



D-3 COMMENT AND RESPONSE REPORT

PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

Issues / comment raised by:	Date	Means of communication	Issue / comment	Response
«Name»	«Date_of_Comms»	«Means_of_Comms»	«Comment»	«Response»
Mistral Page	29 March 2016	Email	<p>Good evening</p> <p>Attached, please find the filled in form. We were away all of last week and only returned late last night.</p> <p>Kind regards, Mistral</p>	<p>Thank you for the registration. You have been registered as an Interested and Affected Party for the Basic Assessment process.</p>
Frikkie	31 March 2016	Email	<p>Hallo Renier</p> <p>Ek en Tertius verteenwoordig n maatskappy Sangriscore Investments wat die plaas Groene Weide besit gelee op die Proteapad en sal graag as I&AP gevoeg wil word.</p> <p>Ons het n opgaardam wat gevoed word deur die bestaande afloopwater vanuit die rioolwerke en enige afname in die water toevoer sal baie nadelige gevolge inhou vir die stand van ons dam – weens die nutriente (bakteriese afval seker meer akkuraat) raak ons dam n dik slikoopel wat al die visse laat vrek met uiters onaangename reuk indien daar nie voldoende water deurloop nie.</p>	<p>Hi Frikkie</p> <p>Julle is beide gerigestreer as belanghebbendes vir die projek en sal deurgaans in kennis gestel word.</p> <p>Die ingenieurs (WEC Consult) het bevestig dat die huidige uitvloeie van die Klappmuts rioolwerke konstant sal bly na afloop van toekomstige opgraderings. Die bestaande 1.5MI werke se uitvloeie word meestal na die verbygaande stroom / riviertjie gevoer.</p>

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			<p>Gegewe julle verslag lyk dit op die oog af of daar baie meer water sal vloei en die kwaliteit daarvan behoort aansienlik beter te wees na opgraderings; ek is egter bekommerd oor die water wat teruggepomp sal word asook die nuwe ontwikkelings wat reeds n besproeiingsalokasie gekry het vir parke ens. Weens die feit dat ons in Drakenstein gelee is en die water eintlik aan Stellenbosch behoort lei ek af dat Stellenbosch munisipaliteit voel hulle betaal vir die suiwering so hulle sal eerder die water gebruik binne eie grense wat kan beteken dat die water wat uitgelaat word om die vleilande wat weens die rioolwerke ontstaan het te voed maar dat dit nie voldoende sal wees vir ons dam se gesondheid.</p> <p>Ons sel nommers:</p> <p>Tertius: 0829044252 Frikkie:073 176 4893</p> <p>Dankie en groete Frikkie</p>	<p>Die toekomstige opgraderings en gepaardgaande vermeerdering in uitvloeie water sal egter binne die Klapmuts area aangewend word. Soos per die beskrywings sal alle toekomstige addisionele uitval water na plase in Klapmuts asook die omgewing belynd word asook na die skool se sportgronde. Die huidige uitvloeie stroom af na julle dam sal dus nie verander nie, soos per die bevestiging van die ingenieurs.</p> <p>Kontak my gerus indien jy enigiets verder rondom dit bespreek.</p>
<p>Etienne Roux DEA&DP Waste Management Department</p>	<p>19 April 2016</p>	<p>Post</p>	<p>1. To respond to a request for comments on the above-mentioned draft BAR dated 18 March 2016, and received by this Department on 29 March 2016.</p> <p>2. The Sub-Directorate: Waste Management Licensing has no objection to the above-mentioned application subject to the clarification of the following matters:</p> <p>2.1 According to page 2 of the DBAR, 3 lagoons are planned. What are the capacity of these lagoons and will they be lined?</p>	<p>The capacity of the 3 sludge lagoons will be 400m³ per lagoon. The lagoons will be lined with a low permeability geo-synthetic liner laid on an A2 geo-fabric.</p>

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			<p>2.2 The application states that either chlorine or ultra violet (UV) treatment will be used as the final disinfectant step. Please clarify which of these two options will be used.</p> <p>2.3 Page 33 states that a portion of the treated effluent will be used for irrigation. Please note that the effluent must be treated to meet the applicable standards as set out in the South African Water Quality Guidelines (second edition), Volume 4: Agricultural Use: Irrigation as prepared by the Department of Water Affairs and Forestry in 1996.</p> <p>2.4 During winter months the land where the irrigation is planned might already be saturated with water. Please clarify what will happen to the treated effluent in this case.</p> <p>2.5 The application states that 10m³ of waste will be produced. However the application is not clear on the time frame (per day or per week, etc) it will take to generate this waste. Please clarify this in the next phase of the application and please also indicate how this will be stored prior to removal off site.</p>	<p>It is confirmed that chlorination will used as disinfectant.</p> <p>Noted and agreed. The upgraded Klappmuts WWTW facility will treat the effluent to general standards for irrigation purposes. An application in terms of the National Water Act has also been submitted to the DWS.</p> <p>The treated effluent will still be directed to the farmers and the treated water will either still be irrigated or stored in the individual dams including the irrigation dam at the works. It is possible that in extreme cases where the irrigation dam will fill up in which this case more of the treated effluent, which will be chlorinated, will be discharged to the river.</p> <p>The 10m³ referred to in the draft BAR refers to construction waste only. The wasted sludge will be stored in the existing anoxic zone which will be converted to a sludge thickening tank. The sludge will be kept in suspension using mixers before it is fed to the belt press. The wasting will be as shown below for the different phases:</p> <ul style="list-style-type: none"> • 2.4 Ml/day Sludge wasted per day = 109 kl/day
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			<p>2.6 According to the application, dried sludge will be transported to a silo and stored there before removal by a truck. Please state the expected quantity to be stored on site, as well as the frequency of removal of the waste by trucks.</p> <p>2.7 The EMP states on page 9 that sludge will be dried via a belt press once the belt press is in operation. However, the application is not clear as to the current practice regarding the treated sludge. Please clarify what currently happens to the sludge in the next phase of the application.</p> <p>2.8 Screenings wastes should be stored prior to safe removal and disposal. Details on the handling and disposal of these screenings should be made clear in the next phase of the application and should be documented properly.</p> <p>3. The Department reserves the right to revise initial comments and request further information based on new information received.</p>	<ul style="list-style-type: none"> • 4.8 Ml/day Sludge wasted per day = 218 kl/day • 7.2 Ml/day Sludge wasted per day = 327 kl/day <p>The silo will have a storage of about 34 m³. This is equivalent to a storage of about 4 days at 7.2 Ml/day. The sludge will be removed as required.</p> <p>Currently the sludge is wasted to the sludge lagoons and transported using trucks to the Stellenbosch Waste Water Treatment Plant where it is taken through the belt press.</p> <p>Screenings will be discharged to a skip and will be removed by trucks as required. The skip will be provided a covering. Mechanical screens will be used. During the first 2 upgrades all flow will be screened by one mechanical screen on the one inlet channel, and a bypass channel has a hand operated manual screen for emergency conditions. As part of the final upgrade to full capacity, both screens will be mechanical and a new manual screen chamber will be built in line before the inlet channel for the installation of a manual screen.</p>
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Cor van der Walt	05 May 2016	Post	<p>Your application of 18 March 2016 has reference.</p> <p>The Western Cape Department of Agriculture has no objection against the upgrade of the Klappmuts Waste Water Treatment Works.</p>	<p>It is noted that the Western Cape Department of Agriculture has no objection against the upgrade of the Klappmuts Waste Water Treatment Works.</p>
Rhett Smart	06 May 2016	Email	<p>CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.</p> <p>The property on which the current waste water treatment works (WWTW) is situated is classified as a Critical Biodiversity Area (CBA) according to the Western Cape Biodiversity Framework. The natural vegetation that occurs on the site is Swartland Alluvium Fynbos listed as Critically Endangered. A tributary of the Klappmuts River originates on site and flows in a northerly direction.</p> <p>There was no botanical specialist study undertaken for the proposed project, despite the CBA classification and the natural vegetation consisting of a Critically Endangered habitat type. The description of the habitat on site is restricted to the wetland habitat, which has been described and assessed in the freshwater ecosystem assessment.</p>	<p>This comment is noted. A botanical assessment cannot be conducted at this stage. It is proposed that a botanical survey can be conducted during August / September month. This would merely be for translocation and mitigation purposes, should any conservation worthy vegetation be identified. The EAP would however like to point out that the site does not contain any significant terrestrial vegetation. In this regard also please refer</p>

