

# Stakeholder Engagement Report for Secunda Operations

**STAKEHOLDER ENGAGEMENT REPORT IN REGARD TO SASOL SECUNDA OPERATIONS APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004**



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## List of abbreviations

AIR	Atmospheric Impact Report
ARM	Air Resource Management (Pty) Ltd
CRR	Comments and Response Report
EIA	Environmental Impact Assessment
I&AP	Interested and Affected Party
MES	Minimum Emission Standard
NAQO	National Air Quality Officer
NEMAQA	National Environmental Management: Air Quality Act
PPP	Public Participation Process

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## 1. Introduction

### 1.1 Scope of Report

Sasol is a global chemicals and energy company that owns and operates a petrochemical and chemical manufacturing facility in Secunda, Mpumalanga. Sasol's Secunda Operations converts both natural gas and coal into liquid fuels and a range of chemical products. The Secunda Operations has various atmospheric emissions across its operations and undertakes these activities in accordance with an Atmospheric Emissions Licenses (AELs) which authorise these emissions subject to certain emission limits and other associated conditions.

In terms of the National Environmental Management: Air Quality Act, 39 of 2004 as amended (NEMAQA), the Secunda Operations is required to comply with its AELs which incorporates provisions of the Minimum Emission Standards (MES - Government Gazette No. R. 893 of 13 November 2013). Accordingly, the Secunda Operations had to meet the limits specified in the MES for existing plants by 1 April 2015 and for new plants by 1 April 2020. The Secunda Operations had also been granted postponement from meeting the new plant standard for sulphur dioxide (SO<sub>2</sub>) for its boilers at the steam plants, governed in terms of subcategory 1.1 of the MES, until 31 March 2025.

Clause 12A of the MES provides for an existing plant, such as the Secunda Operations, to apply to the NAQO for an emission load limit to be granted in instances where a new plant standard cannot be met for a particular pollutant, such as SO<sub>2</sub>, provided that certain criteria as specified in the MES are met. The motivation report explains the Secunda Operations' motivation for requesting load-based emission limits for SO<sub>2</sub> and how the specified criteria for the application are met.

A public consultation process was conducted as part of the application process. The process followed for this application allowed potential interested and affected parties (I&APs) an opportunity to comment on or raise issues relevant to the intended application. The principles on public participation as explained in NEMA and the EIA regulations guided the process.

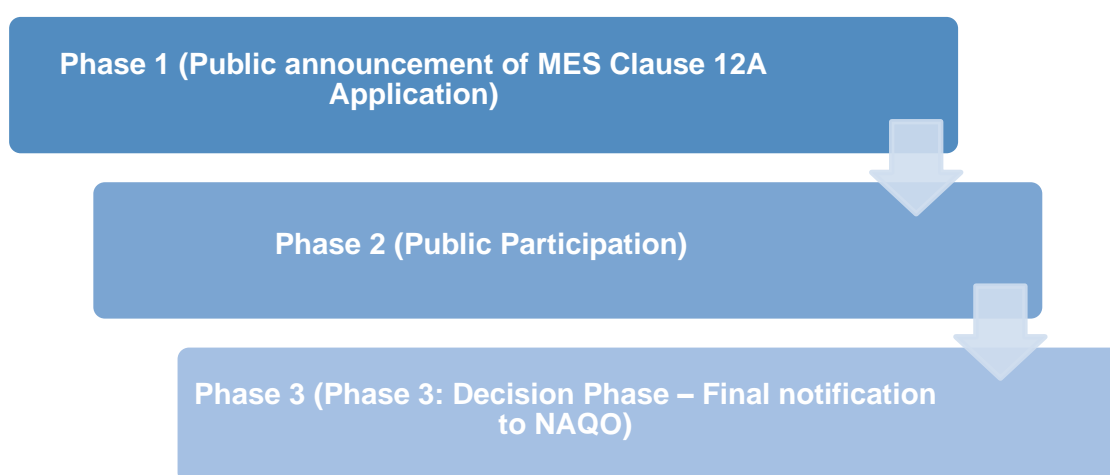
This Stakeholder Engagement Report documents the public participation process followed as part of the Clause 12A application. Additionally, this report also outlines the comments raised during the stakeholder engagement process and includes the associated responses. This report together with the AIR and motivation report, will be submitted to the NAQO in support of the application for consideration.

## 2. Approach to Public Participation

### 2.1 Outline of the Public Participation Process

The process followed for this application allowed potential (and subsequently registered) interested and affected parties (I&APs) an opportunity to participate in the process and comment on and/ or raise issues relevant to the intended application and the documents substantiating the application. For purposes of this application, in conducting the Public Participation Process (PPP), we aimed to engage with the I&APs in a manner that allows them to participate meaningfully. The principles on public participation as explained in NEMA and the EIA regulations guided the approach.

The three phases of our PPP are illustrated in Figure 1.



**Figure 1: Three phases of the PPP**

The PPP approach has been simplified in Figure 2 below and indicates *inter alia* when the public open day was held and when copies of the draft application documents including the draft AIR and draft motivation report were available.

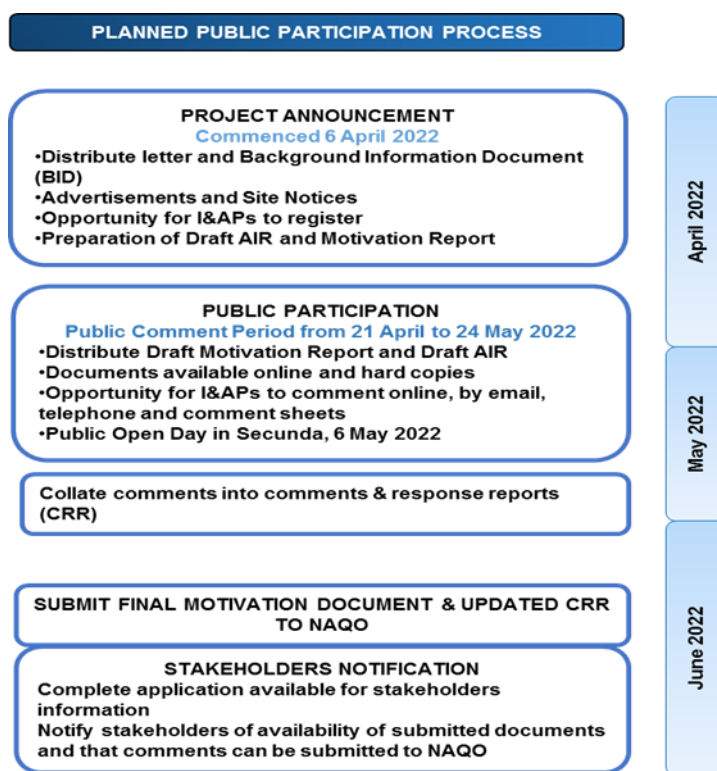


Figure 2: Public Participation Process as part of the Clause 12A application

### 3. I&AP identification, notification & meetings

#### 3.1 I&AP identification

Advertisements were placed in five newspapers including local, regional and online newspapers, as indicated in Table 1, reaching Afrikaans, English and isiZulu speaking audiences which are the predominantly spoken languages in the area of impact. The intent of these advertisements was to invite the broader public to participate and register as I&AP's for the Sasol Clause 12A application. Examples of the advertisements placed are included as Annexure 6.7. In addition to this, to ensure a wider community reach, radio advertisements were released on key national and local radio stations, running daily for the week prior to the engagement. (Table 2)

Table 1: Newspaper outlets, language and publication dates

Newspaper	Type	Language	Publication Date
Ridge Times	Local Newspaper	English and Afrikaans	08/04/2022
Seskhona	Local Newspaper	English and Zulu	19/04/2022
Seskhona	Online Newspaper	Zulu	19/04/2022
Daily Sun	Regional Newspaper	English and Zulu	20/04/2022
Beeld	Regional Newspaper	Afrikaans	20/04/2022

**Table 2: Radio Advertisements**

Radio Station	Region (Local/National)	Language	Date on Air
702	National	English	25,26,28,29 April and 3 May
Khaya FM	National	English	25,26,28,29 April and 3 May
Power FM	National	English	25,26,28,29 April and 3 May
Ikwewezi	National	isiNdebele	28 April to 6 May
Radio Langa	Local	English	25 April to 6 May
Rise FM	Provincial	English	25 April to 6 May

In addition to the advertisements in the newspapers and on the radio, large site notices (size A2) were placed at the following venues:

- 1) Sasol Site offices;
- 2) Secunda Public Library;
- 3) Govan Mbeki Local Municipality;

Examples of the placed site notices are included as Annexure 6.5.

Futhermore, flyers were distributed in the local communities along with the radio advertisements broadcasted on various local and regional radio stations to further raise awareness and encourage participation and registration by fenceline communities. Overall 1000 flyers (Annexure 6.6) were distributed by hand at various locations within eMbalenhle and Leandra, including shopping centres and taxi ranks.

In preparation for the open day copies of the Background Information Document (BID), invitation letter and registration form were placed on the ARM website and at the venues where site notices were placed.

### **3.2 I&AP Notifications**

A total of approximately 722 individuals, organisations and non-governmental organisations who had historically registered on Sasol's stakeholder engagement databases (Sasol postponement applications, Sasol offset implementation plan PPP, SO environmental/health consultation sessions on air quality matters) were informed of the applications process, the public comment period, the availability of documentation and the public meeting via sms and email notification. These stakeholders were first requested to indicate whether they consented to receiving further information on the process and detail on how to register as an interested and affected party (I&AP).

All stakeholders, that registered as I&APs, were sent an invitation letter (included as Annexure 1), a Background Information Document (BID) and a registration form.

Stakeholders were further able to contact ARM directly for assistance in accessing the documentation, registering as an I&AP or to submit comments telephonically or by email. I&APs were able to register throughout the public participation process and the stakeholder database was updated accordingly. Continual reminders were sent to the I&APs by SMS and/or email (Annexure 6.3) The list of registered I&APs is included as Annexure 4.

### **3.3 I&AP public open day meeting**

A public open day was held on the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre in Secunda. At the open day, information on the contents of the draft AIR and draft motivation report was shared with I&APs through various formats, such as a video presentation and a series of posters outlining the application. The venue was divided up into 5 stations consisting of a welcoming section, a video presentation section, a poster section (included as Annexure 11) and a table with hard copies of the documentation substantiating the intended application and which were made available for review and comment. The video presentation and posters were also available on the ARM website (<https://arm-air.co.za/documents/>) after the public open day.

I&APs could provide their comments at the comments table, where assistance was also provided in capturing comments and translating questions and comments. Afrikaans and isiZulu interpreters were available to assist stakeholders. A separate section was set up to address concerns/enquiries regarding employment and commercial contracts matters that were not related to the application.

The video presentation, consisting of 10 minutes of a voiced over slide show, aimed to inform the community of the background of the application, what the application entails and what is being requested. It was played on repeat throughout the open day to ensure that whatever time a community member arrived they were able to watch the entire video.

In addition to the Sasol staff and project team members, 27 stakeholders representing individual community members, community representatives, local businesses and non-governmental organizations attended the public meeting. The redacted attendance register (redacted in accordance with the provisions of POPIA) is included in Annexure 5. Photos of the open day are included in Annexure 10 of this report.

## **4. Public comments**

During the public consultation period (from 21 April to 24 May 2022), the draft AIR and draft motivation report was available on the ARM website (<https://arm-air.co.za/documents/>). Hardcopies were also available at the Govan Mbeki Local Municipality, the Secunda Public Library and at the Sasol site offices. During the public participation period I&APs were provided an opportunity to review and comment on the draft AIR and the draft motivation report by email, electronically via Jotform ([https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)) or telephonically. I&APs were able to submit their comments directly in writing at the open day. Stakeholders were further able to contact ARM directly for assistance in accessing the documentation, registering as an I&AP or to submit comments.



#### **4.1. Public comments on the draft atmospheric impact report and draft motivation report**

The key comments raised by stakeholders are summarised below:

- Legal basis for the Clause 12A application - Just Share NPC expressed the view that the application is tantamount to an exemption and is unlawful, as 1 April 2025 is the latest date for compliance with the MES. Just Share NPC further expressed the view that Sasol has not fulfilled the requirements for a Clause 12A application.
- Environmental and health concerns - stakeholders were concerned about the health impacts of emissions on especially children and persons without medical aid.
- Information sharing on environmental matters - stakeholders expressed a need to be informed of air quality related matters and be informed of events (for example changes in process conditions or venting) that may impact on the emissions from the facility. Sasol explained that a bi-annual consultation engagement takes place on certain aspects regarding its performance as required in terms of its AEL. Advertisements for these sessions are sent to I&APs and also published in local newspapers.
- Offsetting projects - stakeholders expressed their interest in and support for the Sasol offsetting project. Stakeholders further expressed the need to involve local businesses and female owned businesses in offsetting projects.

#### **4.2. Comments Received from I&AP's**

Table 3 provides a summary of all the comments (Annexure 6.12) that were received from I&AP's on the Clause 12A application. Responses to all the comments received were provided by Sasol, ARM and Airshed Planning Professionals.

**Table 3: Summary of I&AP Comments and associated Responses**

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
1	Mr	Sarel	Sebolela	Private	21/04/22	Email	<p>I am interested for you. I want to make business for transport. Transport goods of of the people. When I can get long base or half truck. My phone 0716463548 or for my wife 0722856523.</p> <p>I hope my applications will be highly considered.</p> <p>Yours faith fully Sarel Sabolela</p>	<p>An email written response by ARM was provided back on (10/05/2022) to the stakeholder as per text below:</p> <p>“Dear Stakeholder,</p> <p>Thank you for your comments. Unfortunately, your comment is unrelated to the Sasol Secunda Operations Clause 12A application. We request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolshareservices@sasol.com">contact.sasolshareservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration.</p> <p>Please let us know if you any comments or queries related to the Sasol Secunda Operations Clause 12A application.“</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
2.	Mr	Richard	Durant	Private	21/04/22	Email	<p>Dear Anesu Shamu,                      The sulphur emissions could be reduced by pyrolysis of the coal. Please see item 'Disco smokeless fuel process'. The gas produced by coal carbonisation at 537 degrees Celsius (1000 degrees Fahrenheit). could be desulphurised before use as fuel for the process. The char could then be fed to the boilers, without cooling. This Disco product would have higher ash and lower sulphur than the coal feed. Valuable byproducts could be obtained.</p> <p>Regards, Richard Durrant</p>	<p>An email written response by ARM was provided back on (23/06/2022) to the stakeholder as per text below:</p> <p>"Dear Stakeholder,</p> <p>Thank you for your comments. Unfortunately your comment is unrelated to the Sasol Secunda Operations Clause 12A application. We request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolshareservices@sasol.com">contact.sasolshareservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration."</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
3	Ms	Robyn	Hugo	Just Share	26/04/22	Email	<p>Dear Anesu In order to support meaningful participation in and understanding of this process, please could you make the following available to I&amp;APs asap:</p> <ul style="list-style-type: none"> <li>· the latest version of the Secunda AEL; and</li> <li>· at least the 2 most recent emission reports, referred to in paragraphs 17 and 18 of the List of Activities.</li> </ul> <p>Looking forward to your response. Thanks and regards</p>	<p>An email written response by ARM was provided back on (28/04/2022) to the stakeholder as per text below:</p> <p>“Dear Robyn Hugo, thank you for the enquiry.</p> <p>As confirmed the current SO AEL in redacted form is available on the Sasol website and has also been made available on the Air Resource Management (ARM) website with the suite of documents applicable to the current Clause 12A application. You can access these documents on <a href="https://arm-air.co.za/documents/">https://arm-air.co.za/documents/</a></p> <p>Further, please note that emissions data applicable to the boiler plant at Secunda Operations as is necessary for this Clause 12A application is contained in the Atmospheric Impact Report (AIR) that has been compiled by Airshed Planning Professionals (Airshed), an independent, third party service provider. Should any clarification be required in terms of the emissions data contained in the AIR or any of the related content, please contact ARM in this regard who will facilitate the necessary responses thereto. Alternatively, an ‘Open Day’ has been scheduled on the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Walter Sisulu Road, Secunda where information on the Atmospheric Impact Report and Draft Motivation report will be discussed. Airshed as well as Sasol’s air quality specialists will be present on the day to assist.”</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
4	Mr	Mbulawa	Mahlangu	Slongwane Manufacturing and Projects (PTY) LTD	26/04//22	Jotform	<p>Good day Sasol Secunda</p> <p>Slongwane Manufacturing and Projects is a small business that provides gas cylinders to the community at large.</p> <p>Our business has struggle our the past few years as the gas stoves and heaters installed in our area seemed to benefit other companies but not local embalenhle businesses which are supposed to empower township economy and reduce youth unemployment rates in our community.</p> <p>How can Sasol help us fight reduce the rate of unemployment and empower township economy.</p> <p>I would like to request a response back regarding the scope of work done by Sasol in the Govan Mbeki municipality of installing gas stove and heaters.</p> <p>Please send me a feedback via email.</p>	<p>An email written response by ARM was provided back on(10/05/2022) to the stakeholder as per text below:</p> <p>“Dear Stakeholder,</p> <p>Thank you for your comments. Unfortunately, your comment is unrelated to the Sasol Secunda Operations Clause 12A application. We request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolsharedservices@sasol.com">contact.sasolsharedservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration.</p> <p>Please let us know if you any comments or queries related to the Sasol Secunda Operations Clause 12A application.”</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
5	Mr	Fana	Sibanyoni	MS Environmental Projects	28/04/22	Email	<p>This postponement application by Sasol is giving enough tangible proof that there is a challenge of Sulphur Dioxide emission which have negative impact to the fence-line communities. But the existing challenge is that very few inhabitants of Embalenhle are benefiting from the riches of Sasol as it been reported previous by Sasol that not everyone will be employed or get CSI projects (Offset projects) from Sasol. We believe that to have a fair benefit to all, Sasol is requested to consider establishing a shareholding scheme that will cater those fence-line community who are left out via this proposed Community Shareholding Scheme. We hope ARM can assist in facilitating this proposal and looking forward to hearing from you.</p>	<p>Sulphur dioxide (SO<sub>2</sub>) has been identified in legislation as a criteria pollutant due to its possible effects on human health. As such it is regulated by the national ambient air quality standards (NAAQS) that specifies the limits below which the impact on human health is deemed tolerable. The concentration of SO<sub>2</sub> in SO's local airshed complies with the limits set out in the NAAQS</p> <p>The remainder of the question is strictly speaking not relevant to the application nor for ARM to address within its scope relevant to the application at hand, but we can confirm that Sasol currently delivers community development through its corporate social investment (CSI) initiatives.</p> <p>The offsetting projects that may be alluded to in the comment, are executed above and beyond Sasol's ongoing CSI initiatives.</p> <p>The request regarding shareholding schemes is also unrelated to this application. However, Sasol's Company Secretariat can be approached for more detail and for purposes of communicating the request. The contact details are <a href="mailto:Helaine.joubert@sasol.com">Helaine.joubert@sasol.com</a></p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
6	Mr	Khehla	Mahlangu	MS Environmental Projects	28/04/22	Jotform	<p>This postponement application by Sasol is giving enough tangible proof that there is a challenge of Sulphur Dioxide emission which have negative impact to the fence-line communities. But the existing challenge is that very few inhabitants of Embalenhle are benefiting from the riches of Sasol as it been reported previous by Sasol that not everyone will be employed or get CSI projects (Offset projects) from Sasol. We believe that to have a fair benefit to all, Sasol is requested to consider establishing a shareholding scheme that will cater those fence-line community who are left out via this proposed Community Shareholding Scheme. We hope ARM can assist in facilitating this proposal and looking forward to hearing from you.</p>	<p>Sulphur dioxide (SO<sub>2</sub>) has been identified in legislation as a criteria pollutant due to its possible effects on human health. As such it is regulated by the national ambient air quality standards (NAAQS) that specifies the limits below which the impact on human health is deemed tolerable. The concentration of SO<sub>2</sub> in the local airshed complies with the limits set out in the NAAQS</p> <p>The remainder of the question is strictly speaking not relevant to the application nor for ARM to address within its scope relevant to the application at hand, but we can confirm that Sasol currently delivers community development through its corporate social investment (CSI) initiatives.</p> <p>The offsetting projects that may be alluded to in the comment, are executed above and beyond Sasol's ongoing CSI initiatives.</p> <p>The request regarding shareholding schemes is also unrelated to this application. However, Sasol's Company Secretariat can be approached for more detail and for purposes of communicating the request. The contact details are Helaine.joubert@sasol.com</p>



No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
7	Ms	Penny	Ngwekazi	Tigress	01/05/22	Email	<p>Good day</p> <p>I am Penny Ngwekazi who is a local resident from a black owned woman company by the name of Tigress, and would like to comment as per the invitation.</p> <p>It has come to my attention that the local black women owned business are never given an opportunity to take part in the offset project. Despite numerous attempts in trying to bid for this project, it is almost impossible to get a breakthrough for women in this project.</p> <p>In addition, we have taken note that only male owned business have been given the preference to the offset projects and females have been often time over looked.</p> <p>We, would like for this opportunity to also be given to women in order to bring balance to the gender equity.</p> <p>I trust you will find the above mentioned matter in order.</p> <p>Regards Penny 082 676 6934</p>	<p>An email written response by ARM was provided back on (13/05/2022) to the stakeholder as per text below:</p> <p>“Dear Stakeholder,</p> <p>Thank you for your comments. Unfortunately your comment is unrelated to the Sasol Secunda Operations Clause 12A application. We request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolsharedservices@sasol.com">contact.sasolsharedservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration.”</p> <p>Please let us know if you any comments or queries related to the Sasol Secunda Operations Clause 12A application.”</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
8	Mrs	Duduzile	Mazabane	Lintle for the youth	05/05/22	Jotform	I am interested to learn how Sasol and the commission are planning to speed up the process of bringing down gas emissions in our area and how they are going to involve the community in such projects.	<p>Sasol remains committed to ambient air quality improvement through compliance and its efforts and achievements to date enabled Sasol to meet the prescribed minimum emissions standards (MES) for 98% of its emissions sources. Sasol is on track with its air quality compliance roadmaps to achieve this milestone for all point sources, except boiler SO<sub>2</sub> emissions at its Secunda steam plant. They are progressing their ongoing emission reduction efforts which includes assessing alternative pathways linked to Sasol's GHG emission reduction program i.e. an integrated air quality and GHG solution. The integrated air quality and GHG solution will not only reduce SO<sub>2</sub> emissions but will also have a favourable impact on GHG, other pollutants such as NO<sub>x</sub> and PMs as well as Sasol's overall environmental footprint.</p> <p>In addition to their onsite investments, Sasol has invested significantly in air quality offset programmes resulting in the avoidance of emissions of more than 207 tons of PM<sub>10</sub>, 194 tons of PM<sub>2.5</sub> and 80 tons of SO<sub>2</sub> in the surrounding community/airshed from non-industrial sources.</p> <p>In instances where public participation was required, stakeholder engagement, including engagement with communities, were undertaken in accordance with the relevant legal provisions. This provided an opportunity for the community to participate in the process and provide comments. This is similar to the approach followed in this instance.</p> <p>Communities are further engaged in the related offsetting programmes, including the education and awareness campaigns.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								Should offsetting also be required as a requirement of a decision on this intended application, we anticipate that communities will be similarly involved.

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
9	Ms	Lerato	Mokoena	Little for the youth	05/05/22	Email	<p>Sulphur dioxide affects has affect the many Secunda area,and brought many health issues such as the respiratory system, particularly lung function, including irritation of the eyes in young children.</p> <p>Sulphur dioxide in Sasol plants has seen not Sasol employees developing causes of coughing, mucus secretion and aggravates conditions such as asthma and chronic bronchitis.</p> <p>We as the NPO YOUTH, recently attended the Youth Environment at Climate Change, where we have developed programs as well as projects that can create jobs for these youths. Issues can be tackle through easy access of information,where such projects can be heard and assistant can be given on funding.</p> <p>Regards</p> <p>Lerato Mokoena</p>	<p>Sulphur dioxide (SO<sub>2</sub>) has been identified in legislations as a criteria pollutant due to its possible effects on human health. As such it is regulated by the national ambient air quality standards (NAAQS) that specifies the limits below which the impact on human health is deemed tolerable. The concentration of SO<sub>2</sub> in the local airshed complies with the limits set out in the NAAQS.</p> <p>The AIR was prepared by Airshed Planning Professionals an independent consultant and professionally registered organisation. Results from the AIR shows that an overall improvement in the ambient air quality will realize as a result of the interventions proposed in this application.</p>
10	Mr	Simon	Van Renssen	Sasol	06/05/22	Open Day Comments & Responses Form	Informative, specifically on reduction on all priority pollutants. Support process	Thank you for attending the Open Day.

