



Renqe Kunene Inc

Attorneys, Conveyancers, Notaries
Intellectual Property Law &
Environmental Law Specialists

**ESKOM HOLDINGS SOC LIMITED
CAMDEN POWER STATION:
ENVIRONMENTAL LEGAL COMPLIANCE AUDIT REPORT**

**Atmospheric Emission Licence, as contemplated in Section 43 of the National
Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) NEMAQA,
which was issued on the 31st of March 2014**

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334 Farenden Street, Arcadia, Pretoria • PO Box 38629, Garsfontein, 0060

Cell: (084) 450 6274 or (082) 880 6986

Tel: (012) 012 343 9952 / 9956

Fax: (012) 343 9985

E-mail: info@rk-law.co.za • landiwek@rk-law.co.za • Feziwer@rk-law.co.za

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Executive summary

Renqe Kunene Inc. was appointed by Eskom Holdings SOC Limited (“**Eskom**”) to conduct Environmental Legal Compliance Audit at the Camden Power Station (“**Camden**”).

Renqe Kunene Inc’s scope of work entailed assessing compliance with conditions of the Atmospheric Emission License, as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) NEMAQA, which was issued on the 31st of March 2015.

This report summarises the audit process and contains audit findings.

During the audit, evidence was found of instances where conditions of this permit were complied with. However, in some other instances it was found that Camden does not fully comply with the conditions of the licence and there is an application for the variation of some of the conditions of the licence which would, if granted, address some of the non compliances.

It should be borne in mind that it is an offence in terms of section 51 (1) (e) of the National Environmental Management Air Quality Act 34 of 2004 to contravene or failure to comply with a condition or requirement of an atmospheric emission licence. According to section 52 (1) a person convicted of an offence is liable to a fine not exceeding five million rand, or to imprisonment for a period not exceeding five years and in the case of a second or subsequent conviction, to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years or in both instances, to both a fine and such imprisonment.

Audit report

Introduction:

1. **Renqe Kunene Inc** was appointed by Eskom Holdings SOC Limited ("**Eskom**") to conduct Environmental Legal Compliance Audit at the Camden Power Station ("**Camden**").
2. **Renqe Kunene Inc's** scope of work entailed assessing compliance with Environmental Authorisations, Licence and Permit conditions and compile separate reports as Camden may elect to submit these to relevant authorities.
3. It should be noted that any election by Camden to make any aspect of this report available to authorities will be entirely at its own risk in so far as adverse compliance consequences are concerned.
4. It should also be recognised by the reader of this report that **Renqe Kunene Inc's** personnel do not undertake scientific or engineering technical audits and depended entirely on the relevant Camden personnel for scientific and/or engineering / technical information as is necessary to determine compliance. **Renqe Kunene Inc.** also placed reliance on such personnel to provide all necessary factual information and documentation sufficient to allow us to assess compliance. It is necessary for the reader to take this status into consideration in reading this report and, if there are any areas where the understanding of the factual, scientific, engineering or technical information provided to us has been misinterpreted or misconstrued, we need to have this brought to our attention.

Confidentiality:

5. This report is deemed to be confidential and is prepared solely for the use of Eskom and any other party that Eskom may elect to share it with. Therefore, this report may not be used, or made available or copied in whole or in part to any person without express permission of Eskom.

Audit objectives and scope of work:

6. **Renqe Kunene Inc's** scope of work was only limited to assessing compliance with Environmental Authorisations, Licence and Permit conditions.

Methodology:

7. The following methodology was followed :

7.1 Audit questionnaires were prepared and submitted to Camden prior to the site visit. The questionnaires specifically considered compliance with Camden's Environmental Authorisations, Permits and Licence Conditions and Camden personnel was required to formulate responses to all questions and gather all the necessary documents.

7.2 In the course of the audit, on-site visit and interviews were conducted, as mentioned below:

7.3 Day 2 (1 December 2015): Site visit to selected areas was conducted, followed by interviews with relevant personnel, perusal of supporting documents and discussing the responses to the questionnaires.

7.4 The following Camden personnel were interviewed:

Members of the Environmental Team	Designation
Mr Thabiso Mpongo	Environmental Manager
Ms Fikile Sithole	Environmental Officer Responsible for Atmospheric Emission Licence.

Environmental Authorisations, Licences and Permits:

8. In the course of the assignment we were provided with the *Atmospheric Emission Licence as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) NEMAQA.*

9. The licence was audited against a checklist that was developed and forwarded to Eskom Camden Power Station personnel prior to the audit site visit to enable them to prepare for the audit.

Documents reviewed:

10. In the cause of the audit a number of documents were reviewed, a list is attached hereto.

Audit Findings:

Audit conclusion:

Conclusion	Definition
Compliant	Indicates full compliance with condition of the licence.
Non-Compliant	There is no compliance with condition of the licence.
Partially Compliant	There is no full compliance with condition of the licence.
Not Verified	No information / Documents provided ; or No sufficient information was provided to establish compliance.
Not Applicable	No requests were received / No incidents occurred / No inspections or Audits were conducted by the Department/ Due date for compliance has not yet materialised.
Recommendations	Advices on how instances of non and partial compliance should be addressed.

