of five sirens on farms near Melkbosstrand. Responsible for compiling environmental impact assessment (EIA) reports, and the public participation process.

### **Overberg District Municipality integrated transport plan (ITP) strategic environmental informants, Western Cape Province, South Africa, Overberg District Municipality, 2009, Environmental Practitioner**

Aurecon's Transportation Unit was appointed to revise the integrated transport plan (ITP). The Environmental Unit was subcontracted to provide environmental input. Responsible for identifying and describing the relevant informants.

### **Annandale Commercial: development of petrol filling station on portion of Erf 5561, Kuils River, Western Cape Province, South Africa, Communicate, 2009, Environmental Practitioner**

Appointed to compile a construction environmental management plan (CEMP) for the construction of a filling station on the corner of Gladioli Street and Amandel Drive, Kuils River. Responsible for the compilation of the project specification document as part of the CEMP.

### **Environmental impact assessment (EIA) for the proposed Langezandt Quays development in Struisbaai Harbour, Western Cape Province, South Africa, Golden Falls (Pty) Ltd, 2008 - Date, Environmental Practitioner**

Aurecon was appointed to undertake an environmental impact assessment (EIA) process for the proposed development of a four storey development on Erf 848 within the Struisbaai harbour precinct. Responsible for drafting responses to the Department of Environmental Affairs' independent review report on the proposed development.

### **Pre-feasibility and feasibility studies for augmenting the Western Cape water supply system, South Africa, Department of Water Affairs (DWA), 2008 - 2013, Project Staff**

The Department of Water Affairs commissioned pre-feasibility and feasibility studies for the augmentation of the Western Cape water supply system through the further development of the surface water resources. Surface water schemes to be investigated were identified by the Western Cape water supply system reconciliation strategy study. Responsible for the public participation process, managing environmental specialists, and compiling a socio-economic overview of the study area.

### **Proposed redevelopment of the Blaauwberg Conservation Area: Eerstestein Node, Western Cape Province, South Africa, City of Cape Town, 2008 - 2010, Environmental Practitioner**

The project entailed an environmental impact assessment (EIA) process for redeveloping the Eerstestein Conservation Area on the West Coast. Responsible for compiling the EIA report, as well as managing specialists and the public participation process.



## Franci Gresse Senior Environmental Impact Assessment Practitioner

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### **Table Mountain Group aquifer feasibility study and pilot project, Western Cape Province, South Africa, City of Cape Town, 2008 - 2010, Environmental Control Officer**

The City of Cape Town initiated a study into the Table Mountain Group Aquifer as a potential water source to augment the city's supply. The feasibility and pilot project phase record of decision (RoD) required completion for site-specific environmental management plans (EMP's) for drilling sites that were assessed to be environmentally sensitive. Site-specific EMP's were designed for sensitive sites to ensure minimal environmental impact during the drilling phase. Responsible for monitoring compliance with the RoD and EMP during the drilling phase.

### **Water reconciliation strategy for the Algoa water supply area, Eastern Cape Province, South Africa, 2008 - 2009, Environmental Practitioner**

This project provided an assessment of the environmental opportunities and constraints for a suite of water schemes in the Algoa water supply area. This was undertaken as part of a broader study in the area.

### **Application for rectification in terms of Section 24G of the National Environmental Management Act (NEMA) for the unlawful commencement of a fruit processing factory on Op de Tradouw Farm, Number 69, Barrydale, Western Cape Province, South Africa, Schoonies Family Trust, 2008 - 2009, Environmental Practitioner**

The project consisted of an application for rectification in terms of Section 24G of NEMA. Responsible for compiling an environmental impact report and an environmental management plan (EMP) for the application, as well as managing the public participation process.

### **Proposed development of apple and pear orchards on Soetmelksvlei Farm, Western Cape Province, South Africa, BETCO, 2008 - 2009, Project Staff**

This Agri-development project involved the development of 50 ha of apple and pear orchards in the Riviersonderend region. Responsible for compiling the basic assessment report, environmental management plan (EMP), and managing the specialists and public participation process.

### **C.A.P.E. Olifants-Doring Catchment Management Agency project: Development of a catchment management strategy water resource protection sub-strategy for the Olifants-Doring Catchment, South Africa, CapeNature, 2008 - 2009, Environmental Practitioner**

Appointed by CapeNature to compile a catchment management strategy water resource protection sub-strategy for the Olifants-Doorn catchment. Responsible for compiling a database that lists all institutions and their respective mandates in terms of water resource protection and biodiversity conservation decision making for the Olifants-Doring Catchment, workshop arrangements, and general project related work.

### **Environmental sensitivity study for the proposed Dasdrif poultry farm in Moorreesburg, Western Cape Province, South Africa, Eikenhoff Poultry Farms (Pty) Ltd, 2008, Project Staff**

The project consisted of an environmental sensitivity study (ESS) which, inter alia, highlighted the potential constraints ('red flags') and opportunities presented by the site from an environmental perspective. Responsible for compiling the ESS.

## **Annexure A.2**

**Application form, including EAP affirmation**



## environmental affairs

Department:  
Environmental Affairs  
**REPUBLIC OF SOUTH AFRICA**

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**DEA Reference:** 14/12/16/3/3/3/217

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### PER EMAIL / MAIL

Dear Sir/Madam

### ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FOR INTEGRATED ENVIRONMENTAL AUTHORISATION (ENVIRONMENTAL IMPACT ASSESSMENT PROCESS) FOR THE PROPOSED EXPANSION OF THE ASH DISPOSAL FACILITY AT KRIEL POWER STATION, MPUMALANGA

The Department confirms having received the Application for Integrated Environmental Authorisation for the abovementioned project on 03 November 2016. You have submitted these documents to comply with the Environmental Impact Assessment Regulations, 2014, the National Environmental Management Waste Act, Act No. 59 of 2008 and GN R921 of 29 November 2013.

**Further note that in terms of Regulation 45 of the EIA Regulations, 2014 this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).**

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely

**Mr Sabelo Malaza**

**Chief Director: Integrated Environmental Authorisations**

**Department of Environmental Affairs:**

**Letter signed by: Ms Toinette van der Merwe**

**Designation: Environmental Officer: EIA Coordination, Strategic Planning and Support**

**Date:** 08/11/2016

CC:	Deidre Herbst	Eskom Holdings SOC Limited	Email: HerbstDL@eskom.co.za
	M Mkhize	Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs	Email: thobelam@mpg.gov.za
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# environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA


## DETAILS OF EAP AND DECLARATION OF INTEREST

File Reference Number:

NEAS Reference Number:

Date Received:

(For official use only)

12/12/20/ or 12/9/11/L

DEA/EIA

Application for integrated environmental authorisation and waste management licence in terms of the-

(1) National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and the Environmental Impact Assessment Regulations, 2014; and

(2) National Environmental Management Act: Waste Act, 2008 (Act No. 59 of 2008) and Government Notice 921, 2013

## PROJECT TITLE

Integrated Environmental Impact Assessment: Proposed Expansion of Ash Dam Facility, Kriel Power Station, Mpumalanga

Environmental Assessment Practitioner (EAP):

Contact person:

Postal address:

Postal code:

Telephone:

E-mail:

Professional affiliation(s) (if any)

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#### 4.2 The Environmental Assessment Practitioner

I, F. I. GRESSE, declare that –

##### General declaration:

I act as the independent environmental practitioner in this application;

I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;

I declare that there are no circumstances that may compromise my objectivity in performing such work;

I have expertise in conducting environmental impact assessments, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;

I will comply with the Act, Regulations and all other applicable legislation;

I will take into account, to the extent possible, the matters listed in regulation 8 of the Regulations when preparing the application and any report relating to the application;

I have no, and will not engage in, conflicting interests in the undertaking of the activity;

I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;

I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;

I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;

I will keep a register of all interested and affected parties that participated in a public participation process;

I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not;

all the particulars furnished by me in this form are true and correct;

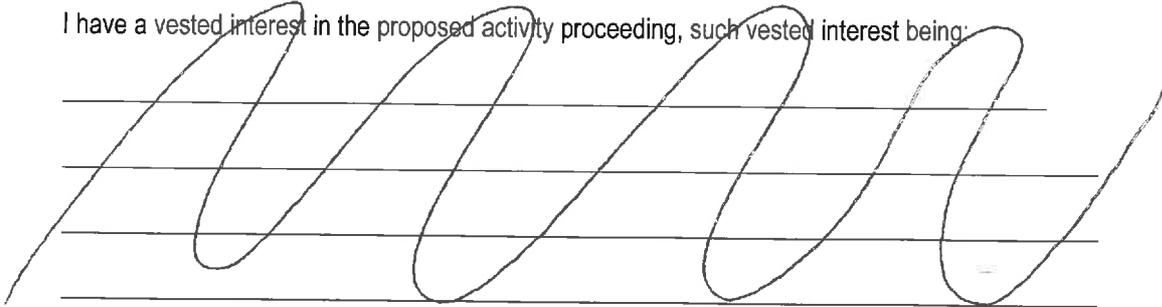
will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and

I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

**Disclosure of Vested Interest (delete whichever is not applicable)**

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014;

I have a vested interest in the proposed activity proceeding, such vested interest being:



Signature of the environmental assessment practitioner:

Aurecon South Africa (Pty) Ltd

Name of company:

2016-10-26

Date:

## **Annexure B**

### **Annexure B.1**

#### **Process followed to reach the proposed preferred activity, site and location**

## Annexure: Assessment of Alternatives

The purpose of this Annexure is to provide the information required by Annexure 2(h)(v) of Government Notice Regulation 983 of 2014, which entails full description of the process followed to reach the proposed preferred **activity, site** and **location** within the site, including:

- The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts-
  - Can be reversed;
  - May cause irreplaceable loss of resources; and
  - Can be avoided, managed or mitigated.

In addition to the site selection process described in Section two of the scoping report<sup>1</sup> the below tables provide a description of the process followed to reach the proposed preferred activity, site and location. The method of assessment is provided below and is aligned with the methodology which will be used to undertake the assessment of impacts in the EIA phase, however the scoping phase assessment is done comparatively i.e. alternatives assessed against each other whereas the assessment in the EIA phase will be done for the preferred alternative against the “no-go” alternative.

For each impact, the **EXTENT** (spatial scale), **MAGNITUDE** and **DURATION** (time scale) would be described. These criteria would be used to ascertain the **SIGNIFICANCE** of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The mitigation described in the EIR would represent the full range of plausible and pragmatic measures but does not necessarily imply that they would be implemented

The tables on the following pages show the scale used to assess these variables, and defines each of the rating categories.

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<sup>1</sup> AURECON.2016. Integrated Environmental Impact Assessment Process: Proposed Extension of Ash Dam Facility, Kriel Power Station, Mpumalanga: Scoping Report. Report No. 11081/113084

Table 1 | Assessment criteria for the evaluation of impacts

Criteria	Category	Description
Spatial influence of impact	Regional	Beyond a 10 km radius of the candidate site.
	Local	Between 100m and 10 km radius of the candidate site.
	Site specific	On site or within 100 m of the candidate site.
Magnitude of impact (at the indicated spatial scale)	High	Natural and/ or social functions and/ or processes are <i>severely</i> altered
	Medium	Natural and/ or social functions and/ or processes are <i>notably</i> altered
	Low	Natural and/ or social functions and/ or processes are <i>slightly</i> altered
	Very Low	Natural and/ or social functions and/ or processes are <i>negligibly</i> altered
	Zero	Natural and/ or social functions and/ or processes remain <i>unaltered</i>
Duration of impact (temporal)	Construction period	From commencement up to 2 years of construction
	Short Term	Between 2 and 5 years after construction
	Medium Term	Between 5 and 15 years after construction
	Long Term	More than 15 years after construction

The **SIGNIFICANCE** of an impact is derived by taking into account the temporal and spatial scales and magnitude. The means of arriving at the different significance ratings is explained in Table 2.

Table 2 | Definition of significance ratings

Significance ratings	Level of criteria required
High	<ul style="list-style-type: none"> <li>High magnitude with a regional extent and long term duration</li> <li>High magnitude with either a regional extent and medium term duration or a local extent and long term duration</li> <li>Medium magnitude with a regional extent and long term duration</li> </ul>
Medium	<ul style="list-style-type: none"> <li>High magnitude with a local extent and medium term duration</li> <li>High magnitude with a regional extent and construction period or a site specific extent and long term duration</li> <li>High magnitude with either a local extent and construction period duration or a site specific extent and medium term duration</li> <li>Medium magnitude with any combination of extent and duration except site specific and construction period or regional and long term</li> <li>Low magnitude with a regional extent and long term duration</li> </ul>
Low	<ul style="list-style-type: none"> <li>High magnitude with a site specific extent and construction period duration</li> <li>Medium magnitude with a site specific extent and construction period duration</li> <li>Low magnitude with any combination of extent and duration except site specific and construction period or regional and long term</li> <li>Very low magnitude with a regional extent and long term duration</li> </ul>
Very low	<ul style="list-style-type: none"> <li>Low magnitude with a site specific extent and construction period duration</li> <li>Very low magnitude with any combination of extent and construction or short term duration</li> </ul>
Neutral	<ul style="list-style-type: none"> <li>Zero magnitude with any combination of extent and duration</li> </ul>

Once the significance of an impact has been determined, the **PROBABILITY** of this impact occurring as well as the **CONFIDENCE** in the assessment of the impact, would be determined using the rating systems outlined in Lastly, Table 7 gives an indication to the extent to which the impact is mitigatable.

Table 3 and Table 4, respectively. It is important to note that the significance of an impact should always be considered in concert with the probability of that impact occurring. The **REVERSIBILITY** of the impact is estimated using the rating system outlined in Table 5 and the **RESOURCE IRREPLACEABILITY** refers to the “Loss of resource” and thus the degree to which a resource is permanently affected by the activity, i.e. the degree to which a resource is irreplaceable outlined in Table 6. Lastly, Table 7 gives an indication to the extent to which the impact is mitigatable.

**Table 3 | Definition of probability ratings**

<b>Probability ratings</b>	<b>Criteria</b>
Definite	Estimated greater than 95 % chance of the impact occurring.
Probable	Estimated 5 to 95 % chance of the impact occurring.
Unlikely	Estimated less than 5 % chance of the impact occurring.

**Table 4 | Definition of confidence ratings**

<b>Confidence ratings</b>	<b>Criteria</b>
Certain	Wealth of information on and sound understanding of the environmental factors potentially influencing the impact.
Sure	Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact.
Unsure	Limited useful information on and understanding of the environmental factors potentially influencing this impact.

**Table 5 | Definition of reversibility ratings**

<b>Reversibility ratings</b>	<b>Criteria</b>
Irreversible	The activity will lead to an impact that is in all practical terms permanent.
Reversible	The impact is reversible within 2 years after the cause or stress is removed.

**Table 6 | Definition of Irreplaceable ratings**

<b>Irreplaceable ratings</b>	<b>Criteria</b>
Low	Where the activity results in a loss of a particular resource but where the natural, cultural and social functions and processes are not affected.
Medium	Where the loss of a resource occurs, but natural, cultural and social functions and processes continue, albeit in a modified way
High	Where the activity results in an irreplaceable loss of a resource.

**Table 7 | Definition of mitigation**

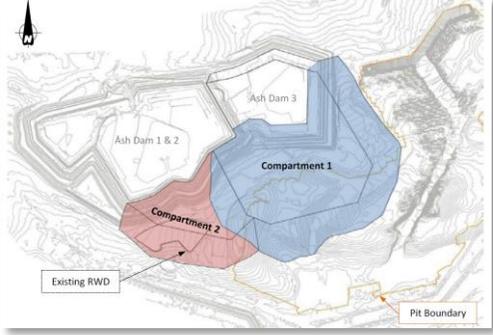
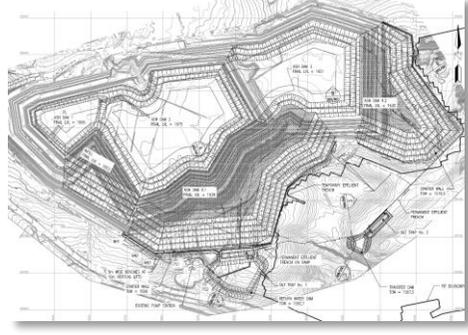
<b>Mitigatable ratings</b>	<b>Criteria</b>
Low	Low extent to which impacts can be mitigated
Medium	Medium extent to which impacts can be mitigated
High	High extent to which impacts can be mitigated

# 1 Location Alternatives

	Alternative Site 10	Alternative Site 16N
Short description	<p>Site 10 is brownfield site immediately adjacent the existing Kriel Ash Disposal Facility. (Also see Section 2 in the Scoping Report no.: 113084 / 11081) Latitude 26°16'33.37"S; Longitude 29°12'9.46"E</p> 	<p>Site 16N is a greenfield site approximately 12km from Kriel Power Station. (Also see Section 2 in the Scoping Report no.: 113084 / 11081) Latitude 26°11'26.43"S; Longitude 29°14'35.50"E</p> 
Description of alternative specific attributes (environmental / socioeconomic / Technical and financial)	<p>Site 10 partially overlies a backfilled open cast mine pit (Kriel Colliery Pit 1) and is further bordered by this pit to the east. The Provincial Road R547 (Evander-Kriel) is located to the south, Matla Power Station to the west and the Kriel Power Station to the north.</p>	<p>Site 16N overlies unmined ground that is mostly used for agriculture with some remnants of natural vegetation. It's bordered by the Steenkoolspruit to the east, agricultural land and a valley ridge to the north and south and to the west agricultural land that is underlain by the Kriel Colliery Coal fields.</p>
List of potential negative impacts and risks	<p><b>Construction phase impacts on the biophysical and social environments:</b></p> <ul style="list-style-type: none"> <li>• Disturbance of flora and fauna;</li> <li>• Sedimentation and erosion of water ways;</li> <li>• Increase in traffic volumes;</li> <li>• Storage of hazardous substances on site;</li> <li>• Increased risk of fire;</li> <li>• Pollution (noise, air and water); and</li> <li>• Dust impacts.</li> </ul> <p><b>Operational phase impacts on the biophysical environment:</b></p> <ul style="list-style-type: none"> <li>• Impact on the terrestrial fauna and flora;</li> <li>• Impact on aquatic flora and fauna;</li> <li>• Impact on groundwater resources; and</li> <li>• Impact on air quality.</li> </ul> <p><b>Operational phase impacts on the social environment:</b></p> <ul style="list-style-type: none"> <li>• Visual impacts;</li> <li>• Impact on heritage resources;</li> <li>• Noise impacts;</li> <li>• Impact on the local economy;</li> </ul>	<p><b>Construction phase impacts on the biophysical and social environments:</b></p> <ul style="list-style-type: none"> <li>• Disturbance of flora and fauna;</li> <li>• Sedimentation and erosion of water ways;</li> <li>• Increase in traffic volumes;</li> <li>• Storage of hazardous substances on site;</li> <li>• Increased risk of fire;</li> <li>• Pollution (noise, air and water); and</li> <li>• Dust impacts.</li> </ul> <p><b>Operational phase impacts on the biophysical environment:</b></p> <ul style="list-style-type: none"> <li>• Impact on the terrestrial fauna and flora;</li> <li>• Impact on aquatic flora and fauna;</li> <li>• Impact on groundwater resources; and</li> <li>• Impact on air quality.</li> </ul> <p><b>Operational phase impacts on the social environment:</b></p> <ul style="list-style-type: none"> <li>• Visual impacts;</li> <li>• Impact on heritage resources;</li> <li>• Noise impacts;</li> <li>• Impact on the local economy;</li> </ul>