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
11	Ms	Duduzile	Mazibane	Lintle for the Youth	06/05/22	Open Day Comments & Responses Form	<p>Information to the community does not reach everyone. I have been a secunda resident for 8 years this is the first time this year hearing that Sasol has been addressing the Air quality issue. I am a woman who likes to be empowered and would like to take information down to other ladies I normally engage with. We would like to see more education functions being held for the youth because I believe education is power. I would like to see more Go Green projects from Sasol in the locations.</p> <p>We would like to see Sasol utilising our NPOs to send information across all spheres</p> <p>Create easy access to information for everyone</p>	<p>Thank you for attending the Open Day. The Sasol Secunda Operation (SO) Atmospheric Emission License (AEL) requires SO to conduct a bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fenceline communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards compliance with the Minimum Emission Standards; and Performance of point source emissions in relation to applicable AELs.</p> <p>The first meeting of 2022 took place in January and the second meeting took place on 21 and 22 June 2022. Invitations to this event were distributed via local newspapers and radio stations. Email invitations were also sent to registered interested and affected parties. The sessions on 21 and 22 June 2022 were held in eMbalenhle, Secunda and Leandra.</p> <p>Through the Secunda Operations' various requisite public participation processes, other stakeholder engagements, school education programs and the required bi-annual consultation sessions on Air Quality, Sasol has aimed to inform the community of Sasol's air quality compliance roadmaps.</p> <p>As part of the Secunda offsetting project, an environmental air quality education and awareness programme conducted with 7 700 households and 26 000 learners through door-to-door and primary school campaigns was held. Sasol remains committed to implementing the second phase of our offsetting implementation plan. In Secunda this includes an environmental air quality education and awareness programme to be conducted with 7 600 households in eMbalenhle and Lebohang</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								communities through a door-to-door campaign. 27 060 learners from twenty-six primary schools in Govan Mbeki Municipality and 10 834 learners from nine secondary schools will participate in the air quality education and awareness campaign. The scope has been expanded to include education and awareness campaigns on veld fire management and prevention and communities will be informed about best practices on separation, sorting and recycling of waste as opposed to burning, with recyclable waste collected and taken to a buy back centre by households
12	Ms	Zwelibanzi	Mahlangu	Cogta	06/05/22	Open Day Comments & Responses Form	You must inform communicate about this and you must inform CDWs (community development worker to assist in terms of mobilizing community. This is good initiative for us. And CDWs can make it easier to invite community	Thank you for attending the Open Day. The Sasol Secunda Operation (SO) Atmospheric Emission License (AEL) requires SO to conduct a bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fenceline communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards compliance with the Minimum Emission Standards; and Performance of point source emissions in relation to applicable AELs. The first meeting of 2022 took place in January and the second meeting took place on 21 and 22 June 2022. Invitations to this event were distributed via local newspapers and radio stations. Email invitations were also sent to registered interested and affected parties. The sessions on 21 and 22 June 2022 were held in eMbalenhle, Secunda and Leandra.

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
13	Mr	Lazarus	Kutumela	Private	06/05/22	Open Day Comments & Responses Form	<p>Consultation only done in Secunda is limiting to other residents in different areas particularly those in Emba. Not reasonable to assume residents in Emba can easily come to Secunda. Postponement of the Clause 12A application means there is still an impact before standards are met. How will people be compensated over this period especially the people who suffer from health impacts of the pollution in the area (as the writer does now)</p> <p>As much as air quality modelling is done, the health impact studies are not planned and not reflected in distributed documentation. Can the community be able to have someone who can peer review the modelling study</p> <p>There have been people that come through to the community who do a study times when applications are being done by Sasol. What are the credentials of the people coming into the community doing these studies? (Umowayetu)</p> <p>If one has concerns about the health issues related to the air pollution, who does one contact in Sasol to ask for engagement about these issues?</p>	<p>We wish to record that the open day was but one of the means of engagement provided for during the public participation process on this pending application.</p> <p>The chosen venue, in our view, was a central location and in close vicinity to the Govan Mbeki Municipality, the main taxi rank and the Secunda Mall. It was chosen as a central location which can be reached by all the communities including eMbalenhle and Lebohang. Sasol prioritised the safety and security of all interested and affected parties (I&amp;APs), participants, visitors and Sasol employees. Selecting such a central venue enables more effective security measures to be put in place including arrangements with the SAPS. The information provided at the Open day, including the video presentation and posters, was made available on the ARM website (<a href="https://arm-air.co.za/documents/">https://arm-air.co.za/documents/</a>). Stakeholders were able to submit comments electronically and telephonically. Sasol conducts its activities in accordance with applicable AELs that govern Sasol's emissions, at point source. Emissions below or at these regulated limit levels are therefore lawful and are what Sasol is required to comply with in terms of the National Environmental Management: Air Quality Act (NEMAQA). Sasol remains committed to ambient air quality improvement through compliance and our efforts and achievements to date enabled Sasol to meet the prescribed minimum emissions standards (MES) for 98% of Sasol's emissions sources. Sasol is on track with its air quality compliance roadmaps to achieve this milestone for all point sources, except boiler SO<sub>2</sub> emissions at the Secunda steam plant</p> <p>The provisions of the NEMAQA, the National Ambient Air Quality Standards (NAAQS), establish the ambient concentration levels for tolerable or permissible human health risk. The AIR was</p>



No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								<p>prepared by Airshed Planning Professionals an independent consultant and professionally registered organisation. Results from the AIR shows that an overall improvement in the ambient air quality is anticipated as a result of the interventions proposed in this application. The integrated air quality and greenhouse gas solution is expected to not only reduce SO<sub>2</sub> emissions but to also have a favourable impact on GHG, other pollutants such as NO<sub>x</sub> and PMs as well as our overall environmental footprint (reduction).</p> <p>The Sasol Secunda Operation (SO) Atmospheric Emission License (AEL) requires SO to conduct a bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fenceline communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards compliance with the Minimum Emission Standards; and performance of point source emissions in relation to applicable AELs. The first meeting of 2022 took place in January and the second meeting took place on 21 and 22 June 2022. Invitations to these events were distributed via local newspapers and radio stations. Email invitations were also sent to registered I&amp;APs.</p> <p>The sessions on 21 and 22 June 2022 were held in eMbalenhle, Secunda and Leandra.</p> <p>The contact details for lodging of environmental complaints are:                      Cell phone: 082 902 1989                      E mail: <a href="mailto:environmentstandby.secunda@sasol.com">environmentstandby.secunda@sasol.com</a></p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
14	Mr	Segole	Thotse	Private	06/05/22	Open Day Comments & Responses Form	<p>The public consultation should be extended through out all regions in Govan Mbeki.</p> <p>Take the service to the people and they will tell all their problems occurred or caused by the air pollution. Firstly Sasol,government and other cooperate companies should be held accountable because currently Sasol itself is not doing anything to the community because many people staying around Govan Mbeki are suffering from chest problems and eyes problems caused by air pollution.</p> <p>Secondly the municipal sewerage plants are producing a lot of air pollution because of the bad smelling from the sewerage plant and that too contributes in a number of people who a sick with chest problems,sinus,etc.</p> <p>Thirdly the co-operate companies like welding companies producing companies, as well as a lot of dust caused by Evander Harmony gold mine,so all those should be held accountable and be told to comply with the environmental air quality nationally</p>	<p>The chosen venue was a central location to the Govan Mbeki Municipality. The information provided at the Open day, including the video presentation and posters, was made available on the ARM website (<a href="https://arm-air.co.za/documents/">https://arm-air.co.za/documents/</a>). Stakeholders were able to submit comments electronically and telephonically. Sasol Secunda Operation (SO) conducts bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fenceline communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards adherence to the Minimum Emission Standards; and performance of point source emissions in relation to applicable AELs. At these meetings, participants are able to raise their concerns regarding air quality.</p> <p>The first meeting of 2022 took place in January and the second meeting took place on 21 and 22 June 2022. Invitations to this event were distributed via local newspapers and radio stations. Email invitations were also sent to registered interested and affected parties.</p> <p>The sessions on 21 and 22 June 2022 included sessions held in eMbalenhle, Secunda and Leandra.</p> <p>Sasol remains committed to ambient air quality improvement through compliance and our efforts and achievements to date enabled Sasol to meet the prescribed minimum emissions standards (MES) for 98% of our emissions sources. Sasol is on track with the air quality compliance roadmaps to achieve this milestone for all point sources, except boiler SO<sub>2</sub> emissions at the Secunda steam plant..</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								<p>The integrated air quality and GHG solution will not only reduce SO<sub>2</sub> emissions but will also have a favourable impact on GHG, other pollutants such as NO<sub>x</sub> and PMs as well as our overall environmental footprint. The AIR was prepared by Airshed Planning Professionals an independent consultant and professionally registered organisation. Results from the AIR shows that an overall improvement in the ambient air quality will realize as a result of the interventions proposed in this application.</p> <p>In addition to our on site investments, Sasol has invested significantly in air quality offset programmes resulting in the avoidance of emissions of more than 207 tons of PM<sub>10</sub>, 194 tons of PM<sub>2.5</sub> and 80 tons of SO<sub>2</sub> in the surrounding community/airshed from non-industrial sources.</p> <p>Various sources contribute to ambient air quality including industrial emission sources, mining emissions and household emissions. The impact of all these sources is reflected in the measured ambient pollutant concentrations which can be compared to the National Ambient Air Quality standards (NAAQS), which establish the ambient concentration levels for tolerable or permissible human health risk. It should be noted the levels of SO<sub>2</sub> within our local airshed is within the NAAQS (limits).</p> <p>Sasol recognises that it has a heightened obligation to respect and care for the environment, our employees the communities within which we operate. This is reflected in Sasol's SHE Policy.. To this end, Sasol remains committed to complying with all applicable laws and obligations arising from our licence conditions. We are implementing roadmaps to meet the Minimum Emission Standards for new</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								plants as legally required and Sasol is on track to achieve this by 1 April 2025 in accordance with the provisions of its AEL, save for boiler SO <sub>2</sub> compliance which is the subject of this application..

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
15	Mr	Samuel	Ndlozi	Embalenhle resident	06/05/22	Open Day Comments & Responses Form	Health issue resulting from this project and impact on children. For example we are comparing people working for Sasol having medical aid vs people not working for Sasol and being affected what is going to happen to them	The ambient impact of the application was assessed, in accordance with applicable legal provisions, in the Atmospheric Impact Report (AIR) and shows that an overall improvement in the ambient air quality is anticipated as a result of the interventions proposed in this application. The integrated air quality and greenhouse gas reduction roadmap is expected to not only reduce SO <sub>2</sub> emissions but to also yield a favourable impact on reducing GHGs, other pollutants such as NO <sub>x</sub> and PMs as well as our overall environmental footprint.
16	Mr	Khehla	Mahlangu	MS Environmental Projects	06/05/22	Open Day Comments & Responses Form	<p>Involvement of the community in transformation that is doing by company. We understand that sulphur dioxide causes the problem for the community.</p> <p>Come with the project that will assist community and creates job especially for fence line community</p>	<p>Through the Secunda Operations' various requisite public participation processes, other stakeholder engagements, school education programs and the required bi-annual consultation sessions on Air Quality, Sasol has aimed to inform the community of Sasol's air quality compliance roadmaps.</p> <p>Please refer to Comment 2 for information on how to contact Sasol Enterprise and Supplier Development.</p> <p>Sulphur dioxide (SO<sub>2</sub>) has been identified in legislation as a criteria pollutant due to its possible effects on human health. As such it is regulated by the national ambient air quality standards (NAAQS) that specifies the limits below which the impact on human health is deemed tolerable. The concentration of SO<sub>2</sub> in our local airshed complies with the limits set out in the NAAQS.</p> <p>In addition, Sasol has progressed the implementation of its air quality offsetting programme which focused on a reduction of PM and SO<sub>2</sub> pollution in the communities (from non industrial sources) which included specific activities such as:</p> <ul style="list-style-type: none"> <li>insulation of 5 532 Reconstruction and Development Programme (RDP) houses and replacing coal stoves with liquified petroleum gas stoves and heaters;</li> </ul>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								<ul style="list-style-type: none"> <li>• an environmental air quality education and awareness programme conducted with 7 700 households and 26 000 learners through door-to-door and primary school campaigns;</li> <li>• cutting of grass and preparation of fire breaks for veld fire management; and</li> <li>• informing communities through education and awareness of best practices on separation, sorting and recycling of waste as opposed to burning with recyclable waste collected and taken to a buy back centre by households.</li> </ul> <p>This air quality offsetting project was the largest investment project of its kind to date and addresses the challenge of domestic fuel burning. Job opportunities were created and some local small medium and micro enterprises were empowered through the offsetting implementation programme.</p>
17	Mrs	Mamohau	Maleka	Private	06/05/22	Open Day Comments & Responses Form	In support of the propose plan. Promising indeed	Thank you for attending the Open Day and expressing your support of Sasol's application.

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
18	Mr	Sunboy	Mthimunye	Embalenhle resident	06/05/22	Open Day Comments & Responses Form	<p>Sasol needs to engage with the community partnering environmental issues.</p> <p>Proper communication platform should be exercised.</p> <p>Let people decide for themselves as they are the ones facing challenges each day.</p> <p>People within the community should be taken for training so that they will be the ones to explain and engage with the community.</p> <p>Please bring this to the people right inside the location so that everyone will be involved from the community because no one could afford to take a taxi Secunda Lillian Ngoyi</p>	<p>Thank you for attending the Open Day.</p> <p>The Sasol Secunda Operation (SO) Atmospheric Emission License (AEL) requires SO to conduct a bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fence line communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards adherence to the Minimum Emission Standards; and Performance of point source emissions in relation to applicable AELs.</p> <p>The first meeting of 2022 took place in January and the second meeting has taken place on 21 and 22 June 2022. Invitations to this event were distributed via local newspapers and radio stations. Email invitations were also sent to registered interested and affected parties.</p> <p>The sessions on 21 and 22 June 2022 were held in eMbalenhle, Secunda and Leandra.</p> <p>Through the Secunda Operations' various requisite public participation processes, other stakeholder engagements, school education programs and the required bi-annual consultation sessions on Air Quality, Sasol has aimed to inform the community of Sasol's air quality compliance roadmaps.</p> <p>As part of the Secunda offsetting project, an environmental air quality education and awareness programme conducted with 7 700 households and 26 000 learners through door-to-door and primary school campaigns was held. Sasol remains committed to implementing the second phase of our offsetting implementation plan. In Secunda this includes an environmental air quality education and awareness programme to be conducted with 7 600</p>



No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								households in eMbalenhle and Lebohang communities through a door-to-door campaign. 27 060 learners from twenty-six primary schools in Govan Mbeki Municipality and 10 834 learners from nine secondary schools will participate in the air quality education and awareness campaign. The scope has been expanded to include education and awareness campaigns on veld fire management and prevention and communities will be informed about best practices on separation, sorting and recycling of waste as opposed to burning, with recyclable waste collected and taken to a buy back centre by households

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
19	Mr	Fana	Sibanyoni	MS Environmental Projects	06/05/22	Open Day Comments & Responses Form	<p>By Sasol trying to come up with this load based SO<sub>2</sub> emission limits. This can play a crucial role in cleaning our ambient air quality and less negative impact to our community in terms of health issues. But there is a new challenge of employment problem that will add to the current huge unemployment challenge. We proposed that Sasol consider linking this new load-based emission limits project with the community in order to ensure that employees are re-skilled. The current student education is aligned to the new proposed production that will limit the SO<sub>2</sub> in our ambient air quality/atmosphere. And save, retain jobs. Our other proposal is to start having a program that will make the community to share from the financial success of Sasol through introduction of a community shareholding scheme as not everyone will get a job at Sasol or benefit through the offset project with regard to the offset projects, will propose that Sasol start to be more transparent and involve all small businesses especially of the affected communities. This includes women start-up companies. We hope all our comments will be considered and proper feedback will be given to us.</p>	<p>The load based approach is anticipated to result in reduced SO<sub>2</sub> emissions and also have a favourable impact on the reduction of GHG, other pollutants such as NO<sub>x</sub> and PMs as well as our overall environmental footprint.</p> <p>It is recognised that the high unemployment rate is a national issue of significant concern. Sasol endeavours, through various means, to contribute to the growth of the economy including through the creation of job opportunities and the utilisation of local content.</p> <p>With regards to small business involvement we request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolsharedservices@sasol.com">contact.sasolsharedservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration.</p> <p>The request regarding shareholding schemes is also unrelated to this application. However, Sasol's Company Secretariat can be approached for more detail and for purposes of communicating the request. The contact details are <a href="mailto:Helaine.joubert@sasol.com">Helaine.joubert@sasol.com</a></p>

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20	Mr	Stanley	Houane	Embalenhle resident	06/05/22	Open Day Comments & Responses Form	<p>It was a very informative event where the needs of the people in terms of air quality are put first. From what I have heard, the mission of the project is to greatly reduce the amount of SO<sub>2</sub> in the Gert Sibande atmosphere.</p> <p>I thought a process like greenhouse gas capture would have been good enough but apparently it works for those gases alone and not sulphur dioxide.</p> <p>It does not help that the world is also researching that technology so competition is very much tough. The method of decreasing the amount of coal in your steam plant whilst keeping the same product in amount is a very great idea.</p> <p>Production is not decreased whilst further improving the quality of air in the surrounding area</p>	Thank you for attending the Open Day and participating in the process. Your comments and inputs are noted and appreciated.

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
21	Mr	Mphikele	Kwebu	Embalenhle resident	06/05/22	Open Day Comments & Responses Form	<ul style="list-style-type: none"> <li>• How is the project going to affect the health of the people? When they vent the gas they must let the people know before hand and say how long they must stay inside(e.g. 2 days)</li> <li>• The town is filthy and too much rubbish that needs to be attended to and it creates a health issue</li> <li>• Sasol should create jobs for those in Emba</li> <li>• Suggestion to do the open day at the Embalenhle Sasol Club as people do not have money to come(transport is expensive)</li> </ul>	<p>The load based approach is anticipated to result in reduced SO<sub>2</sub> emissions and alsoto have a favourable impact on reductions in GHG, other pollutants such as NO<sub>x</sub> and PMs as well as our overall environmental footprint.</p> <p>Your concern regarding the removal of refuse is noted.</p> <p>Sasol currently delivers community development through corporate social investment (CSI). The offsetting projects are executed above and beyond the ongoing CSI initiatives and provides further opportunity for the development of local small and medium enterprises.</p> <p>We wish to record that the open day was but one of the means of engagement provided for during the public participation process on this pending application. The information provided at the Open day, including the video presentation and posters, was made available on the ARM website (<a href="https://arm-air.co.za/documents/">https://arm-air.co.za/documents/</a>). Stakeholders were able to submit comments electronically and telephonically. The chosen venue was a central location and in close vicinity to the Govan Mbeki Municipality, the main taxi rank and the Secunda Mall. It was chosen as a central location which can be reached by all the communities including eMbalenhle and Lebohang. Sasol prioritised the safety and security of all I&amp;APs, participants, visitors and Sasol employees. Selecting such a central venue enables more effective security measures to be put in place including arrangements with the SAPS.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
22	Mr	Ephraim	Moldi	Private	06/05/22	Open Day Comments & Responses Form	I request that Sasol continue with the project of Air Quality offset at eMbalenhle so that they can take away the coal stoves and give people the gas stoves. This will help communities to burn less or no coal	Sasol remains committed to implementing the second phase of our offsetting implementation plan. In Secunda this includes an environmental air quality education and awareness programme to be conducted with 7 600 households in eMbalenhle and Lebohang communities through a door-to-door campaign. 27 060 learners from twenty-six primary schools in Govan Mbeki Municipality and 10 834 learners from nine secondary schools will participate in the air quality education and awareness campaign. The scope has been expanded to include education and awareness campaigns on veld fire management and prevention and communities will be informed about best practices on separation, sorting and recycling of waste as opposed to burning, with recyclable waste collected and taken to a buy back centre by households

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23	Ms	Lerato	Moepi	Little For Youth	06/05/22	Open Day Comments & Responses Form	<ul style="list-style-type: none"> <li>• Less community communication to address such issues</li> <li>• Less access opportunities for NPOS and youth developers to propose projects that can assist in collaborations with Sasol</li> <li>• Awareness was not sufficient enough to reach specific target</li> <li>• More progress needed to create youth employment and innovations among the community</li> <li>• Again there is no education awareness for families or employees of Sasol about the side effects that can arise from relatives working within these stations or plants</li> <li>• Where goals are set not all members within the community have access to media or social communication</li> <li>• More community outreach awareness should be directed to a committee that will be able to address these issues become links for the community and Sasol</li> <li>• As the community has already endure these healthy problems, more healthy awareness should be made</li> </ul>	<p>Thank you for attending the Open Day. We wish to record that the open day was but one of the means of engagement provided for during the public participation process on this pending application. The information provided at the Open day, including the video presentation and posters, was made available on the ARM website (<a href="https://arm-air.co.za/documents/">https://arm-air.co.za/documents/</a>). Stakeholders were able to submit comments electronically and telephonically.</p> <p>The Sasol Secunda Operation (SO) Atmospheric Emission License (AEL) requires SO to conduct a bi-annual "consultation engagement" on certain aspects regarding its performance under the AEL including the ambient air quality status in SO's fenceline communities as per data from Sasol's ambient air quality monitoring stations, SO's progression of its air quality improvement roadmap towards compliance with the Minimum Emission Standards; and Performance of point source emissions in relation to applicable AELs.</p> <p>The first meeting of 2022 took place in January and the second meeting took place on 21 and 22 June 2022. Invitations to this event were distributed via local newspapers and radio stations. Email invitations were also sent to registered interested and affected parties. The sessions on 21 and 22 June 2022 were held in eMbalenhle, Secunda and Leandra.</p> <p>Through the Secunda Operations' various requisite public participation processes, other stakeholder engagements, school education programs and the required bi-annual consultation sessions on Air</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
								<p>Quality, Sasol has aimed to inform the community of Sasol's air quality compliance roadmaps.</p> <p>Sasol remains committed to implementing the second phase of our offsetting implementation plan. In Secunda this includes an environmental air quality education and awareness programme to be conducted with 7 600 households in eMbalenhle and Lebohang communities through a door-to-door campaign. 27 060 learners from twenty-six primary schools in Govan Mbeki Municipality and 10 834 learners from nine secondary schools will participate in the air quality education and awareness campaign. The scope has been expanded to include education and awareness campaigns on veld fire management and prevention and communities will be informed about best practices on separation, sorting and recycling of waste as opposed to burning, with recyclable waste collected and taken to a buy back centre by households</p> <p>With regards to small business involvement we request that you please contact the Sasol Enterprise &amp; Supplier Development by: visiting the Sasol website (<a href="https://www.sasol.com/suppliers/contacts">https://www.sasol.com/suppliers/contacts</a>) or sending an email to <a href="mailto:contact.sasolshareservices@sasol.com">contact.sasolshareservices@sasol.com</a> or phoning +27 860 104 777 for further information on supplier requests and registration.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
24	Ms	Thembelani	Poco	Hlelisa NPC	06/05/22	Open Day Comments & Responses Form	<p>I understand and agree with the application for a load based application limit for sulphur dioxide by Sasol</p> <p>I also notice the effort made by Sasol around our community for the people to be issued as gas stoves and heaters and removing old coal stoves and heaters. It has done a huge difference in the community. The CO<sub>2</sub> has been reduced a lot. It has been effective thus far. My concern fully based on the health of the people in the surrounding communities. The efforts made by Sasol will go in vain because of the gas prices being high in an unemployed community. Starting this winter a lot of people are now opting to go back to using their coal stoves and heaters. And this will take us back to where we started with the problem of CO<sub>2</sub> in the communities. As for the environment am happy with this Sasol application for load based emission</p> <p>I also want to ask Sasol and the government to do the same for the people who have been living here for the past ten years and mostly for the ones who were born here and lived their whole lives here.</p> <p>I think a study should be conducted on all the people who have been here for ten years and longer by Sasol and the government</p> <p>And my last comment is to ask Sasol to include local members of Secunda originally born here to also partake in taking care of the environment and</p>	<p>We note your support of Sasol's load based application and for recognising the difference the offsetting initiatives have made within the community.</p> <p>Sasol will consider your comments and proposed solutions future offsetting initiatives. The focus will be on identifying opportunities to improve and to ensure that the impact of such initiatives and projects is beneficial to the community and is sustainable</p> <p>Sasol offsetting initiatives include an environmental air quality education and awareness programme to be conducted with 7 600 households in eMbalenhle and Lebohang communities through a door-to-door campaign. 27 060 learners from twenty-six primary schools in Govan Mbeki Municipality and 10 834 learners from nine secondary schools will participate in the air quality education and awareness campaign. The scope has been expanded to include education and awareness campaigns on veld fire management and prevention and communities will be informed about best practices on separation, sorting and recycling of waste as opposed to burning, with recyclable waste collected and taken to a buy back centre by households</p>



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							<p>the people. Thank you.                      Our environment needs taking care of                      Our river needs cleaning and monitoring                      Our cattles drink from this river and it's dirty                      Thus when people consume their livestock get exposure to the pollution from the river where our cattle drink</p> <p>Solution                      An awareness should be conducted to the locals. Our river should be cleaned. Frequent rubbish removing and working with the government to maintain a healthy and clean society ensuring a great healthy and profitable future for both Sasol and our community</p>	

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25	Ms	Robyn	Hugo	Just Share	11/05/22	Email	<p>Hi Anesu Is it accurate (as per <a href="https://www.news24.com/fin24/companies/sasol-ceo-we-spend-billions-to-comply-with-air-quality-standards-20220506">https://www.news24.com/fin24/companies/sasol-ceo-we-spend-billions-to-comply-with-air-quality-standards-20220506</a>) that Sasol still awaits the outcomes of its 2020 postponement applications for four additional emissions sources at its Secunda steam plants? Please could you confirm:</p> <ul style="list-style-type: none"> <li>· the specific postponements that were sought in 2020;</li> <li>· whether Sasol is currently in non-compliance with its AEL at these operations – while it awaits the outcome of these 2020 applications; and</li> <li>· what response the NAQO has given as to when these outcomes can be expected?</li> </ul> <p>Thank you</p>	ARM directed the enquiry directly to Sasol, since this query is unrelated to the intended Clause 12A application relating to the boilers at the steam plants at the Secunda Operations. Sasol has since responded directly.
26	Mr	Madoda	Ngwekazi	Sakha Isizwe Safety Boots Supplier	20/05/22	Email	<p>Good day, Sir.</p> <p>After reading the first document, I realize that my comments will be biased since I have a very close relationship with Sasol. I apologize for any inconvenience caused, and I hope that other participants will be able to contribute more effectively.</p> <p>Good luck with the exercise.</p> <p>Best regards Madoda</p>	Thank you for participating in the process, your comment is noted.