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			<p>The freshwater ecosystem assessment identified two wetlands on site, namely a channelled floodplain wetland directly upstream of the WWTW and an unchannelled floodplain wetland located between the effluent discharge point from the WWTW and the seasonal watercourse (it appears that the maps have switched the channelled and unchannelled wetlands around). The expansion of the WWTW will require additional structures to the north of the existing facility, which will impact on the wetland adjacent to the discharge point.</p>	<p>to the most recent photo pages of the site included as Annexure C. The previously approved interim upgrade to 1.5MI (Phase 1,2 as per the Phasing Layout Site Development Plan in Annexure B) have almost been completed. This current upgrade has previously been authorised as part of the 1.5MI EIA approval in place, included as Annexure F. It is thus proposed that a botanical scan / survey be conducted during August / September month. This would be for translocation and mitigation purposes, should any conservation worthy vegetation be identified. The area towards the north of the works where expansion of the footprint will occur, will thus be included in the survey. This will be made a condition of approval for the EIA and must be carried out during August / September 2017 and prior to activities commencing.</p> <p>Noted and agreed.</p>
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			<p>The application for the water use license was initiated prior to the NEMA application, during which the Department of Water and Sanitation requested a wetland offset to compensate for the loss of the wetland. Wetland offsets need to be considered both in terms of the impacts on water resources and biodiversity, therefore although in most cases they will be addressed in terms of the WULA process, they are also of relevance in consideration of the NEMA process.</p> <p>As a result of the predominantly artificial origin of the wetland due to the effluent discharge, Cape Nature does not object to the proposal for the recreation of the wetland. In the specialist study, the present ecological status (PES) has only been provided for the watercourse, but not the two wetlands. The description of the affected wetland however would indicate that it is an impacted, disturbed system, as is expected for an artificial system that has established as a result of WWTW effluent.</p> <p>The wetland offset would create an equivalent area of habitat and has been designed to maximize the ecological functioning and value. The habitat could potentially be of higher biodiversity value than the current wetland, provided it is implemented and managed correctly.</p> <p>The wetland offset area will however result in a larger footprint on the terrestrial environment. As stated above, the information provided is not sufficient to be confident that the development proposal will not have a significant impact on terrestrial biodiversity. Although the photographs provided would indicate that the habitat is mainly highly degraded to transformed, these do not cover the entire affected area and there is sufficient information available to raise the</p>	<p>This is noted and agreed.</p> <p>This comment is noted and it is agreed that the PES for the existing wetland toward the north of the site is an impacted, disturbed system.</p> <p>Noted and agreed.</p> <p>This comment is noted. A botanical assessment cannot be conducted at this stage. It is proposed that a botanical survey can be conducted during August / September month. This would merely be for translocation and mitigation purposes, should any conservation worthy vegetation</p>
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			<p>precautionary principle regarding potential impacts on terrestrial biodiversity e.g. CBA.</p> <p>CapeNature therefore recommends that a botanical scan is undertaken to assess the impact of the proposed upgrade. This must include a field survey undertaken in August/September, which should provide a description of the vegetation on site, including variance across the site, with a particular focus on identifying threatened plant species (there are several threatened plant species records in the vicinity, including on highly disturbed sites). The botanical scan must provide appropriate recommendations based on the findings.</p> <p>One aspect related to the impacts on the freshwater environment that has not been sufficiently evaluated is the impact of increased effluent into a seasonal watercourse. The increased effluent is likely to significantly alter the hydrology and hence ecology of the environment downstream of the WWTW. This impact can be reduced by the use of effluent, such as irrigation.</p>	<p>be identified. The EAP would however like to point out that the site does not contain any significant terrestrial vegetation. In this regard also please refer to the most recent photo pages of the site included as Annexure C. The previously approved interim upgrade to 1.5MI (Phase 1,2 as per the Phasing Layout Site Development Plan in Annexure B) have almost been completed. This current upgrade has previously been authorised as part of the 1.5MI EIA approval in place, included as Annexure F. It is thus proposed that a botanical scan / survey be conducted during August / September month. This would be for translocation and mitigation purposes, should any conservation worthy vegetation be identified. The area towards the north of the works where expansion of the footprint will occur, will thus be included in the survey. This will be made a condition of approval for the EIA and must be carried out during August / September 2017 and prior to activities commencing.</p> <p>The engineers have indicated that the discharge in the seasonal stream will remain in line with the current discharge of the 1.5MI treatment works. Additional discharges in future will be made available to farms in the surrounding area who</p>
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			<p>Diversion of effluent from discharge is supported by Cape Nature. It is noted that an irrigation dam and pumping facilities has been included in the project description however no further detail such as layouts and locations has been provided.</p> <p>It is noted that reference is made to an aquatic constraints analysis that was initially undertaken and which formed the basis for the proposed wetland offset. This study should be included as an appendix to the basic assessment report in order to provide more context for the evaluation of the wetland offset, particularly with regards to the wetland design.</p> <p>In conclusion, Cape Nature recommends that the information as described above needs to be provided before the application can be considered further. This includes a botanical scan as described, an assessment of the impact of increased effluent disposal to the watercourse and current and proposed efforts at diverting the effluent and the initial aquatic constraints analysis.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>have readily been identified and large irrigation areas have been proposed by the farmers. During times of high rainfall the treated effluent will be stored in the farmer's individual dams. It is possible that in extreme cases where the irrigation dam will fill up in which this case more of the treated effluent, which will be chlorinated, will be discharged to the river. The location for the irrigation dam have been indicated on the Site Development Plan.</p> <p>This report has herewith been included in the 2nd Draft BAR as Annexure G - Specialist Reports. The recommendations in this report included the construction of a serpentine wetland and the re-use / irrigation of the treated effluent which have both now been included as part of the design.</p> <p>This comment is noted. A botanical assessment cannot be conducted at this stage. It is proposed that a botanical survey can be conducted during August / September month. This would merely be for translocation and mitigation purposes, should any conservation worthy vegetation be identified. The EAP would however like to point out that the site does not contain any significant terrestrial vegetation.</p>
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			Yours sincerely	<p>In this regard also please refer to the most recent photo pages of the site included as Annexure C. The previously approved interim upgrade to 1.5MI (Phase 1,2 as per the Phasing Layout Site Development Plan in Annexure B) have almost been completed. This current upgrade has previously been authorised as part of the 1.5MI EIA approval in place, included as Annexure F. It is thus proposed that a botanical scan / survey be conducted during August / September month. This would be for translocation and mitigation purposes, should any conservation worthy vegetation be identified. The area towards the north of the works where expansion of the footprint will occur, will thus be included in the survey. This will be made a condition of approval for the EIA and must be carried out during August / September 2017 and prior to activities commencing.</p> <p>The engineers have indicated that the discharge in the seasonal stream will remain in line with the current discharge of the 1.5MI treatment works. Additional discharges in future will be made available to farms in the surrounding area who have readily been identified and large irrigation areas have been proposed by the farmers. During times of high rainfall the treated</p>
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				<p>effluent will be stored in the farmer's individual dams. It is possible that in extreme cases where the irrigation dam will fill up in which this case more of the treated effluent, which will be chlorinated, will be discharged to the river. The location for the irrigation dam have been indicated on the Site Development Plan.</p> <p>This initial aquatics constraints analysis report has herewith been included in the 2nd Draft BAR as Annexure G - Specialist Reports. The recommendations in this report included the construction of a serpentine wetland and the re-use / irrigation of the treated effluent which have both now been included as part of the design.</p>
Loretta Osborne	09 May 2016	Fax	<p>1. The draft BAR and the letter dated 18 March 2016, as received by the Department on 24 March 2016, refer.</p> <p>2. This letter serves as an acknowledgment of receipt of the aforementioned document by the Department.</p> <p>3. The following is the Department's comment on the pre-application draft BAR and must be addressed in the draft BAR that will be circulated during the application process:</p> <p>3.1 The Department notes that the additional expansion activities are not included in the draft BAR as indicated in the Departmental letter</p>	<p>One expansion activity was included namely Activity 48 as defined in GN No. R. 983.</p>