	Alternative Site 10		Alternative Site 16N	
	<ul style="list-style-type: none"> <li>Impact on agriculture and other land uses in the study area;</li> <li>Impact on traffic;</li> <li>Impact on existing infrastructure and services; and</li> <li>Impact on health and safety of workers and others in the area.</li> </ul>		<ul style="list-style-type: none"> <li>Impact on agriculture and other land uses in the study area;</li> <li>Impact on traffic;</li> <li>Impact on existing infrastructure and services; and</li> <li>Impact on health and safety of workers and others in the area.</li> </ul>	
List of potential positive impacts (comparative between alternatives)	<ul style="list-style-type: none"> <li>Smaller impact on traffic</li> <li>Reduced disturbance to fauna and flora</li> <li>Reduced visual impact</li> <li>Reduced dust impact</li> <li>Reduced impact on existing infrastructure and services</li> <li>Reduced construction and operational cost requirements</li> </ul>		<ul style="list-style-type: none"> <li>None</li> </ul>	
Comparative Cumulative Assessment of Impacts (without mitigation)				
Impact nature	Positive	Negative	N/A	Negative
Duration	Long term	Long term	N/A	Long term
Extent	Local	Local	N/A	Regional
Magnitude	Medium	Medium	N/A	High
Probability	Definite	Definite	N/A	Definite
Confidence	Sure	Sure	N/A	Sure
Reversibility	Irreversible	Irreversible	N/A	Irreversible
Resource irreplaceability	N/A	Medium	N/A	Medium
Mitigatable	Medium	Medium	N/A	Medium
Significance	Medium	Medium	N/A	High
List of potential mitigations	The most significant mitigation measure to be undertaken with regards to location alternatives is to choose the location with the least amount of potential issues and risks. Once the location is chosen, the mitigation measures undertaken will relate to the layout of the proposed ash dams (AD4.1 and AD4.2) and the type of activity that takes place. These will be incorporated in the EMP during the EIA Phase to inform construction and operational phase activities.			
Conclusion				
Ranked preference	Preferred			
Motivation for preferred alternative	<p>Upon consideration of various technical, financial and environmental criteria (see Section 2 of the Scoping Report (report no.: 113084 / 11081) for extensive explanation of process follow), the logical preferred location to expand the Ash Disposal Facility would be to do so adjacent to the existing ash dam complex. The above comparative cumulative assessment of potential impacts further supports the preference of Site 10.</p> <p>In addition Site 10 has the advantage of:</p> <ul style="list-style-type: none"> <li>Being located relatively close to the Kriel Power Station and therefore requires less capital costs.</li> <li>No need to construct on Greenfield site (or other site located further from Kriel Power Station).</li> <li>Being underlain by natural ground with no instability concerns (AD 4.1 and AD 4.2).</li> <li>A Best practical use of Brownfields area with limited future land use.</li> <li>Facilitating ongoing operation at current Ash Disposal Facility which means Kriel Power Station can function until its predicted end of life.</li> </ul> <p>It must however be noted that all potential impacts will be assessed separately in detail during the EIA phase.</p>			

## 2 Layout Alternatives

	Ash Dam 4 Concept 2014 (A)	Ash Dam 4 Concept 2016 (B)	Ash Dam 4 Concept 2016 revised (C)
Short description	<p>Site 10 divided into Compartment 1 to the east and Compartment 2 to the west. Figure 3-3</p> 	<p>Site 10 divided into three ash dams namely AD4.1, AD4.2 and AD4.3. Figure 3-4</p> 	<p>Site 10 divided into two ash dams namely AD4.1 and AD4.2. Figure 3-5</p> 
Description of alternative specific attributes (environmental / socioeconomic / Technical and financial)	<p>The two compartments on Site 10 partially overlies a backfilled open cast mine pit (Kriel Colliery Pit 1) and is further bordered by this pit to the east.</p>	<p>One of the three proposed ash dams on Site 10, AD4.3, partially overlies a backfilled open cast mine pit (Kriel Colliery Pit 1) and is further bordered by this pit to the east.</p>	<p>Of the two proposed ash dams on Site 10, none overlies the backfilled open cast mine (Pit 1). AD4.2 do however border the backfilled Kriel Colliery open cast mine (Pit 1) to the east.</p>

	Ash Dam 4 Concept 2014 (A)		Ash Dam 4 Concept 2016 (B)		Ash Dam 4 Concept 2016 revised (C)	
List of potential negative impacts and risks	<p><b>Construction phase impacts on the biophysical and social environments:</b></p> <ul style="list-style-type: none"> <li>Disturbance of flora and fauna;</li> <li>Sedimentation and erosion of water ways;</li> <li>Increase in traffic volumes;</li> <li>Storage of hazardous substances on site;</li> <li>Increased risk of fire;</li> <li>Pollution (noise, air and water); and</li> <li>Dust impacts.</li> </ul> <p><b>Operational phase impacts on the biophysical environment:</b></p> <ul style="list-style-type: none"> <li>Impact on the terrestrial fauna and flora;</li> <li>Impact on aquatic flora and fauna;</li> <li>Impact on groundwater resources; and</li> <li>Impact on air quality.</li> </ul> <p><b>Operational phase impacts on the social environment:</b></p> <ul style="list-style-type: none"> <li>Visual impacts;</li> <li>Noise impacts;</li> <li>Impact on agriculture and other land uses in the study area; and</li> <li>Impact on health and safety of workers and others in the area.</li> </ul>		<p><b>Construction phase impacts on the biophysical and social environments:</b></p> <ul style="list-style-type: none"> <li>Disturbance of flora and fauna;</li> <li>Sedimentation and erosion of water ways;</li> <li>Increase in traffic volumes;</li> <li>Storage of hazardous substances on site;</li> <li>Increased risk of fire;</li> <li>Pollution (noise, air and water); and</li> <li>Dust impacts.</li> </ul> <p><b>Operational phase impacts on the biophysical environment:</b></p> <ul style="list-style-type: none"> <li>Impact on the terrestrial fauna and flora;</li> <li>Impact on aquatic flora and fauna;</li> <li>Impact on groundwater resources; and</li> <li>Impact on air quality.</li> </ul> <p><b>Operational phase impacts on the social environment:</b></p> <ul style="list-style-type: none"> <li>Visual impacts;</li> <li>Noise impacts;</li> <li>Impact on agriculture and other land uses in the study area; and</li> <li>Impact on health and safety of workers and others in the area.</li> </ul>		<p><b>Construction phase impacts on the biophysical and social environments:</b></p> <ul style="list-style-type: none"> <li>Disturbance of flora and fauna;</li> <li>Sedimentation and erosion of water ways;</li> <li>Increase in traffic volumes;</li> <li>Storage of hazardous substances on site;</li> <li>Increased risk of fire;</li> <li>Pollution (noise, air and water); and</li> <li>Dust impacts.</li> </ul> <p><b>Operational phase impacts on the biophysical environment:</b></p> <ul style="list-style-type: none"> <li>Impact on air quality.</li> </ul> <p><b>Operational phase impacts on the social environment:</b></p> <ul style="list-style-type: none"> <li>Visual impacts; and</li> <li>Noise impacts.</li> </ul>	
List of potential positive impacts	<ul style="list-style-type: none"> <li>None.</li> </ul>		<ul style="list-style-type: none"> <li>None.</li> </ul>		<ul style="list-style-type: none"> <li>No risk of liner damage due to subsidence;</li> <li>Less risks of impacts on aquatic systems and water quality; and</li> <li>Reduced footprint (fauna, flora and agricultural land).</li> </ul>	
<b>Comparative Cumulative Assessment of potential Impacts (without mitigation)</b>						
Nature	N/A	Negative	N/A	Negative	Positive	Negative
Duration	N/A	Long term	N/A	Long term	Long term	Long term
Extent	N/A	Regional	N/A	Regional	Local	Local
Magnitude	N/A	Medium	N/A	Medium	Medium	Medium
Probability	N/A	Probable	N/A	Probable	Probable	Probable
Confidence	N/A	Unsure	N/A	Unsure	Unsure	Unsure
Reversibility	N/A	Irreversible	N/A	Irreversible	Irreversible	Irreversible
Resource irreplaceability	N/A	Medium	N/A	Medium	N/A	Medium
Mitigatable	N/A	Medium	N/A	Medium	Medium	High

	Ash Dam 4 Concept 2014 (A)		Ash Dam 4 Concept 2016 (B)		Ash Dam 4 Concept 2016 revised (C)	
<b>Significance</b>	N/A	High	N/A	High	Medium	Medium to High
<b>List of potential mitigations</b>	<p>The most significant mitigation measure to be undertaken with regards to layout alternatives is to choose the layout with the design that poses the least amount of potential issues and risks, i.e. by excluding the backfilled areas over Kriel Colliery Pit 1 which are included in Ash Dam 4 Concept 2014 (A) and Ash Dam 4 Concept 2016 (B). Once the layout is chosen mitigation measure undertaken will relate to the type of activity (i.e. wet ashing vs. dry ash stacking) that takes place. Once the activity type has been finalised the EMP, which forms part of the EIA Phase, will inform construction and operational phase mitigations.</p> <p>Layout alternatives, also known as design alternatives, are mitigated by optimising the design which will be done through the EIA phase for the preferred alternative.</p>					
<b>Conclusion</b>						
<b>Ranked preference</b>					<b>Preferred</b>	
<b>Motivation for preferred alternative</b>	<p>Site 10 has a three comparatively significant advantages nl. no risk of liner damage due to subsidence; less risks of impacts on aquatic systems and water quality; and reduced footprint which in this case translates into a lower potential impact on fauna, flora and agricultural land. Site 10 was however in question because of geotechnical stability relating to potential subsidence of underlying strata i.e. the required liners were at risk. The layout was thus changed from what was proposed in 2014 (A) to the 2016 designs (B and C) with three dams. The third dam nl. AD4.3 has been identified as a potential option if it can be proven (by means of a MTE) that the underlying backfilled area is stable. Since further geotechnical studies have been undertaken by J&amp;W (2016) Site 10 (AD 4.1 and AD4.2) has been proven to be technically feasible and thus these two ash dams (AD4.1 and AD4.2) are the preferred options (C). AD4.3 does thus not form part of the preferred alternative (C).</p>					

### 3 Activity Alternatives

	Option 1 – Wet Ashing (current ashing option)		Option 2 – Dry Ash Stacking	
Short description	Wet ash dams are constructed by means of development in an upstream direction commonly referred to as the daywall system.		Dry stacking by conveyors and stackers to transport and deposit the coarse and fine ash in a conditioned state.	
Description of alternative specific attributes (environmental / socioeconomic / Technical and financial)	The wet ash dams are constructed by means of development in an upstream direction commonly referred to as the daywall system. The daywall method works on the premisses that a starter wall is built prior to deposition of ash.		The method of dry stacking utilises conveyors and stackers to transport and deposit the coarse and fine ash in a conditioned state. The method adopted for this concept is radial stacking (opposed to parallel stacking) whereby the conveyors rotate about one central point as the advancing face progresses from the start to finish points of the facility.	
List of potential negative impacts and risks	<ul style="list-style-type: none"> <li>• Impact on groundwater resources;</li> <li>• Visual impacts;</li> <li>• Noise impacts;</li> <li>• Sedimentation and erosion of water ways;</li> <li>• Pollution (noise, air and water); and</li> <li>• Dust impacts.</li> </ul>		<ul style="list-style-type: none"> <li>• Impact on groundwater resources;</li> <li>• Visual impacts;</li> <li>• Noise impacts;</li> <li>• Impact on the economy;</li> <li>• Impact on existing infrastructure and services;</li> <li>• Impact on health and safety of workers and others in the area;</li> <li>• Sedimentation and erosion of water ways;</li> <li>• Pollution (noise, air and water); and</li> <li>• Dust impacts.</li> </ul>	
List of positive impacts	<ul style="list-style-type: none"> <li>• Lower risk of impact on health and safety of workers and others in the area because it's a known technology (the workers at the plant know how systems run and potential issues).</li> <li>• Impact on the economy will be lower because of lower capital costs.</li> </ul>		<ul style="list-style-type: none"> <li>• None.</li> </ul>	
List of potential mitigations	The most significant mitigation measure to be undertaken with regards to activity alternatives is to choose the activity with the least amount of potential issues and risks. Once the activity is chosen mitigation measure undertaken will relate to the implementation of the EMP which forms part of the EIA will inform construction and operational phase mitigations.			
<b>Comparative Cumulative Assessment of potential Impacts (without mitigation)</b>				
Nature	Positive	Negative	N/A	Negative
Duration	Long term	Long term	N/A	Long term
Extent	Large	Large	N/A	Large
Magnitude	Medium	High	N/A	High
Probability	Medium	High	N/A	High
Confidence	Unsure	Unsure	N/A	Unsure
Reversibility	Irreversible	Irreversible	N/A	Irreversible
Resource irreplaceability	N/A	Medium	N/A	Medium
Mitigatable	Medium	Medium	N/A	Medium
Significance	Medium	Medium	N/A	High
<b>Conclusion</b>				
Ranked preference	Preferred			

	Option 1 – Wet Ashing (current ashing option)	Option 2 – Dry Ash Stacking
<b>Motivation for preferred alternative</b>	<p>The dry option will require substantial modification in plant and is substantially more expensive (nearly three times the capital cost) than that of the wet option based on net present value calculated in 2014. Operational cost of dry stacking is slightly cheaper than wet ash, but over the operational period of the power station would not nearly abate the capital cost required to make the transition from wet to dry ash infrastructure. Furthermore, the dry ashing option would require additional investigation into a number of concerns including the stability of the advancing face on the liner system (due to the steep declines in natural ground and the angle of repose slope that the stacker forms, which could be unstable and needs to be buttressed by placing a layer of ash that is trucked and placed into position). In addition, a complex arrangement of the mechanical stacking equipment due to the irregular shape of the site would be required. This is further burdened by the fact that little flexibility exists to extend ash deposition beyond the current life of power plant due to the in-situ density of the dry ash which is approximately 20% less than the wet ash. Based on the above factors and the decided positive that wet ashing would be using a technology that is known and familiar to employees of the Kriel Ash Disposal Facility and that wet ashing is decidedly the preferred alternative.</p>	

## Annexure C

### Annexure C.1

#### 2010 Site selection process

## 2 SITE SELECTION PROCESS

The purpose of this chapter is to document and describe the process and rationale by which the proposed sites were identified and selected. It describes the regional boundaries within which the sites were identified and the criteria used to identify potential sites.

### 2.1 BACKGROUND

As outlined in Chapter 1, given the need to develop additional storage disposal facilities for ash produced by the coal-fired Kriel Power Station, Eskom initiated an EIA process for the development of a new ash dam disposal facility that would have sufficient capacity for the remaining operational life of the power station until ~~2039~~ 2043 plus a five year contingency. While Eskom has initially indicated their preference the initial focus, from a logistical/ operational perspective, ~~for a site was on an area~~ identified by Jones and Wagener Consulting Engineers (Jones and Wagener)<sup>6</sup> in 2006 to the immediate south of the Kriel Power Station and the existing ash dams, it was recognised that the EIA process requires the applicant to consider all reasonable and feasible alternatives thoroughly. As part of the EIA process, the Aurecon EIA team, assisted by Eskom and Jones and Wagener, undertook the identification of potential sites within a 10 km radius<sup>7</sup> of the Kriel Power Station, in order to ensure that the EIA process could commence from a robust and defensible starting point.

The process of identifying potential sites within the 10 km radius included a site visit to the Kriel Power Station, various discussions with relevant Eskom personnel, as well as a number of internal project team meetings and workshops. The Department of Water Affairs' guideline on minimum requirements for waste disposal for landfill sites (2<sup>nd</sup> edition, 1998) were also taken into consideration during the screening process. The criteria discussed in this document were used to identify potential environmental impacts and to inform specialist investigations. These criteria include: potential to pollute surface and ground water resources, stability issues, sensitive environmental features, landscape characteristics, surrounding land use, air quality, distance of site from waste source and visual aesthetics. Please refer to the sections below, as well as Chapters 5 and 6 of this document for more information on the potential environmental impacts and specialist investigations.

The purpose of this Chapter is to document the process that led to the identification of the proposed site alternatives for further investigation in this EIA process.

<sup>6</sup> Kriel Power Station Ash Dam Feasibility Investigation, September 2006. Report No: JW127/06/A407

<sup>7</sup> The 10 km radius has been extended to 12 km as two of the identified sites are located between 10 and 12 km from the Power Station.

## 2.2 SELECTION OF POTENTIAL AREAS

### 2.2.1 Determining the boundaries of the investigation area

At the onset of the site selection process, it was indicated by Eskom that the ash dam should be located on Eskom-owned land, within a 3 km radius area. This area was however subsequently extended to a 6 km radius area from the Kriel power station, to include both Eskom and privately owned properties. The 6 km radius limit was based on the maximum capacity of the existing ashing transportation infrastructure being utilised by Eskom (ash slurry pumps), price of electricity and the costs of additional infrastructure. However during further investigations and discussions, it was decided to increase the area of investigation to a radius of 10 km (**Figure 2-1**) as it became clear that there was limited space left for an ash dam within the 6 km radius area, i.e. areas that are not located on coal resources and/or underground mines. It was also pointed out by Eskom's engineers that the existing pumps cannot work effectively over a distance of more than 6 km and that new infrastructure would be required.

### 2.2.2 Selection of potential areas

With the outer boundaries of the project footprint identified, potential candidate areas within the study area were identified by considering a range of ~~potential~~ technical, financial and environmental criteria. These included *inter alia* locality of coal resources and undermined areas, existing infrastructure, groundwater/ hydrological features, geotechnical considerations and sensitive biodiversity features, which are described below.

