

Appendix E2 - Issues and Concerns Report

NO.	ISSUE	RAISED BY	RESPONSE PROVIDED	PROVIDED BY
1.	How the rehabilitation of the project will be done in line with the rehabilitation plan which was submitted as part of the Water Use Licence (WULA) and approved by this Department. This will focus much on measures to ensure that the water resources (Vaalbank Spruit and its associated wetland) are not contaminated by waste from dump. These may include for example: dust suppression; and storage of hydrocarbons; type, location, and management temporary ablution facilities; and stormwater management during rehabilitation.	Samuel Maliaga DHSWS (Email 27-05-2021)	<p>A Rehabilitation and Implementation Programme (RSIP) dated 2016/1017 was prepared and reviewed annually. The RSIP indicates that a formal process for the authorisation of closure for the CDR is underway but does not specify the rehabilitation measures to be undertaken. The following general closure objectives are stated in the RSIP:</p> <ul style="list-style-type: none"> • Ensure ongoing communication with stakeholders • Keep a site water balance up to date • Provide post closure management of water related infrastructure on the sites property and off-site properties • Regular review of water management plans to ensure they align with the Rehabilitation Strategy. <p>In support of this strategy and the RSIP commitments, additional mitigation is included for this EIA in order to ensure that the Vaalbank Spruit and its associated wetland is not contaminated by waste from the CDR facility.</p> <p>Mitigation and management measures for: dust suppression; and storage of hydrocarbons; type, location, and management temporary ablution facilities are contained in Table 3 of the EMP (Part B of the BAR).</p> <p>Stormwater management during rehabilitation is detailed in Section 5.2 of the Design Report</p>	Tania Oosthuizen Environmental Scientist Knight Piésold

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			(Appendix B).																	
2	The quantification of total waste to be removed, and volume to be removed per day.	Samuel Maliaga DHSWS (Email 27-05-2021)	<p>Section 5.6 of the Design Report (Appendix B) details the schedule and construction timeline.</p> <p>The table below shows that the estimated time for an experienced contractor with high percentage of ownership for large dump trucks (40 tons) is 366 days (14 months), this works out to around 750 tons of waste removed per day. This calculation have been checked with large waste removal companies and some clarified that if the working days is extended the project can be completed in less than 14 months</p> <table><tr><th>Description</th><th>Value</th></tr><tr><td>Waste</td><td>216 000 tons</td></tr><tr><td>Soil</td><td>35 700 tons</td></tr><tr><td>Total</td><td>251 700 tons</td></tr><tr><td>Day of site (8 months)</td><td>160 days</td></tr><tr><td>40-Ton truck capacity for one load</td><td>35 tons</td></tr><tr><td>No. of truck loads required in total</td><td>7 192 loads</td></tr><tr><td>No. of truck loads required per day</td><td>45 loads</td></tr></table>	Description	Value	Waste	216 000 tons	Soil	35 700 tons	Total	251 700 tons	Day of site (8 months)	160 days	40-Ton truck capacity for one load	35 tons	No. of truck loads required in total	7 192 loads	No. of truck loads required per day	45 loads	Thabang Makoma Principal Engineer Knight Piésold
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4	Indicate if the removal of dump to the existing dump may lead to the receptor dump size to exceed the volume authorized in a WUL. If so, you will have to apply for a WUL amendment;	Samuel Maliaga DHSWS (Email 27-05-2021)	<p>The operational Slag Disposal Facility on the MFC site will be the receptor site for the Type 3 waste to be removed from the CDR facility.</p> <p>The Slag Disposal Facility is authorised in terms of Waste Management Licence (#12/9/11/P105/R1) and Water Use Licence (04/B12D/G/1193, as amended in 2017).</p> <p>Section 5.4 of the Design Report (Appendix B) details the Capacity of the Receptor site and demonstrates that sufficient capacity is available.</p> <p>The volumes as per Waste Management Licence as well as the Water Use Licence will not be exceeded.</p> <p>Should any amendment or additional authorisation be required at any stage, this will also be obtained before any work commence to ensure continued compliance of this project.</p>	Slag dump information provided by MFC
5.	Indicate the maximum period the rehabilitation project (also indicate the months/ season)	Samuel Maliaga DHSWS (Email 27-05-2021)	<p>Section 5.6 of the Design Report (Appendix B) details the worst case schedule and construction timeline.</p> <p>In summary, if a large waste contractor is used the removal can be undertaken in approximately 14 months. It is recommended that the removal be commenced in the period from March to August in order to avoid working during the rainy season as far as practicable.</p>	Thabang Makoma Principal Engineer Knight Piésold
6.	Design also the monitoring programme which targets only the impacts that may result during this rehabilitation project.	Samuel Maliaga DHSWS (Email 27-05-2021)	The monitoring programme described in Section 6 of the EMP (Part B of the BAR), details the monitoring programme that is required to assess all impacts associated with the CDR project. In our informed opinion, no additional monitoring points are required.	Tania Oosthuizen and Neal Neervoort Senior Environmental Scientists Knight Piésold

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7.	Page 19 gives details of the alternatives considered. However, the advantages and disadvantages of each alternative should be given.	Tiyani Baloyi DFFE (Letter 25-05-2021)	Table 23 provides a comparative assessment of the three options in terms of environmental aspects.	Tania Oosthuizen Senior Environmental Scientist Knight Piésold
8.	The applicable information in the table below must be included in the report for a Record of Decision (RoD) to be processes	Tiyani Baloyi DFFE (Letter 25-05-2021)	Refer to Table 3 for the table of information requirements from DFFE. Table 3 also provides the link to the document and/or appendices where these have been addressed.	