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27	Mr	Hennie	Potgieter	Sasol	24/05/22	Jotform	While we cannot stress the importance of the environment and controlling air pollution enough, we have to consider that we are facing serious socioeconomic and employment challenges in South Africa. We have to balance our environmental and social responsibility and one cannot focus on the one while ignoring the other. At this point in time the socioeconomic crisis is far greater than the effects of Sulphur pollution. We cannot expect first world standards on pollution levels while we have a 50% unemployment rate, while we have 35 million people on social grants, while we have people starving in our community.	Thank you for participating in the process, your comment is noted.
28	Ms	Robyn	Hugo	Just Share	24/05/22	Email	Just Share places on record that we <b><i>strongly dispute that paragraph 12A of the “List of activities which have or may have a significant detrimental effect on the environment; including health, social conditions, economic conditions, ecological conditions or cultural heritage, 2013” (“the List of Activities”) permits Sasol to make the current application.</i></b> Sasol seeks an alternative emission load from 1 April 2025 until 31 March 2030 of 503 t/d and from 1 April 2030 and apparently indefinitely, of 365 t/d. This application amounts to non-compliance with the SO <sub>2</sub> MES beyond April 2025, it is tantamount to an exemption from the MES, and is unlawful. That much is clear from the	<b><i>“We strongly dispute that paragraph 12A permits Sasol to make the current application”</i></b> Noted, but for the reasons that follow below, Sasol does not agree. In Sasol view and considering the relevant provisions of the applicable legislation, the application is regarded both permissible and lawful.  <b><i>“1 April 2020 is the latest date for compliance with new plant MES. The National Air Quality Officer should refuse to consider this application”</i></b> April 2020 was in fact the deadline for compliance with the new plant standards under the MES. This date was therefore the default position for compliance, save in those <u>permissible circumstances</u> where an extension, delay or different approach is justified and provided for under the MES. This is also clear under the National Framework. 1 April 2025 (an extended compliance date given that the regulation provides as follows: <i>“No once-off postponement with</i>

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							<p>List of Activities and the Framework for Air Quality Management (“the Framework”). <b>1 April 2025 is the latest date for compliance with new plant MES. The National Air Quality Officer should refuse to consider this application.</b></p> <p><b>Granting such application would violate the Constitution of the Republic of South Africa, 1996 (“the Constitution”), the National Environmental Management Act, 1998 (NEMA); the National Environmental Management: Air Quality Act, 2004 (AQA), the List of Activities, and the Framework.</b></p> <p>The 2017 Framework forms part of the definition of “this Act” in AQA, and “binds all organs of state in all spheres of government”. AQA requires that an organ of state “give effect to the national Framework when exercising a power or performing a duty in</p>	<p><i>the compliance timeframes with minimum emission standards for new plant will be valid beyond 31 March 2025.)</i> is one such instance provided for under Clause 11A of the MES. Another permissible instance is for specific pollutants where alternative emission limits or loads are permitted (at any time) under Clause 12A. Consequently, 1 April 2025 is not in and of itself a basis for the NAQO to refuse Sasol’s application. The criteria specified for Clause 12A applications do not preclude such applications on this basis.</p> <p><b>“Granting such application would violate the Constitution of the Republic of South Africa, 1996 (“the Constitution”), the National Environmental Management Act, 1998 (NEMA); the National Environmental Management: Air Quality Act, 2004 (AQA), the List of Activities, and the Framework “</b> The comment is noted, Sasol disagrees that granting the application would “violate” or otherwise offend any of the legislative framework listed. Just Share does in any event not build on and/or substantiate the statement.</p> <p><b>“As a significant emitter and a major source of pollution in South Africa, Sasol is legally required to limit its emissions to help ensure compliance with national ambient air quality standards (NAAQS).”</b> Sasol agrees with this statement insofar as it records that Sasol is legally required to limit its emissions in accordance with the provisions of its AEL, read with applicable legislation, under which its lawfully operates. However, this is trite. The AIR and draft motivation report demonstrate that Sasol has reduced its emissions, continues to do so through focussed emissions reductions programmes, and that</p>

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							<p>terms of [AQA] or any other legislation regulating air quality management”.</p> <p><b><i>As a significant emitter and a major source of pollution in South Africa, Sasol is legally required to limit its emissions to help ensure compliance with national ambient air quality standards (NAAQS).</i></b></p> <p>When the List of Activities and the Framework were amended in 2018, these made clear that, at the latest (and assuming the maximum 5 year postponement had been granted), full compliance with the new plant MES is required by 1 April 2025 at the latest; unless facilities had applied - by 31 March 2019 (with a detailed decommissioning plan) - and been granted a once-off suspension of compliance (in which event they are required to be decommissioned by 31 March 2030).</p>	<p>it has a proposal to further reduce its emissions, all of which seeks to contribute towards ensuring that the airshed it operates within (as defined in the motivation report) will meet NAAQS.</p> <p><b><i>“The legislation makes clear that “No once-off postponement with the compliance time frames will be valid beyond March 2025”. Sasol has not sought a once-off suspension of compliance”</i></b></p> <p>Postponements and suspension of compliance (as provided for in clause 11A and B of the MES) and requesting alternative emissions/load limits (as provided for in clause 12A of the MES) are two different and separate tools in the legislative toolbox. This is also clear from the National Framework which clearly provides for “postponements OR suspension of compliance timeframes” and does so in a “specific order”. Sasol disagrees with the comment from the submitter as it confuses or conflates the two tools and the circumstances under which they apply. Further, the provisions of the MES do not compel Sasol to bring an application in terms of clause 11B (suspension of compliance application), thereby precluding it from submitting an application under clause 12A. Differently put, the provisions in clause 11 provide for different scenarios which do not talk to Sasol’s specific circumstances and request as detailed in the motivation report and Sasol maintains that it is not precluded, for any reason, to submit the clause 12A application.</p> <p><b><i>“Under guise (Sasol seeks to evade its legal obligations – own emphasis for purposes of responding)”</i></b></p> <p>An application under clause 12A cannot be construed as a “guise”. It is a prescribed and valid (legitimate) application in appropriate circumstances. As such, it</p>

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							<p>The legislation makes clear that <b>“No once-off postponement with the compliance time frames will be valid beyond March 2025”</b>. Sasol has not sought a once-off suspension of compliance.</p> <p><i>Now, under the guise of seeking an “alternative emission load”, Sasol seeks to evade legal compliance with the MES in circumstances where: it does not intend to comply with new plant SO<sub>2</sub> MES by 1 April 2025, and will not be decommissioned by 31 March 2030. This is unlawful.</i></p> <p>Paragraph 12A of the List of Activities <b>does not create an additional avenue to postpone compliance with the new plant MES beyond April 2025. It governs the alternative emission limit/load that would apply during the period of a once-off postponement/suspension, and that, in the case of a once-off postponement, full MES compliance is still required by 1 April 2025 – even if an alternative emission limit/load is granted in terms of paragraph 12A.</b></p>	<p>it is emotively and inappropriately described as “evasion” of legal obligations. It is no such thing, but rather is a lawful means through which compliance can be achieved through a different means in appropriate circumstances which are prescribed.</p> <p><b>“Does not create additional avenue to postpone compliance with the new plant MES beyond April 2025”</b></p> <p>Without debating terminology- only the submitter seems to conflate alternative limits/loads (clause 12A) and postponements/suspensions (clause 11A and B), when they are two separate remedies (legal mechanisms), clause 12A does indeed not create an alternative “postponement” avenue. There is nothing in the relevant provisions to support this interpretation. Rather it establishes a new means through which compliance with a specific pollutant/s in circumscribed circumstances, may otherwise be achieved.</p> <p><b>“It governs the alternative emission limit/load that would apply during the period of a once-off postponement/suspension, and that, in the case of a once-off postponement, full MES compliance is still required by 1 April 2025 – even if an alternative emission limit/load is granted in terms of paragraph 12A”</b></p> <p>Clause 12A is in no way linked to the deadline of 1 April 2025 as referred to above in the specific context of clause 11A. Had this been the intention of the legislature in 2018 when it published the amendment, it would have made this clear. Rather in 2018 the legislature chose to limit the 1 April 2025 deadline to clause 11A only. This was clearly done to distinguish once off postponements (clause 11A) from decommissioning and suspension of compliance applications (clause 11B) and from alternative</p>

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							<p>Even if Sasol were entitled to seek additional leniency in relation to SO<sub>2</sub> compliance – beyond April 2025 (which is denied) – it has not fulfilled the requirements of paragraph 12A of the List of Activities and this application should be rejected.</p> <p>(12A)</p> <p><i>(a) An existing plant may submit an application regarding a new plant standard to the National Air Quality Officer for consideration if the plant is in compliance with other emission standards but cannot comply with a particular pollutant or pollutants.</i></p> <p><i>(b) An application must demonstrate a previous reduction in emissions of the said pollutant or pollutants, measures and direct investments implemented towards compliance with the relevant new plant standards.</i></p> <p><i>(c) The National Air Quality Officer, after consultation with the Licensing Authority, may grant an alternative emission limit or emission load if:</i></p> <p><i>(i) there is material compliance with the national ambient air quality standards in the area for pollutant or pollutants applied for; or</i></p> <p><i>(ii) the Atmospheric Impact Report does not show a material increased health risk where there is no ambient air quality standard.</i></p> <p>In any event, the MES compliance period is 24 hours, not the 1 month proposed by Sasol in this application;</p>	<p>emission limits (clause 12A). Moreover in support of clause 12A providing an entirely separate and distinct remedy (legal mechanism), and to the submitter's point, what purpose would it serve to create a further postponement process in another "guise" (i.e. clause 12A) which is bound by and limited in precisely the same terms as the existing postponement solution (i.e. Clause 11A)? Clause 12A is accordingly intended for other purposes which is supported by its express wording (clearly differentiable from clause 11A and 11B applications as provided for in the MES) to address compliance challenges of existing plants under differentiable/different circumstances.</p> <p><b><i>"Even if Sasol were entitled to seek additional leniency in relation to SO<sub>2</sub> compliance – beyond April 2025 (which is denied) – it has not fulfilled the requirements of paragraph 12A of the List of Activities and this application should be rejected"</i></b></p> <p>Sasol submits that its application meets all the requirements as explained in Clause 12A as clearly set out in the Motivation report.</p> <p><b><i>"In any event, the MES compliance period is 24 hours, not the 1 month proposed by Sasol in this application"</i></b></p> <p>While the averaging period in the MES is 24 hours, unless otherwise specified, it does not preclude any other averaging period from being specified and it does not specify the averaging period applicable to load based limits contemplated in clause 12A. Therefore it can be requested for discretionary consideration by the NAQO.</p> <p><b><i>"The Atmospheric Impact Report (AIR) is defective in many respects; the Highveld Priority</i></b></p>

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							<p>the Atmospheric Impact Report (AIR) is defective in many respects; the Highveld Priority Area is non-compliant with the national PM<sub>10</sub> and PM<sub>2.5</sub> standards, by a wide margin. In this regard, we also point out that the AIR does not address the SO<sub>2</sub> contribution to secondary PM<sub>2.5</sub>. Despite request, Sasol has not submitted its compliance reports to demonstrate compliance with other emission standards. In addition, Sasol has not submitted specific data showing previous reductions in SO<sub>2</sub> emissions and its direct investments towards compliance with the SO<sub>2</sub> standards. In other words, Sasol has failed to meet the requirements of paragraph 12A.</p>	<p><b><i>Area is non-compliant with the national PM 10 and PM2.5 standards, by a wide margin. In this regard, we also point out that the AIR does not address the SO<sub>2</sub> contribution to secondary PM2.5”</i></b></p> <p>We disagree that the AIR is defective. It was developed in accordance with all applicable legal requirements as explained in the motivation report. Further more, the submitter does not build on or substantiate the allegations of many defects.</p> <p>Please refer to Section 5.1.3.4 of the AIR that outlines how the conversion of SO<sub>2</sub> to PM<sub>2.5</sub> was accounted for in the study.</p> <p><b><i>“Despite request, Sasol has not submitted its compliance reports to demonstrate compliance with other emission standards.”</i></b></p> <p>All information relevant to this application is in the AIR and Motivation report. Sasol also reports on its compliance and performance with its AEL in accordance with legal provisions and its AEL to the local licensing authority and the National Air Quality Officer.</p> <p><b><i>“In addition, Sasol has not submitted specific data showing previous reductions in SO<sub>2</sub> emissions and its direct investments towards compliance with the SO<sub>2</sub> standards. In other words, Sasol has failed to meet the requirements of paragraph 12A.”</i></b></p> <p>The Secunda Operations (SO) has incorporated air quality offsetting as part of its ambient air quality improvement plans to reduce PM and SO<sub>2</sub> emissions from domestic fuel use in low-income dense settlements. These initiatives included, amongst others, the insulation of 5 532 reconstruction and</p>



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							<p><u>NAAQS out of compliance</u> Paragraph 5.4.3.4 of the Framework stipulates that compliance with MES may be postponed and a suspension of compliance may be granted, provided NAAQS are in compliance and the air emissions are not causing direct adverse impacts on the surrounding environment. The NAAQS compliance requirement holds particular significance in relation to the 3 air quality Priority Areas situated within the Highveld, Vaal Triangle, and the Waterberg-Bojanala - all of which remain out of compliance with NAAQS, despite their statuses as "Priority Areas" and despite the fact that: the Vaal Triangle Airshed Priority</p>	<p>development program (RDP) houses and replacing coal stoves with liquified petroleum gas stoves and heaters.</p> <p>Prior to 1 April 2025 the application also indicates the expected realisation of a further 4% reduction in SO<sub>2</sub> emissions from the Steam Plant. In addition Sasol is evaluating the decommissioning of the Biosludge incinerators which will result, among others, in further SO<sub>2</sub> emission reductions.</p> <p>Sasol has undertaken various studies with equipment suppliers, whereby promising technology options were further investigated and assessed, considering not only the efficiency to achieve the desired emission reduction, but also site and process integration, ease of implementation, safety constructability and cross media impacts. The assessments highlighted that commercially available technologies for boiler SO<sub>2</sub> abatement are technically complex with many unintended consequences, especially invoking cross-media impacts on the water and waste environments as well as increased GHG emissions. Further it was found that the majority of these technologies cannot be constructed within the physical space constraints of the existing facility. The Secunda Operations has spent R75 million on investigating SO<sub>2</sub> abatement options from 2006 to date. Of that amount R45 million was spent investigating the implementation of wet and dry flue gas desulphurization abatement.</p> <p><b><i>"Provided NAAQS are in compliance and the air emissions are not causing direct adverse impacts on the surrounding environment"</i></b></p> <p>This is an incorrect reference to what both the National Framework and the MES say (which align completely with each other). Firstly the requirements are in the alternative ("or" and not "and"). Secondly the requirement is not that NAAQS are in</p>

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							<p>Area was declared over 16 years ago; the Highveld Priority Area (HPA) more than 14-and-a-half years ago; and the Waterberg-Bojanala Priority Area (WBPA), ten years ago. This non-compliance appears from the Department of Environment, Forestry and Fisheries' reports, and is not controversial.</p> <p>No industries operating within these Priority Areas should be permitted to apply for postponement, suspension or alternative limits. Granting such applications will only exacerbate the high levels of air pollution, and its dire impact on human health, well-being, and the environment; which would in turn, make it even more difficult for the Priority Areas to meet their goals of ensuring compliance with NAAQS. As the recent Deadly Air judgement makes clear, air quality in the HPA, home to Sasol's Secunda operations (and 12 Eskom coal plants) is so severe that it violates residents' constitutional rights to an environment not harmful to health or wellbeing. It is also beyond dispute that the emissions of Eskom and Sasol are responsible for by far the majority of air pollution, not only in the HPA, but in the entire continent.</p> <p>Granting any of these alternative load applications would be ultra vires the Constitution, the AQA, the amended List of Activities, the Framework, and NEMA.</p>	<p>compliance, but rather that there is compliance with the NAAQS for the pollutant or pollutants applied for. This is materially different, and the motivation report makes it clear that the pollutant applied for is in material compliance with the NAAQS in the airshed in question.</p> <p><b><i>“Granting such applications will only exacerbate the high levels of air pollution “</i></b>                      This statement is misleading. Sasol's application demonstrates that it is not increasing pollution levels through this application, so it cannot be said to “exacerbate pollution levels”. This statement is also not supported by any substantive information and hence lacks substance.</p> <p><b><i>“Other non-compliance by Sasol                      Sasol is not in compliance with all of the emission limits contained in its atmospheric emission licences (AEL) and is therefore operating legally.”</i></b>It is denied that SO or Sasol is in non-compliance with all its emission limits contained in its AELs and that it is operating illegally. It is noted that this statement is unsubstantiated. SO and Sasol confirms that they report on their environmental incidents, challenges and non-compliances in a transparent manner and in accordance with legal and relevant conditions of its AELs. Performance on air quality and environmental non compliances are also disclosed in Sasol's Sustainability Report annually on www.sasol.com. The statement in the AIR is aligned with what Sasol discloses in its Sustainability Report and also correct for the plant pertaining to this application. As is evident from the motivation application, the steam plant and boilers, as the subject of this application, is in compliance and not the subject of any criminal</p>

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							<p><u>No proof that Sasol's emissions are not causing adverse impacts</u>                      In addition to the requirement that the area's air quality must be in compliance with NAAQS, the Framework requires that Sasol must demonstrate that its air emissions are not causing direct adverse impacts on the surrounding environment. Sasol has wholly failed to demonstrate this.</p> <p><u>Other non-compliance by Sasol</u>                      Sasol is not in compliance with all of the emission limits contained in its atmospheric emission licences (AEL) and is therefore operating illegally. Urgent enforcement action should be initiated against Sasol as a result of this non-compliance, as opposed to considering this impermissible application to further delay and suspend compliance with the MES. In this regard, we note from the latest DFFE National Environmental and Compliance Report that a criminal investigation was instituted in relation to various violations of its licences. Instead of disclosing this information, and its other air quality non-compliances in relation to VOCs at Secunda (while it awaits the outcome of further postponement applications), Sasol's AIR states; "No final directives or compliance notices have been issued to the Secunda Operations in the last five years". We call upon Sasol to make accurate information available to interested and affected</p>	<p>investigations as referred to by the submitter. <b>"Granting any of these alternative load applications would be ultra vires the Constitution, the AQA, the amended List of Activities, the Framework, and NEMA"</b>                      Noted, but Sasol disagree that it is <i>ultra vires</i> any of these statues (also see related response above) and the comment does not indicate in what respects it allegedly is. The so called "Deadly Air" judgment is a decision of the court relating to regulatory controls required of the DFFE to give effect to the HPA Priority Area Management Plan. It does not in any respects vitiate this application which must be assessed on its own merits.</p> <p>"</p> <p>Sasol remains committed to ambient air quality improvement through compliance and our efforts and achievements to date enabled that 98% emissions sources currently comply to the Minimum Emissions Standards (MES), with the remainder to be compliant by 1 April 2025, except boiler SO<sub>2</sub> emissions at our Secunda steam plant. We are progressing our ongoing compliance efforts which includes assessing alternative pathways linked to our GHG emission reduction program i.e. an integrated air quality and GHG solution. The integrated air quality and GHG solution will not only reduce SO<sub>2</sub> emissions but will also have a favourable impact on GHG, other pollutants such as NO<sub>x</sub> and PMs as well as our overall environmental footprint.</p> <p><b>"Assessment of the AIR"</b>                      The AIR used a conservative approach by utilizing the date at which all projects, including Renewable Energy, that enable the load reduction would have</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>parties in relation to its non-compliance.</p> <p><u>Assessment of AIR</u> The AIR contains flawed estimates of Sasol's SO<sub>2</sub> emissions values.</p> <p>Sasol's Synfuels plant operates 17 coal-fired boilers which produce steam mainly for use in its Gasification process, ultimately to produce petrol and diesel. The balance of the steam not used in its Gasification and other processes produced is used to drive turbo-generators to produce 600MW of electricity for use in the plant, which is extremely energy-intensive.</p> <p>The CO<sub>2</sub> emissions from these 17 boilers are a major part of Synfuel's direct (Scope 1) emissions. In its GHG emissions roadmap, it proposes to replace part of the electricity generated via these boilers with renewable energy (RE) generated offsite and wheeled to the Synfuels plant via the Eskom grid. Given the significantly cheaper cost of RE, Sasol's generation and/or purchase of RE to replace its own coal-based coal power or Eskom-supplied power would result in a good return on the capital employed. Replacing some of the electricity generated via its coal-fired boilers with RE generated offsite will also enable Sasol to reduce the load on these boilers.</p>	<p>been implemented. The scenarios in the AIR indicate the benefits in reducing SO<sub>2</sub> load emissions will already realise with 4% emission reduction by 2025 and 30% emission reduction by 2030.</p> <p>The 95<sup>th</sup> percentile is utilized to provide a conservative estimate of the impact. The approach followed was to demonstrate anticipated/expected improvements beyond the requirements of the MES for SO<sub>2</sub> since the Clause 12A application is for SO<sub>2</sub> with PM and NO<sub>x</sub> as additional benefits. SO<sub>2</sub> baseline and subsequent scenarios were conservative estimate to indicate the worst case impact on the ambient for all scenarios. PM and NO<sub>x</sub> are not the main focus of the Clause 12A application, since these are not the pollutants that are the subject of the load based application for purposes of implementing the integrated SO<sub>2</sub> and GHG reduction roadmap. However, the proposed roadmap do anticipate additional benefits with reductions post 2025 and therefore the approach followed to select the average baseline for these two pollutants. SO<sub>2</sub> is the main focus of the application and using the 95<sup>th</sup> percentile is due to the application asking for a limit, which should represent an upper limit and not an average and that the AIR should reflect the impact of this upper limit.</p> <p>The MES is expressed as a ceiling value and not an average value. In order to compare the load reduction scenarios with the MES concentration based compliance scenario, the 95<sup>th</sup> percentile value was used.</p> <p>In order to compare the modelled baseline values with the ambient monitoring results, the average emission value over 2018 – 2020, three year period was used.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>Reducing the power generating load on the boilers ('turning them down') means burning less coal and emitting proportionately less SO<sub>2</sub>, assuming that the sulphur content of the coal is constant. The AIR does not clearly and explicitly set out the planned timeline for reducing the load on the boilers.</p> <p>Sasol's motivation and justification for its "load-based" emission limits is presented in an obscure manner. In essence it is attempting to argue that it would achieve the same reduction in SO<sub>2</sub> emissions through a combination of a 30% reduction of boiler load and being allowed to operate the boilers under its load-based emissions limits, as would be achieved by compliance with the 1000mg/Nm<sup>3</sup> standard in 2025, the case modelled as Scenario 3. This argument is critically examined below.</p> <p>The motivation is based on the claim that a greater reduction of Synfuel's SO<sub>2</sub> emissions would occur at some time after 2025 compared with the reduction in emissions that would be achieved by compliance in 2025 with the new plant emission limit of 1000 mg/Nm<sup>3</sup>. This claim is disputed, because the method of estimating emissions under various scenarios, and therefore their relative values, is flawed.</p> <p>The emissions from all 17 boilers are</p>	<p>As explained in the motivation report, Sasol is of the view that it is able to achieve emission reductions, in terms of emission load, beyond the emission reductions required to achieve the 1000 mg/Nm<sup>3</sup> SO<sub>2</sub> emission limit by reducing boiler load</p> <p>As set out in the AIR and Motivation Report, Sasol intends to lower SO<sub>2</sub> emissions from the Steam plant by reducing boiler load. Thereby anticipating/expecting to achieve ambient air quality improvements beyond what would be achievable with compliance to the MES concentration-based limit.</p> <p>Using the average emission values, as indicated in Table 1 - column "Calculated values" of the submission would not enable an accurate comparison between the load reduction scenarios and the MES compliance scenario. As the intent was to demonstrate improvements beyond the requirements of the MES, this approach was followed.</p> <p>Sasol is therefore advancing an application provided for in the MES (Clause 12A) to implementation of the integrated reduction roadmap beyond 1 April 2025 on a load basis as opposed to a concentration basis. This is in accordance with a condonation granted by the Minister on 19 January 2022.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>discharged via two stacks, B1 (U43): Main Stack West and B2 (U243): Main Stack East. The AIR, Table 5-27, describes two SO<sub>2</sub> emission rates as baseline emissions, Baseline - 95th percentile SO<sub>2</sub> and Baseline - Average. These are not two separate emissions datasets, but are statistical descriptors of the same set of data, the average of all the values and the value, the 95th percentile value, below which 95% of the values fall. A baseline consisting of the plant operating constantly at the 95th percentile value or at an average equal to the 95th percentile value does not exist and should not be called a baseline. The comparison of emissions under future or hypothetical scenarios on the basis of extreme values such as the 95th percentile values is prone to large uncertainty and error. The comparisons should be based on the average values. Describing two different SO<sub>2</sub> emissions as "baseline" creates uncertainty. For example, in "5.3 Main Findings of the report", the statement that one of four scenarios modelled is "Baselines - using 95th percentile emission concentrations (for SO<sub>2</sub>) or the average emission concentrations (for NO<sub>2</sub> and PM)". Table 5-27 reflects data for five modelling scenarios, including two baseline scenarios, Baseline - 95th percentile SO<sub>2</sub> and Baseline - Average.</p>	