Audit findings are reflected in the Tables below.

ATMOSPHERIC EMISSION LICENCE AS CONTEMPLATED IN SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT : AIR QUALITY ACT ,2004 (ACT NO. 39 OF 2004) NEMAQA , LICENCE NUMBER : MSUKALINGWA /ESKOM H SOC LTD /CPS /0012/2014 /F01 31 MARCH 2014

Condition Number	Condition/ Action Requirement	Question	Compliant /Non-Compliant /Partially Compliant / Not Applicable/ Not Verified	Findings	Recommendations/Comments /Proposed Corrective /Improved Action
<i>Process and ownership changes 4.1.(a)</i>	<i>The holder of the atmospheric emission licence must ensure that all unit processes and apparatus used for the purpose of undertaking the listed activity in question, and all appliances and mitigation measures for preventing or reducing atmospheric emissions, are at all times properly maintained and operated to the minimum of manufactures specifications.</i>	Are all the unit processes and apparatus used for the purpose of undertaking the listed activity in question and all appliances and mitigation measures for preventing or reducing atmospheric emission properly maintained at all times and operated to the minimum of manufactures' specifications ?	Not Verified	According to the Emission's Control Officer there are Fabric Filter Bags which are properly maintained. However, records relating to the proper maintenance of the Fabric Filter Bags were not provided.	
4.1(b)	<i>No building, plant or site of works related to the listed activity or activities used by the licence holder shall be extended, altered or added to the listed activity without an environmental authorisation from the competent authority. The investigation, assessment and communication of</i>	<ul style="list-style-type: none"> Are there any buildings, plant or site works related to the listed activity or activities used by Eskom that have been extended, altered, or added 	Not Applicable	According to the Emission Control Officer, there has not been any building, alteration or extension of the plant during the period of the audit.	

	<p><i>potential impact of such an activity must follow the basic assessment procedure as prescribed in the Environmental Impact Assessment Regulations published in terms of section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended</i></p>	<p>to the listed activity without an environmental authorisation from the competent authority?</p> <ul style="list-style-type: none"> Should that be the case, did the investigation, assessment and communication of potential impact of such activity follow the basic assessment procedure as prescribed in the Environmental Impact Assessment Regulations published in terms of section 24 (5) of the National Environmental Management Act ,1998 (Act 107 of 1998) (NEMA), as amended? 			
<p>4.1 (c)</p>	<p><i>Any changes in the processes or production increases, by the licence holder, will require</i></p>	<ul style="list-style-type: none"> Are there any changes that have made by Eskom 	<p>Not Applicable</p>	<p>According to the Emission Control Officer, there have not been any</p>	

	<i>prior approval by the licensing authority. Any changes to the type and quantities of input materials and products, or to production equipment and treatment facilities will require prior written approval by the licensing authority.</i>	<p>in the processes or production increase?</p> <ul style="list-style-type: none"> Should there be such changes, did Eskom obtain the approval of the licensing authority? 		changes in the processes or production increase during the period of the audit.	
4.1 (d)	<i>The licence holder must, in writing, inform the licensing authority of any change of ownership of the enterprise. The licensing authority must be informed within thirty (30) working days after the change of ownership. The licence holder must immediately on cessation or decommissioning of the listed activity inform, in writing the licensing authority.</i>	<ul style="list-style-type: none"> Are there any changes to the ownership of the enterprise? In the event that there are any, was the licensing authority informed in writing about such changes? Was the licensing authority informed within 30 days after the change of ownership? Are there any listed activities that have been ceased or decommissioned? Should that be the case, was the licensing 	Not Applicable	There have not been any changes in the ownership of the enterprise.	

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		authority informed in writing?			
4.1(e)	<i>The Licence Holder must immediately on cessation or decommissioning of a listed activity inform , in writing licensing authority</i>	Are there any activities that have been ceased or decommissioned?	Not Applicable	According to the Emission Control Officer, no activities were ceased or decommissioned during the audit period.	
4.2(a) General duty of care	<i>The holder of the licence must, when undertaking, the listed activity, adhere to the duty of care obligations as set out in section 28 of the NEMA. The licence holder must undertake the necessary measures to minimize or contain the atmospheric emissions. The measures are set out in section28 (3) of the NEMA.</i>	<ul style="list-style-type: none"> • Has Eskom adhered to the duty of care obligation set out in section 28 of NEMA when undertaking listed activities? • Has Eskom undertaken the necessary measures as set out in section 28 (3) of NEMA to minimize or contain the atmospheric emissions? 	Compliant	There is an ongoing process of regular maintenance of the plant. There is continuous monitoring of ambient concentrations of sulphur dioxide, nitrogen dioxide, ozone, and fine particulate matter. In addition, meteorological parameters of wind velocity, wind direction, ambient temperature, humidity and ambient pressure are also recorded. Standard specifications , equipment / techniques used for measurement of SO2,Nitrogen oxides conforms to US-EPA equivalent method No EQSA-0486-060,EQOA-	

