

Mr C Brand
Working Group 1: Minimum Emission Standards:
Combustion Installations, Petroleum Industry, and
Carbonisation and Coal Gasification
SABS SC 146 A: Quality Standard: Source Emissions

Date:
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Enquiries:
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Ref: GEM00_L011

Dear Mr Brand

ESKOM SUBMISSION ON PROPOSED MINIMUM EMISSION LIMITS FOR COMBUSTION INSTALLATIONS

In the light of recent discussions around Eskom's emission licences and strategy for the new build programme, we would like to amend our submission to Working Group 1 for the setting of Minimum Emission Standards for power plants.

We previously requested a particulate matter (PM) emission limit of 75 mg/Sm³ for existing plant. However, for several stations, it is not possible to achieve this standard, even after upgrades and refurbishments. In particular, the return-to-service stations were designed to run at an average of 100 mg/Sm³, as agreed with Department of Environmental Affairs and Tourism. We therefore request that the minimum PM emission standard for existing plant be revised to 100 mg/Sm³. Please note that some power stations will achieve emissions of lower than 50 mg/Sm³, and this will be included in their emission licences.

Furthermore, we would like to request that it be stipulated that the proposed SO₂ minimum emission standard of 500 mg/Sm³ for new plant apply to pulverised fuel (PF) stations with wet flue gas desulphurisation (FGD) only, and that appropriate minimum emission standards for other technologies be evaluated and included when the standards are revised. Resources like water and sorbent may simply not be available to enable all new power stations to achieve an SO₂ emission limit of 500 mg/Sm³, and it is necessary to keep open the possibility of building an alternative technology, like fluidised bed combustion (which still has lower SO₂ emissions than existing plant), to ensure sufficient power supply for the country. An interim SO₂ emission standard of 500 mg/Sm³ for new PF plant with wet FGD is adequate, as power stations currently under construction, like Kusile, will in all likelihood be installing wet FGD, and the minimum emission standard will thus apply to them.

We apologise for disrupting the process at this stage and appreciate that finalisation of the standards is becoming urgent. However, there is an even greater need to ensure that the standards are appropriate for the technology available and the constraints under which we operate

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in this country, and that the minimum emission standards do not hinder the provision of adequate power supply for South Africa.

Yours sincerely,



Wendy Poulton

General Manager: Sustainability & Innovation



Deidre Herbst

Generation Environmental Manager