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			<p>issued on 27 October 2015. You are requested to indicate:</p> <p>3.1.1 Which pipelines are going to be constructed (new)?</p> <p>3.1.2 The length, diameter and throughput capacity of the new pipelines.</p> <p>3.1.3 Which pipelines will be upgraded?</p> <p>3.1.4 The current diameter and throughput capacity of each pipe to be upgraded, as well as the length it will be expanded with and the new throughput capacity.</p> <p>3.2 The linear co-ordinates on page 14 of the draft BAR are incomplete. The starting, middle and end points of all linear activities must be provided.</p> <p>3.3 Pages 19, 38, 49 and others, as well as the Freshwater Ecosystem Assessment dated August 2015, indicate that the vegetation type is Swartland Alluvium Fynbos. Pages 4 and 37 of the draft BAR however refers to Swartland Granite Renosterveld. The draft BAR that will be submitted during the application phase must include the correct vegetation type.</p> <p>3.4 The Department notes that a Water Use License Application ("WULA") was submitted to the Department of Water and Sanitation together with the WULA assessment information. You are requested to:</p>	<p>Only one new pipeline is being constructed as part of this application. The pipeline refers to the irrigation pipeline which is indicated as part of Annexure B – Preferred Site Plan.</p> <p>The pipeline is approximately 3km and the pipeline will not be larger than 200mm in diameter. The only pipeline which forms part of this application is the irrigation pipeline.</p> <p>The only pipeline which forms part of this application is the irrigation pipeline.</p> <p>The linear co-ordinates for the irrigation pipeline has been included in the 2nd Draft BAR.</p> <p>The correct vegetation type is Swartland Alluvium Fynbos. Pages 4 and 37 have been updated to refer to Swartland Alluvium Fynbos.</p>
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			<p>3.4.1 Clarify why the assessment does not refer to the irrigation dam and irrigation pipeline that forms part of the proposal.</p> <p>3.4.2 Provide proof of submission of the WULA to the Department of Water and Sanitation.</p> <p>3.5 You are also requested to indicate the storage capacity of the irrigation dam as this may have additional activities associated with it.</p> <p>3.6 The report mentions that, "a Notice of Intent was previously submitted to Heritage Western Cape for the same Klappmuts Waste Water Treatment Works upgrade proposal and a positive Record of Decision was issued by Heritage Western Cape dated 24 October 2012." Note that the aforementioned letter was not included for reviewing purposes.</p> <p>3.7 Page 56 of the Environmental Management Programme ("EMP") states that, "future maintenance of the stream and wetland vegetation surrounding the stream must be done in line with the Wetland Rehabilitation and Management Plan." Note that the Wetland Rehabilitation and Management Plan must be undertaken and included in the draft BAR that will be submitted during the application phase for commenting purposes. Furthermore, the Department's Guideline for Maintenance Management Plans is herewith attached since future maintenance to the infrastructure located within the watercourse may be required and can form part of the Wetland Rehabilitation and Management Plan.</p>	<p>An updated WULA was submitted after consultation with the DWS. The updated WULA included all aspects related to the application.</p> <p>Proof of the initial submission to the DWS is included as Annexure</p> <p>The storage capacity of the irrigation dam is approximately 400m³ and is approximately 20m x 20m in extent.</p> <p>This letter has now been included in the 2nd Draft BAR as part of Annexure F.</p> <p>The River Maintenance Management Plan has been included in the 2nd Draft BAR as part of Section C.</p>
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			<p>3.8 Page 60 of the Waste, Water Use and Electricity consumption minimization and management programme dated March 2016, indicates that, "Hartenberg Farm (Pty) Ltd, will use this Planning, Construction and Operational Phase EMP as a tool in managing the impacts of the proposed Upgrading and Rehabilitation of the Hartenberg Bottom Dam" The abovementioned programme must be amended to refer to the correct proposal. In addition, please ensure that all minimization and management measures are applicable to this proposal.</p> <p>3.9 The Wetland Map (Annexure A) in the draft BAR and the Wetland Map in the Freshwater Ecosystem Assessment dated August 2015 (Annexure F) does not correspond with each other. You are requested to amend the Wetland Map (Annexure A) to indicate the correct information. In addition, this Department is of the opinion that the Critical Biodiversity Areas Map is not adequate. Appropriate maps must be provided.</p> <p>3.10 In addition to the above, you are requested to submit a legible site layout plan of the Waste Water Treatment Works that depicts the serpentine wetland, the irrigation dam and the surrounding associated infrastructure.</p>	<p>This has been amended in the 2nd Draft EMP to refer to the Klapmuts WWTW proposal.</p> <p>The wetland map in the draft BAR has been taken from Cape Farm Mapper, which is a Provincial planning and mapping information tool. The Wetland map in the Freshwater Ecosystem Assessment is a groundtruthed map which was done on fine scale on site. This Map is thus much more accurate and has been included as part of Annexure A – Wetlands Map.</p> <p>The critical biodiversity areas map was also obtained Cape Farm Mapper, which is a Provincial planning and mapping information tool. The Map indicates that the site is located within a Critical Biodiversity area as confirmed by Cape Nature.</p> <p>An updated Site Layout Plan of the proposed WWTW upgrade has been included as part of Annexure B – Preferred Layout Alternative.</p>
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			<p>3.11 Please ensure that the final BAR and the Environmental Management Programme contain all the information outlined in Appendices 1 and 4 tot the Department for comment during the application phase.</p> <p>3.12 All original signed declarations (applicant, environmental assessment practitioner and specialists) are to be included with the draft BAR submitted to the Department for comment during the application phase.</p> <p>3.13 Comments received during the Public Participation Process from the Interested and Affected Parties and the relevant authorities and a Comments and Response Report that adequately addresses any highlighted issues must be included in the draft BAR during the application phase.</p> <p>3.14 Please ensure that all recommendations and mitigation measures stipulated in the specialist report are included in the EMP to be submitted with the draft BAR.</p> <p>4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>5. Please note that the activity may not commence prior to an environmental authorization being granted by the Department.</p> <p>6. The Department reserves the right to revise or withdraw comments or request further information based on any information received.</p>	<p>This has been included in the 2nd Draft BAR for comment.</p> <p>The original signed declarations will be included with the Final BAR to be submitted to the Department for decision making.</p> <p>This is noted and has been included as part of Annexure D in the 2nd Draft BAR.</p> <p>This is noted and all mitigation measures have been included as part of the EMP and the 2nd Draft BAR.</p> <p>Noted.</p> <p>Noted.</p>
Mr Nkosinathi Mkonto	11 May 2016	Email	The Department acknowledges receipt of your Draft Basic Assessment Report dated March	