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>The methods for calculating the emissions rates in Table 5-27 of the AIR, used to model the five scenarios, are not explained. The estimated emission reductions that are only due to a reduction in load should simply be in proportion to the percentage reduction in load, assuming that the plants continue to be operated with current coal quality and under current conditions. A reduction of the coal sulphur content or the installation of SO<sub>2</sub> abatement equipment to comply with the MES stack concentration limits would result in a further reduction in emissions, additional to the reduction due to a reduction of load. Table 1 reflects the emissions values of Table 5-27, compares these values to the Baseline average scenario values, and with values calculated based on load reduction and on load reduction plus compliance with the 1000mg/Nm<sup>3</sup> MES limit value (Table 1 of submission).</p> <p>The error of comparing various emissions scenarios with the 95th percentile value rather than the baseline average value is apparent in Table 1. The AIR emissions for a 4% load reduction results in an increase in emissions relative to current emissions. A 15% load reduction plus compliance with the MES, results in an average reduction of less than 5%. Sasol's reasoning is flawed. A reduction in the load of these boilers</p>	

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>will result in the reduction in SO<sub>2</sub> emissions, subject to a similar quality of coal (sulphur content) in the feedstock. A 30% reduction in the load alone will result in a 30% reduction in SO<sub>2</sub> emissions (to 321 tonnes per day) compared to the 20% reduction (to 364 tonnes per day) of Sasol's "End state, 30% load reduction"</p> <p><u>Compliance with the 1000mg/Nm<sup>3</sup> SO<sub>2</sub> emission limit</u>                      Sasol's current emission rates will clearly not comply with the 1000mg/Nm SO<sub>2</sub> emission limit (Figure 1 demonstrates Sasol's emissions during July 2015 to June 2016). Compliance with this MES limit from 2025 would result in a further reduction in emissions of 30 to 50% beyond any emissions reductions that may achieved through load reductions.</p> <p>A load reduction of 30% and compliance with the MES would likely reduce emissions to less than 200 tonnes per day compared with current average emissions of about 460 tonnes per day. Compliance can only be achieved by reducing the sulphur content of the coal used in the boiler plants, or through the installation of emission reduction equipment, or a combination of the two approaches.</p>	



No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p>SO<sub>2</sub> is a notorious pollutant that causes significant harm to human health and the environment. It can affect the respiratory system and the functions of the lungs, and causes irritation of the eyes. Inflammation of the respiratory tract causes coughing, mucus secretion, aggravation of asthma and chronic bronchitis, and makes people more prone to infections of the respiratory tract. Studies have linked SO<sub>2</sub> to low birth weight in infants and an increased risk for gestational diabetes mellitus, stillbirths, and pre-term births. Hospital admissions for cardiac disease and mortality increase on days with higher SO<sub>2</sub> levels. When SO<sub>2</sub> combines with water, it forms sulphuric acid, which is the main component of acid rain.</p> <p>South Africa's 2020 SO<sub>2</sub> standard – which exists to protect people's health and human rights – is about 28 times more lax than in China, and 10 times weaker than India's. The means of reducing SO<sub>2</sub> emissions are well-known and not controversial. The costs and benefits of compliance are also well-known. SA's SO<sub>2</sub> MES are weak, compared even to other developing countries, and Sasol has had an inordinately long time to prepare for compliance. In addition, it does not meet the requirements of paragraph 12A of the List of Activities.</p>	

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
							<p><u>Conclusion</u>                      In short, we dispute that Sasol provide justifiable or acceptable reasons in support of its application. If it cannot comply with the weak new plant SO<sub>2</sub> MES, it should be decommissioned. Applying for a 'tailored' set of alternative emission loads beyond March 2025, that are weaker than the new plant MES through to decommissioning, in areas where there is chronic noncompliance with the NAAQS, cannot be permitted. It undermines the Constitution, NEMA, the AQA, the List of Activities and the Framework.</p> <p>The application should be rejected.</p>	
29	Mr	Ephraim	Moloi	Private	25/05/22	Email	<p>I currently have a coal stove. I currently stay in a house I built myself which has a metal roof sheet. They slowly getting damaged by the amount of smoke from Sasol and my stove.</p>	<p>The results from the AIR show that an overall improvement in the ambient air quality is anticipated/expected as a result of the interventions proposed in this application.</p>

No.	Title	First Name	Last Name	Organization	Date received	Source	Comment	Response
30	Mr	Marco	Mahlangu	Private	28/05/22	Jotform	<p>The Time series data for the SO<sub>2</sub> and NO<sub>2</sub> ground level concentration is only measured for the areas that are in close proximity to the SASOL complex and does not account for the areas located at least 40KM from Sasol. I am of the opinion that these excluded areas are continuing to be heavily affected by these emissions. therefore, data needs to be collected and analyzed as well.</p>	<p>The time series data in the AIR are analysed for all 6 Air Quality Monitoring Station in the 50 km domain where Sasol is one of the main contributors to SO<sub>2</sub> and NO<sub>2</sub> emissions. The isopleths results in the AIR also shows that Sasol has a much smaller contribution at the domain boundary. Analyzing data outside the 50 km domain is likely to be confounded by additional sources.</p> <p>The South Africa air quality information system (SAQQIS) is a tool developed for tracking ambient air quality concentrations close to your location, the tool can be downloaded via your phone for easy access to track air quality concentrations.</p>

## 5. Way forward

The application documentation consisting of the motivation report, AIR and stakeholder report will be submitted to the National Air Quality Officer by SO for consideration. The final documents will be available after submission and can be accessed as follows:

- Electronically on the ARM website at <https://arm-air.co.za/documents/>
- Copies of the documents can be requested from ARM via email ([comments@arm-air.co.za](mailto:comments@arm-air.co.za)) or telephonically (011 655 7170)

I&APs will be notified of the submission and informed of the process to submit any further comments on the final application documents. All registered I&APs will be notified once a decision has been issued.

## 6. Annexures

### 6.1 I&AP Notification Letter

**Air Resource Management (Pty) Ltd**

Montrose Street, Birchwood Court - West Wing,

Vorna Valley,

Midrand,

1685,

South Africa

Tel: 011 655 7170

Email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za)

Website [www.arm-air.co.za](http://www.arm-air.co.za)

6 April 2022

**Attention: Interested & Affected Party**

#### **INVITATION TO REGISTER AND PARTICIPATE**

**SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS:**

**APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004**

#### **Introduction**

Sasol is a global chemicals and energy company that owns and operates a petrochemical and chemical manufacturing facility located in Secunda, Mpumalanga. In terms of the National Environmental Management: Air Quality Act 39 of 2004 (NEMAQA), the Secunda Operations' facility is required to comply with its atmospheric emissions license (AEL) which incorporates provisions of the Minimum Emission Standards (MES -LIST OF ACTIVITIES WHICH RESULT IN ATMOSPHERIC EMISSIONS WHICH HAVE OR MAY HAVE A SIGNIFICANT DETRIMENTAL EFFECT ON THE ENVIRONMENT, INCLUDING HEALTH, SOCIAL CONDITIONS, ECONOMIC CONDITIONS, ECOLOGICAL CONDITIONS OR CULTURAL HERITAGE in GN 893 in GG 37054 of 22 November 2013).

Whilst most of the Sasol Secunda Operations' processes comply with the MES limits as reflected in its AEL, there were selected listed activities for which the Secunda Operations was unable to comply with the

prescribed limits for new plants by the regulatory compliance date of 1 April 2020. For these specific activities the Secunda Operations applied for and was granted postponement of the compliance timeframes until 31 March 2025. The Secunda Operations is currently on track with its air quality compliance roadmaps to achieve compliance of these limits except for the SO<sub>2</sub> limit applicable to its boilers at its Steam Plant which is regulated in the MES under subcategory 1.1. Solid Fuel Combustion Installations SO<sub>2</sub> - limit for existing plants.

## The Application

As such, the Secunda Operations intends to apply to the National Air Quality Officer for an alternative load-based emission limit for SO<sub>2</sub> in terms of Clause 12A of the MES, to enable continued lawful operations pending the completion of the implementation of the compliance solution post 1 April 2025 and subsequent sustained compliance (the application).

## Process to be followed

The Secunda Operations will submit a motivation report together with an Atmospheric Impact Report (AIR) in support of the Clause 12A application in accordance with all applicable regulatory requirements. The AIR will undertake an independent and objective analysis of the potential impact of the application on ambient air quality. Additionally, the Secunda Operations will undertake a public participation process to enable any Interested and Affected Parties (I&APs) to review and comment on the application.

Air Resource Management (Pty) Ltd (ARM), an independent environmental consulting company, assisted by appropriate independent specialists, has been appointed to compile the application and manage the associated public participation process. The announcement of the application and opening of the associated I&AP registration process will commence on 6<sup>th</sup> April 2022.

## Availability of Documents

Background information on the application will be included in the announcement and Interested and Affected Parties (I&APs) are encouraged to register as soon as possible for public participation on the application. The registration period will continue to run concurrently with the review and commenting period of the Draft AIR and Motivation Report which will be available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022 for I&AP review and comments. The documents are accessible from either ARM's website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	TeI
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street , Secunda	Reception	(017) 610 1111

## Public Open Day

Registered Interested and Affected Parties will receive an invitation to an Open Day scheduled for the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Walter Sisulu Road, Secunda where information on the Draft Atmospheric Impact Report and Motivation report will be discussed.

## Contact Details

Should I&APs require assistance in accessing the documentation, you are welcome to contact ARM using the contact details specified below. I&APs must provide their comments together with their name, contact details (preferred method of notification, e.g. e-mail address or cell number) and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below within the above-mentioned timeframes.

To obtain further information, register on the stakeholder database and/or to submit your comments, please contact Mr Anesu Shamu at ARM: Tel: 011 655 7170, email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za). Alternatively, you can utilise the online registration and comment form at: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)

Regards,

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**Fred Goede**

Executive Head: Air Quality

Air Resource Management (Pty) Ltd

SASOL SOUTH AFRICA LIMITED OPERATING THROUGHITS SECUNDA OPERATIONS:APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

## REGISTRATION AND COMMENT SHEET

APRIL 2022

Interested and Affected Parties (I&APs) are invited to participate in the process by registering their interest in this project by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

### CONTACT DETAILS

<b>Title</b>		<b>First name</b>	
<b>Initials</b>		<b>Surname</b>	
<b>Organisation</b>			
<b>Postal Address</b>			
		<b>Postal Code</b>	
<b>Land Line No</b>		<b>Cell No</b>	
<b>Email</b>			
<b>Signature</b>		<b>Date</b>	

### REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications during the application process	<b>YES</b>	<b>NO</b>
<b>I would like my notifications by:</b>		
<b>E-mail:</b>	<b>Tel:</b>	<b>SMS:</b>
		<b>Letter:</b>
<b>Comments (Use a separate sheet if necessary)</b>		

**I consent to the collection, storage and management of my personal information as part of this 12A Application**

**YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.**

**NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.**



## 6.2 I&AP notification letter-availability of documents

### Air Resource Management (Pty) Ltd

Montrose Street, Birchwood Court - West Wing,

Vorna Valley,

Midrand,

1685,

South Africa

Tel: 011 655 7170

Email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za)

Website [www.arm-air.co.za](http://www.arm-air.co.za)

21<sup>st</sup> April 2022

Attention: Interested & Affected Party

### **AVAILABILITY OF DOCUMENTS AND INVITATION TO ATTEND PUBLIC OPEN DAY SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS:**

### **APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004**

#### **BACKGROUND**

As communicated previously, Sasol South Africa Limited, operating through its Secunda Operations intends to apply for the National Air Quality Officer for a load-based emission limit for SO<sub>2</sub> in terms of Clause 12A of the MES, to enable continued lawful operations pending the completion of the implementation of the compliance solution post 1 April 2025 and subsequent sustained compliance (the application).

The Secunda Operations will submit a Motivation report together with an Atmospheric Impact Report (AIR) in support of the Clause 12A application in accordance with all applicable regulatory requirements. The Motivation Report outlines the detailed reasons and a justification for the Clause 12A application whilst the AIR presents an independent and objective analysis of the potential impact of the application on ambient air quality. Additionally, the Secunda Operations will undertake a public participation process to enable any Interested and Affected Parties (I&APs) to review and comment on the application.

Air Resource Management (Pty) Ltd (ARM), an independent environmental consulting company, assisted by appropriate independent specialists, has been appointed to compile the Sasol Secunda Operations application and manage the associated public participation process.

## AVAILABILITY OF DOCUMENTS FOR PUBLIC REVIEW & COMMENT: DRAFT AIR & MOTIVATION REPORTS

The Draft AIR and Motivation Report are available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022 for I&AP review and comments. The documents are accessible from either ARM's website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street, Secunda	Reception	(017) 610 1111

Registered I&APs are requested to review and provide comment on the Draft AIR and Motivation Report utilising one of the following methods:

- 1) Completing the online comments and response form at: [https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation)
- 2) Filling out the attached comment sheet and emailing the completed form to the ARM mailbox: [comments@arm-air.co.za](mailto:comments@arm-air.co.za);
- 3) Sending a letter to ARM using the following postal address: Air Resource Management, PostNet Suite 029, Private Bag X 59, Halfway House, Midrand, Johannesburg, 1685
- 4) Attending the public open day to be held on the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Secunda
- 5) Requesting a focus group meeting or
- 6) Alternatively contacting Anesu Shamu at ARM telephonically on 011 655 7170.

## INVITATION TO PUBLIC OPEN DAY

I&AP's are invited to the public open day is planned on the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre in Secunda. At the open day, information on the contents of the draft AIR and motivation report will be shared with I&APs. I&APs can submit comments at the open day and ARM will be available to assist in capturing comments.

Please confirm your attendance of the public open day by using the online attendance registration form at: [https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation). Registration will also be possible at the venue on the 6<sup>th</sup> of May 2022. Alternatively, to confirm your attendance at the public open day,

request a focus group meeting, or comment on the draft AIR & Motivation Reports, please contact Mr Anesu Shamu at ARM: Tel: 011 655 7170 or email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za).

Regards,

---

**Fred Goede**

Executive Head: Air Quality

Air Resource Management (Pty) Ltd

SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS: APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

## COMMENTS and RESPONSE FORM

APRIL 2022

I&AP comments on the Draft AIR and Motivation Reports are kindly requested to be submitted to ARM by the latest 24 May 2022

### INTERESTED AND AFFECTED PARTY (I&AP) CONTACT DETAILS

Title		First name	
Initials		Surname	
Organisation/Affiliation			
Postal Address			Postal Code
Land Line Number			Cellphone Number
Email Address			
Signature		Date	

### REGISTRATION AS I&AP (please tick applicable box)

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES	NO
---	-----	----

I would like my notifications by:

E-mail:	Tel:	SMS:	Letter:
---------	------	------	---------

### PUBLIC OPEN DAY MEETING ATTENDANCE

Date	Location	Venue	Time	Attending (please tick applicable box)	
				Yes	No
6 <sup>th</sup> May 2022 (Friday)	Walter Sisulu Road, Secunda (Map attached)	Lilian Ngoyi Centre	10:00 to 16:00		

### COMMENTS (Please use a separate sheet/s if necessary)


### 6.3 I&AP notification letter-availability of documents

<b>Communication with Stakeholders</b>			
<b>Date</b>	<b>Group</b>	<b>Message Type</b>	<b>Format</b>
12 <sup>th</sup> April 2022	Previously registered I&APs	Notice of Sasol 12A application (Annexure 3.1)	Email & SMS
14 <sup>th</sup> April 2022	Previously registered I&APs	Reminder to respond to Email and SMS (Annexure 3.1)	Email & SMS
18 <sup>th</sup> April 2022	Previously registered I&APs	Reminder to respond to Email and SMS (Annexure 3.1)	Email & SMS
18 <sup>th</sup> April 2022	Previously registered I&APs that replied with Yes	Information on how to register for more information (Annexure 3.2)	Email & SMS
18 <sup>th</sup> April 2022	Registered I&APs	Notification of Successful registration (Annexure 3.3)	Email
19 <sup>th</sup> April 2022	Previously registered I&APs (Councillors, municipality Adjacent landowners, residents associations)	Notice of Sasol 12A application (Annexure 3.4)	Email & SMS
21 <sup>st</sup> April 2022	Registered I&APs	Letter of Notification of Availability of Documents and Invitation to Public Open Day (Annexure 3.5)	Email
22 <sup>nd</sup> April 2022	Previously registered I&APs that replied with Yes	Reminder to I&APs that said yes to register (Annexure 3.3)	Email & SMS
25 <sup>th</sup> April 2022	Previously registered I&APs that replied with Yes	Reminder to I&APs that said yes to register (Annexure 3.3)	SMS
26 <sup>th</sup> April 2022	Adjacent landowners	Notice of Sasol 12A application (Annexure 3.4)	SMS
29 <sup>th</sup> April 2022	Previously registered I&APs that replied with Yes	Reminder to I&APs that said yes to register (Annexure 3.3)	SMS
29 <sup>th</sup> April 2022	Adjacent landowners	Reminder Notice of Sasol 12A application (Annexure 3.4)	SMS
2 <sup>nd</sup> May 2022	Previously registered I&APs that replied with Yes	Reminder to I&APs that said yes to	SMS

		register (Annexure 3.3)	
<b>11<sup>th</sup> May 2022</b>	Registered I&APs who attended open day	Thank you for attending open day (Annexure 3.6)	Email & SMS
<b>11<sup>th</sup> May 2022</b>	Registered I&APs who need to comment	Reminder to comment (Annexure 3.7)	Email
<b>11<sup>th</sup> May 2022</b>	Stakeholders who attended open day but did not comment	Reminder to comment (Annexure 3.8)	Email & SMS
<b>20<sup>th</sup> May 2022</b>	Registered I&APs	Reminder to Comment (Annexure 3.13 & 3.14)	Email & SMS
<b>23<sup>rd</sup> May 2022</b>	Registered I&APs	Reminder to Comment (Annexure 3.13 & 3.14)	Email & SMS
<b>24<sup>th</sup> May 2022</b>	Registered I&APs	Reminder to Comment (Annexure 3.13 & 3.14)	Email & SMS
<b>8<sup>th</sup> June 2022</b>	Commented I&APs	Acknowledgement of receipt of Comments	Email & SMS

### 6.3.1 Email sent to previously registered I&APs-Notice of Sasol 12A application

Good day,

Since you were registered as an I&AP for a previous Sasol Postponement application we are sending you this request. Sasol South Africa Limited, operating through its Secunda Operations intends to apply for a load based emission limit for sulfur dioxide in terms of clause 12A of the Minimum Emission Standards, in terms section 21 of the National Environmental Management: Air Quality Act, 39 of 2004. Should you wish to register to participate in this process and receive further information regarding this application, please reply to this email by 20 April 2022.

Kind regards,



Anesu Shamu

Air Quality Specialist

Air Resource Management (Pty) Ltd

South Africa

0116557170

[comments@arm-air.co.za](mailto:comments@arm-air.co.za)

[www.arm-air.co.za](http://www.arm-air.co.za)

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### **6.3.2 SMS sent to previously registered I&APs-Notice of Sasol 12A application**

Notice to previously registered I&APs - Sasol intends to apply for a load based emission limit for SO<sub>2</sub> in terms of clause 12A of the Minimum Emission Standards (section 21 of the National Environmental Management: Air Quality Act). Should you wish to register to participate in this process and receive further information regarding this application, please reply YES by 20 April 2022



### 6.3.3 Email sent to previously registered I&APs that replied with “Yes”- Information on how to register for more information

Dear Interested and Affected party (I&AP),

You have replied yes to register to participate in the process and receive further information regarding the Sasol Secunda Operations application for a load-based emission limit for SO<sub>2</sub> in terms of clause 12A of the MES.

The Background Information Document, Introduction Letter and Registration form to register as an I&AP to accordingly participate in this process is available at <https://arm-air.co.za/documents/>.

To register on the I&AP stakeholder database and/or to submit your comments, please utilise the online registration and comment form at: [https://form.iotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.iotform.com/Anesu_Shamu/sasol-registrationform) . Alternatively, you can email the completed registration & comment form to: [comments@arm-air.co.za](mailto:comments@arm-air.co.za) or contact Mr Anesu Shamu at ARM: Tel: 011 655 7170 for further information herein.

Kind regards,



Anesu Shamu  
Air Quality Specialist

Air Resource Management (Pty) Ltd  
South Africa  
0116557170  
[comments@arm-air.co.za](mailto:comments@arm-air.co.za)  
[www.arm-air.co.za](http://www.arm-air.co.za)

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#### **6.3.4 SMS sent to previously registered I&APs that replied with “Yes”- Information on how to register for more information**

Dear Interested and Affected party (I&AP), you have replied yes to register, participate, and receive further information regarding the Sasol application for a load-based emission limit for SO<sub>2</sub> in terms of clause 12A of the MES. Additional information on this application and a registration form to register as an I&AP is available at

<https://arm-air.co.za/documents/>

To register online go to: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)

### 6.3.5 Registered I&APs- Notification of Successful registration

Dear Interested and Affected party (I&AP),

We confirm that you have been successfully registered as an I&AP for Sasol South Africa Limited, operating through its Secunda Operations, application for a load-based emission limit for sulfur dioxide in terms of clause 12A of the Minimum Emission Standards in terms section 21 of the National Environmental Management: Air Quality Act, 39 of 2004.

Air Resource Management (Pty) Ltd (ARM), an independent environmental consulting company, assisted by appropriate independent specialists, has been appointed to compile the Sasol Secunda Operations application and manage the associated public participation process. Additional information on the application is available at ARM's website: <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street, Secunda	Reception	(017) 610 1111

As a registered I&AP, you will receive an invitation to an Open Day scheduled for the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Walter Sisulu Road, Secunda where information on the Draft Atmospheric Impact Report and Motivation report will be provided discussed.

If you have any further queries herein, please contact Mr Anesu Shamu at ARM: Tel: 011 655 7170, email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za)

Kind regards,



Anesu Shamu

Air Quality Specialist

Air Resource Management (Pty) Ltd

South Africa

0116557170

[comments@arm-air.co.za](mailto:comments@arm-air.co.za)

[www.arm-air.co.za](http://www.arm-air.co.za)

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### **6.3.6 Email to Previously registered I&APs (Councillors, municipality, adjacent landowners, residents associations) - Notice of Sasol 12A application**

Dear Interested and Affected party (I&AP),

Since you were registered as an I&AP for a previous Sasol Postponement application we are sending you this request. Sasol South Africa Limited, operating through its Secunda Operations intends to apply for a load based emission limit for sulfur dioxide in terms of clause 12A of the Minimum Emission Standards in terms section 21 of the National Environmental Management: Air Quality Act, 39 of 2004.

