



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

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Ref: 12/12/20/1255

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Mrs. Deidre Herbst
Eskom Holdings Ltd
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Dear Mrs. Herbst

ACCEPTANCE OF SCOPING REPORT AND PLAN OF STUDY FOR EIA: THE PROPOSED CONSTRUCTION OF TWO COAL FIRED POWER STATIONS IN THE WATERBERG; LIMPOPO PROVINCE

The abovementioned document dated July 2008 and received by this Department on 30 July 2008, refer.

You are hereby informed that the Scoping Report ("SR") and the Plan of Study for EIA ("PoSEIA") has been accepted with the following conditions –

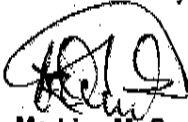
1. The location of the source of coal to be utilised in the operation of the proposed project is not indicated on the maps included in the SR. This information is important in determining the impacts associated with the transportation of coal either by a conveyer or any other method. This will further indicate the necessity of investigating an alternative transportation method for coal from the source to the project site. This must be addressed and indicated on the maps included in the Environmental Impact Report (EIR).
2. This Department notes that the Indirect Wet Cooling method will not be investigated further as a cooling alternative method because it uses nine times more water than the Dry Cooling method. However, water volumes to be used by the proposed project must be quantified. Confirmation from the Department of Water Affairs of the availability of water supply to the proposed project must be provided in the EIR.
3. The proposed project will lead to an establishment of a new township for workers during construction and operational phases. The location of this township site must be indicated in maps and the associated impacts evaluated in the EIR. This must include, *inter alia*, confirmation from the Municipality on the availability of infrastructure (e.g. waste

treatment facilities, licensed landfill sites) and sustainable water for the residential area to be established.

4. The preferred route and associated alternative routes to be used for the transmission power lines (especially to the proposed Delta substation) must be indicated on maps to be included in the EIR as they form an integral part of this application. This Department's has no record of any EIA process currently underway for these transmission power lines; therefore, they must be included and evaluated in this EIA process.
5. This Department notes that currently a maximum and efficient distance, according to Eskom, over which a coal conveyer can be operated, is approximately 30km. However, this Department is of the opinion that a coal conveyer of such a long distance will not be appropriate in an area such as Waterberg due to the presence of many game farms, some of which have been declared private Nature Reserves and are recognised by the Protected Areas Act as having nature reserve status. Alternative methods of coal transportation from source to the proposed power stations must be investigated in the EIR.
6. In terms of air impacts, the expected releases of mercury from the burning of coal with mercury content and the impacts of fall out on vegetation and soil must be considered in the EIR. The Terms of Reference for the Air Quality Impact Assessment must be amended to include mercury emissions and deposition over the 50 year operational period of the plant noting that mercury bio accumulates in soil, the potential for mercury to become mobilised in the water resources of the area and the impact of mercury on the food chain.
7. In terms of impacts on agricultural potential, the impacts of fall out from the stacks and dust from the ash disposal sites on agricultural potential must also be assessed in the specialist study of agricultural potential and included in the EIR. Presently it just considers loss of land and water.
8. It is noted that SO₂ concentrations are currently being exceeded at several monitoring stations in the area. Constructing a further two power stations in the area will significantly increase the current non-compliance situation. Therefore, the combined emissions must be considered in the EIR phase and be related to health implications.
9. Please note that some of the listed activities applied for (i.e. GN R386 Activity 1(p) and 25; and GN R387 Activities 1(f)(g)(o)(p)(r)(e) has been repealed from NEMA, Act 107 of 1998 and are now listed in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008). Therefore an application for a waste permit must be submitted to the Directorate: Waste Stream Management of the Department of Environmental Affairs. For more information on the application procedure, please contact Ms Lené Grobbelaar on (012) 310-3087.

10. A detailed motivation must be provided in the EIR to justify the exclusion of Activity Alternatives.
11. You are hereby reminded that the activity may not commence prior to an environmental authorisation being granted by the Department.

Yours sincerely



Ms Lize McCourt

**Chief Director: Environmental Impact Management
Department of Environmental Affairs**

Letter signed by: Mr. Dumisane Mthembu

Designation: Director: Environmental Impact Evaluation

Date: 7/09/2009

Cc: Ashwin West

Auricon

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