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			<p>2016 for the above mentioned activity. This office would like to comment on the document based on the evaluation of the impact of the proposed activity on water resources.</p> <p>Water Use Authorisation</p> <p>1. The Department noted that the proposed activities triggers water uses in terms of Section 21(e) engaging in a controlled activity in terms of Section 37(1)(a) and 21(l) discharging waste into a water resource through pipe, canal etc. of the National Water Act, 1998 (Act 36 of 1998). The water use authorisation in terms of section 40 of the Act should be applied for and obtained prior to commencement of any activity.</p> <p>2. The report also mentions the infilling of a highly degraded wetland to the north of the WWTW. The proposed activities constitute water uses in terms of Section 21(c) impeding or diverting the flow of water in the watercourse and 21 (i) altering the bed, banks, course or characteristics of a watercourse of the National Water Act, 1998 (Act 36 of 1998).</p> <p>3. The following information requirements must be submitted with the water use authorisation application but may not be limited to:</p> <ul style="list-style-type: none"> • Fully and correctly completed application forms • Copy of receipt of Registration fee of R114 • Certified ID of applicant/Company registration certificate 	<p>This is noted and agreed. A Water Use License Application was submitted to the DWS and the Water Uses as defined in Section 21 of The National Water Act 36 of 1998 includes the following:</p> <p>Effluent Discharge</p> <p>Discharge of treated effluent into a water resource.</p> <ul style="list-style-type: none"> • Effluent Discharge - Section 21 (f) <p>Irrigation of treated effluent</p> <ul style="list-style-type: none"> • Engaging in a Controlled Activity - Section 21 (e) <p>Infilling of Wetland and Stream Formalisation</p> <ul style="list-style-type: none"> • Effluent Discharge - Section 21 (c) & (i) <p>The information requirements to accompany the WULA has been discussed and agreed upon with the DWS representatives during a meeting at the DWS offices on the 31st of August 2016. This information has been included as part of the amended WULA</p>
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			<ul style="list-style-type: none"> • Copy of property's title deed • A copy of a 1: 50 000 topographic map /1:10 000 indicating map, name, number of farm boundaries including subdivision/s • Comprehensive Method statement for the activities occurring within the affected watercourse/wetland • Geohydrological Report • Wetland rehabilitation and management plan • Wetland Delineation and assessment Report including Present Ecological State (PES) and Ecological Importance and Sensitivity (EIS) • Civil Design drawings of the structures that will affect a watercourse/wetland • Civil Designs of the proposed upgrade of the WWTW • Environmental Management programme • Stormwater management plan and monitoring programme • Impact assessment associated with the characteristics (Flow Regime, Water quality, Biota and Riparian habitat) of a watercourse/wetland • Water Quality Management Report in accordance with the Departmental Operational guideline No.U2.1, Aide Memoire for Sewage Treatment Works, first edition, February 2003 • Public participation Report • Site layout plans (master plan) indicating the various activities and existing and proposed infrastructure in relation to the 1: 100 year flood line or/and the delineated riparian habitats, whichever is the greatest of the watercourse. • Environmental Authorisation from Department of Environmental Affairs and Development Planning once issued. 	<p>application which was submitted to the DWS in March 2017.</p> <p>It was agreed that a Geohydrological Report was not required and that the Stormwater Management Plan should be submitted prior to the upgrading activities commencing. All other aspects have been addressed as part of the amended WULA submitted.</p>
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PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

			<ul style="list-style-type: none"> Section 27(1) Motivation of National Water Act <p>4. No activity may take place within a 500m radius from the boundary of any wetland or 1: 100 flood line and/or within the delineated riparian habitats, whichever is the greatest from the water course unless authorised by this Department.</p> <p>The Department reserves the right to revise its initial comments and request additional information that may arise from correspondence and/or upon inspection. Should you have any queries, please do not hesitate to contact Nkosinathi Mkonto at the contact details provided above.</p>	This is noted.
Russell Mehl	07 June 2016	Email	<p>Good Morning Mr Nel</p> <p>I have been through the documentation that you submitted for the PROPOSED UPGRADE OF THE KLAPMUTS WASTEWATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE. Ref No.16/3/3/6/7/1/B4/23/1269/15.</p> <p>I have some concerns with regard to this proposal as our Directorate has had many complaints relating to the current plant and issued notices on the municipality in this regard. I am proposing a site inspection (walkthrough) of the facility and surrounds in order to better understand the information in the DBAR. Please suggest a date at your earliest convenience I am available 13, 14 or 17 June 2016 or any day in the following week</p> <p>Kind regards</p>	This is noted. A site meeting was held with Mr Russel Mehl on the 23 rd of June 2016.