The Introduction Letter, Background Information Document, and a Registration form to register as an I&AP to accordingly participate in this process is available at <https://arm-air.co.za/documents/>.

To register on the I&AP stakeholder database and/or to submit your comments, please utilise the online registration and comment form at: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform) Alternatively, you can email the completed registration & comment form to: [comments@arm-air.co.za](mailto:comments@arm-air.co.za) or contact Mr Anesu Shamu at ARM: Tel: 011 655 7170 for further information herein.

Kind regards,



**Anesu Shamu**

**Air Quality Specialist**

**Air Resource Management (Pty) Ltd**

**South Africa**

**0116557170**

**[comments@arm-air.co.za](mailto:comments@arm-air.co.za)**

**[www.arm-air.co.za](http://www.arm-air.co.za)**

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### **6.3.7 SMS to Previously registered I&APs (Councillors, municipality, adjacent landowners, residents associations) - Notice of Sasol 12A application**

Notice - Sasol intends to apply for a load based emission limit for SO<sub>2</sub> in terms of clause 12A of the Minimum Emission Standards (section 21 of the National Environmental Management: Air Quality Act). Should you wish to register to participate in this process and receive further information regarding this application, please reply YES

### **6.3.8 Email to registered I&APs - Letter of notification of availability of documents and invitation to Public Open Day**

Dear Interested and Affected party (I&AP),

Please find attached the letter of notification of availability of documents, the Draft Motivation report and Draft Atmospheric Impact Report, and invitation to attend the public open day.

Kind regards,



**Anesu Shamu**

**Air Quality Specialist**

**Air Resource Management (Pty) Ltd**

**South Africa**

**0116557170**

**[comments@arm-air.co.za](mailto:comments@arm-air.co.za)**

**[www.arm-air.co.za](http://www.arm-air.co.za)**

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### 6.3.9 Email to registered I&APs who attended the Public Open Day

Dear Stakeholder,

Thank you very much for attending the Sasol Secunda Operations' Clause 12A application public open day held on 6th May 2022 at the Lilian Ngoyi centre. We hope you have derived value from your participation at this public open day. This email is to acknowledge receipt of your comments on the Sasol Clause 12A application. We will revert with a response herein.

Please note that the Draft AIR and Motivation Report are available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022 for I&AP review and comments. The documents are accessible from either ARM's website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street, Secunda	Reception	(017) 610 1111

Should you have any additional comments on the Draft AIR and Motivation Report utilising one of the following methods:

1. Completing the online comments and response form at: [https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation)
2. Filling out the attached comment sheet and emailing the completed form to the ARM mailbox: [comments@arm-air.co.za](mailto:comments@arm-air.co.za);
3. Sending a letter to ARM using the following postal address: Air Resource Management, PostNet Suite 029, Private Bag X 59, Halfway House, Midrand, Johannesburg, 1685
4. Requesting a focus group meeting or
5. Alternatively contacting Anesu Shamu at ARM telephonically on 011 655 7170.

Kind regards,



Anesu Shamu

Air Quality Specialist

Air Resource Management (Pty) Ltd

South Africa

0116557170

[comments@arm-air.co.za](mailto:comments@arm-air.co.za)

[www.arm-air.co.za](http://www.arm-air.co.za)

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### **6.3.10 SMS to registered I&APs who attended the Public Open Day**

Dear I&AP, Thank you for attending the Sasol Secunda Operations Clause 12A application public open day held on 6th May 2022 at the Lilian Ngoyi centre. We hope you have derived value from your participation. This SMS is to acknowledge receipt of your comments on the Sasol Clause 12A application. We will revert with a response herein. Documents are accessible at <https://arm-air.co.za/documents/>. Additional comments are welcome



### 6.3.11 Email to stakeholders who attended the Public Open Day but didn't comment

Dear Stakeholder

Thank you very much for attending the Sasol Secunda Operations' Clause 12A application public open day held on 6<sup>th</sup> May 2022 at the at the Lilian Ngoyi centre. We hope you have derived value from your participation at this public open day.

Please note that the Draft AIR and Motivation Report are available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022 for I&AP review and comments. The documents are accessible from either ARM's website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street , Secunda	Reception	(017) 610 1111

Registered I&APs are requested to review and provide comment on the Draft AIR and Motivation Report utilising one of the following methods:

1. Completing the online comments and response form at: [https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation)
2. Filling out the attached comment sheet and emailing the completed form to the ARM mailbox: [comments@arm-air.co.za](mailto:comments@arm-air.co.za);
3. Sending a letter to ARM using the following postal address: Air Resource Management, PostNet Suite 029, Private Bag X 59, Halfway House, Midrand, Johannesburg, 1685
4. Requesting a focus group meeting or
5. Alternatively contacting Anesu Shamu at ARM telephonically on 011 655 7170.

### **6.3.12 SMS to stakeholders who attended the Public Open Day but didn't comment**

Dear Stakeholder, Thank you very much for attending the Sasol Secunda Operations Clause 12A application public open day held on 6th May 2022 at the Lilian Ngoyi centre. We hope you have derived value from your participation. Registered I&APs are requested to review and provide comment on the Draft AIR and Motivation Report. The documents are accessible from ARMs website at <https://arm-air.co.za/documents/>

### 6.3.13 Email to registered I&APs who need to comment

Dear Stakeholder,

As a registered Interested and Affected Parties (I&AP) for the Sasol Clause 12A application you are reminded that the Draft AIR and Motivation Report are available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022 for I&AP review and comments. The documents are accessible from either ARM’s website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street , Secunda	Reception	(017) 610 1111

Registered I&APs are requested to review and provide comment on the Draft AIR and Motivation Report utilising one of the following methods:

1. Completing the online comments and response form at: [https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation)
2. Filling out the attached comment sheet and emailing the completed form to the ARM mailbox: [comments@arm-air.co.za](mailto:comments@arm-air.co.za);
3. Sending a letter to ARM using the following postal address: Air Resource Management, PostNet Suite 029, Private Bag X 59, Halfway House, Midrand, Johannesburg, 1685
4. Requesting a focus group meeting or
5. Alternatively contacting Anesu Shamu at ARM telephonically on 011 655 7170.

#### **6.3.14 Reminder to registered I&APs who need to comment**

Dear Stakeholder as a registered Interested and Affected Parties (I&AP) for the Sasol Clause 12A application you are reminded that the Draft AIR and Motivation Report are available for 30 calendar days (excluding public holidays) from 21 April - 24 May 2022 for I&AP review and comments. The documents are available at ARMs website at <https://arm-air.co.za/documents/> and at: Sasol Charlie 1 entrance, Govan Mbeki Local Municipality, Govan Mbeki Public Library

### 6.3.15 Email acknowledgement of comments

Dear I&AP,

We acknowledge receipt of your comments. A response will be issued in due course.



Anesu Shamu

Air Quality Specialist

Air Resource Management (Pty) Ltd

South Africa

0116557170

[comments@arm-air.co.za](mailto:comments@arm-air.co.za)

[www.arm-air.co.za](http://www.arm-air.co.za)

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### **6.3.16 SMS acknowledgement of comments**

Dear I&AP, we acknowledge receipt of your comments. A response will be issued in due course.

## 6.4 I&AP notification letter-availability of documents

Sasol 12A Registered Stakeholder				
Title	First	Surname	Company	City/Town
Mrs	Christel	Bonnet	Proconics	Secunda
Ms	Val	Carelse	Sasol	Secunda
Ms	Linda	Cebekhulu	No affiliation	Secunda
Mr	Ian	Erasmus	Secunda Resident	Secunda
Ms	Robyn	Hugo	Just Share	Cape Town
Mr	Rohan	Kamesh	Govan Mbeki Local Municipality	Secunda
Mr	Marco	Mahlangu	No affiliation	Evander
Mr	Mbulawa	Mahlangu	Slongwane Manufacturing and Projects (PTY) LTD	Embalenhle
Mr	Khehla	Mahlangu	MS Environmental Projects	Embalenhle
Mrs	Adrie	Maia	Laerskool Trichardt	Secunda
Ms	Lerato	Malebye	KP Lime GM Sales and Marketing	Johannesburg
Ms	Keletso	Mashego	Actom MV Switchgear	Johannesburg
Mrs	Duduzile	Mazabane	Lintle for the youth	Trichardt
Mr	Bryan	McCourt	Eskom Holdings	Johannesburg

Mr	Johnny	Mokgatsi	Adjacent Landowner	Secunda
Mr	Khanye	Molato	No affiliation	Greylingstad
Mr	TT	Mpunga	No affiliation	Evander
Mr	Madoda	Ngwekazi	Sakha Isizwe Safety Boots Supplier	Bassonia
Mr	Ebrahim	Patel	Eskom	Johannesburg
Dr	Christiaan	Pauw	Nova Institute NPC	Pretoria
Mr	Onashan	Pillay	Sasol	Secunda
Mr	Hennie	Potgieter	No affiliation	Secunda
Ms	Neenu	Sajan	Sasol	Secunda
Mr	Hendrik	Snyman	Nova Institute NPC	Pretoria
Ms	Zodwa	Yikha	Sasol	Embalenhle
Mr	Simon	Van Renssen	Sasol	Secunda
Ms	Zwelibanzo	Mahlangu	Cogta	Secunda
Mr	Lazarus	Kutumela	Private	Evander
Mr	Segole	Thotse	Private	Embalenhle
Ms	Thembelani	Poco	Hlelisa NPC	Secunda



Mr	Stanley	Houane	Embalenhle Resident	Embalenhle
Mr	Sunboy	Mthimunye	Embalenhle Sports Council	Embalenhle
Mr	Ephraim	Moloi	Embalenhle Resident	Embalenhle
Mrs	Mamohau	Maleka	Private	Secunda
Ms	Lerato	Moepi	Lintle for Youth	Trichardt
Mr	Mphikele	Kwebu	Secunda Resident	Secunda
Mr	Samuel	Ndlozi	Embalenhle Resident	Embalenhle
Mr	Fana	Sibanyoni	MS Environmental Projects	Embalenhle

## 6.5 Site notices

### 6.5.1 English Site Notice

**SASOL**



#### INVITATION TO REGISTER AND PARTICIPATE

SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS:

APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF REGULATION 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

Sasol is a global chemicals and energy company that owns and operates a petrochemical and chemical manufacturing facility located in Secunda, Mpumalanga. In terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), as amended (NEMAQA), the Sasol Secunda Operations facility is required to comply with the Minimum Emission Standards (MES) (Government Gazette No. R. 893 of 13 November 2013, as amended). Whilst most of the Sasol Secunda Operations processes comply with the MES limits, there were selected activities for which Sasol Secunda Operations was unable to comply with the specified compliance timeframes, or the specified emission limits for new plants by 1 April 2020 .

For these specific cases Sasol Secunda Operations applied for and was granted, postponement of the compliance timeframes until 31 March 2025. Sasol Secunda Operations is currently on track with its air quality plans to achieve the 2025 compliance milestones for all postponement emission sources except for the Subcategory 1.1. Solid Fuel Combustion Installations SO<sub>2</sub> MES limit for existing plants. As such, Sasol Secunda Operations intends to apply to the National Air Quality Officer for an alternative load-based emission limit for SO<sub>2</sub> in terms of Clause 12A of the MES.

Sasol Secunda Operations will provide a motivation report together with an Atmospheric Impact Report (AIR) in support of the Clause 12A MES application. The AIR will undertake an independent and objective analysis of the impact on ambient air quality. Additionally, Sasol Secunda Operations will undertake a public participation process to enable any Interested and Affected Parties (I&APs) to review and comment on the application. Air Resource Management (Pty) Ltd (ARM), an independent environmental consulting company, assisted by appropriate specialists, has been appointed to compile the Sasol Secunda Operations Clause 12A MES application.

The announcement and registration period of the NEMAQA MES Regulation 12A application process, with the availability of the Background Information Document (BID) for information purposes commences from 6th April 2022. Interested and Affected Parties (I&APs) are encouraged to register as soon as possible. The registration period will be also run concurrently with the review and commenting period of the Draft AIR and Motivation Report which will be available for 30 calendar days (excluding public holidays) from 21 April – 24 May 2022. The documents will be available for review on either ARM's website at <https://arm-air.co.za/documents/> or as hardcopies at the following public venues:

Venue	Address	Contact Person	Tel
Background Information Document (available from 6 April 2022) The Draft Atmospheric Impact Report and Motivation Report (available for review and comment from 21 April 2022)			
Public Library	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street , Secunda	Reception	(017) 610 1111

Interested and Affected Parties will receive an invitation to an Open Day scheduled for the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Walter Sisulu Road, Secunda where information on the Draft Atmospheric Impact Report and Motivation report will be provided.

All Interested and Affected Parties (I&APs) are invited to review and comment on the application during the 30 calendar day period. Should I&APs require assistance in accessing the documentation, you are welcome to contact ARM using the contact details specified below. I&APs must provide their comments together with their name, contact details (preferred method of notification, e.g. e-mail address or cell number) and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below within the above-mentioned timeframes.

To obtain further information, register on the stakeholder database and/or to submit your comments, please contact Mr Anesu Shamu at Air Resource Management (Pty) Ltd (ARM): Tel: 011 655 7170, email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za). Alternatively, you can utilise the online registration and comment form at: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)



## 6.5.2: Afrikaans Site Notice



### UITNODIGING VIR REGISTRASIE EN PUBLIEKE DEELNAME

#### SASOL SUID AFRIKA BEPERK BEDRYF DEUR DIE SECUNDA FASILITEIT

AANSOEK VIR 'n MASSA-GEBASEERDE EMISSIELIMIET VIR SWAEL DIOKSID (SO<sub>2</sub>) IN TERME VAN KLOUSULE 12A VAN DIE MINIMUM EMISSIE STANDAARDE (MES) VAN 22 NOVEMBER 2013, SOOS GEWYSIG, GEPUBLISEER IN TERME VAN ARTIKEL 21 VAN DIE NASIONALE OMGEWINGSBESTUUR: LUGKWALITEIT WET 39 VAN 2004

Sasol is 'n internasionale chemikalieë - en energie maatskappy wat 'n petrochemiese and chemiese vervaardigingsfasiliteit, genaamd die Secunda Fasiliteit (Secunda Operations) geleë in Secunda, Mpumalanga besit en bedryf. Volgens die Nasionale Omgewingsbestuur: Lugkwaliteitswet 39 van 2004, soos gewysig (NEMAQA), moet die Secunda Fasiliteit voldoen aan die voorwaardes van die betrokke luglisensie wat sekere bepalinge van die MES (LIST OF ACTIVITIES WHICH RESULT IN ATMOSPHERIC EMISSIONS WHICH HAVE OR MAY HAVE A SIGNIFICANT DETRIMENTAL EFFECT ON THE ENVIRONMENT, INCLUDING HEALTH, SOCIAL CONDITIONS, ECONOMIC CONDITIONS, ECOLOGICAL CONDITIONS OR CULTURAL HERITAGE in GN 893 in GG 37054 of 22 November 2013) insluit. Hoewel dit vir die meeste van die Secunda Fasiliteit se prosesse moontlik was om te voldoen aan die MES limiete soos bepaal in die relevante luglisensie, was daar sekere aktiwiteite waaraan die spesifieke limiete nie deur die Fasiliteit teen 1 April 2020 voldoen kon word nie.

Vir hierdie spesifieke aktiwiteite het die Sasol Fasiliteit suksesvol aansoek gedoen vir die uitstel van voldoening aan die tydsraamwerke tot 31 Maart 2025. Die Secunda Fasiliteit is tans op koers met die implimentering van lugkwaliteitsvoldoeningsplanne om aan die vereide limiete te voldoen teen 31 Maart 2025 behalwe vir die SO<sub>2</sub> limiet op die ketels by die Stoomaanleg wat gereguleer word in die MES deur Subkategorie 1.1: Vaste brandstof verbrandingsinstallasies SO<sub>2</sub> limiet vir bestaande aanlegte. Dus beplan Die Secunda Fasiliteit om 'n aansoek te rig aan die Nasionale Luggehaltebeampte vir 'n alternatiewe massa-gebaseerde limiet vir SO<sub>2</sub> volgens Klousule 12A van die MES om die wetlike voortsetting van die bedryf van die Stoomaanleg te verseker terwyl die voldoeningsplan geïmplementeer word na 1 April 2025 en om volgehoue voldoening aan wetlike vereistes in staat te stel (die aansoek).

Sasol Secunda Operations sal 'n motiveringverslag tesame met 'n Atmosferieseimpakverslag (AIR) indien ter staving van die aansoek in ooreenstemming met all relevante regulatoriese vereistes. Die AIR sal 'n onafhanklike en objektiewe analise van die potensiële impak van die aansoek op lugkwaliteit onderneem. Die Secunda Fasiliteit sal verder 'n openbare deelname proses volg om enige Belanghebbende en Geaffekteerde Partye (I&APs) 'n geleentheid te gee om die aansoek te hersien en kommentaar daarop te lewer. Air Resource Management (Pty) Ltd (ARM), 'n onafhanklike omgewingskonsultasie firma, met die ondersteuning van onafhanklike spesialiste, is aangestel om die aansoek saam te stel en die geassosieerde publieke deelname proses te bestuur.

Die aankondiging van die aansoek en die opening van die I&AP registrasieproses begin op 6 April 2022. Agtergrondinligting is ingesluit in die aankondiging van die aansoek en Belanghebbende en Geaffekteerde Partye (I&APs) word aangemoedig om so spoedig moontlik te registreer vir publieke deelname in die aansoek. Die registrasieperiode bly oop vir die volle publieke deelname proses waartydens geleentheid gegee word vir oorweging van en lewer van kommentaar op die motiveringverslag en die konsep AIR wat vir 30 kalenderdae ter insae beskikbaar sal wees (publieke vakansies uitgesluit) vanaf 21 April - 24 Mei 2022. Die dokumentasie is elektronies beskikbaar op ARM se webtuiste by <https://arm-air.co.za/documents/> asook in harde kopie formaat by die volgende publieke lokale:

Plek	Adres	Kontakpersoon	Tel
Agtergrond Inligtingsdokument (beskikbaar vanaf 6 April 2022). Die Konsep Atmosferiese impakverslag (AIR) en Motiveringsverslag (beskikbaar vanaf 21 April 2022 vir hersien en kommentaar)			
Openbare Biblioteek	Laurens Mullerstraat, Secunda	Ontvangs	(017) 620 6175
Govan Mbeki Plaaslike Munisipaliteit	Horwoodstraat, Secunda	Ontvangs	(017) 620 6279
Sasol Charlie 1- hoofingang	Frans du Toitstraat, Secunda	Ontvangs	(017) 610 1111

Geregistreerde Belanghebbende en Geaffekteerde Partye (I&AP) sal 'n uitnodiging ontvang na 'n Opedag wat geskeduler is vir die 6e Mei 2022 vanaf 10:00 tot 16:00 by die Lilian Ngoyi Sentrum in Walter Sisulu Straat, Secunda waartydens inligting vervat in die Konsep AIR en motiveringsverslag bespreek sal word.

Indien enige I&AP hulp benodig om die dokumentasie vir hersiening te bekom, is u welkom om ARM te kontak via die kontakbesonderhede hieronder. I&APs moet hul kommentaar tesame met hul name, kontak besonderhede (insluitende voorkeur wyse van kommunikasie byvoorbeeld e-pos, telefonies ens.) aandui en ook enige direkte besigheids-, finansiële-, persoonlike- of ander belange in die aansoek verklaar en verskaf binne die bogenoemde publieke deelname tydsraamwerk.

Om verdere inligting te bekom, te registreer op die I&AP databasis of om kommentaar te lewer kontak gerus vir Mnr Anesu Shamu by ARM: Tel: 011 655 7170, epos: [comments@arm-air.co.za](mailto:comments@arm-air.co.za)

Alternatiewelik kan u ook die aanlyn vorm gebruik wat beskikbaar is by: [https://form.jotform.com/Anesu\\_Shamu/sasolregistrasievorm-](https://form.jotform.com/Anesu_Shamu/sasolregistrasievorm-)



### 6.5.3: Zulu Site Notice

**ISIMEMO SOKUBHALISA FUTHI UBAMBE IQHAZA  
I-SASOL SOUTH AFRICA LIMITED ISEBENZISANA  
NESIKHUNGO SAYO SASE SECUNDA:**



**ISICELO SOMKHAWULO OSEKELWE UMLAWULO WE-SULPHUR DIOXIDE (SO<sub>2</sub>)  
NGOKWEMIBANDELA YESIGCAWU 12A IZILINGANISO ZOKUKHISHWA OKUNCANE  
ZIKA 13 KULWEZI 2013, NJENGOBA KUCHITSHIYELWE, KUSHICILELWE IMIGOMO  
YESIGCAWU SA-21 SOKUPHATHWA KWEZOKUGCINA KUZWELONKE: ACT QUALITY  
ACT, 39 OF 2004**

I-Sasol yinkampani yomhlaba wonke yamakhemikhali namandla engumnikazi futhi eqhuba isikhungo sokukhiqiza amakhemikhali namakhemikhali atholakala eSecunda, eMpumalanga. NgokoMthetho Wokulawulwa Kwemvelo Kazwelonke: Umthetho Wekhwalthi Yomoya39 ka-2004 (NEMAQA), indawo ye-Secunda Operations' iyadingeka ukuze ihambisane nelayisense yayo yokukhipha umoya (AEL) ehlanganisa izinhlinzeko Zamazinga Okukhipha Okuncane (MES -UHLU LWEMISEBENZI OKUBA NGU MPHUMELA KWI ATMOSPHERIC EMISSIONS OKUBA NOMA OKUNGABA UMTHELELA OMKHULU KWI MVELO, NAKWEZEMPILO, IMIBANDELA YENHLALAKAHLE, IZIMO ZOMNOTHO, IZIMO ZEMVELO NOMA IGUGU LESIKO KU-GN 893 KU-GG 37054 OKUKA -22 KULWEZI 2013). Yize iningi lezinqubo zeSasol Secunda Operations zihambisana nemikhawulo ye-MES njengoba kuvezwe ku-AEL yayo,kube khona imisebenzi esohlwini ekhethiwe lapho Imisebenzi ye-Secunda ingakwazi ukuhambisana nemikhawulo ebekiwe yayo wezimboni ezintsha ngosuku lokuthobela imithetho lomhla Ku-1 kuMbaso KU-2020.

Kule misebenzi ethize i-Secunda Operations yafaka isicelo futhi yavunyelwa ukulehliswa kokuthotshelwa kwemithetho izikhathi ezimisiwe kuze kube umhla zingu-31 kuNdasa 2025. I-Secunda Operations okwamanje isendleleni ngemithetho yayo yokuthobela izinga lomoya, ukufinyelela ukuthobela le mikhawulo ngaphandle komkhawulo we-SO<sub>2</sub> kuma-boilers ayo kuSteam Plant yayo elawulwa ngaphakathi yi-MES ngaphansi kwesigatshana 1.1. I-Solid Fuel Combustion Installations SO<sub>2</sub> - umkhawulo wezimboni ezikhona. Ngokunjalo, iSecunda izimisele ukufaka isicelo kwi-National Air Quality Officer ukuthola omunye umkhawulo wokukhipha umoya osuselwa kumthwalo we-SO<sub>2</sub> ngokwemibandela yesigaba somthetho 12A se-MES, ukuze kuqhutshelwe nemisebenzi esemthethweni ukuba kuphotshulwe ukuqaliswa kokusetshenziswa kwe sixazululo sokuthobela iposi lamhla zingu-1 kuMbaso ku-2025 kanye nokuhambisana nokulandelana okuqhubekayo (kwe sicelo).

I-Secunda Operations izoletha umbiko wokugqunguzela kanye noMbiko Womthelela We- Atmospheric Impact Report (AIR) ukweseka Isigaba somthetho 12A wesicelo ngokuhambisana nazo zonke izidingo zokulawula ezisebenzayo. I-AIR izokwenza uhlahlazi oluzimele futhi okuhlose kumthelela ongaba khona wohlelo lokusebenza kwikhwalthi yomoya ozungezile. Ngaphezu kwalokho, iSecunda Operations izokwenza inqubo yokubamba iqhaza komphakathi ukuze sikwazi ukusiza noma yimaphi Amaqembu Anentshisekelo Nathintekayo ngama fuphi - Interested and Affected Parties (I&APs) ukuthi abuyekeze futhi aphawule kwisicelo. I-Air Resource Management (Pty) Ltd (ARM), inkampani ezimele ebonisana ngemvelo, ilekelelwa ochwepheshe abazimele abafanelekile, baqokwe ukuthi bahlanganise isicelo futhi balawule umphakathi ukubamba iqhaza kulesi sicelo.

