

**Date: 24 August 2020**

**Attention:** Dr T Khumalo  
Chief Director: Air Quality Management Services  
Department of Environment, Forestry and Fisheries (DEFF)  
Environment House  
473 Steve Biko Street  
Arcadia, Pretoria  
0083

Enquiries:  
Marissa Botha  
Tel: 015 296 3988  
Cell: 084 226 5584

Email: [tkhumalo@environment.gov.za](mailto:tkhumalo@environment.gov.za)

**DEFF Ref:** Pending

Dear Dr T. Khumalo,

**ESKOM'S APPLICATION FOR SUSPENSION OF THE MES NEW PLANT EMISSION LIMITS AND COMPLIANCE TIMEFRAMES FOR NO<sub>x</sub> AND SO<sub>2</sub> FOR GROOTVLEI POWER STATION NEAR BALFOUR IN THE MPUMALANGA HIGHVELD**

1. With condonation from the Minister of Environment, Forestry and Fisheries, Eskom submitted a late MES suspension application for Grootvlei power station in November 2019.
2. In the application, Eskom undertook to submit additional information to the NAQO including an updated Atmospheric Impact Report (AIR), motivation and reasons for the application, variation request and a consolidated Public Participation Report.
3. Naledzi Environmental Consultants Pty Ltd (NEC) is the independent environmental consultants, appointed by Eskom SOC Limited to prepare the updated Atmospheric Impact Report (AIR) and conduct the public participation process (PPP) for the above-mentioned project.
4. Attached please find the updated application for once-off suspension of the MES new plant limits and compliance timeframes for Eskom's Grootvlei power station for consideration and decision making. The application also includes an Atmospheric Emission License (AEL) Variation request and the supporting documentation.
5. The application documentation has been subject to a 30 day public review period from 1 to 30 July 2020. The full Public Participation Process (PPP) is detailed under Annexure D to the application. All the comments received through the entire PPP have been recorded in the Issues and Response Report provided as a stand-alone document namely Annexure D-Appendix 12.
6. Included in the application documentation is the complete updated Cumulative AIR (August 2020) inclusive of the 2030 cumulative scenario dispersion modeling attached as Annexure B. The updated Cumulative AIR submitted to the NAQO on 31 July 2020, included a discussion on the 2030 scenario maintaining that to model the predicted ambient concentrations for the 2030 scenario would be difficult. Despite that, NEC has proceeded to model the 2030 scenario and have now included it in the attached complete updated Cumulative AIR dated

August 2020. The 2030 scenario has been modelled based on the projected average monthly emissions of SO<sub>2</sub>, NO<sub>x</sub> and PM for the seven power stations planned to be operational in 2030, i.e. Duvha, Kendal, Lethabo, Majuba, Matla, Tutuka and Kusile. The dispersion modelling scenario results further substantiate the argument made in the July 2020 report.

7. The additional information submitted to the NAQO as part of the application includes one hard copy and one soft copy (flash drive) of the below-listed documents:

#### **ADDITIONAL APPLICATION DOCUMENTATION**

- Cover letter from Naledzi;
  - Updated MES Suspension Application Motivation for Grootvlei power station prepared by Eskom;
  - AEL Variation request for Grootvlei power station prepared by Eskom
  - Annexure A – Grootvlei Power Station Atmospheric Impact Report prepared by Naledzi
  - Annexure B - Complete updated Highveld Cumulative Atmospheric Impact Report prepared by Naledzi (updated in April 2020 and reviewed in August 2020)
  - Annexure C – Eskom’s 2018 Health Impact related cost-benefit analysis including its recent (2020) review prepared by Prime Africa Consultants
  - Annexure D – Consolidated Public Participation (PP) Report prepared by Naledzi
  - Annexure D – Appendix 12: Issues and Response Report prepared by Naledzi and presented as a stand-alone document to the PP Report.
8. We also bring to the department’s attention that this application has been copied to the Gert Sibande District Air Quality Officer, Mr Dan Hlanyane (082 904 0736).

Please provide us with a written acknowledgement of receipt of the additional application information.

Please do not hesitate to contact our office should you require further information.

Sincerely,



Marissa Botha (Pri.Sci.Nat)

Environmental Assessment Practitioner

For **Naledzi Environmental Consultants Pty Ltd**

Physical Address: 160 Marshall Street, Polokwane, 0700

Postal address: Suite #320, Postnet Library Gardens, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988 Fax: 015 296 4021 Cell: 084 226 5584

Email: [botham@naledzi.co.za](mailto:botham@naledzi.co.za)