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<p>Russel Mehl</p>	<p>27 June 2016</p>	<p>Email</p>	<p>The Directorate: Pollution and Chemicals Management (D: PCM) evaluated the pre-application Draft Basic Assessment Report for the above-mentioned development and conducted an inspection of the facility on 23 June 2016. The D: PCM reserves its comments to final reports however; the following matters must receive attention.</p> <p>The Klapmuts Wastewater Treatment Works (WWTW) currently has a capacity of 1.5 ML/day and will be increased to a maximum capacity of 7.2 ML/day which will be completed in 3 phases. Currently, existing improvements are being done at the facility; including the development of a new inlet works and upgrading of various other components to achieve a capacity of 2.4 ML/day that will allow it cope with the current hydraulic requirements. At its maximum capacity the Klapmuts WWTW will serve as a regional works that will receive effluent from both the expanding residential and industrial areas within the area.</p> <ol style="list-style-type: none"> 1. The upgrading of the facility during any of the proposed phases must not reduce the current hydraulic capacity during the construction phase. 2. Non-aerated lagoons should not be used if excessive sulfate is present in the wastewater. 	<p>We confirm that at no stage of any construction upgrade will the current hydraulic capacity be reduced. The switch over between the existing facility and the upgraded facility is properly planned and executed.</p> <p>No non-aerated lagoons are used. Only one sludge lagoon is planned for Phase 1, and allowance has been made for a total of 3 lagoons. These lagoons are only used in a case of emergency when the belt press facility is broken down for a short period. During such a</p>
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PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

			<p>3. Flood considerations, including the 50 and 100 year flood levels, impact on floodplain and flood-way, and compliance with applicable regulations regarding construction in flood-prone areas, shall be evaluated.</p> <p>4. The applicant must indicate what type screening system will be used (manual or mechanical). If mechanical screens are used, what measures will be put in place during mechanical breakdowns, maintenance periods or power outages (this management system must be included in the Operational Environmental Management Plane).</p> <p>5. Please indicate what type of flow measurement system is being used and whether these measurements are automated or manually recorded?</p>	<p>period all the sludge that was pumped to the sludge lagoon will settle out in the lagoon and the overflow effluent with less sludge will be recirculated to the Biological reactor.</p> <p>The upgrading of all components of the works is situated outside the 1:50 as well as the 1:100 year floodlines.</p> <p>Mechanical screens will be used. During the first 2 upgrades all flow will be screened by one mechanical screen on the one inlet channel, and a bypass channel has a hand operated manual screen for emergency conditions. As part of the final upgrade to full capacity, both screens will be mechanical and a new manual screen chamber will be built in line before the inlet channel for the installation of a manual screen. During power outages, the emergency standby generator will provide power to all mechanical equipment (including the mechanical screens) required for the Treatment process.</p> <p>A sonic beam flow meter measures the depth of the flow at the inlet works.</p>
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			<p>6. The Environmental Management Plan (EMP) must include projections to determine biological treatment capacity must be made by using actual waste load data to the extent possible and the following must also be considered.</p> <ul style="list-style-type: none"> • Impact of industrial sources shall be documented. • Seepage and leachate may contribute significantly to the organic load and other materials that can cause operational problems and non-compliance with Water Use License conditions. <p>7. Mechanical sludge collection and withdrawal facilities shall be designed to assure rapid removal of the sludge. Each settling tank shall have its own sludge withdrawal lines to ensure adequate control of the sludge wasting rate for each tank.</p> <p>7.1 Sludge drying beds may be used for dewatering well digested sludge from either the anaerobic or aerobic process. Due to the large volume of sludge produced by the aerobic digestion process, consideration should be given to using a combination of dewatering systems or other means of ultimate sludge disposal.</p> <p>7.2 Sludge storage lagoons will be permitted only upon proof that the character of the digested sludge and the design mode of operation are such that offensive odors will not</p>	<p>The Environmental Management Plan (EMP) allows for the measuring of all compacted sludge being carted away in bulk to an approved waste facility. Klapmuts currently has no factories with effluent that places impact loads on the Works. All new building plans of any light industrial or industrial facility that will be planned in the future is monitored by the Municipality. The design of the works allows for the treatment of the organic load for all future industrial developments in the urban area.</p> <p>The mechanical sludge collection and withdrawal facilities consist of a belt press facility for mechanical dewatering and the sludge is conveyed with a conveyor into a silo facility from where it is collected on regular intervals with purpose made sludge transfer vehicles to the approved waste facility. The liquid from the dewatering process is recirculated via the sludge lagoons back to the biological reactor.</p> <p>Only stabilised sludge is drawn off to the sludge lagoons in emergency conditions, and no offensive odours is expected.</p>
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			<p>result. Where sludge lagoons are permitted, adequate provisions shall be made for other acceptable sludge handling methods in the event of upset or failure of the sludge digestion process.</p> <p>8. Disinfection of the effluent shall be provided as necessary to meet applicable standards. The design shall consider meeting both the bacteriological standards and the disinfectant residual limit in the effluent. The disinfection process should be selected after due consideration of waste characteristics, type of treatment process provided prior to disinfection, waste flow rates, pH of waste, disinfectant demand rates, current technology application, cost of equipment and chemicals, power cost, and maintenance requirements.</p> <p>9. Wastewater pumping station structures and electrical and mechanical equipment shall be protected from physical damage by the 100 year flood. Wastewater pumping stations should remain fully operational and accessible during flooding. The pumping station shall be readily accessible by maintenance vehicles during all weather conditions.</p> <p>10. Chemical storage areas shall be enclosed in bunds or curbs which will contain the stored volume until it can be safely transferred to alternate storage or released to the wastewater at controlled rates which will not damage facilities, inhibit the treatment processes, or contribute to stream pollution. Liquid</p>	<p>Disinfection is done with chlorination at the inlet of the chlorination channels. The chlorine dosage is linked to the volume of flow to the chlorination channels.</p> <p>The recycle pump stations are all situated within the perimeter of the Waste Water Treatment Works and will not be affected by the 1:100 floods.</p> <p>Two stores will be utilised for chemical storage. The liquid polymer for the belt press facility will be stored in the belt press building. Allowance is made for non-slip floors in the belt press facility building.</p>
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			<p>polymer should be similarly contained to reduce areas with slippery floors, especially to protect walk ways. Non-slip floor surfaces are desirable in polymer-handling areas.</p> <p>11. Preventive Maintenance: daily maintenance, regular inspection, and prognosis for the scheduling and methods of repair.</p> <p>11.1 Corrective Maintenance: correction to prevent further occurrence of a problem</p> <p>11.2 Breakdown Maintenance: repairing a fault after it occurs</p> <p>11.3 Maintenance Prevention: reflecting maintenance activities, upgrading the reliability of equipment and system at the design stage.</p> <p>12. A comprehensive water quality monitoring programme must be included in the EMP.</p> <p>Please contact Russel Mehl at the contact details indicated, should you have any enquiries regarding these comments. Yours faithfully,</p>	<p>Preventative maintenance: The municipality has a team that is responsible for corrective maintenance to prevent occurrence of an existing problem. When any breakdowns occur, the maintenance team will investigate and proper action will be taken to repair the breakdown problem in house or through a specialised service provider. Maintenance at regular intervals on all mechanical equipment is listed in the operational procedures of the Works.</p> <p>The monitoring of the Klappmuts WWTW is done weekly. Please find attached as Annexure I.</p>
<p>Mr N du Buisson</p>	<p>7 July 2017</p>	<p>Email</p>	<p>With reference to application documents received on 27 June 2016 for civil engineering comments:</p> <p>1 FINDINGS</p>	

PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

			<p>1.1 The current Klapmuts WWTW was upgraded to a 1.5MI/day capacity under an emergence, by making use of an existing clarifier and converted aeration basin, to provide capacity for a new low cost housing development.</p> <p>1.2 The work must now be upgraded to a capacity of 2.4MI/day as a first phase of the proposed three modules of 2.4MI/day for the future 7.2MI/day requirement, as a planned regional WWTW.</p> <p>1.3 An activated sludge process with a sludge lagoon and sludge belt press is proposed as the plant process. Effluent will be recycled through irrigation of sports fields and the remainder released in a tributary to the Klapmuts River.</p> <p>1.4 The outfall sewer lines and pump station feeding the WWTW were done according to the Sewer Master Plan completed by GLS and were approved and funded under MIG.</p> <p>1.5 The proposed expansion will entail the construction of the following facilities:</p> <ul style="list-style-type: none"> • New inlet works (25.5MI/day capacity) • New Anoxic basin • Sludge lagoon and sludge handling facilities • Stand by Generator • Maturation pond • Storm water canal to prevent flooding of works • Belt Press facility at new inlet works for tankers that are now not using this works • New clarifier • Additional aeration capacity • Irrigation dam and pumping facilities for Irrigation purposes 	<p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p>
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PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

			<p>1.6. A process design report for the upgrading of the works was done by WEC Consult.</p> <p>1.7 A Freshwater offset report was submitted on the offset of the current artificial wetland, created by the outflow. The wetland will be infilled for the new expansion and replaced further downstream by means of a serpentine wetland structure.</p> <p>1.8 No monitoring boreholes are present at the WWTW or in the surrounding areas.</p> <p>1.9 Water quality monitoring is taking place on a regular base.</p> <p>1.10 No detail was provided on irrigation pipelines.</p> <p>2 CONCLUSION</p> <p>2.1 After considering the information provided the Department has come to the conclusion that the applicant will have to apply for a water use license in terms of section 40 and 41 of the National Water Act, 1998 (Act 36 of 1998) for the water use in terms of:</p> <ul style="list-style-type: none"> • Section 21 (c): Impeding or diverting the flow of water in a water course • Section 21 (i): Altering the beds, banks, course or characteristics of a water course • Section 21 (e): Engaging in a controlled activity (NOT APPLIED FOR) • Section 21(f): discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit. 	<p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed. The water quality monitoring information is included as part of Annexure I.</p> <p>The pipeline is approximately 3km and the pipeline will not be larger than 200mm in diameter.</p> <p>This is noted and agreed. A Water Use License Application was submitted to the DWS and the Water Uses as defined in Section 21 of The National Water Act 36 of 1998 includes the following:</p> <p>Effluent Discharge</p> <p>Discharge of treated effluent into a water resource.</p> <ul style="list-style-type: none"> • Effluent Discharge - Section 21 (f) <p>Irrigation of treated effluent</p> <ul style="list-style-type: none"> • Engaging in a Controlled Activity - Section 21 (e)
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			<p>2.2 Support is given to the proposed activated sludge process with the incorporation of the biological nitrogen removal. This is a simplified process with only a few mechanical components that will reduce the operational problems with the available operators and technical support system.</p> <p>2.3 The discharge from the upgraded WWTW will be compliant with the general limit standards.</p> <p>2.4 The Tributary of the Klapmuts River and its associated wetlands will be directly physically impacted by the proposed development but the additional discharge may impact the river system in terms of quality and quantity.</p> <p>2.5 Any changes to canalize the existing stream by means of gabions are not supported. The works can be protected by berms that can be</p>	<p>Infilling of Wetland and Stream Formalisation</p> <ul style="list-style-type: none"> • Effluent Discharge - Section 21 (c) & (i) <p>The information requirements to accompany the WULA has been discussed and agreed upon with the DWS representatives during a meeting at the DWS offices on the 31st of August 2016. This information has been included as part of the amended WULA application which was submitted to the DWS in March 2017.</p> <p>It is noted that the DWS supports the proposed activated sludge process.</p> <p>Agreed.</p> <p>Noted and agreed. The Application is made for using 5.7 ML per day for irrigation, the remaining 1,5 ML will continue to flow into the stream for downstream water users and will be treated to General Limit Standards.</p> <p>This is noted and agreed. As per the discussion during the meeting on the 23rd of August 2016 at the DWS offices the</p>
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			<p>vegetated and the river profile shaped to form flat slope sides that can be vegetated.</p> <p>2.6 The irrigation line with possible river crossings and the intended area(s) to be irrigated were not submitted and are not commented on. In terms of an Integrated license application I do recommend that the applicant also apply for:</p> <ul style="list-style-type: none"> • Section 21 (e): Engaging in a controlled activity <p>3. RECOMMENDATION</p> <p>The application in terms of section 21 (c), (i) and (f) of the National Water Act (Act 36 of 1998) is supported on technical aspects on the following conditions:</p> <p>3.1 A monitoring plan, detailing the applicable monitoring measures, must be provided in the license conditions amongst:</p> <ul style="list-style-type: none"> • The quantity of influent treated at the Klapmuts WWTW shall be metered and recorded daily; 	<p>stream will be formalised using a combination of gabions and green engineering. Gabions will be utilized at three locations in order to induce turbulence. The stream formalisation will involve two additional wetland areas in the stream. The stream and wetland areas will be rehabilitated using locally occurring indigenous wetland vegetation. These newly created wetlands will also serve as the wetland offset with the serpentine wetland.</p> <p>The planned irrigation pipeline as well as the intended areas of is herewith included as part of Annexure B – Preferred Site Layout Plan. The areas to be irrigated have furthermore been expanded upon as part of the amended WULA submitted.</p> <p>The conditions are noted and agreed.</p> <p>These conditions have been included as part of the recommendations for approval in the 2nd Draft Basic Assessment Report.</p>
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			<ul style="list-style-type: none"> • The quantity of waste water discharge into the tributary of the Klappmuts River shall be metered and recorded daily; • The quantity of treated effluent from Klappmuts WWTW to third parties shall be metered and recorded daily <p>3.2 The Licensee shall submit in writing under reference 27/2/1/G521/230/2 the following information after approval of the license but before construction commence:</p> <p>3.2.1 A comprehensive storm water plan indicating the mitigation measures for separation of contaminated water and runoff, and the prevention measures to protect groundwater from contaminated water infiltration.</p> <p>3.2.2 Design report for WWTW (electronic copy)</p> <p>3.2.3 Construction drawings (electronic copy) for the WWTW release structure to the tributary of the Klappmuts River and the serpentine wetland.</p> <p>3.3 The Licensee shall within 30 days after the completion of the activities:</p> <p>3.3.1 Inform the Regional head in writing under reference 27/2/1/G521/230/2 thereof. It shall be accompanied by a signature of approval from the designer (Professional Engineer that the construction was done according to the design report and construction drawings.</p> <p>3.3.2 Submit a copy of the Operational and Maintenance Manual</p>	<p>This is noted and will need to be submitted to the DWS subsequent to the approval of the license.</p> <p>This is noted and will need to be submitted to the DWS within 30 days after the completion of the activities.</p>
Loretta Osborne	22 May 2017	Fax	1. The Application Form submitted to the Department on 12 May 2017, refers.	