#### A. Technical / Financial Criteria

##### (i) Locality of coal resources and undermined areas

The Kriel Power Station is located near the northern boundary of the Highveld Coalfield on various exploitable coal seams that occur within the area. The Jones and Wagener technical screening report (2010) (see **Annexure D**) identified three coal seams belonging to the Kriel Colliery, Seams 2, 4 and 5 that are located within the 10 km radius of the power station. Currently only Seam 4 is mined (underground mine and opencast). Kriel Colliery has indicated that Seams 2 (~~underground mine~~) and 5 (~~open cast and underground mines~~) will be mined in the future.

Coal resources of South Africa, which are under the control of the Department of Mineral Resources (DMR), are regarded as a strategic resource for the future of the country in terms of affordable energy provision. The sterilisation of a coal resource through development on top of it is therefore considered to be unacceptable, especially in the case of an ash dam<sup>8</sup>. Furthermore, the sterilisation of a coal resource would be unacceptable to the mining right holder, ~~in this case Anglo Coal~~, due to the large amounts of resources invested in obtaining the mining right. The option to place the proposed ash dam on top of deep coal, which could be mined in the future

<sup>8</sup> Also see Section 53 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) regarding activities that may have a detrimental impact on the mining of mineral resources.

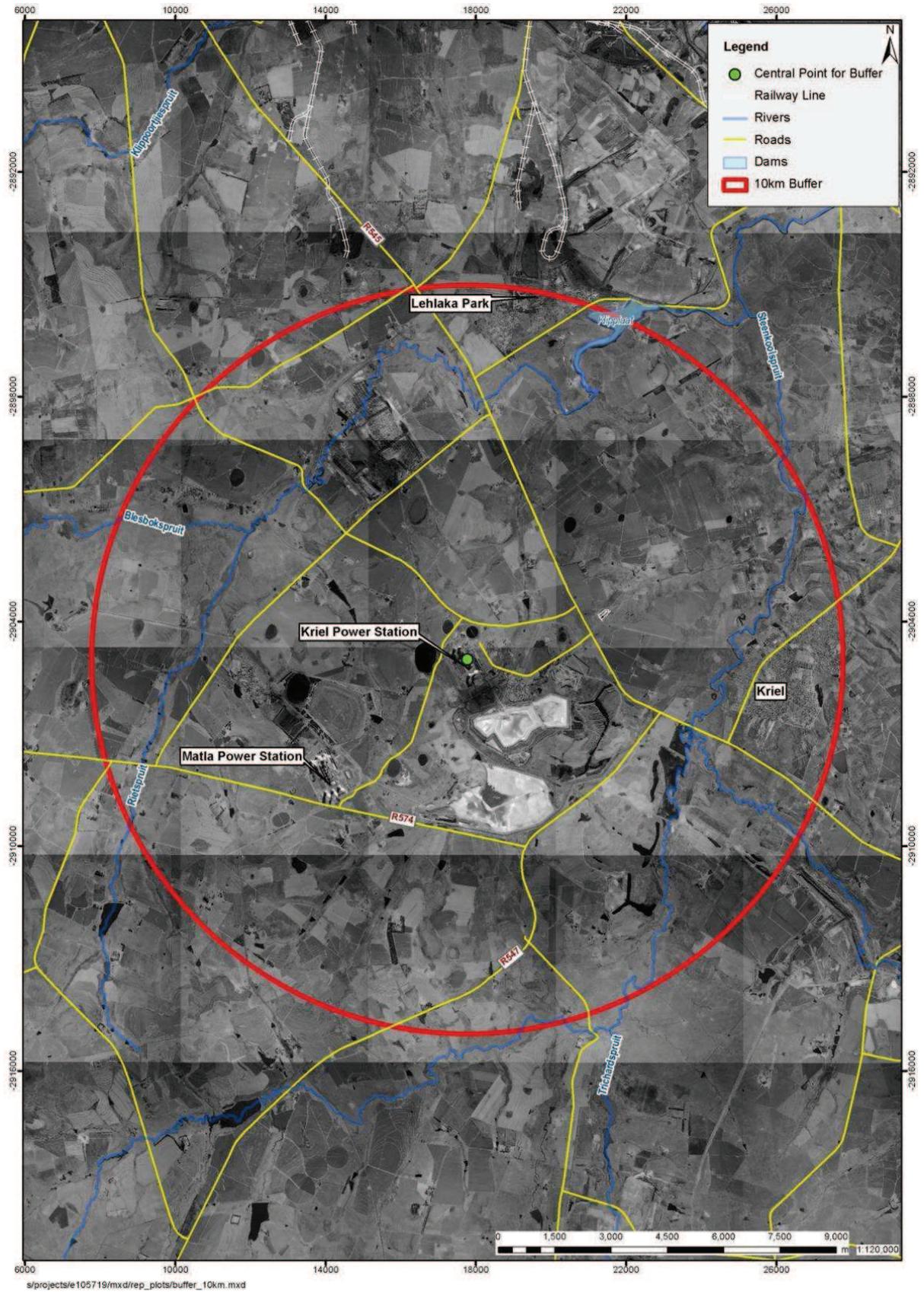


Figure 2-1 Map indicating the 10 km radius areas of investigation

by making use of underground mining methods, was also considered. However, this option would reduce the volume of coal that could be abstracted, and should the mine pillars fail for some reason, it could result in liner and sidewall failure of the ash dam. While it is possible to prevent sidewall failure of the ash dam, the failure of the liner cannot be prevented and is considered to be a fatal flaw.

It was also decided not to construct the ash disposal facility on top of previous underground mines, as the mines (making use of the board and pillars method) were constructed to support the weight of the current overburden, and placing an ash disposal facility in such an area would increase the overburden weight, leading to mine collapse and surface subsidence. Furthermore, it would be prohibitively expensive to place an ash disposal facility across an area identified for an opencast mine in the future as the dam would have to be removed at a later stage when the mining commences.

### **(ii) Existing Infrastructure**

The position of existing, primary infrastructure was also considered as one of the main criteria during the identification of the potentially suitable areas, including:

- Tarred roads
- Primary power lines
- Significant pipelines
- Urban developments
- Mine shafts

It was however concluded by Eskom that the relocation of primary infrastructure was not a fatal flaw to locating an ash disposal facility, and that if necessary, infrastructure of this nature could be avoided or relocated, if required. Therefore, for the purposes of the area selection exercise, the avoidance of primary infrastructure was considered to be a negotiable criterion, unlike the sterilisation of coal reserves.

### **2.2.3 Selection of potential sites**

Based on the findings of the area selection process outlined above, sites were identified as being potentially suitable for further consideration in the site screening exercise to follow (Table 2). To reiterate, the potential candidate sites were identified on the basis of being within (or just outside) 10 km of the power station and being located on land which is not undermined or has the potential in the future to be subjected to open cast or underground mining.

**Table 2-1 Potential areas and coal resources occurring within the area (Jones and Wagener, 2010)**

SITE	Available Area (ha)	Status of Coal Mine underlying area				Comments
		2-Seam Resource	Old 4-Seam Works		2-Seam Resource	
			UG*	OC*		
1	393		Kriel		Kriel	Mined
2	306	Kriel	Kriel		Kriel	Mined
3	356	Kriel	Kriel		Kriel	In Kriel Mine Plan
4	234	Kriel	Kriel		Kriel	In Kriel Mine Plan if LoPP is extended
5	376		Kriel		Kriel	In Kriel Mine Plan
6	139		Kriel		Kriel	Area too small
7	160	Kriel	Kriel		Kriel	Area too small
8	87	Kriel	Kriel		Kriel	Area too small, part of current open cast
9	243		Kriel		Kriel	Mined
<b>10</b>	<b>359</b>			<b>Kriel</b>		<b>Depleted open cast mine</b>
11	170		Matla			Area too small
12	162		Matla			Area too small
13	143		Matla			Area too small
14	734		Matla			On Matla coal
15 North	217			Kriel		Area too small
<b>15 South</b>	<b>282</b>			<b>Kriel</b>		<b>Rehabilitated open cast mine</b>
<b>16 North</b>	<b>308</b>		<b>Insignificant quantities does not influence ash disposal facility siting</b>			<b>Low grade coal; prospecting application lodged with DME; owned by Emalaheni Municipality</b>
16 Central	312	Yes, Unknown applicant	Yes, Unknown applicant			Prospecting application lodged with DME
16 South	181		Unknown			Area too small
17	560		<del>No coal</del> <u>Coal</u>			Includes property leased by the Kriel and Matla Collieries

\*(UG: Underground; OC: Open Cast)

From the above, it is apparent that all areas within the 10 km radius area are located on coal or previously mined areas, except for Areas 10, 15S and 16 North (16N). ~~and 17.~~ It must be noted that a very small volume of coal has been identified on the border of Site 16N and extends over a limit area beneath the site. It is however possible to avoid the coal when placing the ash disposal facility at Site 16N that occurs within a 12 km radius of the power station.

Note that ~~Furthermore~~, an additional site (Site 17) was identified later in the screening process that is located to the northwest of the power station. This site is considered to be suitable from a coal resource perspective, as well as proximity to the power station. Initial data and a high level investigation suggested that this site is without coal resources. However information submitted by the mining right holder Exxaro<sup>9</sup>, confirmed the occurrence of coal and undermined areas within Site 17. As the occurrence of coal and undermined areas have been identified as a fatal flaw, Site 17 is no longer considered to be a potential site for the proposed ash disposal facility.

## 2.3 SCREENING OF POTENTIAL SITES

### 2.3.1 Criteria used to screen sites

The process of selecting potential areas was followed by the screening of potential sites based on site specific technical, financial and environmental criteria. These included the ash disposal facility design and operating requirements, cost of new infrastructure, groundwater and hydrological features, geotechnical considerations and “other factors”. These are described below. Cress

#### A. Technical and Financial Criteria

##### (i) Design and operating requirements

**Capacities and areas:** The maximum area, height and rate of rise were used to compare the capacities of the sites as indicated in **Table 2-2**. The rate of rise (RoR) for Site 10 is lower than the 3 m/year and is limited by the adjacent existing Ash Dam 3. This dam could however ~~come~~ be used for ashing again once Site 10 reaches the crest of Ash Dam 3. Furthermore, since the RoR is lower than 3 m/year for Sites 10, 15 and 16N, the footprint areas could be reduced while still achieving the set capacity.

**Table 2-2 Area capacities (Jones and Wagener, 2010)**

SITE	LIFE (years)	FINAL RoR	HEIGHT (m)	A	B	B/A
				AREA (m <sup>2</sup> )	STORAGE VOLUME (m <sup>3</sup> )	LINER EFFICIENCY (m)
10	26+	1.7	71	359	110 000 000+	-
15 South	26+	2.6	65	282	110 000 000+	-

<sup>9</sup> Refer to Comments and Response Report II in Annexure C for a copy of the information submitted.

SITE	LIFE (years)	FINAL RoR	HEIGHT (m)	A	B	B/A
				AREA (m <sup>2</sup> )	STORAGE VOLUME (m <sup>3</sup> )	LINER EFFICIENCY (m)
16 North	26+	2.2	70	308	110 000 000+	35.7
17	26+	2.2	70	308	110 000 000+	35.7

**Perimeter lengths:** The toe length of the sites is considered to be very important as the delivery line infrastructure is installed along the toe of the dam. The parameter length of areas crossing spoils is also important due to the cost associated with the construction of an outer wall along these areas which is considerably higher than on natural ground. Furthermore, areas on backfilled spoils are also important as drainage systems to ensure stability along the outer walls. Note that continues under drainage systems are used with lined areas over the full facility footprint and not just along the perimeter. Additional costs associated with perimeter drains are not considered to be significant. As indicated in

**Table 2-3** the length of the toe lines are very similar for Site 15S and 16N and 17, except Site 10 which is significantly longer. This is due to Ash Dam 3 that could come into operation again at a later stage and increase the available area and associated perimeter.

**Table 2-3 Area perimeter lengths (Jones and Wagener, 2010)**

SITE	PERIMETER LENGTH	
	Total(km)	On spoils(km)
10	8.7	0.9
15 South	6.8	1.7
16 North	7.0	0.0
17	7.0	0.0

**Relative elevations:** As indicated by **Table 2-4** below, all the areas are located below the Power Station, with the final crest levels rising approximately to the same level as the Power Station. Therefore the demand on the delivery infrastructure would be less (due to gravity), whereas the demand on the return infrastructure would be more.

**Table 2-4 Relative elevations and distances from the plant and relative elevations (Jones and Wagener, 2010)**

SITE	DISTANCE FROM PLANT (km)	DISTANCE TO PLANT (km)	LEVELS		
			PLANT (mamsl)	ASH DISPOSAL FACILITY CREST (mamsl)	RWD FLOOR (mamsl)
10	5.5	6.3	1619	1618.5	1542.5
15 South	8.1	8.2	1619	1616	1545.5

SITE	DISTANCE FROM PLANT (km)	DISTANCE TO PLANT (km)	LEVELS		
			PLANT (mamsl)	ASH DISPOSAL FACILITY CREST (mamsl)	RWD FLOOR (mamsl)
16 North	11.1	11.7	1619	1615	1540.5
17	~10	~10	1619	1615	1540.5

**Distance from station:** The fact that Site 16N and 17 are located more than 10 km at a distance of approximately 12 km from the power station (see **Table 2-4**) may however result in a number of potential negative technical, financial and environmental issues, including:

#### Technical/ financial

- Based on current challenges experienced on a system that extends only 3 km, it would be a logistical challenge to manage the further distances, which would include responding to the increased security issues (e.g. copper theft), maintenance (spillages, blockages and dust along the entire length of the delivery system which eventually impacts security of power supply).
- There would be higher maintenance costs.
- Sites further away from the Power Station would have a higher electricity demand than sites located closer. Seen in the light of the existing electricity shortage experienced in South Africa, sites with a high electricity demand are considered to be less favourable as it could have a negative impact on South Africa's electricity security.
- Existing infrastructure could be affected, e.g. a section of the main road to Kriel (R545) may need to be relocated.
- There would be higher likelihood of spills/ leakages from conveyors/ pipes.
- Bulk infrastructure and services in the area may need to be relocated.
- Additional infrastructure would be required, e.g. new ash removal transportation system, return water line, slurry plant, substation and transfer houses.

#### Environmental (also see Section 2.3.1 B below)

- There would probably be a loss of viable agricultural land;
- It makes more environmental sense to have all the waste/ ash disposal systems together in order to consolidate the associated disturbance footprint, as much as possible;
- Area 10 is an existing, disturbed mining area, as compared to Area 16N which is currently less disturbed;
- Area 10 and 15S would have a smaller impact on landowners / tenants as these areas are disturbed, old mined land;
- The incremental impact at Site 16 and 17 would be higher;
- Moist grassland and wetland corridors occurring at Site 16N are considered to be very important dispersal corridors for fauna, as well as potential foraging habitat for the near-threatened Serval (*Leptailurus serval*);

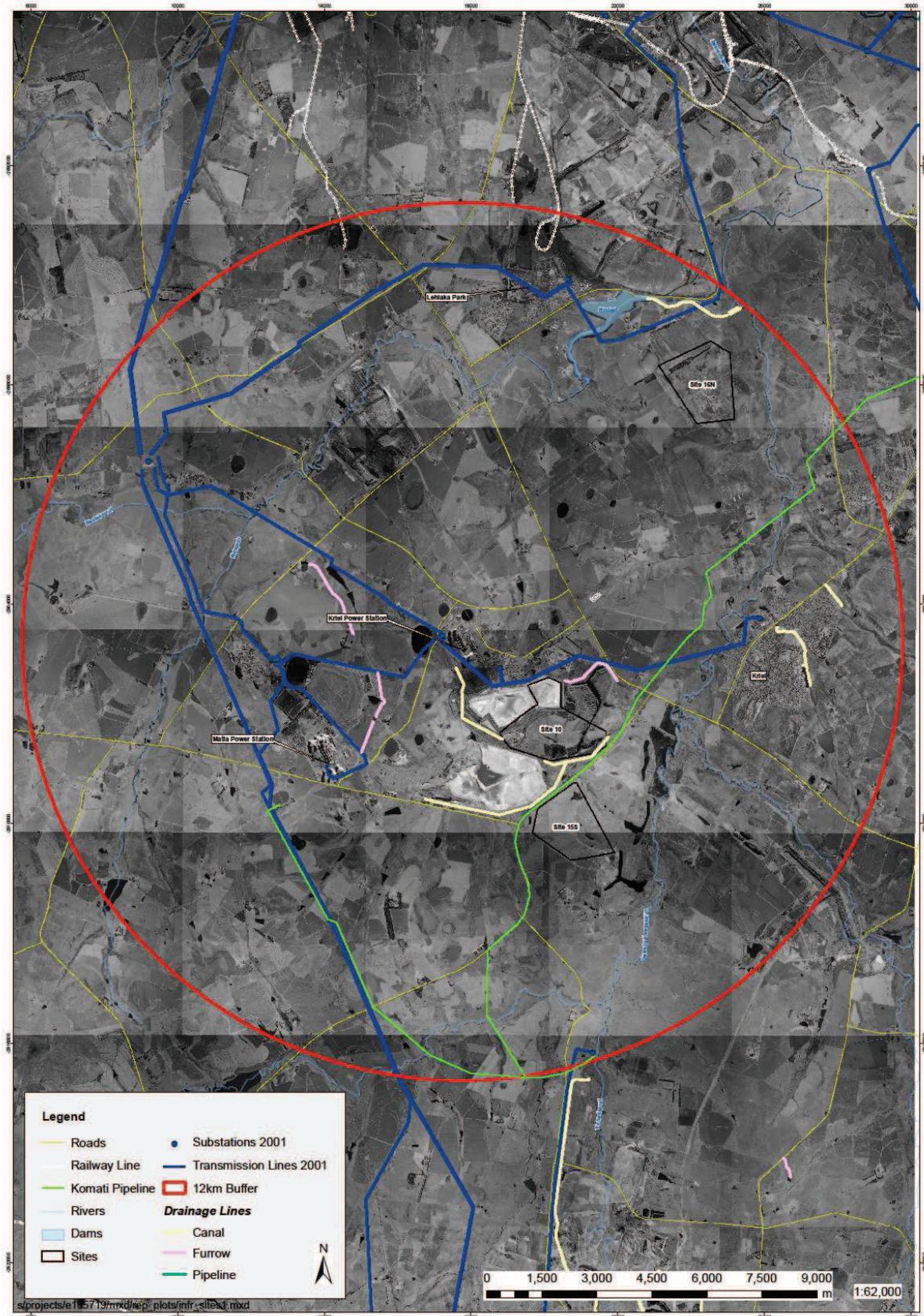


Figure 2-2 Map indicating existing infrastructure within the 12 km radius area

- The opportunity to improve current water issues at Area 10 would no longer exist; and
- Increased risk of water pollution should there be damage to ash transport infrastructure.

