

Mr J Potgieter
South African Bureau of Standards Sub-Committee 146 A:
Air Quality Standard: Source Emissions

Date:
9 March 2009

Enquiries:
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Ref: GEM09_L019

Dear Mr Potgieter

TIMEFRAMES FOR COMPLIANCE WITH MINIMUM EMISSION STANDARDS

The emissions standards setting process being carried out through the South African Bureau of Standards (SABS) Sub-Committee 146A: Air Quality Standard: Source Emissions has reference.


There has been considerable discussion in the working groups on the dates by which the Minimum Emission Standards will apply. This letter serves to clarify Eskom's position on this particular issue.

Ten of Eskom's thirteen operational and return-to-service coal-fired power stations will comply immediately with the proposed particulate matter minimum emission standard of 100 mg/Sm³, but three of the stations need to undergo half-life refurbishments, electrostatic precipitator upgrades or installation of a flue gas conditioning plant before they can comply with the proposed minimum emission standard. These upgrades have been budgeted for in the technical plan and scheduled in the outage plan. It will take 8-10 years in order for all power stations to be able to comply with the proposed existing plant standards.


It is understood that all future power station plants which received Environmental Authorisation to allow the commencement of the construction of the power station prior to the finalization (published and enacted) of the Minimum Emission Standards are classed as existing plant, and required to comply with existing plant standards.

It has subsequently been suggested by the Department of Environmental Affairs and Tourism that after a certain period of time all existing plant will be expected to comply with new plant standards. Paragraph 16 in our communication ref: GEM08_L186 of 12 November 2009 addressed to Mr C. Brand, chairman of Working Group 1, clearly states that this is unrealistic. Due to the existing power station's technology, design and age this is not feasible. Any proposed change in emission limits for individual power stations will need to be considered on a plant-by-plant basis.

Yours sincerely



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