



REFERENCE: 19/2/5/3/C2/3/WL0037/19

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For attention: Ms I Erasmus

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (BAR) FOR THE PROPOSED UPGRADE OF THE KLAARSTROOM OXIDATION POND WASTEWATER TREATMENT SYSTEM, REMAINDER OF PORTION 32 OF FARM KLAARSTROOM 178, PRINCE ALBERT

Dear Ms Erasmus,

1. The above-mentioned document (the 'Report'), dated 4 June 2019, as received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (the 'Department') on 13 June 2019, refers.
2. The Department has reviewed the documentation and has the following comments:
 - 2.1. The Department understands that the Municipality intends to bury the sludge from the existing pond, on site. The Department is concerned with this disposal method, as the sludge has not been tested and should therefore, according to the precautionary principal as defined in the Environmental Management Programme (EMPr) contained in the Report, be considered as hazardous waste. The Department requests that the sludge be tested and classified accordingly and that other uses or alternative disposal options for the sludge be investigated.
 - 2.2. The report also states that the grit and screenings from the inlet works will be buried on site. As the grit and screenings were in contact with raw sewage, it should also be assumed to be hazardous in nature.
 - 2.3. Kindly note, that according to the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM:WA) "*List of Waste Management Activities that have or are likely to have a detrimental effect on the Environment*" as contained in Government Notice (GN) No. 921 of 29 November 2013, the disposal of general waste to land covering an area of more than 50m² but less than 200m² and with a total capacity not exceeding 25 000 tons is identified as a listed activity and as such, a Waste Management Licence will be required, prior to disposal, should this activity be triggered.

- 2.4. Furthermore, the disposal of any quantity of hazardous waste to land is also identified as a listed activity in GN No. 921, and as such, a Waste Management Licence will be required, prior to the disposal of any quantity of suspected hazardous sludge.
- 2.5. The Municipality is encouraged to consult the NEM:WA "*National Norms and Standards for the Disposal of Waste to Landfill*", as contained in GN No. R. 636 of 23 August 2013 (GN No. R 636), to determine the liner requirements the disposal area will need to meet, for the disposal of waste streams generated by the treatment works.
- 2.6. Furthermore, kindly note, that according to the GN No. R. 636, the disposal of waste with a moisture content of >40%, or that liberates moisture and pressure in landfill conditions, and which has not been stabilised by treatment, will be prohibited from disposal to land from 23 August 2019. Should sludge be disposed of at a suitably registered landfill in future, it will be a requirement that the sludge have a moisture content of less than 40%.
3. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours faithfully,



LANCE MCBAIN-CHARLES
DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING
DATE: 2019/7/8