**Liners:** It was estimated that collapse settlement of approximately 3 m could occur on the spoils at Sites 10 and 15S. This could result in substantial differential movement in the foundation of the ash disposal facility that would be very difficult, ~~if possible at all~~, for the liner system to accommodate. The ~~option details~~ to line an open cast mine will however be investigated via a detailed geotechnical investigation.

#### (ii) Cost of infrastructure

In order to compare the different areas from an infrastructure cost perspective, a rough estimate was calculated for Sites 10, 15S and 16N ~~and 17~~ with regards to liner costs, slurry delivery and return water costs and pre-built embankment. A summary of the costs are indicated in **Table 2-5**. More-detailed costs are provided in Jones and Wagener's technical screening report, included as **Annexure D**.

**Table 2-5 Summary of major cost items (Jones & Wagener, 2010)**

DESCRIPTION	Cost (x R 1 000 000)			
	Site 10	Site 15 South	Site 16 North	Site 17
Delivery and Return Infrastructure Cost	110.2	125.6	152.6	<del>152.6</del>
Liner System <sup>10</sup>	<u>TBC<sup>11</sup></u>	<u>TBC</u>	600	<del>600</del>
Pre-built embankments	40	70	0	<del>0</del>
<b>Total</b>	<b>150.2</b>	<b>195.6</b>	<b>752.6</b>	<del><b>752.6</b></del>

**Delivery and return infrastructure cost:** In order to compare the sites, the above calculations were based on the assumption that the existing slurry delivery system would be discarded and a new pump station and pipeline would be required. However, it would be possible to retain the existing system should Site 10 be approved. Furthermore, a rate of 30c/kWh for electricity was also taken into consideration.

With regards to preliminary water treatment costs, it was assumed that the volumes would be similar for all ~~four~~ three sites provided that the footprint areas are similar<sup>12</sup>. Seepage would be collected by the liner system for treatment, whereas seepage from the open cast mines could be abstracted from the groundwater by pumping from the final void or from boreholes around the site.

<sup>10</sup>Liner costs for Site 10 and 15S to be confirmed based on groundwater and detailed geotechnical investigations.

<sup>11</sup>To be confirmed.

<sup>12</sup>Note that the volume of water at Site 10 could be larger (than other sites) due to groundwater seepage and will be investigated by the relevant specialist in the EIA Phase.

**Liner cost:** As noted earlier in this chapter, liner costs would need to be calculated for Sites 10 and 15S based on the findings of a geotechnical investigation. A liner system can however be used for Site 16N ~~and 17 as these two sites are~~ as the site is located on natural soil with no possibility of surface subsidence occurring. The calculated costs for the ~~liners~~ liner is R2 million per hectare.

**Pre-built embankments:** Costs were calculated based on a 30 m high embankment, however the height would need to be investigated as part of the detailed geotechnical investigation.

## B. Environmental Criteria

### (iii) Hydrological features

The locality of permanent streams, wetlands, dams and the geohydrology of the area were taken into consideration due to the regional scale of potential impacts on water resources.

**Groundwater:** Ash from power stations is usually composed of alumina, silica, lime and iron oxides. Seepage from ash disposal sites contains high concentrations of dissolved salts and potentially elevated concentrations of certain trace elements such as arsenic, boron, manganese, nickel, lead, selenium, molybdenum and fluoride and could contaminate soils and groundwater. Furthermore, the ash water has a pH of 12.6 and could result in the solution and mobilisation of complex trace metal compounds. However, exposure to the atmosphere, anaerobic microbial action or the mixing of ash water with acidic groundwater would generally lower the pH. In terms of Site 10, previous studies on this site indicated that the water occurring in the opencast mine has an inherent resistance to acidification (lowering of pH). Under neutral and acidic conditions the soluble metal complexes and carbonates would precipitate and increase the potential for pollution. Groundwater pollution could not only have a negative impact on the water resources, fauna and flora, but also on agricultural productivity and income. These potential impacts are elaborated on in Section 5.3.3.

**Surface water:** The proposed sites are located within the B11D and B11E quaternary catchments which are dominated by the Steenskoolspruit (quaternary catchment B11D). A small portion of Sites 16N ~~and 17 are~~ is located within quaternary B11E, the Rietspruit, which is a tributary of the Steenskoolspruit.

### (iv) Geotechnical considerations

Of major concern is the possibility of collapse settlements of the foundation at Site 10 and 15S which would require portions of the wall to be constructed across the backfilled pit. Furthermore, it has been assumed that a pre-built embankment would need to be constructed where the toe of the facility is founded on spoils. The embankment would allow monitoring of settlements and possibly induce collapse settlement before ash could be deposited. An additional benefit would be that the spoils below the borrow area (i.e. where the embankment material has been excavated from) would be over-consolidated and less initial settlement can be expected.

### (v) Sensitive biodiversity features

The Mpumalanga Biodiversity Conservation Plan (MBCP) (Ferrar & Lötter, 2007) has identified land units in the surrounding landscape (**Figure 2-3**) that are categorised as important and necessary (Category 4), areas of least concern / ecological corridors (Category 5) and areas with no natural habitat left (Category 6). Each of these categories permits or restricts specific land use types. Category 4 specifically does not allow any surface mining activities / developments, including any mine waste and refuse dumps, to be developed, whereas Categories 5 and 6 allow for restricted developments. Most of the surface area of the sites is zoned as Category 5, although a section of wetland system is found at Site 16N which is zoned as Category 4. This wetland is important as a dispersal and ephemeral foraging habitat for faunal species and is therefore considered to be ecologically important.

### C. Other factors

Other factors were considered, but did not significantly differentiate between the areas within the 10 km radius identified as being potentially suitable for the proposed ash disposal facility and therefore did not influence the site selection process. These included:

- **Safety:** The operational plan for the proposed ash disposal facility will include mitigation measures to identify potential safety risks during the operational phase as well as after the ash disposal facility has been decommissioned.
- **Land ownership:** Eskom indicated that the proposed ash disposal facility could be placed on either Eskom owned or private owned property. To this end, Eskom would engage with landowners for purchase of new land, according to Eskom's Involuntary Resettlement policies, which are in line with the World Bank principles. Furthermore, no conservation areas are located within the area of investigation. Therefore this criterion was not considered an important decision making factor.
- **Topography:** The general topography of the area is relatively flat with no features that significantly differentiate between identified areas and possible sites.
- **Vegetation type:** Eastern Highveld Grassland (Gm 8) and Soweto Highveld Grassland (Gm12) occurs within the area of investigation (Mucina & Rutherford, 2006). Both vegetation types are considered to be endangered.
- **Sensitive fauna:** Due to the disturbed nature of the areas investigated, through agriculture, power industry and mining operations, the likelihood of endangered fauna to occur within the sites are very low (see Section 2.3.1 (B)(v)).
- **Wetlands:** The Terrestrial Biodiversity Assessment tool of the MBCP was used to identify any areas of biodiversity concern, including wetlands, within the sites (see Section 2.3.1 (B)(v)).

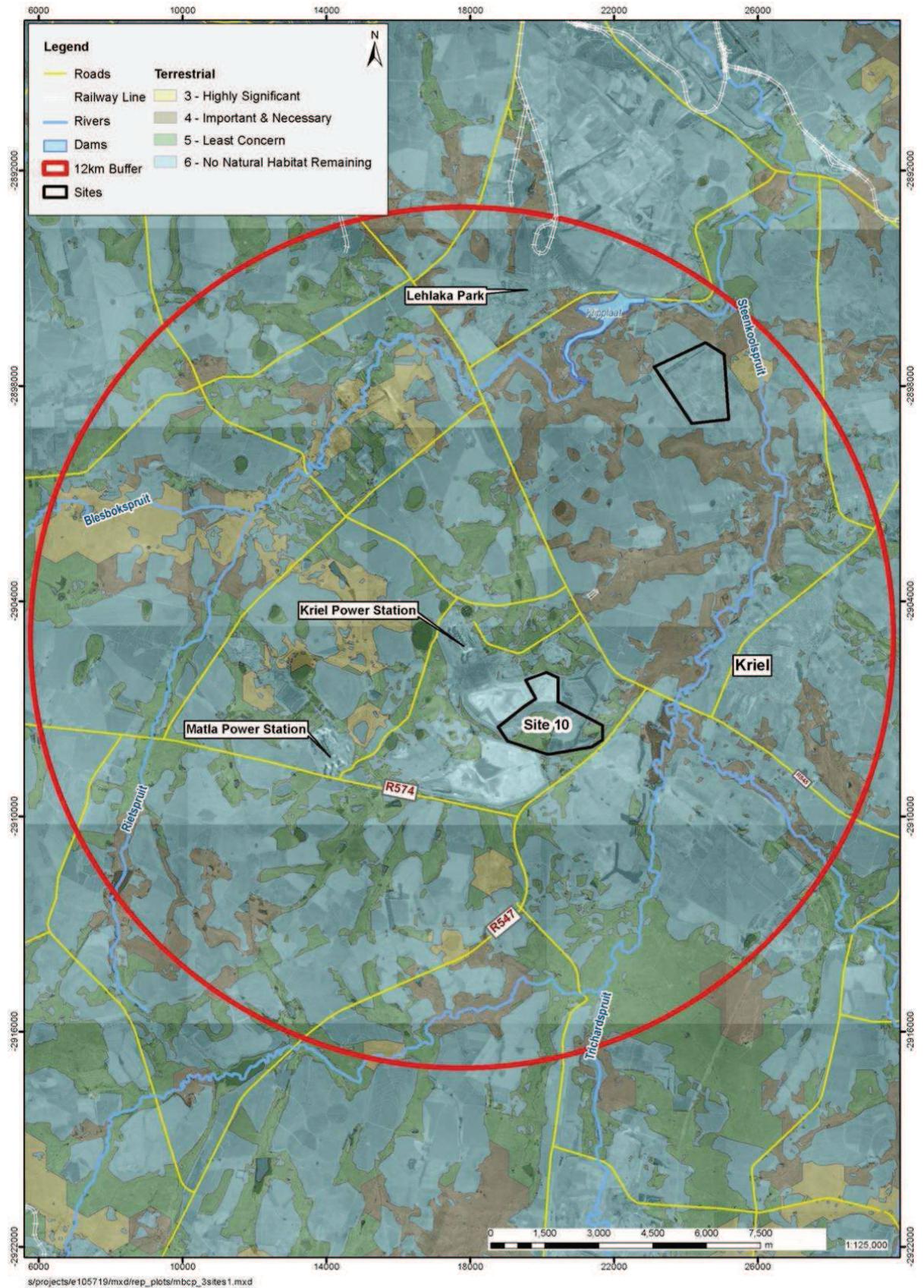


Figure 2-3 Sensitive land units identified by the MBCP at the Kriel Power Station

- **Visual:** An ash disposal facility of the magnitude required for the Kriel Power Station would have a visual impact on the surrounding landscape at all potential areas identified during the selection process. The scale of this impact will however depend on the site's proximity to the Power Station and existing ash disposal facilities.
- **Noise:** Noise generated by the pumping infrastructure could be mitigated and was therefore not used to distinguish between sites.
- **Dust:** The impact of dust on the surrounding landscape could be mitigated and was therefore not used to distinguish between sites.
- **Heritage:** Heritage resources are expected to occur within the vicinity of the potential sites and would need to be assessed via a Heritage Impact Assessment.

### 2.3.2 Description of potential sites

- **Site 10** overlies a backfilled open cast mine pit (Pit 1) and is bordered by the backfilled Kriel Colliery open cast mine pit Pit 1 to the east. The Provincial Road R547 (Evander-Kriel) is located to the south, Matla Power Station to the west and the Kriel Power Station to the north.

Advantages	Risks
Located relatively close to the Kriel Power Station and therefore requires less capital costs.	Situated over <u>a depleted opencast mine undermined</u> areas with associated groundwater and stability issues.
Shorter crossing of backfilled area than Site 15S.	Eastern final void of Pit 1 is open to groundwater and could result in metals leaching from the ash.
Brown fields area with limited future land use.	Possibility of collapse settlements in the foundation that could pose significant risks in terms of environmental (groundwater in particular) pollution should the correct measures not be in place.
Limited visual footprint.	
Predominantly located on Eskom owned land.	
Opportunity to address existing water quality and quantity issues associated with Pit 1.	

- **Site 15 South** also overlies a backfilled open cast mine (Pit 23) with the low point located to the east. The Provincial Road R547 is located to the north of the site and a backfilled open cast mine to the south. Agricultural land occurs to the west.

Advantages	Risks
Located relatively close to the Kriel power station and therefore requires less capital costs.	Situated over undermined areas with associated potential groundwater issues.
Most likely possible to avoid deposition over significant water filled areas open to groundwater*.	Unlike Site 10, this site has been rehabilitated and includes a wetland area.
Brown fields area with limited future land use.	The visual footprint of the Power Station will be spread over a wider area, thus increasing the existing impact on aesthetics and sense of place.
Located on Eskom owned land.	It would be necessary for pump infrastructure to cross the R547 to reach the site and could disrupt existing traffic patterns due to the movement of people and infrastructure to the ash disposal facility when in operation.
	Could potentially interfere with operations of nearby F-Block. May also be necessary to re-route F-Block services.
	Longer outer wall required than for Site 10, which is also more costly.
	East and south toe areas overlie coal resources, but could be negligible due to low additional overburden pressure at the dam toe.

\*A low point with standing water is however located in the centre of the site.

- **Site 16N** overlies natural ground that is partially used for agriculture and is bordered by the Steenkoolspruit to the east, agricultural land and a valley ridge to the north and south and to the west agricultural land that is underlain by the Kriel Colliery Coal fields.

Advantages	Risks
Underlain by natural ground with no instability concerns.	Located relatively far from the Kriel Power Station and would therefore require high infrastructure costs.
Possible to avoid coal located within the site.	Adjacent to Steenkoolspruit and could potentially pollute the river should an accident occur.

Advantages	Risks
	Expensive liner system would be required.
	Disturbance of a Greenfields area that is partially used for agriculture.
	Privately owned property.

- ~~Site 17 is located to the northwest of the power station on Farms Rietvlei 62, Vierfontein 61 and Nooitgedacht 37. The site is bordered by agricultural land on all sides. To the east the R545 (regional road from Ogies to Bethal) is located and to the southeast the Matla Colliery.~~

Advantages	Risks
<del>Underlain by natural ground with no instability concerns.</del>	<del>Located relatively far from the Kriel Power Station and would therefore require high infrastructure costs.</del>
<del>No coal resources or undermined areas are located on site.</del>	<del>Located 600 m to the west of the Rietspruit and could potentially pollute the river should seepage occur.</del>
	<del>Expensive liner system would be required.</del>
	<del>Disturbance of a Greenfields area that is used for agriculture.</del>
	<del>It would be necessary to realign tertiary roads located within the site.</del>
	<del>Privately owned property.</del>

### 2.3.3 Ranking of potential sites identified

A basic ranking system was used to ~~screen~~ provide a comparison between the potential sites in terms of the screening criteria discussed in Section 2.3.1. In light of the preliminary nature of this investigation ~~and lack of broader consultation~~, this ranking should be regarded as initial, and is purely intended to guide Eskom and its consultants in their deliberations regarding the way forward.

The site ranking methodology entails:

- Rating of site suitability criteria (to identify any “fatal flaws”);
- Weighting of site suitability ranking; and
- Site selection based on site ranking

A score was assigned to each site for each of the criteria as indicated in **Table 2-6** below.

**Table 2-6 Scores assigned to criteria to indicate the various levels of site suitability**

Site Suitability Rating	Score
Fatal flaw	0
Low	1
Medium	2
High	3

**Note:** A low score reflects the unsuitability of the site, whilst a high score reflects that the site is suitable. The suitability of a site is based on the mitigation potential of impacts (i.e. if they can be effectively mitigated).

Weightings were assigned to the different criteria. The weightings were decided upon following the site visit, discussions with Eskom and the project engineers.

Site	Design/ operating requirements	Cost <sup>13</sup>	Geotechnical stability	Groundwater pollution	Other sensitive environmental features (e.g. Critical Areas, arable land)
10	2	3	1	1	3
15S	2	3	1	1	2
16N	2	1	3	3	1
17	2	4	3	3	4

The final scores for each criterion were calculated using the following formula:

$$\frac{\text{Score}}{3} \times \text{Weighting}$$

The results of the site ranking process for the three identified sites are presented in **Table 2-7**.

**Table 2-7 Site ranking matrix**

Site	Design/ operating requirements	Cost	Geotechnical stability	Groundwater pollution	Other sensitive environmental features (e.g. Critical Areas, arable land)	Total
Weighting	20	15	25	25	15	100
10	13.3	15	8.3	8.3	15	59.9

<sup>13</sup>Excludes rehabilitation (including water treatment facility), mitigation and maintenance costs. These would be required for the approved site.