Ukumenyezela kwesicelo kanye nokuvulwa kwenqubo yokubhaliswa kwe-I&AP ehambisanayo kuzoqala mhla zingu-6 kuMbaso 2022. Ulwazi oluyisizinda mayelana nesicelo luzofakwa esimemezelweni kanye Nabathintekayo nabane ntshisekelo ngama fuphi ama Interested and Affected Parties. (Ama-I&APs) akhuthazwa ukuthi abhalise ngokushesha ukuze umphakathi ubambe iqhaza esicelweni. Isikhathi sokubhalisa sizoqhubeka nokusebenza kanye nokubuyekezwa kanye nesikhathi sokuphawula soHlelo Lohlaka lwe-AIR kanye Nombiko Wokugqunguzela itholakale izinsuku

zekhalenda ezingu-30 (ngaphandle kwamaholide) kusukela ngomhlaka-21 kuMbaso - 24 kuNhlabo 2022 ukuze ibuyekwe futhi iphawule nge-I&AP. Imibhalo iyatholakala kwisizindalwazi se-ARM ku <https://arm-air.co.za/documents/> noma njengamakhophi aqinile ezindaweni zomphakathi ezilandelayo:

Indawo	Ikheli	Umuntu Ongaxhumana naye	Ucingo
Idokhumenti yolwazi langemuva, ngamafuphi i- Background Information Document (BID) (Itholakala mhla zingu 6 kuMbaso 2022) Umbiko womthelela womkhathi nombiko wokugquzela uzotholakala ukuze kubuyekwe futhi kuphawulwe ngawo kusuka mhla 21 ku Mbaso 2022			
Umtapo wolwazi Womphakathi	Laurens Muller Street, Secunda	Reception	(017) 620 6175
Govan Mbeki Local Municipality	Horwood Street, Secunda	Reception	(017) 620 6279
Sasol Charlie 1-main entrance	Frans du Toit Street , Secunda	Reception	(017) 610 1111

Ababhalisiwe abane ntshisekelo naba thintekayo bazothola isimemo Sosuku Oluvulekile oluhlelwe umhla ziyisi-6 kuNhlabo 2022 kusukela Ngo-10:00 kuya ku-16:00 e-Lilian Ngoyi Centre, ku-Walter Sisulu Road, e-Secunda lapho ulwazi mayelana ne-Draft Atmospheric Impact Kuzoxoxwa ngombiko kanye nombiko wokugquzela. Uma kwenzeka ama-I&APs edinga usizo lokufinyelela kumadokhumenti, wamukelekile ukuthintana ne-ARM usebenzisa imininingwane yokuxhumana ecaciswe ngezansi. Ama-I&APs kufanele anikeze ukuphawula kwawo kanye namagama awo, imininingwane yokuxhumana, (indlela abayi khethwayo yokuthola isaziso, isibonelo. ikheli le-imeyili noma inombolo yeselula) kanye nenkomba yanoma yiliphi ibhizinisi eliqondile, lezezimali, elomuntu siqu noma okunye okuthakaselayo abanazo esicelweni kumuntu othintana naye okhonjiswe ngezansi phakathi nezikhathi ezibalulwe ngenhla. Ukuthola ulwazi olwengeziwe, bhalisa kusizindalwazi sababambe iqhaza kanye /noma ukuhambisa ukuphawula kwakho, sicela uxhumane noMnu U-Anesu Shamu ku-ARM: Ucingo: 011 655 7170, i-imeyili: [comments@arm-air.co.za](mailto:comments@arm-air.co.za). Kungenjalo, ungasebenzisa ifomu lokubhalisa eliku-inthanethi nelokuphawula ku: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)





## 6.6 Public Open Day Flyers Distribution



The flyer features the ARM and SASOL logos at the top. The main heading is 'Invitation to PUBLIC OPEN DAY' set against a background of pink and white flowers. Below this, a paragraph explains that Sasol's Secunda Operations will be applying for a load-based emission limit for sulphur dioxide emissions for boilers at its steam plants in terms of clause 12A of the minimum emissions standards. It then invites the public to join the open day for more information, to register as an interested and affected party and participate in the process. A table provides the following details:

Date:	6 May 2022
Time:	10:00 – 16:00
Venue:	Lilian Ngoyi Centre, Walter Sisulu Road, Secunda.

Interested and affected parties can also register via phone (011 655 7170) or email (comments@arm-air.co.za). A QR code is provided for online registration. An alternative registration link is also provided: [https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform).









## 6.8 Radio Advertisement

### RADIO LIVE READ

#### **Sasol's Secunda Operations' to apply for a load-based emission limit for sulphur dioxide (SO<sub>2</sub>) in terms of clause 12A of the minimum emission standards**

#### LIVE READ SCRIPT:

Sasol's Secunda Operations will be applying to be regulated by a load-based emission limit for sulphur dioxide emissions in terms of clause 12A of the minimum emissions standards.

Please join the open day on 6 May at the Lilian Ngoyi Centre, Walter Sisulu Road, Secunda for more information, to register as an interested and affected party and participate.

Interested and affect parties can also register by calling 011 655 7170 or email [comments@arm-air.co.za](mailto:comments@arm-air.co.za) (spell out A R M dash A I R).

~30 seconds







## 6.10 Public Open Day



**Sasol Clause 12A video presentation**



**Stakeholders and I&APs engaging on the Sasol Clause 12A posters**



**Stakeholders and I&APs capturing their comments related to the Sasol Clause 12A application**

## 6.11 Public Open Day Posters



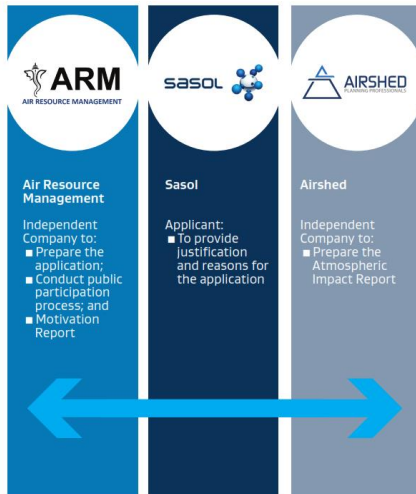
MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

### Purpose of the Open Day

**The objective is:**

- 1) To provide an overview of this Clause 12A application for Sasol Secunda Operations;
- 2) To share information on the contents of the draft Atmospheric Impact Report (AIR) and Motivation Report with interested and affected parties (I&APs)
- 3) To provide I&APs an opportunity to comment on, or raise issues relevant to the Sasol Secunda Operations application

#### Project Team



### Stakeholder Engagement Process

The process followed for this application allows potential interested and affected parties (I&APs) an opportunity to comment on or raise issues relevant to the intended application.

#### Planned public participation process

**PROJECT ANNOUNCEMENT Commenced 6 April 2022**

- Distribute letter, Background Information Document (BID) and comment sheet
- Advertisements and Site Notices
- Opportunity for I&APs to register and comment online, by email, telephone AND comment sheets
- Preparation of Draft AIR and Motivation Report

**PUBLIC PARTICIPATION Public Comment Period from 21 April to 24 May 2022**

- Distribute Draft Motivation Report, Draft AIR and comment sheet
- Documents available online and hard copies
- Opportunity for I&APs to comment online, by email, telephone and comment sheets
- Public Open Day in Secunda, 6 May 2022

**Collate comments into comments & response reports (CRR)**

**Submit final motivation document & updated CRR to NAQO**

**STAKEHOLDERS NOTIFICATION**

- Complete application available for stakeholders information
- Notify stakeholders of availability of submitted documents and that comments can be submitted to NAQO

April 2022

May 2022

June 2022

**I & APs must submit comments by the latest 24th May 2022**



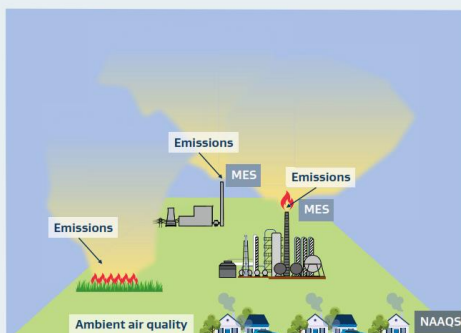


MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

**Background: The National Environment Management: Air Quality Act (Act No. 39 of 2004) (AQA)**

The National Environment Management: Air Quality Act (Act No. 39 of 2004) (AQA) reformed the law regulating air quality by the setting of emission and ambient air quality standards to protect human health and the environment.

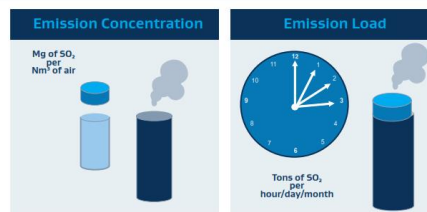
- The Minimum Emissions Standards (MES) issued by the Department of Forestry, Fisheries and Environment (DFFE), prescribe emission limits that must be complied with by different industrial activities.
- The MES aims to control sources of air pollution so that ambient air quality (essentially the air that we breathe) does not present risks to human health and the environment.
- DFFE also publishes National Ambient Air Quality Standards (NAAQS) to prescribe tolerable concentrations of pollution in ambient air.
- In terms of AQA the Secunda Operations had to meet the limits specified in the MES for existing plants by 1 April 2015 and for new plants by 1 April 2020.



Schematic illustrating the difference between point source emission standards and ambient air quality standards

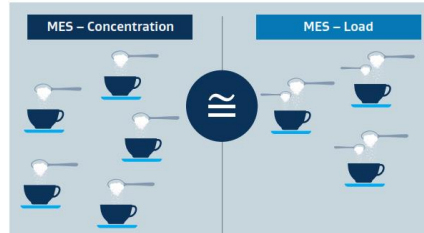
**Background: Concentration limit vs Emission Load**

Compliance with the MES for air quality can be measured in two ways – by pollutant concentration or pollutant load



**Concentration** is the mass of pollutant in a defined volume of air.

**Load** is the amount (mass) of a pollutant that is discharged into the airshed during a period of time (ie. tons of pollutant per year).



Schematic illustrating that ambient concentrations are only indirectly a function of emissions concentration, but a direct function of the emission rate (load) at which the pollution is emitted.



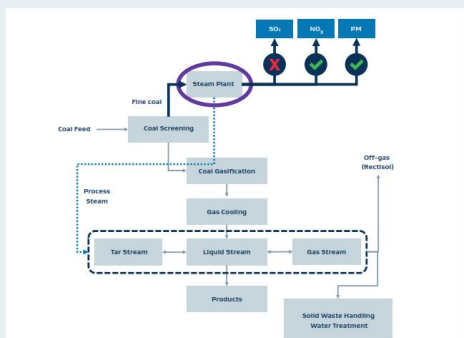


MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

### Secunda Operations Steam Plant

The activities conducted at the Steam Plant are listed activities, governed in terms of MES Category 1: Combustion Installations, (Subcategory 1.1: Solid Fuel Combustion Installations) of the Atmospheric Emission License:

- For the Secunda Operations, it is critical that process steam is continuously available at the right quality and quantity at all processes where steam is required. A fleet of boilers was built to meet the Secunda Operations' steam requirements..
- In addition to process demands, steam is supplied to generate 'critical power' needed in the event of power loss (electricity) from the national grid. That critical power allows for safe shutdown without damage to the plant

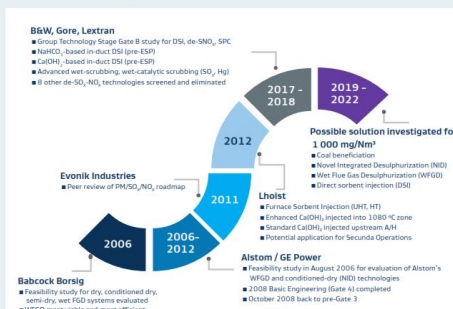


Overview of the various industrial activities at the Secunda Operations

### Secunda Operations Steam Plant MES SO<sub>2</sub> Challenge

Throughout the development of the MES and the various amendments, the Secunda Operations has communicated publicly the unique challenges which its aging boiler fleet at the Steam plant face in achieving compliance

- This is technically extremely challenging due to the integrated nature of the Sasol process as well as physical constraints imposed by the congested nature of the facility.
- The Secunda Operations has conducted detailed technology scans and investigated various air quality abatement technologies for SO<sub>2</sub>.
- Unfortunately, there is no viable abatement technology solution that can be fitted to the Secunda Operations Steam Plant boilers to comply with the SO<sub>2</sub> MES concentration limit of 1000 mg/Nm<sup>3</sup> limit by 1 April 2025.



SO<sub>2</sub> Air Quality Abatement Technology Journey for the Secunda Operations Steam plant

Given the integrated nature of the Sasol value chain, shutting down the Secunda Operations Steam Plant will have a profound impact on the viability of the Sasol business.



MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

## Clause 12A of the MES

Clause 12A of the MES provides for an existing plant, such as the Secunda Operations, to apply to the National Air Quality Officer (NAQO) for an emission load limit to be granted in instances where a new plant standard cannot be met for a particular pollutant, if certain criteria are met.

### Requirements for Clause 12A of the MES

The criteria to be met for a clause 12A of the MES application include the following:

- An existing plant may submit an application regarding a new plant standard to the NAQO for consideration if the plant is in compliance with other emission standards but cannot comply with a particular pollutant or pollutants.
- An application must demonstrate previous reduction in emissions of the said pollutant or pollutants, measures and direct investments implemented towards compliance with the relevant new plant standards.
- The NAQO, after consultation with the Licensing Authority, may grant an alternative emission limit or emission load if:
  - there is material compliance with the NAAQS in the area for the pollutant or pollutants applied for; or
  - the Atmospheric Impact Report (AIR) does not show a material increased health risk where there is no ambient air quality standard.



### Sasol Secunda Operation Clause 12A Application

Sasol intends to apply to the NAQO to be regulated by a load-based emission limits (the mass and the rate of the pollutant emissions) instead of a concentration limit (the mass of pollutant per cubic meter of air emitted) as provided for in the MES for the Steam plant.

- Simply put, the Secunda Operations intends to reduce emissions from the Steam plants by reducing steam produced from its coal fired boilers, utilising less coal and thereby reducing the mass of SO<sub>2</sub> emissions (load).



Note: The green line indicates a theoretical load equivalent, assuming emissions are at the concentration specified in the MES at current steam production"





MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

Sasol Secunda Operations has met all three Clause 12A of the MES requirements for the Steam Plant

Clause 12A (a): The plant is in compliance with other emission standards but cannot comply with a particular pollutant or pollutants.

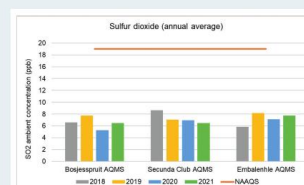
- Through a variety of projects and significant investments to date, the Secunda Operations is able to meet the applicable MES (as per its AEL) for 98% of all its emission sources.
- The Secunda Operations' boilers at their steam plants must comply with the MES Category 1: Combustion Installations, (Subcategory 1.1: Solid Fuel Combustion Installations) for SO<sub>2</sub>, NOx and PM as specified in its AEL by 1 April 2025. In this regard, following comprehensive piloting of the available technologies, the Secunda Operations has already retrofitted nine out of the 17 electrostatic precipitators (ESPs) on the steam plants' boilers and is on target to complete the remaining eight retrofits by 1 April 2025. For NOx abatement, 48 low NOx burners have been installed on three boilers within the steam plants and project completion is on target to enable compliance by 1 April 2025.
- The Secunda Operations is on track to enable compliance with NOx and PM MES limits by 1 April 2025 in accordance with the applicable conditions of its AEL except for SO<sub>2</sub>.
- Since 2006, Secunda Operations has conducted numerous abatement studies on how to achieve the steam plants' boiler SO<sub>2</sub> MES limit. The assessments highlighted that commercially available technologies for boiler SO<sub>2</sub> abatement are technically complex with many unintended consequences, especially invoking cross-media impacts on the water and waste environments as well as increased GHGs emissions.

Clause 12A b) An application must demonstrate previous reduction in emissions of the said pollutant or pollutants, measures and direct investments implemented towards compliance with the relevant new plant standards.

- The Secunda Operations has incorporated air quality offsetting as part of its ambient air quality improvement plans to reduce PM and SO<sub>2</sub> emissions from domestic fuel use in low-income dense settlements
- To date, the offset programme mitigated emissions of more than 207 tons of PM10, 194 tons of PM2.5 and 80 tons of SO<sub>2</sub> in the surrounding airshed.
- To comply with the new plant standards by 1 April 2025, the Secunda Operations has already spent direct investments to install additional PM and NOx abatement on the Steam plant boilers.
- To reduce PM emissions, nine out of 17 boiler electrostatic precipitators (ESPs) have already been retrofitted with better functioning transformers, and the remainder of the boiler fleet is on track to be retrofitted before 1 April 2025.
- For NOx abatement, three boilers have already been retrofitted with a total of 48 low NOx burners with completion on target to enable compliance by 1 April 2025.
- The steam plants' boilers is therefore on track to be fully compliant with the PM and NOx MES limits by 1 April 2025.

Clause 12A (c): There is material compliance with the NAAQS in the area for the pollutant applied for.

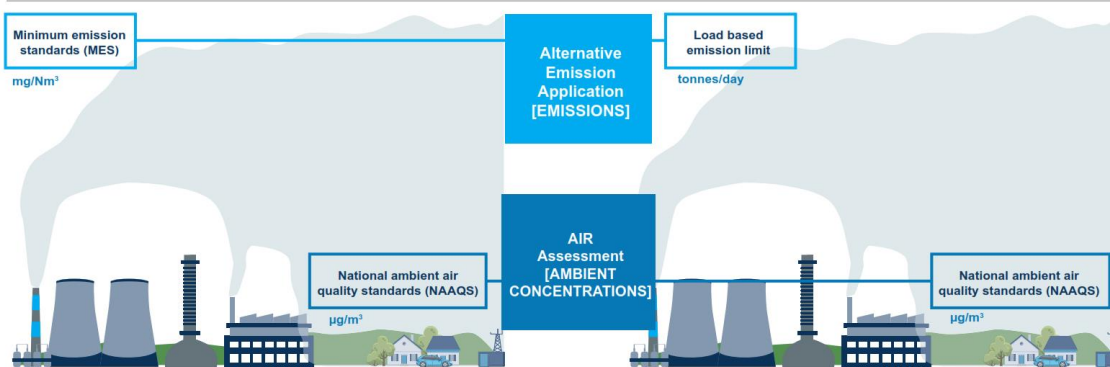
- Material compliance with the NAAQS, in the area in which the applicant will conduct its operations on a load-based emission limit, must be demonstrated for consideration of the clause 12A application.
- The area in question (airshed within which the Secunda Operations operates the steam plants) is defined in the AIR (Airshed, 2022).
- There is a network of accredited (ISO/IEC17025) ambient air quality monitoring stations in the vicinity of Secunda.
- Ambient air quality data for the period 2007 to 2021 was analysed for SO<sub>2</sub> NAAQS compliance in the Secunda area.
- There are no exceedances of the NAAQS limit values above the allowable number for any of the averaging periods.
- Therefore, it is argued that the NAAQS in this area, on average, is not exceeded and consequently constitutes material compliance with the SO<sub>2</sub> NAAQS.



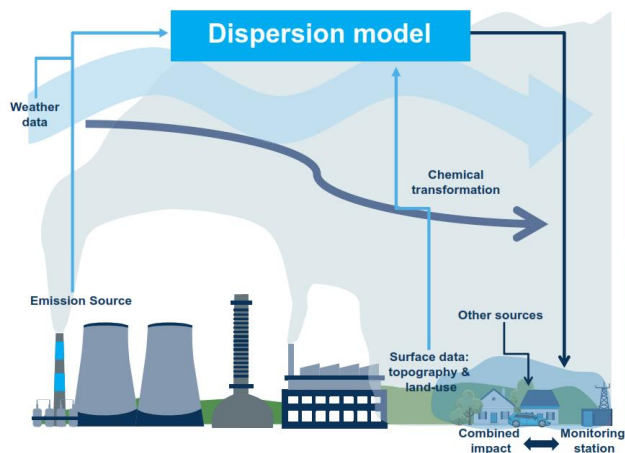
Measured SO<sub>2</sub> annual average ambient air quality concentrations for the period 2018 – 2021 for the Secunda ambient air quality monitoring network.

## MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

### STUDY PURPOSE



### DISPERSION MODELLING



**Question:** How does this application affect the air we breathe?

To answer this, we need an AIR assessment. The AIR is used to assess the implications of the application for ambient air quality.

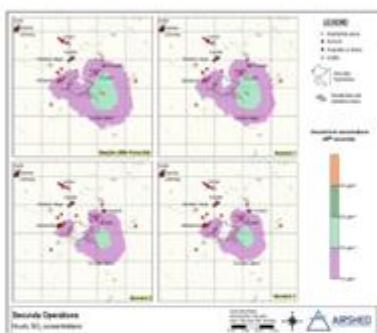
The AIR assessment takes the EMISSIONS and transforms this into AMBIENT CONCENTRATIONS by means of dispersion modelling. The simulated concentrations are compared to the NAAQS.





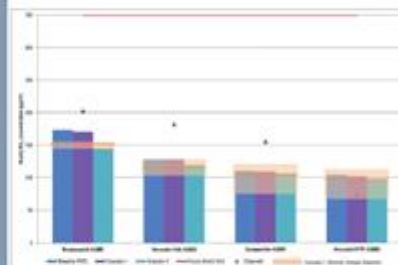
## MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

### AIR Findings – SO<sub>2</sub>

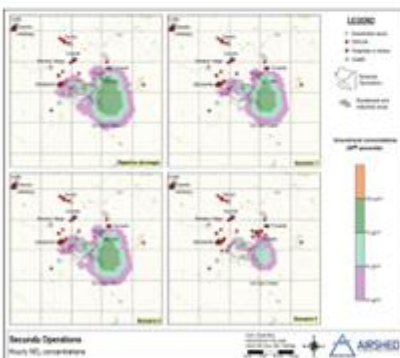


#### Scenarios

- Baseline - 95th percentile SO<sub>2</sub>
- Scenario 1 - Interim Load  
Scenario 4% load reduction
- Scenario 2 - Compliance with  
MES 15% load reduction
- Scenario 3 - End State Load  
Scenario 30% load reduction

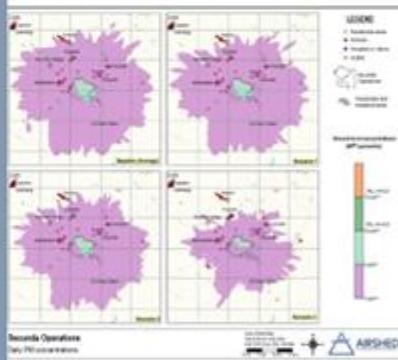


### AIR Findings – NO<sub>2</sub> and PM



#### Scenarios

- Baseline – Average NO<sub>2</sub> and PM emissions
- Scenario 1 - Interim Load  
Scenario 4% load reduction
- Scenario 2 - Compliance with  
MES 15% load reduction
- Scenario 3 - End State Load  
Scenario 30% load reduction



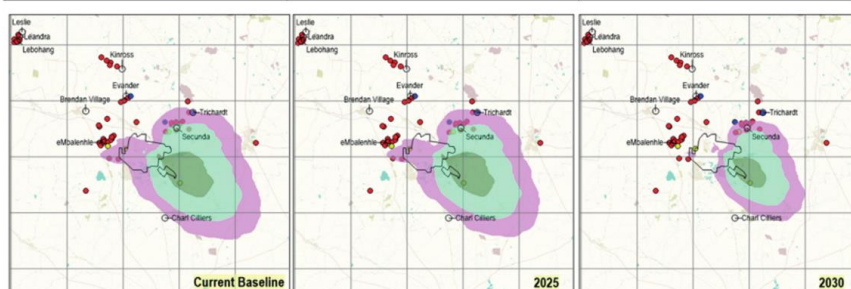


MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

Environmental benefits of adopting a load-based emission approach include the following:

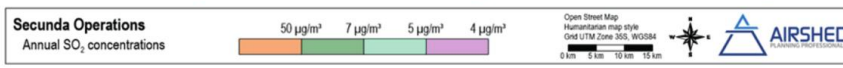
- 1 In addition to the reduction in SO<sub>2</sub> emission load, there would be a proportional reduction in the loads of all other atmospheric emissions from the Steam plants including PM, NO<sub>x</sub> and CO<sub>2</sub> (GHG's). This would not be realised by simply reducing the SO<sub>2</sub> emissions concentration to comply with the concentration based MES limit. The added benefits include associated reductions in the criteria pollutants namely PMs and NO<sub>x</sub> to be realised over and above compliance to the MES limits through the completion of the air quality compliance roadmaps.
- 2 In contrast to the MES SO<sub>2</sub> concentration-based solution of coal beneficiation, the emission load-based solution does not have associated, negative, environmental impacts like additional water use, waste water generation and solid waste disposal.
- 3 The Secunda Operations' steam plants will be able to operate lawfully on load-based limits from 1 April 2025 whilst implementing the integrated GHG and SO<sub>2</sub> reduction roadmap;
- 4 Through the integrated reduction roadmap, the Secunda Operations aims to achieve a 30% total load reduction in SO<sub>2</sub> emissions by 2030, which is significantly more than what would be achieved (15%) under the current concentration limits in the MES
- 5 The SO<sub>2</sub> emission load-based limits will allow for an improvement in ambient air quality equivalent or better than what would be achieved via the SO<sub>2</sub> MES concentration limit, aligned with the objectives of the NEMAQA.