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			<p>2. This letter serves as an acknowledgement of receipt of the aforementioned document by the Department.</p> <p>3. Following review of the information submitted to this Department, the following is noted:</p> <p>3.1 The proposed development entails the upgrade of the existing Klappmuts Waste Water Treatment Works from 1.5 mega litre per day to 7.2 mega litre per day.</p> <p>3.2 The site on which the development is proposed is zoned for agricultural purposes (Remainder of Farm No. 736) and Waste Water Treatment Works (Portion 2 of Farm No. 736).</p> <p>3.3 The Klappmuts River is flowing westwards of the existing Waste Water Treatment Works.</p> <p>3.4 The groundcover present on site includes veld dominated by alien invasive species.</p> <p>4. Please note the following pertaining to the application process:</p> <p>4.1 On 7 April 2017 the Minister of Environmental Affairs amended the regulations that was promulgated on 4 December 2014 in terms of Chapter 5 of the National Environmental Impact Assessment (EIA) Regulations 2014 (as amended) (Government Notice (GN) No. R. 326, R. 327, R. 325 and R. 324 in Government Gazette No. 40772 of 7 April 2017.</p> <p>4.2 In light of the fact that Activity 19A of Government Notice (GN) No. R. 327 in terms of the NEMA EIA Regulations, 2014 (as amended) is triggered by the proposed development, the</p>	<p>Agreed.</p> <p>Agreed.</p> <p>A small tributary of the Klappmuts River flows west of the WWTW. This tributary / stream only flows during rain events.</p> <p>Agreed. Most of the site has been completely disturbed.</p> <p>This is noted.</p> <p>This is noted. The River Maintenance Management Plan has been included as part of the</p>
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			<p>Department recommends that a Maintenance Management Plan (MMP) forms a component of the Operational Environmental Management Plan. Please refer to the attached Guideline for Compiling a MMP. Please be advised that the MMP relates to the aforementioned listed activity only.</p> <p>4.3 Be reminded to amend the headings in the amended application form as well as the Basic Assessment Report form to the correct regulation number as mentioned above.</p> <p>4.4 Note that the original signed declaration of the applicant must be obtained and submitted to the Department.</p> <p>4.5 Having considered the information contained in the NOI the Department has identified the following additional listed activities (not included in the application but may be triggered by the proposed development):</p> <p>Activity 34 as defined in GN No. R, 327: 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 license or an amendment permit or license in terms of national or provincial legislation governing the release of emissions or pollution,</p> <p>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 applies; or</p>	<p>2nd Draft EMP as part of the Operational Phase.</p> <p>This is noted and agreed.</p> <p>The original signed declaration forms signed by the applicant will be submitted to the Department with the Final BAR.</p> <p>This activity has not been included due to the fact that the capacity will be increased by less than 15 000 cubic metres per day.</p>
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			<p>(ii) the expansion of or changes to the existing facilities for the treatment of effluent, waste water or sewerage where the capacity will be increased by less than 15 000 cubic metres per day.</p> <p>Activity 46 as declined in GN No. R. 327: 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 (ii) has a peak throughput of 120 litres per second or more; and (a) where the facility or infrastructure is expanded by more than 1000 metres in length; or (b) where the throughput capacity of the facility or infrastructure will be increased by 10% or more;</p> <p>Excluding where such expansion – (aa) related to transportation of sewage, effluent, process water, waste water, return water, industrial discharge slimes within a road reserve; or (bb) will occur within an urban area.</p> <p>Activity 48 as defined in GN No. R. 327: The expansion of –</p> <p>(i) canals where the canal is expanded by 100 square metres or more in size; (ii) channels where the channel is expanded by 100 square metres or more in size; (iii) bridges where the bridge is expanded by 100 square metres or more in size; (iv) dams, where the dam, including infrastructure and water surface area, is expanded by 100 square metres or more in size;</p>	<p>This activity has not been included due to the fact that the proposed irrigation pipeline to be constructed will not exceed 0.36 metres or more; or have a throughput capacity of 120 litres per second or more.</p> <p>This activity has been included in the 2nd Draft BAR.</p>
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			<p>(v) weirs, where the weir, including infrastructure and water surface area, is expanded by 100 square metres or more in size; (vi) bulk storm water outlet structures where the bulk storm water outlet structure is expanded by 100 square metres or more in size; or (vii) marinas where the marina is expanded by 100 square metres or more in size;</p> <p>where such expansion or expansion and related operation occurs –</p> <p>(a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p> <p>excluding –</p> <p>(aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 22 of 2014 or activity 14 in Listing Notice 3 of 2014, which case that activity applies; (dd) where such expansion occurs within an urban area; or (ee) where such expansion occurs within existing roads or road reserves.</p> <p>Activity 59 as defined in GN No. R. 327: The expansion and related operation of facilities or infrastructure for the treatment of effluent, waste water or sewage where the capacity will be increased by 15 000 cubic metres or more per</p>	<p>This activity has not been included due to the fact that the capacity will be increased by</p>
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			<p>day and the development footprint will increase by 1000 square metres or more.</p> <p>4.6 Only those activities applied for shall be considered for authorisation. The onus is on the applicant to ensure that all the applicable listed activities area applied for and assessed as part of the Basic Assessment process.</p> <p>4.7 You are advised that when undertaking the Basic Assessment process, you must take into account the applicable guidelines including the guidelines developed by the Department. The Departments guidelines can be downloaded from the Departments website (http://eadp-westerncape/kznsshf.gov.za/your-resource-library). In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:</p> <ul style="list-style-type: none"> ➤ Circular EADP 0028/2014: One Environmental Management System ➤ Guideline for the Review of Specialist Input into the EIA process (June 2005). ➤ Guideline for Environmental Management Plans (June 2005) ➤ Guideline on Alternatives (March 2013) ➤ Guideline on Need and Desirability (March 2013) ➤ Guideline for involving a Visual and Aesthetic Specialist (June 2005). <p>The following requirements must be compiled with in respect to all applications for Environmental Authorisation in terms of the National Environmental Management Act, 2998 (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment Regulations (EIA), 2014 (as amended):</p>	<p>less than 15 000 cubic metres per day.</p> <p>This is noted and agreed.</p> <p>This is noted.</p>
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PROPOSED UPGRADE OF THE KLAPMUTS WASTE WATER TREATMENT WORKS ON PORTION 2 AND REMAINDER OF FARM 736 IN KLAPMUTS, WESTERN CAPE.