Site	Design/ operating requirements	Cost	Geotechnical stability	Groundwater pollution	Other sensitive environmental features (e.g. Critical Areas, arable land)	Total
Weighting	20	15	25	25	15	100
15S	13.3	15	8.3	8.3	10	54.9
16N	13.3	5	25	25	5	73.3
17	13.3	5	25	25	5	73.5

### 2.3.4 Site selection summary and way forward

Based on the above, the following summary of the site selection process is provided:

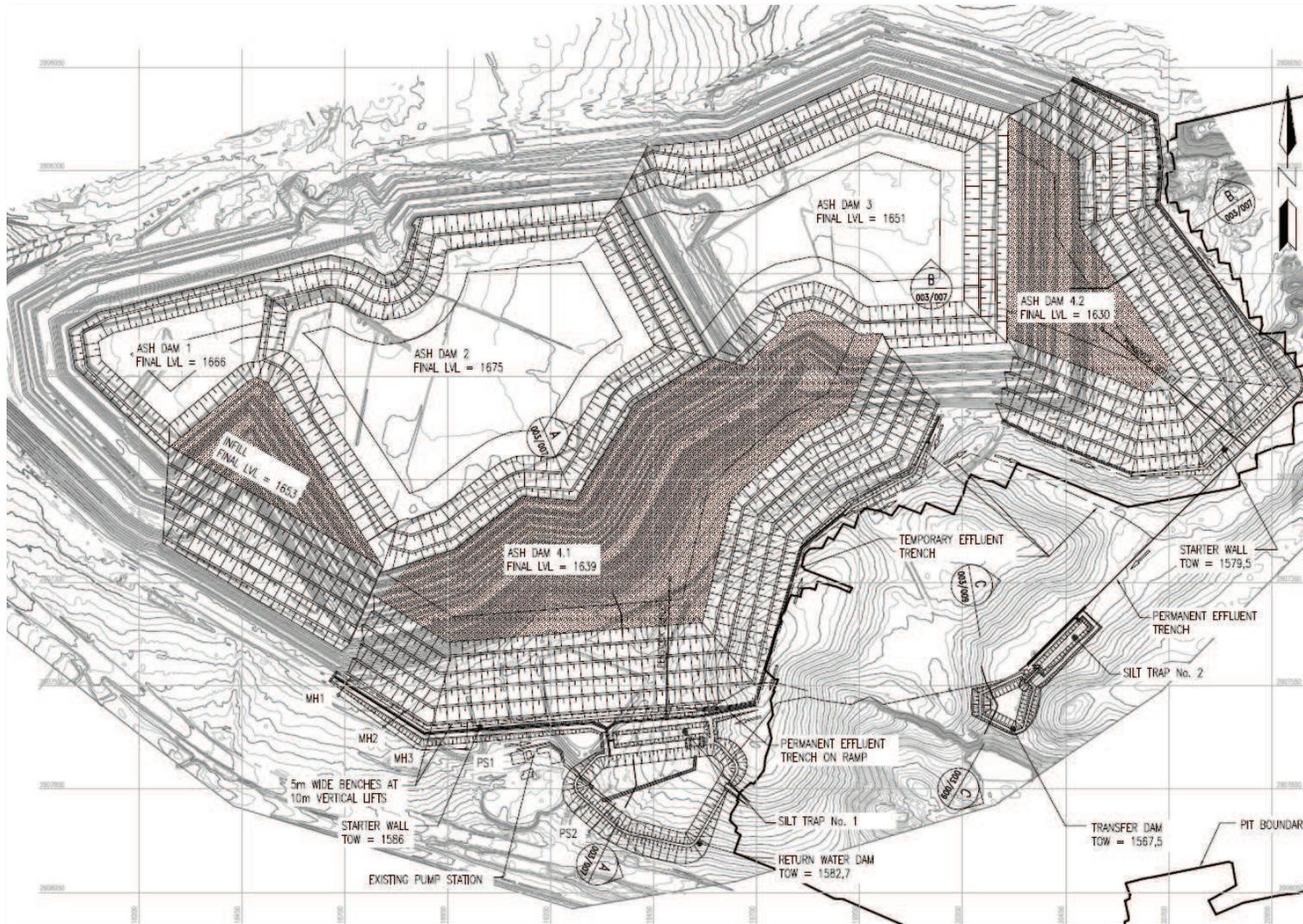
- Sites 10 and 15S are considered to be the least favourable sites with the following screening criteria ranked as “least favourable”: geotechnical stability, groundwater pollution and sensitive biodiversity features. ~~This rating may however change based on the information received from the detailed groundwater and geotechnical investigations.~~
- Site 16N and 17 are located outside the 10 km radius area. However these two sites are is “more favourable” than Site 10 in terms of geotechnical stability and groundwater pollution risks and “least favourable” in terms of design / operating requirements (reasons described in Section 2.3.1 A(i)), cost and sensitive environmental features as it would extend the environmental disturbance footprint of the power station and its associated infrastructure.
- ~~Site 16N and 17 are is ranked as the most favourable site with cost and sensitive environmental features ranked as “least favourable”.~~
- ~~Site 16N and 17 are the is least preferred from a logistical/ functioning perspective only, for the reasons described in Section 2.3.1 A(i), and will result in a further extension to the environmental disturbance footprint of the power station and its associated infrastructure.~~

It is apparent from the above sections of this chapter, as well as the ranking matrix, that Sites 10 and 15S are very similar with regards to groundwater and geotechnical characteristics. However, Site 15S has been indicated as the least favourable option. This is mainly due to the fact that the site has been rehabilitated and includes a wetland area. In addition, Site 15S is located further away from the Power Station than Site 10 and would thus have a higher visual impact on the surrounding landscape. With regards to Site 10, a previous investigation completed in 2002 on the hydrology of the site indicated that a desalination plant ~~could~~ would be ~~established there~~ required for use of this site, to treat the seepage water and improve manage the existing water quantity and quality issues at the site. Therefore, it is proposed to take Site 10 and 16N forward into the EIA Report stage for detailed assessment. ~~, together with Sites 16N and 17.~~

## Annexure D

### Annexure D.1

**Ash Dam 4 Concept 2016 preferred alternative, consisting of only AD 4.1 and 4.2**



## Annexure E

### Annexure E.1

#### List of potential I&APs

##### 2011 Registered I&APs

TITLE	NAME / INITIAL	SURNAME	ORGANISATION / FARM NAME
Mr	Tobile	Bokwe	Eskom : Senior Environmental Advisor
Ms	Karen	Marx	WESSA (Northern Area): Regional Manager
Mr	PT	Mashiane	Emalahleni Local Municipality
Ms	Kim	Webb	WESSA (Northern Area): Conservation Coordinator: Mpumalanga
Ms	Margaret	Phatlane	Kriel Colliery (Community Development)
Mr	A.J. Dries	Cronje	Dries Cronje Broedary
Mr	Andre	Boshoff	Plaas Bakenlaagte
	J.H.	Jacobs	Bakenlaagte
	J.	Opperman	Nooitgedacht
Mr	Edmund M.	Muller	Vierfontein Boerdery
Mr	Phillip	Makgoka	Exxaro Matla mine
Mr	Maphuti	Boloka	Kriel Mine (Anglocoal)
	P J	Van Heerden	Kriel Colliery
	Nick	Bongers	Emalahleni Local Municipality
Ms	Mbali	Pewa	Kriel Mine (Anglocoal)
		Director	Emalahleni Local Municipality: Environmental Health
		Director	Emalahleni Local Municipality: Waste Management
	Marietjie	Wolmarans	Kriel Colliery (Training)
	Bhekithemba	Ndhala	Sibongamandla School
	Busi	Zulu	Total Coal SA
	Sanele	Mzuzu	SAPS
Ms	Fikile	Mokoena	Kriel Colliery (Communications)
	Mzimkhulu	Koyo	Matla Colliery
	Mbali	Nhlengethwa	Matla Power Station
	Johan	van der Walt	Kriel Mine (Anglocoal)
	Wilma	Schutte	Landowner
Dr	Garth	Batchelor	Mpumalanga Department of Agriculture and Land Administration: Director: Environmental Management
Mr	Peter	Lukey	Department of Environmental Affairs (DEA) :Chief Director: Air Quality and Climate Change
Mr	Mazwi	Lushaba	Department of Environmental Affairs (DEA) : Director: Air Quality Management
Ms	Nkosazana	Machete	South African Heritage Resource Agency (SAHRA) : Provincial Manager
Mr	Lebogang	Mofokeng	Department of Agriculture and Land Administration
Mr	Musa	Mondlane	Mpumalanga Department of Agriculture and Land Administration :Director: Environmental Management
Mr	Dumisane	Mthembu	Department of Environmental Affairs (DEA) : Deputy Director: Environmental Impact Evaluation
Mr	Kelello	Ntoampe	Department of Environmental Affairs: Authorisations and Waste Stream Management,
Mr	Mohau	Ramodibe	Economic Development, Environment and Tourism

Mr	Izak	van der Merwe	Department of Water Affairs (DWA)
	Alucia	Mogale	DWA (Bronkhorspruit Office)
	Selby	Luckele	DEDET (Nelspruit)
	Khurisani	Mashava	DWA (Nelspruit)
	Mahadi	Mofokeng	DWA (Pretoria)
	Dash	Mabena	DEDET (Delmas)
Mr	F	Mntambo	Department of Water Affairs (DWA): Chief Director
Cllr	SK	Mashilo	Nkangala District Municipality
	Cynthia	Bongweni	Phumelela HBC
Mr	Naas	Boshoff	Plaas Bakenlaagte
Ms	Dolly	Mthethwa	
Mr	Moosa	Jogee	
	I.M.P.	van Niekerk	Vaal Pan Kriel
	A.J.	van Niekerk	Vaal Pan Kriel
Ms	Nomusa	Shili	Emalahleni Local Municipality
Clr	Z.Z	Bovungane	
Mr	Owen	Muller	Vierfontein Boerdery
Mr	Jeffrey	Skhosana	Ward 26
	Owen	Muller	Vierfontein Boerdery
	Edmund Jnr	Muller	Vierfontein Boerdery
	Andries	van Niekerk	
Clr	TH	Mavuso	Kriel Municipality
Mr	Wilson	Mamwara	Matla Coal

### Authorities identified

TITLE	NAME/INITIALS	SURNAME	ORGANISATION/FARM NAME
Mr	MC	Theledi	Mpumalanga Department of Economic Development, Environment and Tourism
Ms	S	Masoka	Mpumalanga Department of Agriculture and Rural Development and Land Administration
Dr	Thulie	Khumalo	Department of Environmental Affairs (DEA): Climate Change and Air Quality
Mr	O	Baloyi	Department of Environmental Affairs (DEA): Chemical and Waste Management
Mr	Sabelo	Malanza	Department of Environmental Affairs (DEA): Legal Authorisations and Compliance Inspectorate
Mr	M	Mulaudzi	Mpumalanga Department of Water and Sanitation
Mr	Sifiso	Mkhize	Department of Water and Sanitation (DWS)
Mr	Benjamin	Moduka	South Africa Heritage Resource Agency (SAHRA) Mpumalanga Provincial Office
Cllr	SK	Mashilo	Nkangala District Municipality
Mr	PT	Mashaine	Emalahleni Local Municipality
	Matsemela	Moloi	Mpumalanga Department of Public Works, Roads and Transport
		Director	Nkangala Department of Health
		Director	National Energy Regulator of South Africa
Mr	MM	Mlengana	Department of Agriculture, Forestry and fisheries
Ms	Caroline	Khoza	Department of Transport
		Director	Department of Mineral Resources
		Director	South African National Road Agency Limited
		Director	South African Heritage Resources Agency
Ms	Matsidiso	Ogbobo	Civil Aviation Authority
		Director	Department of Energy (Mpumalanga regional Energy director)

### ***Landowner***

The applicant Eskom SOC limited (also see below correspondents).

<b>TITLE</b>	<b>NAME/INITIALS</b>	<b>SURNAME</b>	<b>ORGANISATION/FARM NAME</b>
Mr	Tobile	Bokwe	Eskom : Senior Environmental Advisor
Mr	Tinkie	Holl	Eskom Real Estate

### ***Adjacent landowners***

<b>TITLE</b>	<b>NAME/INITIALS</b>	<b>SURNAME</b>
Mr	Tobile	Bokwe
	Director	Anglo Operations Ltd
Mr	G.J.	Claassen
Mr	A.J.	van Niekerk
Mr	Ngangasi	Joseph Mahlangu

## **Annexure E.2**

### **Proof of public participation**

~~Proof of public participation will be included in final scoping report.~~

# 1 Annexure E.2

This annexure serves to document the public participation process undertaken to date (during the scoping phase) for the proposed expansion of the Kriel Ash Disposal Facility.

## 1.1 Scoping phase public participation process

I&APs were informed of the proposed Kriel Ash Disposal Facility EIA process through:

- Site notice (see Figure 1) at Thubelihle community centre (see Figure 2), Thubelihle tuckshop (see Figure 3), Shop inside Kriel Power Station (see Figure 4), Kriel Library (see Figure 5) and the Spar in Kriel(see Figure 6);
- Advertisements in *Die Beeld* (see Figure 7 and Figure 9) a regional newspaper on 27 October (Afrikaans) and *The Echo* (see Figure 8 and Figure 10) a local newspaper on 28 October (English);
- Emails (all had emails and no letters were required) were sent out to potential I&APs that were registered on a previous project on the same property that was withdrawn and given an opportunity to register as I&AP for this EIA.
- For those with no emails or addresses they were contacted telephonically (see phone records at the end of this annexure, page 10).
- Letters and/or emails were sent to:
  - Authorities with electronic copies of the scoping report (including DEA IEA, Waste management and Biodiversity)
  - Other potential I&APs e.g. NERSA, Emalahleni Municipality and SANRAL
  - The landowner (Eskom)
  - The adjacent landowners
- Open house meetings were held on 9 November 2016 at:
  - Thubelihle Community Hall, Next to clinic, Kriel Drive (see Figure 11, Figure 12 and Figure 13)
    - 14:00 - 17:00 (public open house meeting)
  - Methodist Church Hall, Kriel 65 Springbok Crescent and corner of Flamingo Avenue (see Figure 14, Figure 15, Figure 16 and Figure 17)
    - 18:00 - 20:00 (presentation and public open house meeting)
- A digital version of the scoping report was uploaded onto the Aurecon and Eskom websites for perusal and download (see ):
  - Aurecon: <http://www.aurecongroup.com/en/public-participation.aspx>
  - Eskom: [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)

I&APs were invited to register for the project, notified of the availability of the scoping report (at Kriel Power Station and Kriel Public Library) and invited to attend a public open house meeting at either the Methodist Church Hall in Kriel or Thubelihle Community Hall, Next to clinic on Thubelihle on the 9<sup>th</sup> of November 2016. I&APs were afforded the opportunity to contact Aurecon via telephone, email, fax or mail. In order to better facilitate I&APs to communication officers were provided, Dirk Pretorius for English and Afrikaans and Simamkele Ntsengwane for Xhosa and Zulu.

## 1.2 Site notice

<p><b>BEOOGDE UITBREIDING VAN DIE ASDAM FASILITEIT BY KRIEL KRAGSENTRALE, MPUMALANGA</b></p>	<p><b>KENNISGEWING/NOTICE</b></p> 	<p><b>PROPOSED EXTENSION OF THE ASH DISPOSAL FACILITY AT KRIEL POWER STATION, MPUMALANGA</b></p> <p><b>What is the proposed project</b></p>						
<p><b>Wat is die voorgestelde projek</b></p> <p>Kriel-kragentrale is 'n steenkool-kragentrale wat deur Eskom besit word. Die kragentrale produseer as vanaf steenkool wat verbrand word om elektrisiteit te genereer. Die kragentrale maak gebruik van 'n "nat" proses om die as weg te doen na drie as-damme wat binne die volgende paar jaar hul kapasiteit sal bereik. Eskom is dus van voorneme om 'n bykomende as fasiliteit te bou wat as sal ontvang vir die res van die kragentrale se operasionele lewe.</p>	<p>Kriel Power Station is an Eskom owned coal fired power station, which generates ash when coal is burnt to generate electricity. This ash is disposed of through a wet ashing system to three ash dams which will reach their capacity in the next few years. Eskom is thus proposing to construct an additional Ash Disposal Facility to fulfil ash disposal requirements for the remainder of the power station's operational life.</p>	<p><b>Legal requirements</b></p> <p>The proposed expansion of the ash disposal facility triggers several activities listed in terms of the National Environment Management Act (NEMA) (No. 107 of 1998) Government Notice (GN) R983, R984 and R985; and the National Environmental Management: Waste Act (NEMWA) (No. 59 of 2008) GN 921 of 29 November 2013. As such authorisation from the competent environmental authority, viz. the Department of Environmental Affairs via an Integrated Environmental Impact Assessment (EIA) process (GN No. R982 of December 2014) is necessary.</p>						
<p><b>Wetlike vereistes</b></p> <p>Die beoogde uitbreiding van die fasiliteit val binne die bestek van verskeie gelyste bedrywighede in terme van die Wet op Nasionale Omgewingsbestuur (NEMA) (Wet Nr. 107 van 1998) Goewermentskennisgewing (GK) R983, R984 en R985; en die Wet op Nasionale Omgewingsbestuur: Afval Wet (NEMWA) (Nr. 59 van 2008) GK 921 van 29 November 2013. Sodanig word magtiging van die omgewings owerheid, nl. die Departement van Omgewingsake via 'n Geïntegreerde Omgewingsimpakbepaling (OIB) (GK Nr. R982 van Desember 2014) benodig.</p>		<p>This proposed project triggers activity 10, 12, 19, 45, 48, and 49 of GN No. R983; and activity 15 and 16 of GN No. R984 published in terms of NEMA; and Category A activity 1 and Category B activities 1, 7, 8 and 10 of NEMWA.</p>						
<p>Die beoogde projek het bedrywighede 10, 12, 19, 34, 45, 48 en 49 van GK Nr. R983; en bedrywighede 15 en 16 van GK Nr. R984 gepubliseer in terme van NEMA; en Kategorie A bedrywigheid 1 en Kategorie B bedrywighede 1, 7, 8 en 10 van NEMWA tot gevolg.</p>	<p><b>Telefoon/Phone:</b> (021) 526 6012 (Afrikaans / English) Dirk  <b>Telefoon/Phone:</b> (021) 526 9560 (Xhosa / Zulu) Simamkele  <b>Faks:</b> 086 723 1750  <b>Epos/Email:</b> dirk.pretorius@arecongroup.com  <b>Pos/Post:</b> Posbus 494, Kaapstad, 8000  <b>Aandag/Attention:</b> Dirk Pretorius</p>	<p><b>Who</b></p> <p>Aurecon South Africa (Pty) Ltd has been appointed by Eskom to complete the requisite EIA and Waste Management Licence processes.</p>						
<p><b>Wie</b></p> <p>Aurecon Suid-Afrika (Edms) Bpk is deur Eskom aangestel om die vereiste OIB en Afvalbestuurslisensie prosas te onderneem.</p>	<p><b>Open house meeting on 9 November</b></p>	<p><b>Your involvement</b></p> <p>Notice is hereby given of the commencement of a public participation process in terms of the NEMA EIA Regulations 2014.</p>						
<p><b>U betrokkeheid</b></p> <p>Kennis geskied hiermee van die aanvang van 'n proses van openbare deelname kragtens NEMA se OIB-regulasies, 2014.</p>	<table border="1"> <thead> <tr> <th>Plek / Place</th> <th>Tyd / Time</th> </tr> </thead> <tbody> <tr> <td>Thubelihle Gemeenskap Saal / Community Hall, langs die kliniek / next to clinic, Kriel Drive</td> <td>14:00-17:00</td> </tr> <tr> <td>Metodiste Kerk Saal / Methodist Church Hall, Kriel 65 Springbok Singel / Crescent op hoek van Flamingo Laan / on corner of Flamingo Avenue</td> <td>18:00-20:00</td> </tr> </tbody> </table>	Plek / Place	Tyd / Time	Thubelihle Gemeenskap Saal / Community Hall, langs die kliniek / next to clinic, Kriel Drive	14:00-17:00	Metodiste Kerk Saal / Methodist Church Hall, Kriel 65 Springbok Singel / Crescent op hoek van Flamingo Laan / on corner of Flamingo Avenue	18:00-20:00	<p>Interested and Affected Party (I&amp;APs) are invited to attend a public open house meeting on 9 November at the venues indicated on left</p>
Plek / Place	Tyd / Time							
Thubelihle Gemeenskap Saal / Community Hall, langs die kliniek / next to clinic, Kriel Drive	14:00-17:00							
Metodiste Kerk Saal / Methodist Church Hall, Kriel 65 Springbok Singel / Crescent op hoek van Flamingo Laan / on corner of Flamingo Avenue	18:00-20:00							
<p>Belanghebbende en Geaffekteerde Party (B &amp; GP) word uitgenooi om 'n opedag vergadering op 9 November by plekke hier regs aangedui by te woon.</p> <p>U word uitgenooi om deel te neem in hierdie prosas deur te registreer as 'n Belanghebbende en Geaffekteerde Party (B &amp; GP) by Aurecon. Indien u verder inligting verlang, of enige aanvanklike geskildpunte of kwessies wil uitlig, kontak asseblief Aurecon teen <b>28 November 2016</b> by besonderhede hier regs aangedui.</p>		<p>You are invited to participate in this process by registering as an Interested and Affected Party (I&amp;AP) with Aurecon. If you would like to receive further information, to raise any issues or concerns, please contact Aurecon by <b>28 November 2016</b> at the details provided to the left.</p>						