Current	1 April 2025 to 31 March 2030	1 April 2030 onwards
526 t/d	503 t/d	365 t/d



**LEGEND**

- Residential areas
- Schools
- Hospitals or clinics
- AQMS
- Secunda Operations
- Residential and industrial areas



Simulated improvement in SO<sub>2</sub> annual average ambient air quality concentrations





MOTIVATION FOR AN APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS (MES) OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT 39 OF 2004

Comments to be submitted by 24th May 2022

Registered I&AP's are requested to review and provide comment on the Draft AIR and Motivation Report utilising one of the following methods:

- 1 Completing the comments and response form at the public open day to be held on the 6th of May 2022 from 10:00 to 16:00 at the Lilian Ngoyi Centre, Secunda
- 2 Completing the online comments and response form at:  
[https://form.jotform.com/Anesu\\_Shamu/Sasol12A-CommentsDraftAirMotivation](https://form.jotform.com/Anesu_Shamu/Sasol12A-CommentsDraftAirMotivation)
- 3 Filling out the comment sheet and emailing the completed form to the ARM mailbox: [comments@arm-air.co.za](mailto:comments@arm-air.co.za);
- 4 Sending a letter to ARM using the following postal address: Air Resource Management, PostNet Suite 029, Private Bag X 59, Halfway House, Midrand, Johannesburg, 1685
- 5 Requesting a focus group meeting or
- 6 Alternatively contacting Anesu Shamu at ARM telephonically on 011 655 7170

To obtain further information, and/or to submit your comments, please contact Mr Anesu Shamu at ARM: Tel: **011 655 7170**, email: [comments@arm-air.co.za](mailto:comments@arm-air.co.za). Alternatively, you can utilise the online registration and comment form at:  
[https://form.jotform.com/Anesu\\_Shamu/sasol-registrationform](https://form.jotform.com/Anesu_Shamu/sasol-registrationform)

SCAN ME



The process followed for this application allows registered I&APs an opportunity to comment on, or raise issues relevant to the intended application.

## 6.12 Comments received from I&AP's

power plant

**Subject:** power plant

**From:** Richard Durrant <[REDACTED]>

**Date:** 2022/04/21, 19:50

**To:** comments@arm-air.co.za

Dear Anesu Shamu,

The sulphur emissions could be reduced by pyrolysis of the coal. Please see item 'Disco smokeless fuel process'. The gas produced by coal carbonisation at 537 degrees Celsius (1000 degrees Fahrenheit). could be desulphurised before use as fuel for the process. The char could then be fed to the boilers, without cooling. This Disco product would have higher ash and lower sulphur than the coal feed. Valuable byproducts could be obtained.

Regards, Richard Durrant



**Subject:** RE: Sasol Secunda Operations-Application for a load based emission limit for sulphur dioxide:Letter of Notification of Availability of Documents and Invitation to Public Open Day  
**From:** "Robyn Hugo" <[redacted]>  
**Date:** 2022/04/26, 10:12  
**To:** Anesu Shamu <comments@arm-air.co.za>  
**CC:** Tracey Davies <[redacted]>, Emma Schuster <[redacted]>

Dear Anesu

In order to support meaningful participation in and understanding of this process, please could you make the following available to I&APs asap:

- the latest version of the Secunda AEL; and
- at least the 2 most recent emission reports, referred to in paragraphs 17 and 18 of the List of Activities.

Looking forward to your response.

Thanks and regards

Robyn Hugo  
Director: Climate Change Engagement



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Investor power for a fairer South Africa

 @JustShareSA

[Redacted signature block]

## Mbulawa Solly Mahlangu , Mr.

---

Submission Date	Apr 26, 2022 3:03 PM
Name	Mbulawa Solly Mahlangu , Mr
Organisation / Affiliation / Declaration of Interest	Slongwane Manufacturing and Projects (PTY) LTD
Mobile Number	[REDACTED]
Landline Number	[REDACTED]
Physical/Postal Address	[REDACTED] [REDACTED] [REDACTED]
Email Address	[REDACTED]
Please formally register me as an interested party (I&AP) so that I may receive further information and notifications during the application process	<input checked="" type="checkbox"/> Yes
I would like my notifications by:	<input checked="" type="checkbox"/> E-mail <input type="checkbox"/> SMS <input type="checkbox"/> Letter
Comments	<p>Good day Sosal Secunda</p> <p>Solngwane Manufacturing and Projects is a small business that provides gas cylinders to the community at large. Our business has struggle our the past few years as the gas stoves and heaters installed in our area seemed to benefit other companies but not local embalenhle businesses which are supposed to empower township economy and reduce youth unemployment rates in our community. How can Sasol help us fight reduce the rate of unemployment and empower township economy.</p> <p>I would like to request a response back regarding the scope of work done by Sasol in the Govan Mbeki municipality of installing gas stove and heaters. Please send me a feedback via email.</p>
I consent to the collection, storage and management of my personal information as part of this 12A Application	<input checked="" type="checkbox"/> YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

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Comments of Interested and Affected Parties

**Subject:** Comments of Interested and Affected Parties

**From:** Fana Sibanyoni [REDACTED]

**Date:** 2022/04/28, 10:44

**To:** comments@arm-air.co.za

Good day,

Please find the details below as the Interested and Affected Parties:

Name: Fana Sibanyoni

Title: Mr

Organization name: MS Environmental Projects

Address: [REDACTED]

Email Address: [REDACTED]

Contact Number: [REDACTED]

Comments:

This postponement application by Sasol is giving enough tangible proof that there is a challenge of Sulphur Dioxide emission which have negative impact to the fence-line communities. But the existing challenge is that very few inhabitants of Embalenhle are benefiting from the riches of Sasol as it been reported previous by Sasol that not everyone will be employed or get CSI projects (Offset projects) from Sasol. We believe that to have a fair benefit to all, Sasol is requested to consider establishing a shareholding scheme that will cater those fence-line community who are left out via this proposed Community Shareholding Scheme. We hope ARM can assist in facilitating this proposal and looking forward to hearing from you.

Kind regards

## Khehla Mahlangu, Mr.

[REDACTED]

Submission Date Apr 28, 2022 10:55 AM

Name Khehla Mahlangu, Mr

Organisation / Affiliation / Declaration of Interest MS Environmental Projects

Mobile Number [REDACTED]

Landline Number [REDACTED]

Physical/Postal Address [REDACTED]

Email Address [REDACTED]

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications during the application process  Yes

I would like my notifications by:  E-mail

Comments: This postponement application by Sasol is giving enough tangible proof that there is a challenge of sulphur dioxide emissions which have negative impact to the fence-line communities. But the existing challenge is that very few inhabitants of Embalenhle are benefiting from the financial success of Sasol as it been reported previous by Sasol that not everyone will be employed or get CSI projects (Offset projects) from Sasol. So this make us to believe that to see fairness and almost equal benefit of all fence-line communities, different strategy should be considered. A request that Sasol should consider establishing a shareholding scheme that will cater the fence-line community who are left out through this proposed Community Shareholding Scheme. We request ARM to facilitate this proposal and looking to hear from you.

I consent to the collection, storage and management of my personal information as part of this t2A Application  YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

Thunderbird

**From:** Penny Ngwekazi [REDACTED]  
**Date:** 2022/05/01, 12:51  
**To:** comments@arm-air.co.za

Good day

I am Penny Ngwekazi who is a local resident from a black owned woman company by the name of Tigress, and would like to comment as per the invitation.

It has come to my attention that the local black women owned business are never given an opportunity to take part in the offset project. Despite numerous attempts in trying to bid for this project, it is almost impossible to get a breakthrough for women in this project.

In addition, we have taken note that only male owned business have been given the preference to the offset projects and females have been often time over looked.

We, would like for this opportunity to also be given to women in order to bring balance to the gender equity.

I trust you will find the above mentioned matter in order.

Regards  
Penny  
[REDACTED]

Emission of Sulphur Dioxide

**Subject:** Emission of Sulphur Dioxide

**From:** Lerato Moepe [REDACTED]

**Date:** 2022/05/05, 18:40

**To:** comments@arm-air.co.za

Sulfur dioxide affects has affect the many Secunda area, and brought many health issues such as the respiratory system, particularly lung function, including irritation of the eyes in young children.

Sulfur dioxide in Sasol plants has seen not Sasol employees developing causes of coughing, mucus secretion and aggravates conditions such as asthma and chronic bronchitis.

We as the NPO YOUTH, recently attended the Youth Environment at Climate Change, where we have developed programs as well as projects that can create jobs for these youths. Issues can be tackled through easy access of information, where such projects can be heard and assistance can be given on funding.

Regards

Lerato Mokoena



## Duduzile Mazabane , Mrs .

[REDACTED]

Submission Date May 5, 2022 7:16 AM

Name Duduzile Mazabane , Mrs

Organisation / Affiliation / Declaration of Interest Lintle for the youth

Mobile Number [REDACTED]

Physical/Postal Address [REDACTED]

Email Address [REDACTED]

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications during the application process

Yes

I would like my notifications by:

E-mail SMS

Comments

I am interested to learn how Sasol and the commission are planning to speed up the process of bringing down gas emissions in our area and how they are going to involve the community in such projects.

I consent to the collection, storage and management of my personal information as part of this 12A Application

YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

I saw the add in Evander Took a picture and decided to attend.



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH THS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	Mr	First name	Sunboy
Initials	S	Surname	Mthimunya
Organisation/Affiliation	Community Member (Embsenkhe Sports Council)		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number		Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	[Signature]	Date	06/05/2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>
Letter: <input type="checkbox"/>		
Comments (Use a separate sheet if necessary)		
<p>Sasol Needs To engage with the community pertaining Environmental issues. Proper communication platform should be exercised let people decide for themselves as they are the ones facing challenges each day. People within the community should be taken for training so that they will be the ones to explain and engage with the community. Please bring this to the people right inside the location so that everyone will be involved from the community because no everyone could afford to</p>		

Air Resource Management (Pty) Ltd

B-BBEE Contributor: Level 1

Regus Midrand, Montrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

Website [www.arm-sa.co.za](http://www.arm-sa.co.za)





take a taxi to Secunda Lillian Ngoyi.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
<input checked="" type="checkbox"/>	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
<input type="checkbox"/>	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

Air Resource Management (Pty) Ltd  
 Regus Midrand, Montrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1605, South Africa  
 Tel: 011 655 7170  
 Website: [www.arm-air.co.za](http://www.arm-air.co.za)

B-BBEE Contributor: Level 1



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	MR	First name	SIMON	
Initials	S	Surname	VAN RENSSSEN	
Organisation/Affiliation	INHABITANT SECUNDA, SASOL			
Postal Address	[REDACTED]		Postal Code	[REDACTED]
Land Line Number	[REDACTED]		Cellphone Number	[REDACTED]
Email	SIMON.VANRENSSEN@SASOL.COM			
Signature	A. Van Renssen	Date	6 MAY 2022	

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>
Letter: <input type="checkbox"/>		
Comments (Use a separate sheet if necessary)		
INFORMATIVE, SPECIFICALLY ON REDUCTION ON ALL PRIORITY POLLUTANTS. SUPPORT PROCESS		

Air Resource Management (Pty) Ltd

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Regus Midrand, Montrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

Website [www.arm.co.za](http://www.arm.co.za)



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 22 NOVEMBER 2013 AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	Mr	First name	Zwelebonzi
Initials	Z.M	Surname	Mahlangu
Organisation/Affiliation	Cogta		
Postal Address			Postal Code
Land Line Number			Cellphone Number
Email	[REDACTED]		
Signature		Date	

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <input type="checkbox"/>	Tel: <input checked="" type="checkbox"/>	SMS: <input checked="" type="checkbox"/> Letter: <input type="checkbox"/>
Comments (Use a separate sheet if necessary)		
<p>You must inform community about this and you must inform CDWS (community development worker) to assist in terms of mobilizing community. This is good initiative for us. And CDWS can make it easier to invite community</p>		

Air Resource Management (Pty) Ltd

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Regus Midrand, Meintrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

Website: [www.arm-air.co.za](http://www.arm-air.co.za)

Specific request to be included in future communications/meetings on environmental matters. *MC*





SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS: APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	MR	First name	FANA
Initials	F	Surname	SIBANYONI
Organisation/Affiliation	[REDACTED]		
Postal Address	[REDACTED]		
		Postal Code	2285
Land Line Number		Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	<i>(Signature)</i>	Date	06-05-2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <i>fana.sibanyoni@ymail.com</i>	SMS: <input type="checkbox"/>	Letter: <input type="checkbox"/>
Comments (Use a separate sheet if necessary)		
<p>BY SASOL TRYING TO COME UP WITH THIS LOAD BASED SO<sub>2</sub> EMISSION LIMITS, THIS CAN PLAY A CRUCIAL ROLE IN CLEANING OUR AMBIENT AIR QUALITY AND LESS NEGATIVE IMPACT TO OUR COMMUNITY IN TERMS OF HEALTH ISSUES.</p> <p>BUT THERE IS A NEW CHALLENGE OF EMPLOYMENT PROBLEM THAT WILL ADD TO THE CURRENT HUGE UNEMPLOYMENT CHALLENGE. WE PROPOSED THAT SASOL CONSIDER LINKING THIS NEW LOAD BASED EMISSION LIMITS PROJECT WITH THE COMMUNITY IN ORDER TO ENSURE THAT EMPLOYEES ARE RE-SKILLED, THE CURRENT STUDENT EDUCATION IS <del>ALIGNED</del> ALIGNED TO THE NEW</p>		

Air Resource Management (Pty) Ltd

B-55EE Contributor Level 1

Regus Midrand, Montrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

Website: [www.airm-39.co.za](http://www.airm-39.co.za)



PROPOSED PRODUCTION THAT WILL LIMITS THE SO<sub>2</sub> IN OUR AMBIENT AIR QUALITY / ATMOSPHERE, AND SAVE, RETAIN JOBS. OUR OTHER PROPOSAL IS TO START HAVING PROGRAM THAT WILL MAKE THE COMMUNITY TO SHARE FROM THE FINANCIAL SUCCESS OF SASOL THROUGH INTRODUCTION OF COMMUNITY SHAREHOLDING SCHEME AS NOT EVERYONE WILL GET JOB AT SASOL OR BENEFIT THROUGH THE OFFSET PROJECT. WITH REGARD TO THE OFFSET PROJECTS, WILL PROPOSE THAT SASOL START TO BE MORE TRANSPARENT AND INVOLVE ALL SMALL BUSINESS ESPECIALLY OF THE AFFECT COMMUNITIES. THIS INCLUDE WOMEN START-UP COMPANIES. WE HOPE ALL OUR COMMENTS WILL BE CONSIDERED AND PROPER FEEDBACK WILL BE GIVEN TO US.

I consent to the collection, storage and management of my personal information as part of this 12A Application

X

YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

Air Resource Management (Pty) Ltd

B-BBEE Contributor: Level 1

Regus Midrand, Menrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

Website [www.arm-af.co.za](http://www.arm-af.co.za)





SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	MR	First name	EPHRAIM
Initials		Surname	MOLDI
Organisation/Affiliation	NONE		
Postal Address	[REDACTED]		
Land Line Number		Cellphone Number	[REDACTED]
Email			
Signature	<i>E. Moloi</i>	Date	06/05/2022

REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail:	Tel:	SMS:
Letter: <input type="checkbox"/>		
Comments (Use a separate sheet if necessary)		
<p>I request that Sasol continue with the project of Air quality effect of coalburnable so that they can take away the coal stoves and give people the gas stoves. This will help the communities to burn less or no coal.</p>		



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

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**CONTACT DETAILS**

Title	Mr	First name	Samuel
Initials		Surname	M Ndlozi
Organisation/Affiliation	Community Gmba		
Postal Address	[REDACTED]		
		Postal Code	
Land Line Number		Cellphone Number	[REDACTED]
Email	mafikasamuel95@gmail.com		
Signature		Date	6/5/2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I would like my notifications by:		
E-mail: [REDACTED]	Text: [REDACTED]	SMS: [REDACTED]
Letter: [REDACTED]		
Comments (Use a separate sheet if necessary)		
Health issue resulting from this project and impact on children. For example we are comparing people working for Sasol having medical aid vs people not working for Sasol and being affected what is going to happen to them.		

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Tel 011 655 7170

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SASOL SOUTH AFRICA LIMITED OPERATING THROUGH THS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	Mrs	First name	Duduzile
Initials	DH	Surname	Mazabane
Organisation/Affiliation	Little for the youth		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number	N/A	Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	[Signature]	Date	06 May 2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>
Letter: <input type="checkbox"/>		
Comments (Use a separate sheet if necessary)		
<p>Information to the community does not reach everyone, I have been a Secunda resident for 8 years this is the first time this year hearing that Sasol has been addressing the Air quality issue. I am a woman who likes to be empowered and would like to take information down to other ladies I normally engage with. We would like to see more educational functions being held for the youth because I believe education</p>		

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is power. I would like to see more GO green projects from Sasol in the locations.

We would like to see Sasol utilising our NPO's to send information across all spheres.

Make Create easy access to information for everyone.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
<input type="checkbox"/>	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
<input type="checkbox"/>	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

Air Resource Management (Pty) Ltd

B-BBEE Contributor: Level 1

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Tel: 011 655 7178

Website: [www.arm-air.co.za](http://www.arm-air.co.za)



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

### REGISTRATION AND COMMENT SHEET

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

#### CONTACT DETAILS

Title	M. ✓	First name	Mhabela
Initials		Surname	Maklonge
Organisation/Affiliation	MS Environmental Project		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number		Cellphone Number	[REDACTED]
Email			
Signature		Date	

#### REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
I would like my notifications by:		
E-mail:	Tel:	SMS:
Letter:		
Comments (Use a separate sheet if necessary)		
<p>Involvement of the community in an transformation that is doing by Company. We understand that sulphur dioxide cause the problem for us as community.</p> <p>Come with the proposal that will assist community and creates job especial for fence line community.</p>		

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Newspaper

SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 22 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	Ms	First name	Mumbelane
Initials		Surname	Poco
Organisation/Affiliation	Hletisa NPC and lifetime long community member		
Postal Address	member		
		Postal Code	2285
Land Line Number		Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature		Date	06.05.2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: [REDACTED]	Tel:	SMS: <input checked="" type="checkbox"/> Letter: <input type="checkbox"/>
Comments (Use a separate sheet if necessary)		
I understand and agree with the application for a load based emission limit for sulphur dioxide by Sasol.		
I also notice the effort made by Sasol around our community for the people to be issued gas stoves and heaters and removing the old coal stoves and heaters. It has done a huge difference in the community. The CO <sub>2</sub> has been reduced a lot. It has been effective thus far.		

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My concern is fully based on the health of the people in the surrounding communities. The efforts made by sasol will go in vain because of the gas prices being high in an unemployed community. Starting this winter a lot of people are now opting to go back to using their coal stoves and heaters. And this will take us back to where we started with the problem of CO<sub>2</sub> in the communities.

As for the environment and am happy with this sasol Application for load based emission.

I also want to ask sasol and the government to do the same for the people who have been living here for the past ten years and mostly for the ones who were born here and lived their whole lives here.

I think a study should be conducted on all the people who have been here for ten years and longer by sasol and the government.

And my last comment is to ask sasol to include local members of secunda originally born here to also partake in the <sup>fact</sup> case of the environment and the people. Thank you.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
<input type="checkbox"/>	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
<input type="checkbox"/>	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

Our environment needs taking care of.  
Our river needs cleaning and monitoring.  
Our cattles drink from this river and its disty  
Thus when people consume their livestock  
~~It~~ Get exposure to the pollution from the river  
where our cattle drink.

Solution

An awarness should be conducted to the locals  
Our river should be cleaned.  
Frequent rubbish removing  
And working with the government to maintain a healthy  
And clean society ensuring a great healthy and  
profitable future for both sasol and our community



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH THS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

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**CONTACT DETAILS**

Title	Ms	First name	Rose herato Moepe
Initials	RW	Surname	Moepe
Organisation/Affiliation	Windle for youth		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number	[REDACTED]	Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	[REDACTED]	Date	6-05-2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
---	---	-----------------------------

I would like my notifications by:

E-mail: [REDACTED]	SMS: <input checked="" type="checkbox"/>	Letter: <input type="checkbox"/>
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Comments (Use a separate sheet if necessary)

\* Less community communication to address such issues  
 \* Less access opportunities for NGOs and youth developers to propose projects that can assist in collaborations with Sasol  
 \* Awareness was not sufficient enough to reach specific target  
 \* More projects are needed to create youth employment and innovations among the community.  
 \* Again there is no educational awareness for families of employees of Sasol about the side effects that can arise from relatives

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working within these studios or plants.

- \* When goals are set not all members within the community have access to media or social communication
- \* More community outreach awareness should be directed to a committee that will be able to address these issues, become links for the community and sasol.
- \* As the community has already endured these healthly problems, more healthly awareness should be made.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
<input checked="" type="checkbox"/>	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
<input type="checkbox"/>	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

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Tel: 011 655 7170

Website [www.arm-rio.co.za](http://www.arm-rio.co.za)



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

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**CONTACT DETAILS**

Title	Mr	First name	Mphahlele
Initials	M.P	Surname	Kwabe
Organisation/Affiliation	Secunda Resident/Community Emba.		
Postal Address	[REDACTED]		Postal Code
Land Line Number	[REDACTED]		Cellphone Number
Email	[REDACTED]		
Signature		Date	06/05/2022.

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	<input checked="" type="radio"/> YES	<input type="radio"/> NO
---	--------------------------------------	--------------------------

I would like my notifications by:

E-mail:	Tel:	SMS: <input checked="" type="checkbox"/>	Letter: <input type="checkbox"/>
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Comments (Use a separate sheet if necessary)

- How is the project going to affect the health of the people.  
 When they vent the gas they must let the people know before hand and say how long they must stay inside (e.g 2 days).
- The town is filthy and too much rubbish that needs to be attended to and it creates a health issue.
  - Sasol should create jobs for those in Emba.
  - Suggestion to do the open day at the Emba Sasol Club as people do not have money to come (transport is expensive)

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SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

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**CONTACT DETAILS**

Title	Mr	First name	Segole Samuel
Initials	SS	Surname	Thotse
Organisation/Affiliation	Self		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number	[REDACTED]	Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	[Signature]	Date	06/05/22

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
---	---	-----------------------------

I would like my notifications by:

E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>	Letter: <input type="checkbox"/>
---	-------------------------------	-------------------------------	----------------------------------

Comments (Use a separate sheet if necessary)

The Public Consultation should be extended through out all Regions in Eswatini - take the settle to the People and they will tell all their problems occurred or caused by the air pollution. firstly Sasol, government and other corporate (companies) should be held accountable because currently Sasol itself is not doing anything to the community because many people suffering around Eswatini are suffering from chest problems and eyes problems caused

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by the air pollution. Secondly the Municipal Sewerage Plants are producing a lot of air pollution because of the bad smelling from the sewerage plants and that too contributes in a number of people who are sick with chest problems, sinus etc. Thirdly the co-ordinate companies like welding companies, tar producing companies as well as a lot of dust caused by ekaador hammer add mine, so all these should be held accountable and be told to comply with the environmental air quality nationally.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
<input checked="" type="checkbox"/>	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
<input type="checkbox"/>	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

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 Website [www.arm-af.co.za](http://www.arm-af.co.za)

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From Mother & friend of hers



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIRQUALITY ACT, 39 OF 2004

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APRIL 2022

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**CONTACT DETAILS**

Title	Mr	First name	Stanley
Initials	S	Surname	Houane
Organisation/Affiliation	Embalenhle Resident		
Postal Address	[REDACTED]		
		Postal Code	[REDACTED]
Land Line Number		Cellphone Number	[REDACTED]
Email	[REDACTED]		
Signature	[Signature]	Date	06 May 2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail:	Tel:	SMS: <input checked="" type="checkbox"/> <input type="checkbox"/>
		Letter: <input type="checkbox"/>
Comments (Use a separate sheet if necessary)		
<p>It was a very informative event where the needs of the people in terms of air quality are put first. From what I have heard, the mission of the project is to greatly reduce the amount of SO<sub>2</sub> in the Geri Sibande Atmosphere. I thought a process like greenhouse gas capture would have been good enough but apparently it works for those gases alone and not sulphur dioxide. It does not help that the world is also researching that technology so competition is very much tough.</p>		

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The method of decreasing the amount of coal in your steam plant whilst keeping the same product in amount is a very great idea. Production is not decreased whilst further improving the quality of air in the surrounding area.