			<p>5.1 Alternatives In terms of the NEMA and EIA Regulations, 2014 (as amended) the investigation of alternatives is mandatory. This includes the option of not proceeding with the proposed activity (the “no-go” option). All alternatives identified must be determined to be feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it had been applied for, or may grant authorisation in respect of the whole or part of the proposed project in the application. Alternatives are not limited to activity alternatives, but include layout alternatives, design, operational and technology alternatives.</p> <p>If, after identified alternatives have been investigated, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof of the investigations undertaken, and motivation for there being no reasonable or feasible alternatives other than the preferred option and the no-go option. Refer to the Departments Guideline on Alternatives available on the Departments website (http://eadp-westerncape/kznsshf.gov.za/your-resource-library).</p> <p>5.2 Public Participation</p> <p>The BAR must be subject to a Public Participation Process that must comply with Chapter 6 of the EIA Regulations, 2014 (as amended).</p>	<p>This is noted. Alternatives have been identified as included in the 2nd Draft BAR.</p> <p>This noted.</p>
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			<p>In addition to the above, the Environmental Assessment Practitioner (EAP) must submit a minimum of two printed copies of the draft BAR to the Department for a 30-day comment period. The draft BAR must also be made available to all relevant State Departments / Organs of State that administer laws relating to a matter affecting the environment, for a 30-day comment period. The EAP must notify the Department in writing of the date the draft BAR was submitted to the relevant State Departments / Organs of State and clearly indicate whether or not such State Departments / Organs of State were notified of the 30-day comment period in terms of Section 24O of NEMA. It is imperative that State Departments / Organs of State are in possession of the draft Reports when the EAP issues them with the notice in terms of Section 24O of NEMA. Please note that the EAP is responsible for such consultation. Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments / Organs of State in terms of Section 24O(2) and (3) of NEMA in the draft BAR, where appropriate.</p> <p>In terms of good practice you are encouraged to engage with State Departments and other Organs of State early in the EIA process to solicit their inputs on any of their requirements to be addressed in the EIA process. Please note that this does not replace the requirement of making the draft BAR available to State Departments / Organs of State as stipulated above.</p> <p>A register of Interested and Affected parties (I&APs) must be opened and maintained. The register must also be submitted to the Department.</p> <p>The EAP must record and respond to all comments received. The comments and</p>	<p>This is noted and will be complied with.</p> <p>This is noted and will be complied with.</p> <p>This is noted and will be complied with.</p> <p>This is noted and will be complied with.</p>
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			<p>responses must be captured in a Comments and Response Report and must also include a description of the public participation process followed. This report must also be included in the public participation information attached to the BAR to be submitted for decision.</p> <p>5.3 Environmental Management Programme (EMPr) In accordance with Section 24N of NEMA and Regulation 19 Of Government Notice (GN) No. R. 326 of 7 April 2017, the Department hereby requires the submission of an EMPr. The contents of such an EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R. 326 of 7 April 2017. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). It must be submitted together with the BAR. When compiling the EMPr, the Departments Guideline for Environmental Management Plans (June 2005), available on the Departments website (http://eadp-westerncape/kznsshf.gov.za/your-resource-library) must be taken into account.</p> <p>5.4 Need and desirability In terms of the NEMA EIA Regulations, when considering an application, the Department must take into account a number of specific considerations including <i>inter alia</i>, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.</p>	<p>This is noted and will be complied with.</p> <p>This is noted and will be complied with.</p>
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			<p>Refer to the Departments Guideline on Need and Desirability (March 2013).</p> <p>5.5 NEMA Principles In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.</p> <p>5.6 BAR Requirements The BAR must contain all the information outlined in Appendix 1 of GN No. R. 326 of 7 April 2017 and must also include the information requested in this letter. Failure to submit any information prescribed in Appendix 1 of GN No. R. 326 may result in Environmental Authorisation being refused.</p> <p>The Department awaits the submission of the BAR as prescribed by Regulation 19 of the EIA Regulations, GN No. R. 326 of 7 April 2017. In accordance with Regulation 19 of GN No. R. 326 of 7 April 2017, the Department hereby stipulates that the BAR must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department, calculated from 12 May 2017. If however, significant changes have been made or significant new information has been added to the BAR, the applicant / EAP must notify the Department that an additional 50 days (i.e 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report / additional information.</p>	<p>This is noted and will be complied with.</p> <p>This is noted and will be complied with.</p> <p>Noted.</p>
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			<p>If the BAR is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 326 of 7 April 2017 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid again.</p> <p>Please note that two printed copies as well as two electronic copies (saved on CD/DVD) of the BAR must be submitted to the Department.</p> <p>5.7 General Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>The Department reserves the right to revise initial comments and request further information based on the information received.</p> <p>Yours faithfully.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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