Figure 1 | Example of site notice in Afrikaans and English



Figure 2 | Site notices at Thubelihle community centre

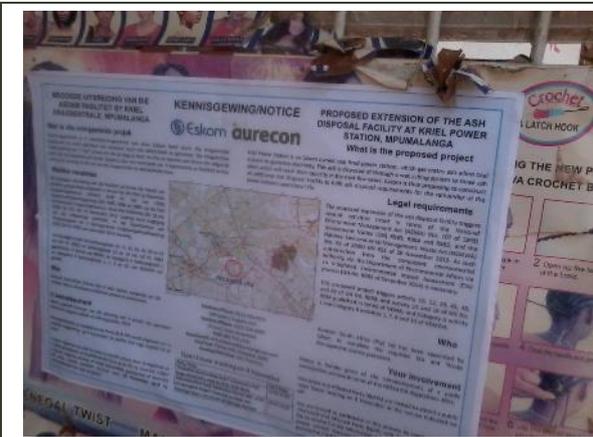


Figure 3 | Site notices at Thubelihle tuckshop



Figure 4 | Site notices at shop inside Kriel Power Station

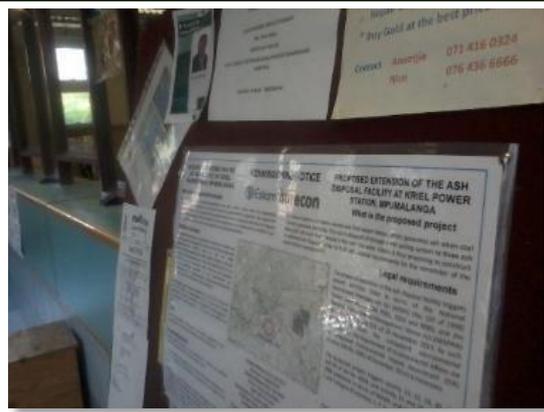


Figure 5 | Site notices at Kriel Library Notice board



Figure 6 | Site notices on the door of the Spar in Kriel

### 1.3 Advertisements

**VOORGESTELDE UITBREIDING VAN DIE ASFASILITEIT  
TE KRIEL KRAGSTASIE, MPUMALANGA  
GEÏNTEGREERDE OMGEWINGSIMPAKSTUDIE  
PUBLIEKE DEELNAME PROSES**

Kriel-kragssentrale is 'n steenkool-kragssentrale wat deur Eskom besit word. Die kragssentrale produseer as vanaf steenkool wat verbrand word om elektrisiteit te genereer. Die kragssentrale maak gebruik van 'n "nat" proses om die as weg te doen na drie as-damme wat binne die volgende paar jaar hul kapasiteit sal bereik. Eskom is dus van voorneme om 'n bykomende as fasiliteit te bou wat as sal ontvang vir die res van die kragssentrale se operasionele lewe.

Die beoogde uitbreiding van die fasiliteit val binne die bestek van verskeie gelyste bedrywighede in terme van die Wet op Nasionale Omgewingsbestuur (NEMA) (Wet Nr. 107 van 1998) Goewermentskennisgewing (GK) R983, R984 en R985; en die Wet op Nasionale Omgewingsbestuur: Afval Wet (NEMWA) (Nr. 59 van 2008) GK 921 van 29 November 2013. Sodanig word magtiging van die omgewings owerheid, nl. die Departement van Omgewingsake via 'n Geïntegreerde Omgewingsimpakbepaling (OIB) (GK Nr. R982 van Desember 2014) benodig.

Die beoogde projek het bedrywighede 10, 12, 19, 24, 45, 48, 49 en 56 van GK Nr. R983; en bedrywighede 15 en 16 van GK Nr. R984 gepubliseer in terme van NEMA; en Kategorie A bedrywigheid 1 en Kategorie B bedrywighede 1, 7, 8 en 10 van NEMWA tot gevolg.

Aurecon Suid-Afrika (Edms) Bpk is deur Eskom aangestel om die vereiste OIB en Afvalbestuurslisensie proses te onderneem.

Kennis geskied hiermee van die aanvang van 'n proses van openbare deelname in terme van die WNOB se OIB-regulasies 2014 en die **beskikbaarheid van die Bestekopnameverslag** vir kommentaar. 'n Harde kopie van die Bestekopnameverslag kan besigtig word by **Kriel Openbare Biblioteek en Kriel Kragstasie**.

'n Digitale kopie van die Bestekopnameverslag is ook beskikbaar op die Aurecon en Eskom Webwerf (en op versoek by persoon hieronder aangedui):  
Aurecon: <http://www.aurecongroup.com/en/public-participation.aspx>  
Eskom: [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)

Belanghebbende en Geaffekteerde Party (B & GP) word uitgenooi om 'n **opedag vergadering** op 9 November by die onderstaande plek by te woon:

Plek	Tyd
Thubelihle Gemeenskap Saal, langs die kliniek, Kriel Drive	14:00-17:00 (opedag vergadering)
Methodiste Kerk Saal, Kriel 65 Springbok Singel op hoek van Flamingo Laan	18:00-20:00 (aanbieding en opedag vergadering)

U word uitgenooi om deel te neem in hierdie proses deur te registreer as 'n B & GP by Aurecon. Indien u verder inligting verlang, of enige aanvanklike geskilpunte of kwessies wil lug, kontak asseblief Aurecon teen 28 November 2016 by:

Telefoon: (021) 526 6012 (Afrikaans / English) Dirk  
Telefoon: (021) 526 9560 (Xhosa / Zulu) Simamkele  
Faks: 086 723 1750

Epos: [dirk.pretorius@aurecongroup.com](mailto:dirk.pretorius@aurecongroup.com)  
Pos: Posbus 494, Kaapstad, 8000  
Aandag: Dirk Pretorius


X1QC64MM-B1261016

Figure 7 | Advertisement example Afrikaans

**PROPOSED EXPANSION OF THE ASH DISPOSAL FACILITY AT KRIEL  
POWER STATION, MPUMALANGA  
INTEGRATED ENVIRONMENTAL IMPACT ASSESSMENT PUBLIC PARTICIPATION PROCESS**

Kriel Power Station is an Eskom owned coal fired power station, which generates ash when coal is burnt to generate electricity. This ash is disposed of through a wet ashing system to three ash dams which will reach their capacity in the next few years. Eskom is thus proposing to construct an additional Ash Disposal Facility to fulfil ash disposal requirements for the remainder of the power station's operational life.

The proposed expansion of the ash disposal facility triggers several activities listed in terms of the National Environment Management Act (NEMA) (No. 107 of 1998) Government Notice (GN) R983, R984 and R985; and the National Environmental Management: Waste Act (NEMWA) (No. 59 of 2008) GN 921 of 29 November 2013. As such authorisation from the competent environmental authority, viz. the Department of Environmental Affairs via an Integrated Environmental Impact Assessment (EIA) process (GN No. R982 of December 2014) is necessary.

This proposed project triggers activity 10, 12, 19, 45, 48, and 49 of GN No. R983; and activity 15 and 16 of GN No. R984 published in terms of NEMA; and Category A activity 1 and Category B activities 1, 7, 8 and 10 of NEMWA.

Aurecon South Africa (Pty) Ltd has been appointed by Eskom to complete the requisite Integrated Environmental Impacts Assessment, which includes a Waste Management Licence processes.

Notice is hereby given of the commencement of a **public participation process** in terms of the NEMA EIA Regulations 2014 and the **availability of the Scoping Report** for public comment.

A hard copy of the Scoping Report can be viewed at **Kriel Public Library** and **Kriel Power Station**.

A digital version of the Scoping Report is available on Aurecon and Eskom websites for perusal and download (or upon request from the persons indicated below):

Aurecon: <http://www.aurecongroup.com/en/public-participation.aspx>

Eskom: [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentallImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentallImpactAssessments/Pages/Environment_Impact_Assessments.aspx)

Interested and Affected Party (I&APs) are invited to attend a public open house meeting on 9 November at the following venues:

Place	Time
Thubelihle Community Hall, Next to clinic, Kriel Drive	14:00-17:00 (public open house meeting)
Methodist Church Hall, Kriel 65 Springbok Crescent and corner of Flamingo Avenue	18:00-20:00 (presentation and public open house meeting)

You are invited to participate in this process by **registering as an I&AP** with Aurecon. If you would like to receive further information, to raise any issues or concerns, please contact Aurecon by **28 November 2016** at:

**Telephone:** (021) 526 6012 (Afrikaans / English) Dirk  
**Telephone:** (021) 526 9560 (Xhosa / Zulu) Simamkele  
**Fax:** 086 723 1750  
**Email:** [dirk.pretorius@aurecongroup.com](mailto:dirk.pretorius@aurecongroup.com)  
**Post:** PO Box 494, Cape Town, 8000  
**Attention:** Dirk Pretorius



Figure 8 | Advertisement example English





**INDUSTRIËLE ERF TE HUUR**  
 Stuk grond ongeveer 1000m<sup>2</sup>  
 met mure om,  
 te huur vir R15 000p/m  
 onderhandelbaar.  
 Geleë in nuwe industriële area  
 in Uitbr. 24  
 Kontak Jaco 082 965 0740

**Elegance Electrical**  
 Debtors / Creditors lady required

**Requirements:**

- Driver's license
- Grade 12
- Must be computer literate
- Must be bilingual
- No smokers please
- Experience will be advantageous

Please hand deliver CV at  
**Elegance Electrical, Shop No. 1,  
 Scheepers Street, Secunda**

**OUR SCHOOLS**



**Laerskool Kruijnpark presteer**  
 SECUNDA - Drie skaakspelers van Laerskool Kruijnpark is gekies om aan die Suid-Afrikaanse Kampioenskap deel te neem wat vanaf 15 tot 23 Desember by die Birchwood Hotel in Boksburg plaasvind. Hier is Wynand Dreyer, Janko Visser en Jason Simich.



Laerskool Secunda se peuters tydens hul konsert.  
**Peuters hou konsert**  
 SECUNDA - Laerskool Secunda het hul Peuterskoolkonsert vanaf 18 tot 20 Oktober aangebied.



SECUNDA - Robyn Jones en Anni Binneman wys hul talent.

Notice in respect of a license application in terms of the Petroleum Products Act, 1977 (Act No 120 of 1977)  
 This notice serves to inform parties that may be interested or affected that PETSOL 14 (PTY) LTD, hereinafter referred to as "the applicant", has submitted an application for a RETAIL license, application number G/2016/10/21/0002.

ERF NO: 000017  
 VOORTREKKER STREET  
 N/A  
 N/A  
 KINROSS

The purpose of the application is for the applicant to be granted a license to undertake petroleum retailing activities as detailed in the application. Arrangements for viewing the application documentation can be made by contacting the Controller of Petroleum products by:

- Telephone: 013 658 1400 or  
 - Fax: 013 656 4898 or  
 - Email: MpiPetroleumlicensing@energy.gov.za

Any objections to the issuing of a license in respect of this application, which must clearly quote the application number above, must be lodged with the Controller of Petroleum Products within a period of twenty (20) working days from the date of publication of this notice. Such objection must be lodged at the following physical or postal address:

**Physical Address:**  
 The Controller of Petroleum Products  
 Department of Energy  
 Cnr. Haig & Rhodes Avenue, Old Absa Building, Witbank

**Postal Address:**  
 The Controller of Petroleum Products  
 Department of Energy  
 P.O. Box 17851, Witbank, 1035

**PROPOSED EXPANSION OF THE ASH DISPOSAL FACILITY AT KRIEL POWER STATION, MPUMALANGA**  
 INTEGRATED ENVIRONMENTAL IMPACT ASSESSMENT PUBLIC PARTICIPATION PROCESS

Kriel Power Station is an Eskom owned coal fired power station, which generates ash when coal is burnt to generate electricity. This ash is disposed of through a wet ashing system to three ash dams which will reach their capacity in the next few years. Eskom is thus proposing to construct an additional Ash Disposal Facility to fulfil ash disposal requirements for the remainder of the power station's operational life.

The proposed expansion of the ash disposal facility triggers several activities listed in terms of the National Environment Management Act (NEMA) (No. 107 of 1998) Government Notice (GN) R983, R984 and R985; and the National Environmental Management Waste Act (NEMWA) (No. 59 of 2008) GN 921 of 29 November 2013. As such authorisation from the competent environmental authority, viz. the Department of Environmental Affairs via an Integrated Environmental Impact Assessment (EIA) process (GN No. R982 of December 2014) is necessary.

This proposed project triggers activity 10, 12, 19, 45, 48, and 49 of GN No. R983; and activity 15 and 16 of GN No. R984 published in terms of NEMA; and Category A activity 1 and Category B activities 1, 7, 8 and 10 of NEMWA.

Aurecon South Africa (Pty) Ltd has been appointed by Eskom to complete the requisite Integrated Environmental Impacts Assessment, which includes a Waste Management Licence processes.

Notice is hereby given of the commencement of a public participation process in terms of the NEMA EIA Regulations 2014 and the availability of the Scoping Report for public comment. A hard copy of the Scoping Report can be viewed at Kriel Public Library and Kriel Power Station. A digital version of the Scoping Report is available on Aurecon and Eskom websites for perusal and download (or upon request from the persons indicated below):  
 Aurecon: <http://www.aurecongroup.com/en/public-participation.aspx>  
 Eskom: [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment\\_Impact\\_Assessments.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Environment_Impact_Assessments.aspx)

Interested and Affected Party (I&APs) are invited to attend a public open house meeting on 9 November at the following venues:

Place	Time
Thubelihle Community Hall, Next to clinic, Kriel Drive	14:00-17:00 (public open house meeting)
Methodist Church Hall, Kriel 65 Springbok Crescent and corner of Flamingo Avenue	18:00-20:00 (presentation and public open house meeting)

You are invited to participate in this process by registering as an I&AP with Aurecon. If you would like to receive further information, to raise any issues or concerns, please contact Aurecon by 28 November 2016 at:

Telephone: (021) 526 6012 (Afrikaans / English) Dirk  
 Telephone: (021) 526 9560 (Xhosa / Zulu) Simamkele  
 Fax: 086 723 1750  
 Email: dirk.pretorius@aurecongroup.com  
 Post: PO Box 494, Cape Town, 8000  
 Attention: Dirk Pretorius



**INVITATION TO REGISTER ON OVERLOOKED COLLIERY'S SUPPLIER DATABASE**  
**LICENSED DIESEL WHOLESALERS**  
 IN THE MAGISTERIAL & ADMINISTRATIVE DISTRICT OF BETHAL, are hereby invited to submit a company profile detailing their company's core competencies and the products/services it can offer the mine.

**THE FOLLOWING ARE MANDATORY REQUIREMENTS FOR DIESEL SUPPLIERS TO OVERLOOKED COLLIERY:**

- Fleet of delivery vehicles – full details to be provided
- Legitimate valid wholesale license - to be provided
- Must be able to supply 50ppm diesel
- Original or certified copy of B-BBEE Verification Certificate and/or Ownership Certificate – preference given to designated groups (51% BWO, BYO or black people living with disability(ies))
- Certified copies of Identity Documents of shareholders/directors/owners/members
- Certified copies of Proof of Residence documents of shareholders/directors/owners/members

Please deliver to the Company Profile Box situated at the mine as follows:

Overlooked Colliery (Pty) Ltd  
 Situated: Farm Halfgewonnen 190 IS, Mpumalanga Magisterial/Administrative District of Bethal  
 GPS co-ordinates 26° 14' 12.80"S, 29° 31' 40.52"E  
 Date: 11 November 2016  
 Time 12:00

Figure 10 | Advertisement in The Echo on 28 October 2016 in English

## 1.4 Open house meetings



Figure 11 | Entrance to the Thubelihle Community hall



Figure 12 | A PowerPoint presentation was presented by Aurecon to I&APs at Thubelihle



Figure 13 | The location of the Thubelihle Community Hall



Figure 14 | Entrance to the Kriel Methodist Church



Figure 15 | A PowerPoint presentation was presented by Aurecon to I&APs at Kriel



Figure 16 | All slides were printed for ease of reference to I&APs

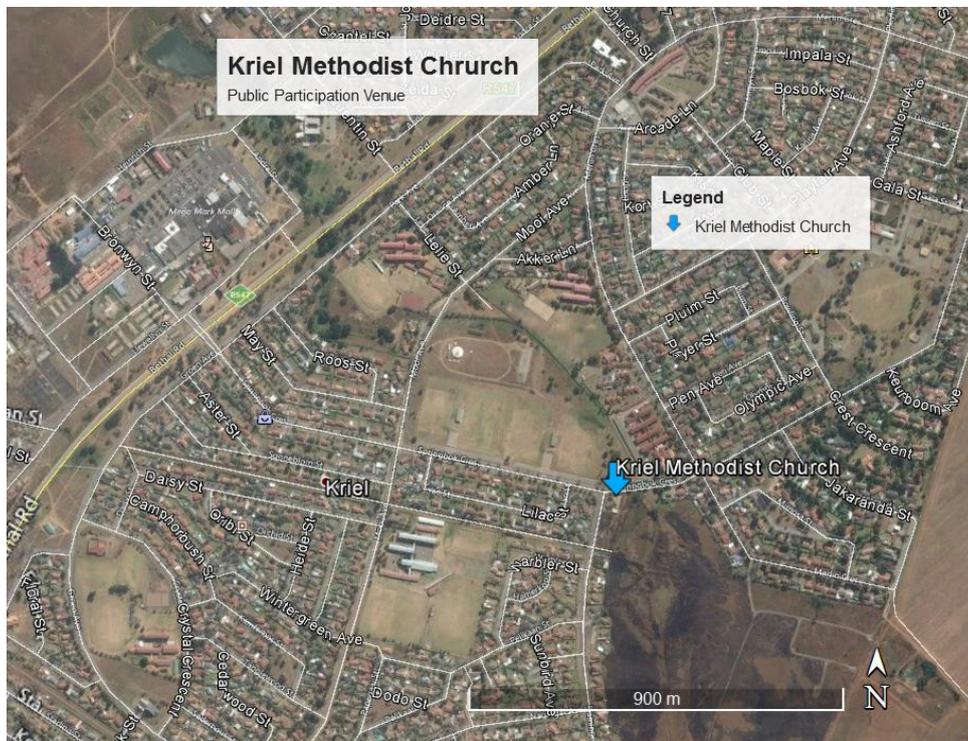


Figure 17 | The location of the Kriel Methodist Church

**aurecon** Transformation Thinking Expertise

**Public participation**

HOME > PUBLIC PARTICIPATION

The projects listed on this page are current Aurecon projects in the environmental and planning fields of expertise. These projects, depending on location, are subject to different statutory requirements in terms of public and stakeholder engagement. Aurecon strives towards meaningful participation on all projects.