I consent to the collection, storage and management of my personal information as part of this 12A Application

X

YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

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APRIL 2022

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**CONTACT DETAILS**

Title	MY	First name	Lazarus	
Initials	L.	Surname	KUMENI	
Organisation/Affiliation				
Postal Address	[REDACTED]		Postal Code	[REDACTED]
Land Line Number	[REDACTED]		Cellphone Number	[REDACTED]
Email	[REDACTED]			
Signature	[REDACTED]		Date	

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
I would like my notifications by:		
E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>
Letter: <input type="checkbox"/>		
Comments (Use a separate sheet if necessary)		
<ul style="list-style-type: none"> <li>• Consultation only done in Secunda is limiting to other residents in different areas <del>and</del> particularly Emba. Not reasonable to assume residents in Emba can easily come to Secunda.</li> <li>• Postponement of the Clause 12A application means there is still an impact before standards are met. How will people be compensated over this period. Who suffer from health impacts of the pollution in the area, as the writer does <del>at</del> right now!</li> <li>• As much as air quality modelling is done, the health impact studies are not planned and not reflected in distributed documentation. Can the community be able to have someone.</li> </ul>		

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who can peer review of the application modelling study.

- There have been people that come through to the community who do a study ~~at~~ <sup>when</sup> times before applications are being done by Sasol. What are the credentials of the people coming into the community doing these studies. (umwuyesu)
- If one has concerns about the health issues related to the air pollution, who does one contact in Sasol to ask for engagement about these issues?

I consent to the collection, storage and management of my personal information as part of this 12A Application



YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.

NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.

Air Resource Management (Pty) Ltd

B-BBEE Contributor: Level 1

Regus Midrand, Monrose Street, Birchwood Court - West Wing, Vorna Valley, Midrand, 1685, South Africa

Tel: 011 655 7170

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SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS: APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 22 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**REGISTRATION AND COMMENT SHEET**

APRIL 2022

Interested and Affected Parties (I&APs) are invited to register and participate in this process by completing and submitting the registration form below. As a minimum stakeholder name and surname, affiliation and mobile number must be entered to submit this form.

**CONTACT DETAILS**

Title	MRS	First name	Mamohay
Initials	MT	Surname	MACKA
Organisation/Affiliation	SELF		
Postal Address	08 Piet Stobbert Extension 22		Postal Code
			2302
Land Line Number	N/A	Cellphone Number	0739352089
Email	mamohay.macka@gmail.com		
Signature	Macka	Date	06/05/2022

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY (I&AP) (please mark applicable box with X)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
I would like my notifications by:		
E-mail: <input checked="" type="checkbox"/>	Tel: 0739352089 <input checked="" type="checkbox"/>	SMS: <input checked="" type="checkbox"/> Letter: <input type="checkbox"/>
Comments (Use a separate sheet if necessary)		
In support of the propose reduction plan. Promising indeed		

## Mr HJ Hennie Potgieter



Submission Date May 24, 2022 8:58 AM

Name Mr HJ Hennie Potgieter

Organisation/Affiliation Sasol employee

Postal Address [Redacted]

Land line Number [Redacted]

Cellphone Number [Redacted]

Email Address [Redacted]

Date May 24, 2022

Attending the Open Day  No

COMMENTS on DRAFT AIR and MOTIVATION REPORT

While we cannot stress the importance of the environment and controlling air pollution enough, we have to consider that we are facing serious socioeconomic and employment challenges in South Africa. We have to balance our environmental and social responsibility and one cannot focus on the one while ignoring the other. At this point in time the socioeconomic crisis is far greater than the effects of Sulphur pollution. We cannot expect first world standards on pollution levels while we have a 50% unemployment rate, while we have 35 million people on social grants, while we have people starving in our community.

I consent to the inclusion of my name,surname,affiliation,declaration of interest,comments and opinions in the 12A application documentation

YES, I consent to Air Resource Management (Pty) Ltd including my name,surname,affiliation,declaration of interest,organsiation,comments and opinions in the 12A application documentation that will be made available for public review and comment




SASOL SOUTH AFRICA LIMITED OPERATING THROUGH THS SECUNDA OPERATIONS: APPLICATION FOR A LOAD BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**COMMENTS and RESPONSE FORM**

APRIL 2022

I&AP comments on the Draft AIR and Motivation Reports are kindly requested to be submitted to ARM by the latest 24 May 2022

**INTERESTED AND AFFECTED PARTY (I&AP) CONTACT DETAILS**

<b>Title</b>	Ms	<b>First Name</b>	Robyn
<b>Initials</b>	RE	<b>Surname</b>	Hugo
<b>Organisation/Affiliation</b>	Just Share NPC		
<b>Postal Address</b>	[REDACTED]		
		<b>Postal Code</b>	[REDACTED]
<b>Land Line Number</b>	N/A	<b>Cell Phone Number</b>	[REDACTED]
<b>Email Address</b>	[REDACTED]		
<b>Signature</b>		<b>Date</b>	24 May 2022

**REGISTRATION AS I&AP (please tick applicable box)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process		<b>YES</b> <input checked="" type="checkbox"/>	<b>NO</b> <input type="checkbox"/>		
I would like my notifications by:					
E-mail: <input checked="" type="checkbox"/>	Tel: <input type="checkbox"/>	SMS: <input type="checkbox"/>	Letter: <input type="checkbox"/>		
<b>PUBLIC OPEN DAY MEETING ATTENDANCE</b>					
Date	Location	Venue	Time	Attending (please tick applicable box)	
				Yes	No
6 <sup>th</sup> May 2022 (Friday)	Walter Sisulu Road, Secunda (Map attached)	Lilian Ngoyi Centre	10:00 to 16:00	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**COMMENTS (Please use a separate sheet/s if necessary)**

Just Share places on record that we strongly dispute that paragraph 12A of the "List of activities which have or may have a significant detrimental effect on the environment; including health, social conditions, economic conditions, ecological conditions or cultural heritage, 2013" ("the List of Activities") permits Sasol to make the current application.

Sasol seeks an alternative emission load from 1 April 2025 until 31 March 2030 of 503 t/d and from 1 April 2030 and apparently indefinitely, of 365 t/d. This application amounts to non-compliance with the SO<sub>2</sub> MES beyond April 2025, it is

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tantamount to an exemption from the MES, and is unlawful. That much is clear from the List of Activities and the Framework for Air Quality Management ("the Framework"). **1 April 2025 is the latest date for compliance with new plant MES. The National Air Quality Officer should refuse to consider this application.**

Granting such application would violate the Constitution of the Republic of South Africa, 1996 ("the Constitution"), the National Environmental Management Act, 1998 (NEMA); the National Environmental Management: Air Quality Act, 2004 (AQA), the List of Activities, and the Framework.

The 2017 Framework forms part of the definition of "this Act" in AQA, and "binds all organs of state in all spheres of government". AQA requires that an organ of state "give effect to the national Framework when exercising a power or performing a duty in terms of [AQA] or any other legislation regulating air quality management". As a significant emitter and a major source of pollution in South Africa, Sasol is legally required to limit its emissions to help ensure compliance with national ambient air quality standards (NAAQS).

When the List of Activities and the Framework were amended in 2018, these made clear that, **at the latest (and assuming the maximum 5 year postponement had been granted), full compliance with the new plant MES is required by 1 April 2025 at the latest**; unless facilities had applied - by 31 March 2019 (with a detailed decommissioning plan) - and been granted a once-off suspension of compliance (in which event they are required to be decommissioned by 31 March 2030). The legislation makes clear that "No once-off postponement with the compliance time frames will be valid beyond March 2025". Sasol has not sought a once-off suspension of compliance.

Now, under the guise of seeking an "alternative emission load", **Sasol seeks to evade legal compliance with the MES in circumstances where: it does not intend to comply with new plant SO<sub>2</sub> MES by 1 April 2025, and will not be decommissioned by 31 March 2030. This is unlawful.**

Paragraph 12A of the List of Activities **does not create an additional avenue to postpone compliance with the new plant MES beyond April 2025**. It governs the alternative emission limit/load that would apply during the period of a once-off postponement/suspension, and that, in the case of a once-off postponement, **full MES compliance is still required by 1 April 2025 – even if an alternative emission limit/load is granted in terms of paragraph 12A.**

Even if Sasol were entitled to seek additional leniency in relation to SO<sub>2</sub> compliance – beyond April 2025 (which is denied) – it has not fulfilled the requirements of paragraph 12A of the List of Activities and this application should be rejected.

(12A)

(a) An existing plant may submit an application regarding a new plant standard to the National Air Quality Officer for consideration if the plant is in compliance with other emission standards but cannot comply with a particular pollutant or pollutants.

(b) An application must demonstrate a previous reduction in emissions of the said pollutant or pollutants, measures and direct investments implemented towards compliance with the relevant new plant standards.

(c) The National Air Quality Officer, after consultation with the Licensing Authority, may grant an alternative emission limit or emission load if:

(i) there is material compliance with the national ambient air quality standards in the area for pollutant or pollutants applied for; or

(ii) the Atmospheric Impact Report does not show a material increased health risk where there is no ambient air quality standard.

In any event, the MES compliance period is 24 hours, not the 1 month proposed by Sasol in this application; the Atmospheric Impact Report (AIR) is defective in many respects; the Highveld Priority Area is non-compliant with the national PM<sub>10</sub> and PM<sub>2.5</sub> standards, by a wide margin. In this regard, we also point out that the AIR does not address the SO<sub>2</sub> contribution to secondary PM<sub>2.5</sub>. Despite request, Sasol has not submitted its compliance reports to demonstrate compliance with other emission standards. In addition, Sasol has not submitted specific data showing previous reductions in SO<sub>2</sub> emissions and its direct investments towards compliance with the SO<sub>2</sub> standards. In other words, **Sasol has failed to meet the requirements of paragraph 12A.**

#### NAAQS out of compliance

Paragraph 5.4.3.4 of the Framework stipulates that compliance with MES may be postponed and a suspension of compliance may be granted, **provided NAAQS are in compliance and the air emissions are not causing direct adverse impacts on**

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**the surrounding environment.** The NAAQS compliance requirement holds particular significance in relation to the 3 air quality Priority Areas situated within the Highveld, Vaal Triangle, and the Waterberg-Bojanala - all of which remain out of compliance with NAAQS, despite their statuses as "Priority Areas" and despite the fact that: the Vaal Triangle Airshed Priority Area was declared over 16 years ago; the Highveld Priority Area (HPA) more than 14-and-a-half years ago; and the Waterberg-Bojanala Priority Area (WBPA), ten years ago. This non-compliance appears from the Department of Environment, Forestry and Fisheries' reports, and is not controversial.

**No industries operating within these Priority Areas should be permitted to apply for postponement, suspension or alternative limits. Granting such applications will only exacerbate the high levels of air pollution, and its dire impact on human health, well-being, and the environment; which would in turn, make it even more difficult for the Priority Areas to meet their goals of ensuring compliance with NAAQS.** As the recent *Deadly Air* judgement makes clear, air quality in the HPA, home to Sasol's Secunda operations (and 12 Eskom coal plants) is so severe that it violates residents' constitutional rights to an environment not harmful to health or wellbeing. It is also beyond dispute that the emissions of Eskom and Sasol are responsible for by far the majority of air pollution, not only in the HPA, but in the entire continent.

Granting any of these alternative load applications would be *ultra vires* the Constitution, the AQA, the amended List of Activities, the Framework, and NEMA.

#### No proof that Sasol's emissions are not causing adverse impacts

In addition to the requirement that the area's air quality must be in compliance with NAAQS, the Framework requires that Sasol must demonstrate that its air emissions are not causing direct adverse impacts on the surrounding environment. Sasol has wholly failed to demonstrate this.

#### Other non-compliance by Sasol

Sasol is not in compliance with all of the emission limits contained in its atmospheric emission licences (AEL) and is therefore operating illegally. Urgent enforcement action should be initiated against Sasol as a result of this non-compliance, as opposed to considering this impermissible application to further delay and suspend compliance with the MES. In this regard, we note from the latest DFFE National Environmental and Compliance Report that a criminal investigation was instituted in relation to various violations of its licences.

Instead of disclosing this information, and its other air quality non-compliances in relation to VOCs at Secunda (while it awaits the outcome of further postponement applications), Sasol's AIR states: "No final directives or compliance notices have been issued to the Secunda Operations in the last five years". We call upon Sasol to make accurate information available to interested and affected parties in relation to its non-compliance.

#### Assessment of AIR

The AIR contains **flawed estimates of Sasol's SO<sub>2</sub> emissions values.**

Sasol's Synfuels plant operates 17 coal-fired boilers which produce steam mainly for use in its Gasification process, ultimately to produce petrol and diesel. The balance of the steam not used in its Gasification and other processes produced is used to drive turbo-generators to produce 600MW of electricity for use in the plant, which is extremely energy-intensive.

The CO<sub>2</sub> emissions from these 17 boilers are a major part of Synfuel's direct (Scope 1) emissions. In its GHG emissions roadmap, it proposes to replace part of the electricity generated via these boilers with renewable energy (RE) generated offsite and wheeled to the Synfuels plant via the Eskom grid. Given the significantly cheaper cost of RE, Sasol's generation and/or purchase of RE to replace its own coal-based coal power or Eskom-supplied power would result in a good return on the capital employed. Replacing some of the electricity generated via its coal-fired boilers with RE generated offsite will also enable Sasol to reduce the load on these boilers.

Reducing the power generating load on the boilers ('turning them down') means burning less coal and emitting proportionately less SO<sub>2</sub>, assuming that the sulphur content of the coal is constant. The AIR does not clearly and explicitly set out the planned timeline for reducing the load on the boilers.





Sasol's motivation and justification for its "load-based" emission limits is presented in an obscure manner. In essence it is attempting to argue that it would achieve the same reduction in SO<sub>2</sub> emissions through a combination of a 30% reduction of boiler load and being allowed to operate the boilers under its load-based emissions limits, as would be achieved by compliance with the 1000mg/Nm<sup>3</sup> standard in 2025, the case modelled as Scenario 3. This argument is critically examined below.

The motivation is based on the claim that a greater reduction of Synfuel's SO<sub>2</sub> emissions would occur at some time after 2025 compared with the reduction in emissions that would be achieved by compliance in 2025 with the new plant emission limit of 1000 mg/Nm<sup>3</sup>. This claim is disputed, because the method of estimating emissions under various scenarios, and therefore their relative values, is flawed.

The emissions from all 17 boilers are discharged via two stacks, B1 (U43): Main Stack West and B2 (U243): Main Stack East. The AIR, Table 5-27, describes two SO<sub>2</sub> emission rates as baseline emissions, Baseline - 95th percentile SO<sub>2</sub> and Baseline - Average. These are not two separate emissions datasets, but are statistical descriptors of the same set of data, the average of all the values and the value, the 95th percentile value, below which 95% of the values fall. A baseline consisting of the plant operating constantly at the 95th percentile value or at an average equal to the 95th percentile value does not exist and should not be called a baseline. **The comparison of emissions under future or hypothetical scenarios on the basis of extreme values such as the 95th percentile values is prone to large uncertainty and error. The comparisons should be based on the average values. Describing two different SO<sub>2</sub> emissions as "baseline" creates uncertainty.** For example, in "5.3 Main Findings of the report", the statement that one of four scenarios modelled is "Baselines - using 95th percentile emission concentrations (for SO<sub>2</sub>) or the average emission concentrations (for NO<sub>2</sub> and PM)". Table 5-27 reflects data for five modelling scenarios, including two baseline scenarios, Baseline - 95th percentile SO<sub>2</sub> and Baseline - Average.

**The methods for calculating the emissions rates in Table 5-27 of the AIR, used to model the five scenarios, are not explained.** The estimated emission reductions that are **only due to a reduction in load should simply be in proportion to the percentage reduction in load, assuming that the plants continue to be operated with current coal quality and under current conditions. A reduction of the coal sulphur content or the installation of SO<sub>2</sub> abatement equipment to comply with the MES stack concentration limits would result in a further reduction in emissions, additional to the reduction due to a reduction of load.** Table 1 reflects the emissions values of Table 5-27, compares these values to the Baseline-average scenario values, and with values calculated based on load reduction and on load reduction plus compliance with the 1000 mg/Nm<sup>3</sup> MES limit value:

Table 1: Analysis of the AIR Table 5-27 emission rates

AIR scenario	AIR values		Calculated values	
	so <sub>2</sub> (g/s), AIR values values	AIR values as % of baseline	Load reduction only, g/s so <sub>2</sub>	% of baseline emissions
<b>Baseline, average</b>				
B1	2 766,10	100%	-	
B2	2 546,80	100%	-	
<b>4% load reduction</b>				
B1	3 211,00	116%	2655,46	96%
B2	2 621,20	103%	2444,93	96%
<b>15% load reduction+compliance</b>				
B1	2 420,80	88%	2351,19	85%
B2	2 771,00	109%	2164,78	85%
<b>End state, 30% load reduction</b>				
	2 164,20	78%	1936,27	70%
	2 053,30	81%	1782,76	70%



The error of comparing various emissions scenarios with the 95th percentile value rather than the baseline average value is apparent in Table 1. The AIR emissions for a 4% load reduction results in an increase in emissions relative to current emissions. A 15% load reduction plus compliance with the MES, results in an average reduction of less than 5%. Sasol's reasoning is flawed. A reduction in the load of these boilers will result in the reduction in SO<sub>2</sub> emissions, subject to a similar quality of coal (sulphur content) in the feedstock. A 30% reduction in the load alone will result in a 30% reduction in SO<sub>2</sub> emissions (to 321 tonnes per day) compared to the 20% reduction (to 364 tonnes per day) of Sasol's "End state, 30% load reduction".

Compliance with the 1000mg/Nm<sup>3</sup> SO<sub>2</sub> emission limit

Sasol's current emission rates will clearly not comply with the 1000mg/Nm<sup>3</sup> SO<sub>2</sub> emission limit (Figure 1 demonstrates Sasol's emissions during July 2015 to June 2016). Compliance with this MES limit from 2025 would result in a further reduction in emissions of 30 to 50% beyond any emissions reductions that may be achieved through load reductions. A load reduction of 30% and compliance with the MES would likely reduce emissions to less than 200 tonnes per day compared with current average emissions of about 460 tonnes per day. Compliance can only be achieved by reducing the sulphur content of the coal used in the boiler plants, or through the installation of emission reduction equipment, or a combination of the two approaches.

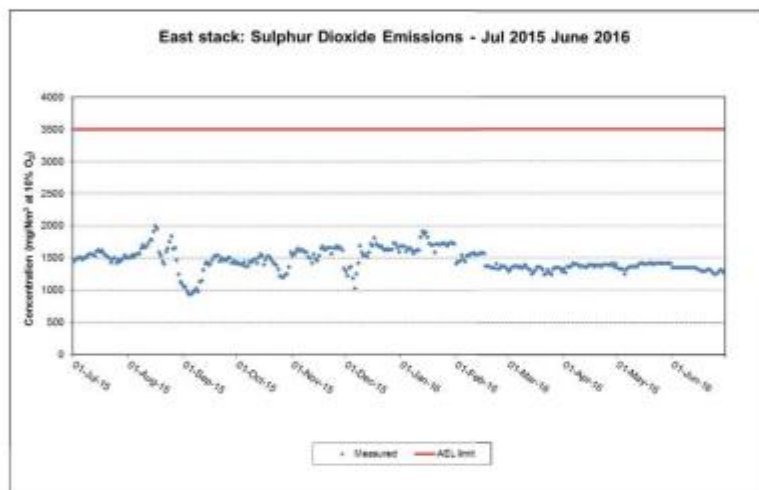


Figure 1: Source: Secunda Synfuels Operations Annual Emissions Report prepared for Gert Sibanda District, 2015-2016.

SO<sub>2</sub> is a notorious pollutant that causes significant harm to human health and the environment. It can affect the respiratory system and the functions of the lungs, and causes irritation of the eyes. Inflammation of the respiratory tract causes coughing, mucus secretion, aggravation of asthma and chronic bronchitis, and makes people more prone to infections of the respiratory tract. Studies have linked SO<sub>2</sub> to low birth weight in infants and an increased risk for gestational diabetes mellitus, stillbirths, and pre-term births. Hospital admissions for cardiac disease and mortality increase on days with higher SO<sub>2</sub> levels. When SO<sub>2</sub> combines with water, it forms sulphuric acid, which is the main component of acid rain.

South Africa's 2020 SO<sub>2</sub> standard – which exists to protect people's health and human rights – is about **28 times** more lax than in China, and **10 times** weaker than India's. The means of reducing SO<sub>2</sub> emissions are well-known and not controversial. The costs and benefits of compliance are also well-known. SA's SO<sub>2</sub> MES are weak, compared even to other developing countries, and Sasol has had an inordinately long time to prepare for compliance. In addition, it does not meet the requirements of paragraph 12A of the List of Activities.



**Conclusion**

In short, we dispute that Sasol provide justifiable or acceptable reasons in support of its application. If it cannot comply with the weak new plant SO<sub>2</sub> MES, it should be decommissioned. Applying for a 'tailored' set of alternative emission loads beyond March 2025, that are weaker than the new plant MES through to decommissioning, in areas where there is chronic non-compliance with the NAAQS, cannot be permitted. It undermines the Constitution, NEMA, the AQA, the List of Activities and the Framework.

The application should be rejected.

I consent to the collection, storage and management of my personal information as part of this 12A Application	
X	YES, I consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information for this 12A application process only.
	NO, I do not consent to Air Resource Management (Pty) Ltd collecting, storing and managing my personal information and understand that my personal information will be deleted and I will not receive any correspondence relating to this 12A application process.



## Marco MP Marco Mahlangu

[REDACTED]

Submission Date May 28, 2022 8:17 AM

Name Marco MP Marco Mahlangu

Organisation/Affiliation private citizen

Postal Address [REDACTED]

Land line Number [REDACTED]

Cellphone Number [REDACTED]

Email Address [REDACTED]

Date May 28, 2022

Attending the Open Day  No

COMMENTS on DRAFT AIR and MOTIVATION REPORT

The Time series data for the SO2 and NO2 ground level concentration is only measured for the areas that are in close proximity to the SASOL complex and does not account for the areas located at least 40KM from Sasol. I am of the opinion that these excluded areas are continuing to be heavily affected by these emissions. therefore, data needs to be collected and analyzed as well.

I consent to the inclusion of my name,surname,affiliation,declaration of interest,comments and opinions in the 12A application documentation

YES, I consent to Air Resource Management (Pty) Ltd including my name,surname,affiliation,declaration of interest,organsiation,comments and opinions in the 12A application documentation that will be made available for public review and comment



SASOL SOUTH AFRICA LIMITED OPERATING THROUGH ITS SECUNDA OPERATIONS: APPLICATION FOR A LOAD-BASED EMISSION LIMIT FOR SULPHUR DIOXIDE (SO<sub>2</sub>) IN TERMS OF CLAUSE 12A OF THE MINIMUM EMISSION STANDARDS OF 13 NOVEMBER 2013, AS AMENDED, PUBLISHED IN TERMS OF SECTION 21 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004

**COMMENTS and RESPONSE FORM**  
APRIL 2022

I&AP comments on the Draft AIR and Motivation Reports are kindly requested to be submitted to ARM by the latest 24 May 2022.

**INTERESTED AND AFFECTED PARTY (I&AP) CONTACT DETAILS**

Title	Mr	First Name	Ephaim Dudu		
Initials	ED	Surname	Moloi		
Organisation/Affiliation	DA				
Postal Address	[REDACTED]			Postal Code	[REDACTED]
Land Line Number	[REDACTED]			Cell Phone Number	[REDACTED]
Email Address	N/A				
Signature	[Signature]		Date	2022/05/25	

**REGISTRATION AS I&AP (please tick applicable box)**

Please formally register me as an interested party (I&AP) so that I may receive further information and notifications herein during the application process

YES       NO

I would like my notifications by:

E-mail: \_\_\_\_\_ Tel: \_\_\_\_\_ [REDACTED] Letter: \_\_\_\_\_

**PUBLIC OPEN DAY MEETING ATTENDANCE**

Date	Location	Venue	Time	Attending (please tick applicable box)	
				Yes	No
6 <sup>th</sup> May 2022 (Friday)	Walter Sisulu Road, Secunda (Map attached)	Lillian Ngoyi Centre	10:00 to 16:00	X	

**COMMENTS (Please use a separate sheet/s if necessary)**

I currently have a coal stove. I currently stay in a house I built myself which has a metal roof sheet. They slowly getting damaged by the amount of smoke from both Sasol and my stove.

## 7. Report disclaimer

Air Resource Management (Pty) Ltd has prepared this report based on an agreed scope of work and acts in all professional matters as an advisor to the Client and exercises all reasonable skill and care in the provision of its professional services in a manner consistent with the level of care and expertise exercised by air quality management professionals.

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