

D: PCM REFERENCE NUMBER: 19/3/2/4/D2/29/PMIM014/24

ENQUIRIES: Gunther Frantz

DATE: 18 October 2024

The Director
Sharples Environmental Services
P.O. Box 9087
GEORGE
6530

For Attention: Ms Lu-anne Beets

Tel: 044 873 4923
Email: luanne@sesc.co.za

PER EMAIL

Dear Madam

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE OF THE
HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT
OF NEW ASSOCIATED INFRASTRUCTURE, HEROLD'S BAY**

The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 12 September 2024. Please find comment from the D: PCM as follows:

1. With reference to pump station 1 (PS1) and associated emergency storage tank and sump, it is mentioned on page 15 of 119 of the DBAR that “All the access points will be covered by removable precast concrete panels or hinged access covers. These covers are designed to minimize the airflow in and out to reduce odour issues. Access manholes will be provided for entry. The access cover will be too heavy for a single person to open and will require mechanical hoisting to reduce the possibility of unplanned entry.” In addition to these access points restricting unauthorized access and controlling odour, they should also be designed to restrict seawater ingress during high tides, spring tides or storm surges caused by extreme weather events.
2. In addition to the above, the D: PCM recommends that backup generator/s at PS1 also be protected against extreme ocean tidal or storm surge events, to prevent diesel spillages from generator fuel tanks.

3. Where backup generators housing diesel fuel tanks are situated on or next to the beachfront, appropriate design measures (i.e. bunds) should be incorporated to prevent diesel spillages from occurring during re-fueling events. Such measures should be incorporated during the upgrading of PS1.
4. The following general recommendations are provided to prevent and manage the potential contamination emanating from the site during the construction, operational and decommissioning phases and should be incorporated into the Environmental Management Programme (EMPr):
 - 4.1. The responsible management of hazardous chemicals should be practiced at all times and storage or handling of chemicals must not take place within close proximity of the beach area/littoral zone.
 - 4.2. The refuelling and/or repair of heavy earth moving vehicles should not take place within the beach area and should be conducted within a dedicated impervious area on site.
 - 4.3. All heavy earth-moving and transport vehicles must be in good working condition with no leaking hydrocarbon fuel, fluids or lubricant emanating from these vehicles.
 - 4.4. The storage of hazardous substances (i.e. petrol, diesel, and lubricants etc.) should be located on impervious bases within bunds (to accommodate 110% of the volume) to contain any fugitive spillages and/or leakages.
 - 4.5. No discharge of effluents or the wash water from cement batching areas should be allowed to enter the littoral zone/beach area. Runoff must be strictly controlled in the vicinity of any cement batching areas.

Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.

The Department reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully,

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MS NATASHA DAVIS-WOLMARANS
DIRECTOR: POLLUTION AND CHEMICALS MANAGEMENT

CC: Dorien Werth (DEA&DP – Directorate: Development Management (Region 3))

Email: Dorien.Werth@westerncape.gov.za