**Filter projects:**

Project type:  Location:

indicates a project you are registered for

**FIND A PROJECT**

Keywords / Authority / project reference no.

USER OPTIONS

## Kriel Power Station, Kriel, Mpumalanga

An Environmental Impact Assessment (EIA) is a process that is undertaken in terms of the requirements of the National Environmental Management Act (Act 107 of 1998) (NEMA), as amended, and its associated regulations (i.e. Government Notice Regulation (GN R.) 982, 983, 984 and 985). The purpose of the EIA process is to evaluate the environmental and socio-economic characteristics of the proposed project and the consequences of the project on the environment and the people living in the area that would be affected by the proposed project activities. Where negative impacts are likely to result from the project, measures can be recommended to avoid or reduce these impacts to a level where the impacts are considered acceptable from an environmental and social perspective. Where positive impacts are likely to result from the project, measures can be recommended to increase these impacts.

**Authority/project reference no.:** 113084 / 11081

**Project status:** Open for comment

Figure 18 | Aurecon Public Participation Website

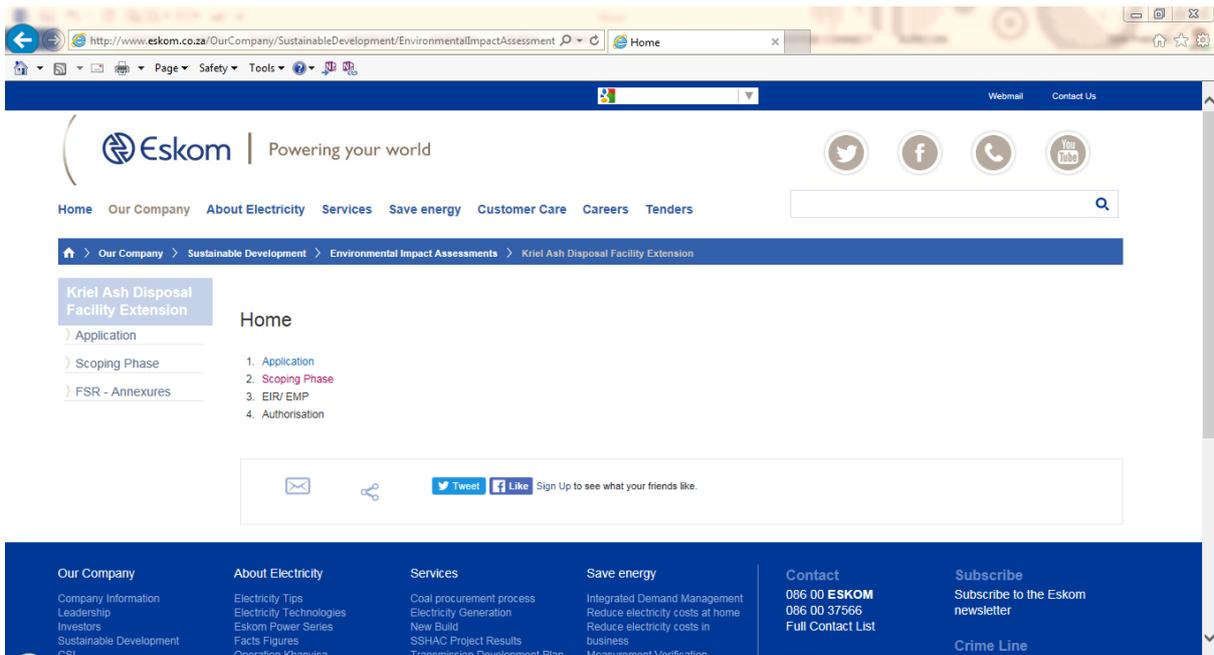


Figure 19 | Eskom Public Participation Website

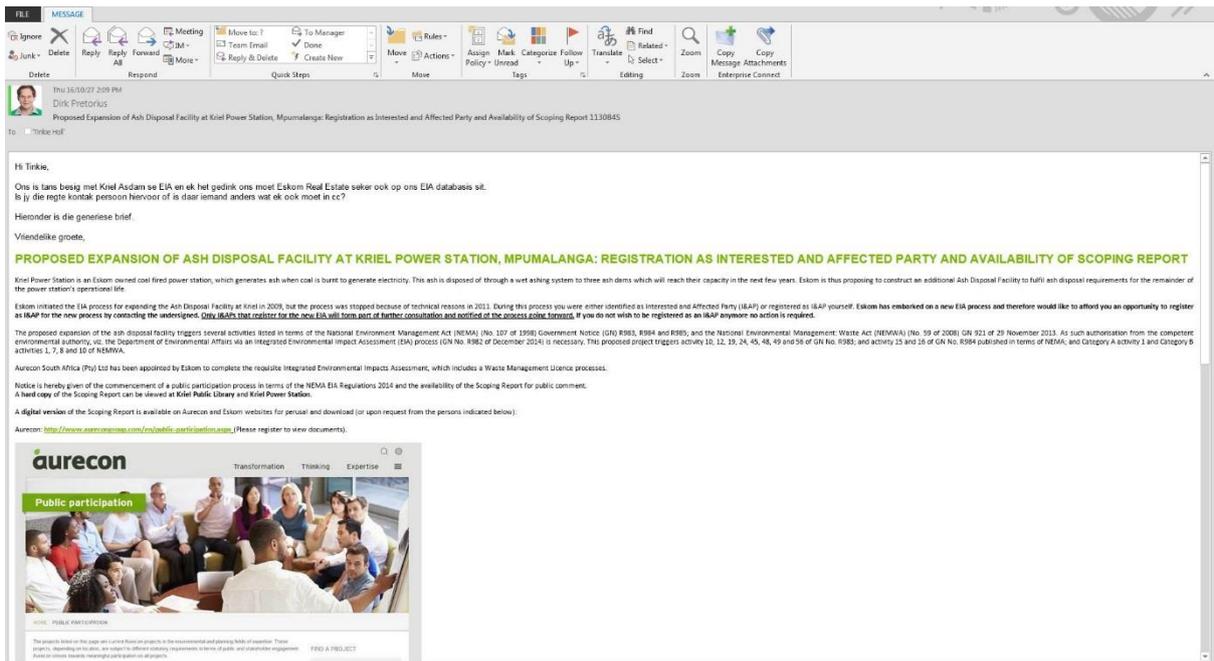


Figure 20 | Email proof

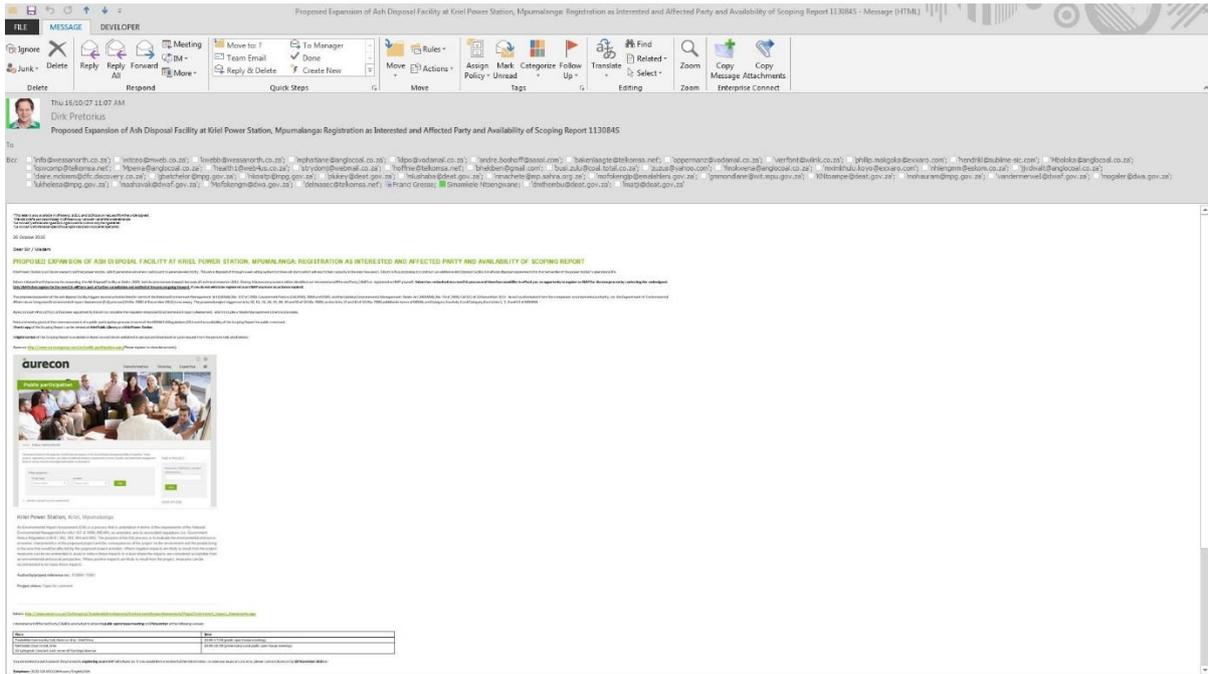


Figure 21 | Email proof

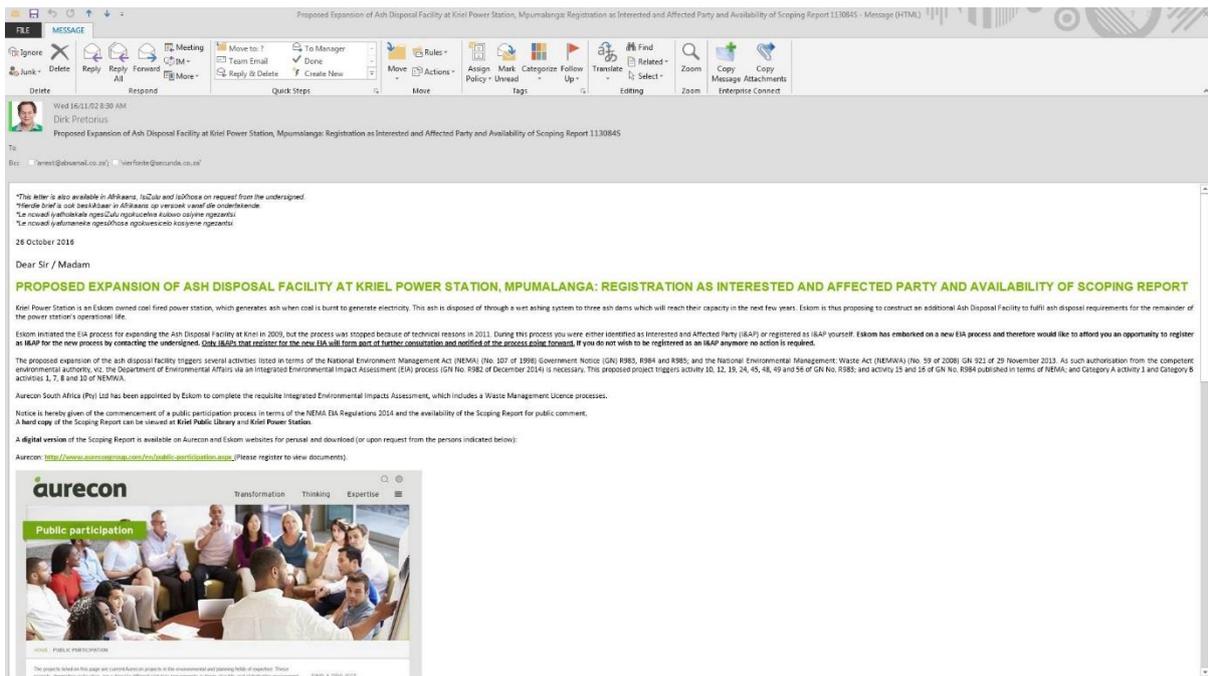


Figure 22 | Email proof



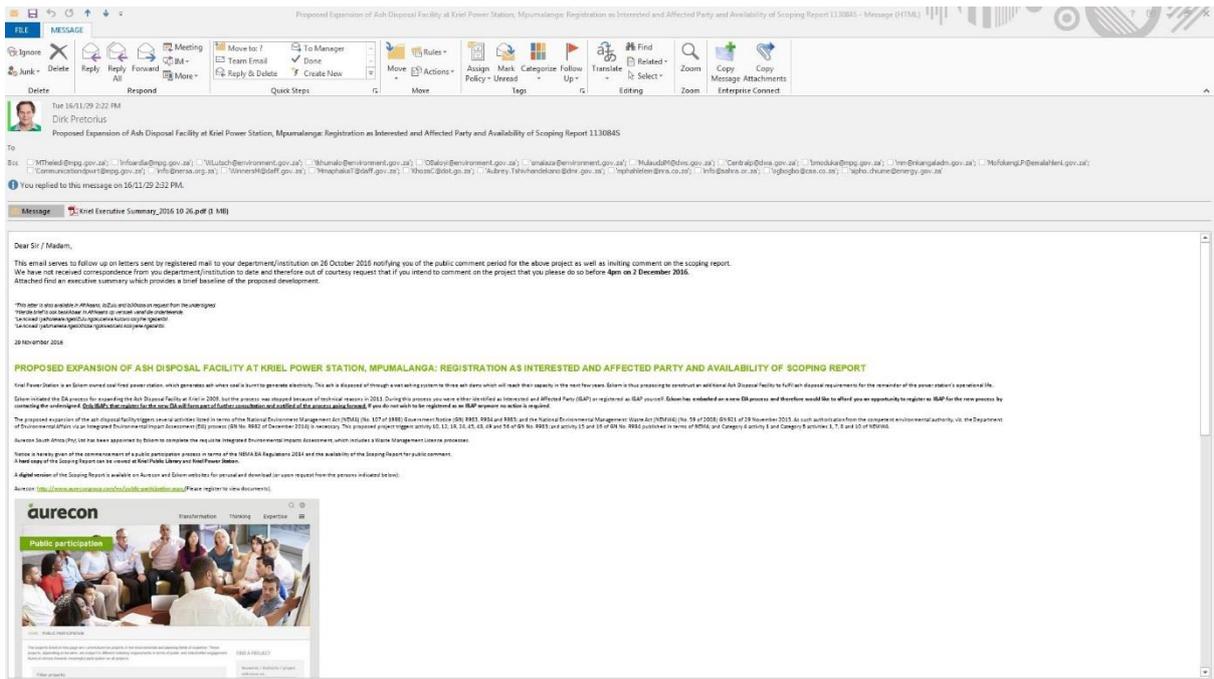


Figure 25 | Email proof

Mr MC Theledi  
Mpumalanga Department of  
Economic Development,  
Environment and Tourism  
Private Bag X11215  
Nelspruit  
1200

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 207 509 Z.A  
CUSTOMER COPY 301016

Mr O Baloyi  
Department of Environmental  
Affairs (DEA): Chemical & Waste  
Management  
Private Bag X447  
Pretoria  
0001

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Mr M Malauzi  
Mpumalanga Department of Water  
and Sanitation  
Private Bag X11259  
Nelspruit  
1200

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Mr PT Mashaine  
Emalahleni Local Municipality  
P O Box 3  
Witbank  
1035

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The Director  
National Energy Regulator of  
South Africa  
P O Box 40343, Arcadia  
Pretoria  
0001

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The Director  
Department of Mineral Resources  
Private Bag X59  
Pretoria  
0001

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Ms Matsidiso Ogbobo  
Civil Aviation Authority  
Private Bag X73  
Midrand  
1658

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Mr Moosa Jogee  
PO Box 100  
Kriel  
2271

Ms S Masoka  
Mpumalanga Department of  
Agriculture & Rural Development  
and Land Administration  
Private Bag X11219  
Mbombela  
1200

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
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Mr Sabelo Malanza  
Department of Environmental  
Affairs (DEA): Legal  
Authorisations & Compliance  
Inspectorate  
Pretoria  
0001

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ShareCall 0800 111 502 www.saps.co.za  
PE 914 207 384 Z.A  
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Mr Benjamin Moduka  
SAHRA Mpumalanga Provincial  
Office  
1st and 2nd Floor, Building 5, 7  
Government  
Nelspruit  
1200

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 226 542 Z.A  
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Matsemela Moloji  
Mpumalanga Department of Public  
Works, Roads and Transport  
18 Bell Street  
Mbombela  
1200

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 226 468 Z.A  
CUSTOMER COPY 301016

Mr MM Mlengana  
Department of Agriculture,  
Forestry and fisheries  
Private Bag x250  
Pretoria  
0001

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PE 914 207 469 Z.A  
CUSTOMER COPY 301016

The Director  
South African National Road  
Agency Limited  
P O Box 415  
Pretoria  
0001

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 226 600 Z.A  
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The Regional Director  
Department of Energy  
(Mpumalanga Regional Energy  
director)  
Private Bag X17851  
Witbank  
1035

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 226 525 Z.A  
CUSTOMER COPY 301016

Ms Dolly Mthethwa  
Po Box 27  
Kriel  
2271

POSTNET CANAL WALK  
Shop 589, Canal Walk Centre  
Century City  
Tel 021 555 4195/6  
VAT# 4380241982

Dr Thulie Khumalo  
Department of Environmental  
Affairs (DEA): Climate Change &  
Air Quality  
Private Bag X447  
Pretoria  
1001

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ShareCall 0800 111 502 www.saps.co.za  
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CUSTOMER COPY 301016

Mr Sifiso Mkhize  
Department of Water and  
Sanitation (DWS)  
Private Bag X313  
Pretoria  
0001

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Clr SK Mashilo  
Nkangala District Municipality  
PO Box 437  
Middelburg  
1050

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PE 914 226 560 Z.A  
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The Director  
Nkangala Department of Health  
Piet Koornhooft Building  
Emalahleni  
1039

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The Director  
Department of Transport  
P Private Bag X193  
Pretoria  
0001

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CUSTOMER COPY 301016

The Director  
South African Heritage Resources  
Agency  
PO Box 4637  
Cape Town  
8001

ORDINARY PARCEL  
ShareCall 0800 111 502 www.saps.co.za  
PE 914 226 587 Z.A  
CUSTOMER COPY 301016

Mr Nomusa Shili  
Emalahleni Local Municipality  
PO Box 1233  
Kriel  
2271

A.J Van niekerk  
Vaal Pan Kriel  
PO Box 1276  
Kriel

20/10/2016

Figure 26 | Letters proof

Mr Owen Muller ^  
Vierfontein Boerdery  
P O Box 604  
Kriel  
2271

Cllr Z.Z. Bovungane ^  
P O Box 1780  
Kriel  
2271

I.M.P van Niekerk ^  
Vaal Pan Kriel  
PO Box 1276  
Kriel  
2271

Mr Naas Boshoff ^  
Plaas Bakenlaagte  
PO Box 3955  
Secunda  
2302

Cynthia Bongweni ^  
Phumelela HBC  
26 William Street  
Kriel  
2271

Cllr SK Mashilo ^  
Nkangala District Municipality  
PO Box 437  
Middelburg  
1050

Mr F Mntambo ^  
Department of Water Affairs  
(DWS): Chief Director  
Private Bag X11259  
Nelspruit  
1200

Mr A.J van Niekerk ^  
Vaal Pan Kriel  
PO Box 1276  
Kriel  
2271

Mr Tobile Bokwe ^  
Eskom: Senior Environmental  
Advisor  
1 Maxwell Drive  
Sunninghill  
2157

The Director ^  
Anglo Operations Ltd  
PO Box 61587  
Marshalltown  
2001

G.J Claasen ^  
Rooibloem Boerdery (Pty) Ltd  
PO Box 201  
2271

Mr Ngangasi Joseph Mahiangu ^  
18 Tsibitso Sibanyoni Street  
Bethal  
2310

POSTNET CANAL WALK  
Shop 589, Canal Walk Centre  
Century City  
Tel 021 555 4195/6  
VAT# 4356241982

*[Handwritten signature]*  
20/11/2016

Figure 27 | Letters proof

Wilma Lutch  
Department of Environmental  
Affairs; Biodiversity Conservation  
Environment House  
473 Steve Biko  
Arcadia, Pretoria  
0001

ORDINARY PARCEL  
StarCard 0000 111 562 www.sapo.co.za  
PE 914 207 543 ZA  
CUSTOMER COPY 301016

Masina Litsoane  
Department of Environmental Affairs;  
Integrated Environmental  
Authorisation  
Environmental House  
473 Steve Biko  
Arcadia, Pretoria  
0001

ORDINARY PARCEL  
StarCard 0000 111 562 www.sapo.co.za  
PE 914 207 526 ZA  
CUSTOMER COPY 301016

Figure 28 | Letters proof



RECORD OF TELEPHONE CONVERSATION		
Date: 2016-10-27		Time: 2:33 pm
Project: Kriel Ash Disposal Facility EIA		Project No: 113084
Conversed with: Andries van Niekerk	Company Address:	
Position/Title:	Telephone No: 082 388 2133	Fax No: N/A
Recorder: Pearl Rakeepile		Office: Aurecon CPT: E&A
Subject: Scoping report I&AP consultation		
Notes: He speaks Afrikaans. Email: anet@absqmail.co.za		
Copies to:		
Action:		

Form TELC-1

TELC  
Rev.0/D4  
J:\New Word File Structure\ISO\ISO Procedure Papers\FORMS\TELC-1.doc

Figure 29 | Telephone records

RECORD OF TELEPHONE CONVERSATION		
Date: 2016-10-27		Time: 2:22pm
Project: Kriel Ash Disposal Facility EIA		Project No: 113084
Conversed with: Edmund Jnr Muller	Company Address: PO Box 1252 Kriel, 2271	
Position/Title:	Telephone No: 082 338 441	Fax No: N/A
Recorder: Pearl Rakepile		Office: Aurecon CPT: E&A
Subject: Scoping report I&AP consultation		
<p>Notes: He still wants to be a registered interested and affected party. Email: vierjonte@sewunda.co.za</p>		
Copies to:		
Action:		

Form TELC-1

TELC  
Rev.0/D4  
J:\New Word File Structure\ISO\ISO Procedure Papers\FORMS\TELC-1.doc

Figure 30 | Telephone records

file TD No. 113084 Kriel Ash Disposal Facility

RECORD OF TELEPHONE CONVERSATION		
Date: 2016-10-27	Time: 2:38 pm & 3:39 pm	
Project: Kriel Ash Disposal Facility EIA		Project No: 113084
Conversed with: NO-ONE x2	Company Address:	
Position/Title:	Telephone No: 082 375 9585	Fax No: N/A
Recorder: Pearl Rakepile		Office: Aurecon CPT: E&A
Subject: Scoping report I&AP consultation		
Notes: No answer. No answer, phone rang and then disconnected		
Copies to:		
Action:		

Form TELC-1

TELC  
 Rev.0/D4  
 J:\New Word File Structure\ISO\ISO Procedure Papers\FORMS\TELC-1.doc

Figure 31 | Telephone records

RECORD OF TELEPHONE CONVERSATION		
Date: 2016-10-27		Time: 2:16pm & 3:36pm
Project: Kriel Ash Disposal Facility EIA		Project No: 113084
Conversed with: No-one x 2	Company Address:	
Position/Title:	Telephone No: 082 388 2138 086 644 2894	Fax No: N/A
Recorder: Pearl Rakepile		Office: Aurecon CPT: E&A
Subject: Scoping report I&AP consultation		
<p>Notes: No Answer for 082 388 2138 Phone rang and then the call was disconnected for 086 644 2894 (fax line)</p> <p>Rings and then disconnects for 082 388 2138 Phone rings one and then makes a high pitch sound for 086 644 2894 (fax line)</p>		
Copies to:		
Action:		

Form TELC-1

TELC  
 Rev.0/D4  
 J:\New Word File Structure\ISO\ISO Procedure Papers\FORMS\TELC-1.doc

Figure 32 | Telephone records

Mr. Jeffrey Robinson 216-273-3535

RECORD OF TELEPHONE CONVERSATION		
Date: 2016-10-27	Time: 2:11 pm & 3:35 pm	
Project: Kriel Ash Disposal Facility EIA	Project No: 113084	
Conversed with: no-one x 2	Company Address:	
Position/Title:	Telephone No: 074 341 9766	Fax No: N/A
Recorder: Pearl Rakeepile	Office: Aurecon CPT: E&A	
Subject: Scoping report I&AP consultation		
Notes: No Answer No Answer		
Copies to:		
Action:		

Form TELC-1

TELC  
 Rev.0/D4  
 J:\New Word File Structure\ISO\ISO Procedure Papers\FORMS\TELC-1.doc

Figure 33 | Telephone records

## **Annexure E.3**

### **Comment Response Report**

**INTEGRATED ENVIRONMENTAL IMPACTS ASSESSMENT:  
PROPOSED EXPANSION OF ASH DISPOSAL FACILITY, KRIEL POWER STATION, MPUMALANGA**

**Comments and Response Report No.1, Scoping Phase**

**Date: 13 December 2016**

This Comments and Response Report reflects the comments received during the Scoping Phase public comment period (27 October 2016 to 28 November 2016). Note that comments and requests for registration on the project database have been included below.

In cases where Interested and Affected Parties (I&AP's) commented in any language other than English, a translation (to English) is provided in italics together with the original text that were received during the public comment period.

**Table 1: List of I&AP submissions**

No	Name	Organisation	Date of communication	Method
1.	Andre Boshoff	Plaas Bakenlaagte	01 November 2016	Email
2.	Mmenako Dludlu	Private	9 November 2016	Phone
3.	Love Shabane	Department of Agriculture, Forestry and Fisheries	13 December 2016	Email
4.	Wilma Lutsch	Department of Environmental Affairs: Biodiversity Management	13 December 2016	Email
5.	Sabelo Malaza	Department of Environmental Affairs: Integrated Environmental Authorizations	19 December 2016	Email

**Table 2: Comments and Responses**

No.	From	Comments received	Response/Comment
1.	Andre Boshoff	Thanks for invite me to your open meeting I will attend to it on the 9 November 2016.	Acknowledged.
2.	Mmenako Dlodlu	<ol style="list-style-type: none"> <li>1. Mr. Dlodlu enquired about potential job opportunities on the proposed project.</li> <li>2. Mr. Dlodlu asked to be registered as I&amp;AP.</li> </ol>	<ol style="list-style-type: none"> <li>1. Mr. Dlodlu was informed that the proposed project would not be creating any significant new job opportunities since the application is to expand the existing ash disposal facility to keep the Kriel Power Station operational. Furthermore, Eskom has also indicated that the principal contractor would be encouraged to identify and source part of the contract to Black Owned entities with a registered business address in the local district municipality / Province according to procurement targets that would be set by Eskom.</li> <li>2. Mr. Dlodlu has been registered as I&amp;AP.</li> </ol>
3.	Love Shabane	<p>With reference to the expansion of ash disposal facility in Kriel power station, the Department of Agriculture Forestry and Fisheries, Directorate Land use and soil management has no objection on the development, however:</p> <p>Please you are requested to consider /address the following when compiling the report.</p> <ol style="list-style-type: none"> <li>1. Compliance with Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)</li> <li>2. The Act makes provision for the Conservation of the Natural Agricultural Resources of South Africa through: <ul style="list-style-type: none"> <li>• Maintaining the production of land.</li> <li>• Combating and preventing of erosion.</li> </ul> </li> </ol>	<p>Acknowledged.</p> <p>1 and 2. Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) (CARA) and the provision made therein will be considered when undertaking the Environmental Impact Assessment, specifically as part of the Agricultural Impact Assessment. An Environmental Management Programme (EMPr) will also be compiled in which aspects such as maintenance of productive land, combating and preventing of erosion, preventing the weakening or destruction of the water</p>

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		<ul style="list-style-type: none"> <li>• Preventing the weakening or destruction of the water sources.</li> <li>• Protecting of the vegetation.</li> <li>• Combating of weeds and invader plants.</li> </ul> <p>3. Detailed soil study as well as sensitive areas that will be negatively impacted by the project.</p> <p>4. Mitigation measures to be applied in order to minimize the negative impact.</p> <p>5. Pre and post land use on the properties to be affected by the project.</p> <p>6. A detailed rehabilitation plan to be implemented during and after completion of the project.</p>	<p>sources, protection of vegetation and combating of weeds and invader plants will be addressed.</p> <p>3. A detailed soil study will be undertaken for the proposed development.</p> <p>4. Mitigation measures will be identified for all potential negative impacts during the EIA process and included in the EMPr to minimise these potential impacts.</p> <p>5. Land use of the properties within a 12km of the Kriel Power Station were considered during the site selection process described in Section 2 of the Scoping Report. The preferred site that has been identified is located directly adjacent to the existing ash disposal facility to minimise the impact on the ecological, social and economic environments and the disturbance footprint of the facility.</p> <p>6. Rehabilitation measures will be included in the EMPr for the construction and operational phases of the proposed expanded ash disposal facility. During the decommissioning phase, Eskom will need to apply for the relevant approvals in terms of the prevailing legislation at that specific point in time, which would include details on the specific rehabilitation activities to be implemented.</p>
4.	Wilma Lutsch	<p>The Directorate Conservation received and carefully reviewed the SDSR and it was noted that the proposed Ash Disposal Facility could potentially result in a range of biodiversity impacts during the construction and operational phases and therefore the following recommendations must adhere to:</p> <p>Recommendations:</p>	Acknowledged.

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		<ol style="list-style-type: none"> <li>1. The extent of the impacts that will be caused by the proposed Ash Disposal Facility must be explored and explained carefully with all the mitigation measures in places to limit impacts on biodiversity.</li> <li>2. A sensitivity map must be produced showing all the sensitive areas with buffer zones and also indicating all the “no-go areas” on the site.</li> <li>3. A final Ecological Report and Wetland Specialist Reports must be submitted together with a full layout plan overlaid with the development footprint and sensitive areas.</li> </ol> <p>Conclusion: On condition that the above recommendations are taken into consideration in the EIA phase, the Directorate: Biodiversity Conservation does not have any objection to the proposed development.</p>	<ol style="list-style-type: none"> <li>1. Potential impacts on biodiversity have been considered during the scoping and site selection phase of the proposed development and will be investigated during the EIA phase by various specialists (see Section 6.5 of the Scoping Report). During the EIA phase specific mitigation measures pertaining biodiversity will be identified for inclusion into the EMPr.</li> <li>2. A sensitivity map showing all sensitive areas with buffer zones and “no-go areas” will be produced and included in the Environmental Impact Report (EIR) and EMPr.</li> <li>3. Sensitive areas as identified by the Ecological and Wetland Reports will be mapped and overlaid by the development footprint in the EIR. These reports will be made available to registered I&amp;APs and authorities during the EIA Phase.</li> </ol> <p>The above recommendations will be included in the EIR to ensure that biodiversity features are adequately identified and potential impacts mitigated.</p>
5.	Sabelo Malaza	<ol style="list-style-type: none"> <li>1. The project title indicates that the proposed development is for expansion of ash disposal facility (ADF). However, the project description indicates that the new ash disposal facility is proposed. You are therefore requested to clarify why the project title does not relate to the project description.</li> </ol>	<ol style="list-style-type: none"> <li>1. In order to prevent any confusion, all references in the report to a “new” facility has been removed to refer to the proposed expansion of the existing ash disposal facility at the Kriel Power Station. The expansion of the existing facility would entail the construction of two additional ash dams (ash dam 4.1 and 4.2) and ancillary infrastructure directly adjacent to the existing ash disposal facility as described in <i>Chapter 3: The Proposed Development</i> of the Scoping Report. These ash dams (i.e. 4.1 and 4.2) and ancillary infrastructure would form part of the expansion of the existing ash disposal facility.</li> <li>2. The MTE was proposed to monitor potential subsidence over the backfilled area. The monitoring results would be used to inform</li> </ol>

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		<p>2. It is noted that the MTE (Monitored Trial Embankment) and Ash dam 4,3 does not form part of this EIA and that it will be investigated at a later stage. If this EIA is for a new ADF as depicted in the project description, why would the MTE be investigated at a later stage as according to the approved MTE, the MTE was recommended to collect data to design barrier system for the new ADF?</p> <p>3. Equally important, on page 16 of the report, it is stated that <i>'it was concluded that the MTE to investigate pit backfill settlement will only be needed for Ash dam 4.3 of the new proposed ash dam'</i>. Please clarify how many new proposed dams are proposed for Kriel Power Station.</p>	<p>the designing of the lining of the concept designs. According to Eskom, the investigations on ash dam 4.3 are not at a progressed development to inform inclusion of ash dam 4.3 into this project, thus there would be a delay in Kriel's readiness if ash dam 4.3 is awaited. In subsection 3.3.3. <i>Site layout alternatives</i> of the Scoping Report, it is shown how the ash dam design has been amended so that only ash dam 4.3 overlays the backfilled area. Thus the MTE is only required for ash dam 4.3 which does not form part of this EIA. The process of authorising, constructing and monitoring the MTE would take several years to complete which would result in the Kriel Power Station having to stop operations or implement very expensive disposal measures (e.g. making use of Matla's ash disposal facility) due to not having sufficient disposal space at the power station. While a separate Basic Assessment process was undertaken by Eskom for the construction of the MTE, for which an Environmental Authorisation was issued, the EA lapsed and Eskom has initiated a separate Basic Assessment for the construction of the MTE while this application is for the construction of ash dams 4.1 and 4.2 to allow continued operations at the Kriel Power Station.</p> <p>3. The existing ash disposal facility would be expanded by two ash dams (i.e. 4.1 and 4.2) located directly adjacent to it. Should the MTE studies (which will take several years to complete) prove that ash dam 4.3 would be (1) <i>stable in terms of subsidence</i> and (2) <i>if the additional ash disposal capacity is required</i>, an application for authorization would be undertaken at such time by Eskom to further expand the existing ash disposal facility at the Kriel Power Station.</p>

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		<p>4. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.</p> <p>5. An amended application form with original signatures must be submitted. Please note that the Departments application form template has been amended and can be downloaded from the following link <a href="http://www.environment.gov.za/documents/forms">www.environment.gov.za/documents/forms</a> .</p> <p>6. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 and 44 of the EIA Regulations 2014.</p> <p>7. Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable,</p>	<p>4. Relevant listed activities in terms of the National Environmental Management Act, Act 107 of 1998, Government Notice Regulation (GN R.) 983, GN R984 and GN R985 of 4 December 2014, to be authorised for the proposed Ash Disposal Facility and the National Environmental Management Waste Act, GN No. 921 of 29 November 2013, List of waste management activities that have, or are likely to have, a detrimental effect on the environment are provided in Subsection 1.2.2 and 1.2.3 of the Scoping Report, respectively. Each activity applied for is accompanied by a description of the project activity that may trigger the listed activity.</p> <p>5. An application form with original signatures will be provided to the Department.</p> <p>6. All comments received from I&amp;APs have been included in this comment response report. Please refer to Annexure E.2 of the Scoping Report for proof of public participation undertaken to date in terms of Regulation 39 to 44 of the 2014 EIA Regulations.</p> <p>7. Chapter 2 of the Scoping Report provides an overview of the site selection process which took several year to complete (due to</p>

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		<p>including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 1(2) (e) and 3 (1) (h) (i) of GN R 982 of 2014. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</p> <p>8. In accordance with Appendix 1(3)(1)(a) of the EIA Regulations 2014, the details of-</p> <ul style="list-style-type: none"> <li>i. the EAP who prepared the report; and</li> <li>ii. the expertise of the EAP to carry out Scoping and Environmental Impact assessment procedures; must be submitted.</li> </ul> <p>9. You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations, 2014.</p> <p>10. Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>	<p>additional geotechnical studies undertaken by Eskom). The outcome of this site selection process is further described in subsection 3.3 of the Scoping Report which describes the location, site and activity alternatives that have been considered for this application. Please also refer to Annexure B.1 Process followed to reach the proposed preferred activity, site and location for additional information.</p> <p>8. Please refer to subsection 6.9 and Annexure A.1 of the Scoping Report for the details and expertise of the EAP that prepared the report.</p> <p>9. Regulation 21(1) of the 2014 EIA Regulations has been considered as part of undertaking the Scoping Report. Please refer to Table 1 of the Scoping Report which reference the location of the information required in terms of Appendix 2 of the 2014 EIA Regulations.</p> <p>10. The prescribed timeframes in terms of Regulation 45 of the EIA Regulations 2014 are noted and will be complied with.</p>