				0880-047 and RFNA-1289-074 respectively. ¹	
4.3(a) Sampling and/or analysis requirement	<i>Measurement, calculations and /or sampling and analysis shall be carried out in accordance with any nationally or internationally acceptable standard in line with NEMAQA (Annexure A). A different method may be acceptable to the licensing authority as long as it has been consulted and agreed to in writing and to the satisfactory documentation necessary in confirming the equivalent test reliability, quality and equivalence of analysis has been submitted.</i>	<ul style="list-style-type: none"> • Are the measurements, calculation and /or sampling and analysis carried out in accordance with any nationally or internationally acceptable standards in line with NEMAQA (Annexure A)? • In the event that a different method is used, has it been accepted by the licensing authority in writing? 	Compliant	The measurements, calculations and sampling are carried out in accordance with international standards such as ISO 9096 & 12141 and ISO 10155. ²	

¹ Camden Air Quality Report April 2014.

² Report dated December 2013 from Stacklabs Environmental Services

<p>4.3(b)</p>	<p><i>The licence holder is responsible for quality assurance of methods and performance. Where the holder of the licence uses external laboratories for sampling or analysis, only accredited laboratories by the national accreditation body shall be used. The certified copy of the licence and the accreditation of the external laboratory must be submitted to the licence authority annually including its external audits certification.</i></p>	<ul style="list-style-type: none"> • Is Eskom using external laboratories for sampling or analysis? • Should that be the case, is the Eskom using only laboratories that are accredited by national accreditation body? • Is a certified copy of the license as well as the accreditation of the external laboratory submitted to the licensing authority annually, including the external audits certification? 	<p>Compliant</p>	<p>Stacklabs, environmental testing laboratory, which is an external laboratory, was contracted by Eskom Camden Power Station for sampling and analysis.</p> <p>Certificate of accreditation of Stocklabs was not provided to verify the accreditation. The accreditation certificate of Stocklabs and its annual audit have not yet been submitted to the licensing authority.</p>	<p>The accreditation certificate is not yet due for submission; it should be submitted to the licensing authority before 31 March 2016.</p>
<p>4.3(c)</p>	<p><i>The licence holder must prior to using any methodology obtain written approval from the licence authority for use of such methodology for compilation of compliance sampling reports.</i></p>	<ul style="list-style-type: none"> • Did Eskom obtain written approval from the licensing authority prior using any methodology for compilation of compliance 	<p>Compliant</p>	<p>The methodology that is used is in line with the requirements of the Act and the method that is used meets international standards.</p>	

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<p>4.3(d)</p>	<p><i>The licence holder must provide the licensing authority on request with raw data obtained during sampling and or analysis including proof of agreed methodology used to reach the final results submitted for compliance.</i></p>	<p>sampling report?</p> <ul style="list-style-type: none"> • Was there any request by the licensing authority of raw data obtained during sampling and/ or analysis including proof of agreed methodology used to reach the final results submitted for compliance? • In the event that there was such a request, did Eskom provide the licensing authority with the information? 	<p>Not Applicable</p>	<p>According to the Emission Control Officer, there has never been any request by the licensing authority for raw data obtained during sampling and / or analysis during the audit period.</p>	
<p>4.4 (b) General requirements for licence holder</p>	<p><i>A copy of the licence must be kept at the premises where the listed activity is undertaken. The original licence must be made available to the environmental management inspector/air quality officer or an authorised officer representing the licensing authority who requests to see it.</i></p>	<ul style="list-style-type: none"> • Is a copy of the license kept at the premises where the listed activity is undertaken? • Was there any request from the environmental management inspector / air quality offer or an authorised officer 	<p>Compliant</p>	<p>A copy of the licence is kept at the premises where the listed activity is undertaken and is also available on the G-drive.</p> <p>A copy is available from the Environmental Manager and the Emission Control Officer.</p> <p>There has never been</p>	

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		<p>representing the licensing authority to see the original license?</p> <ul style="list-style-type: none"> Should that be the case, was the original license made available to them? 		<p>any request by the environmental management inspectors / air quality officer or an authorised officer representing the licensing authority to see the original licence.</p>	
4.4(c)	<p><i>The licence holder must inform, in writing, the licensing authority of any changes to its details but not limited to the name of the emission control officer, postal address and/or telephonic details within 5 working days after such change has been effected.</i></p>	<ul style="list-style-type: none"> Are /were there any changes to the name of emissions control, postal address / or telephonic details? In the event that there had been any changes, was the licensing authority informed, in writing within 5 working days after such changes had been effected? 	Compliant	<p>A letter was sent to the licensing authority advising them about the corrections that had to be made to the license, which are: details of the emission control officer, correct postal address, contact details of the emission control officer, details of the Responsible person as well as his/her contact details.³</p>	
4.4(d)	<p><i>The licence holder must hold</i></p>	<ul style="list-style-type: none"> Are there any bi- 	Partially compliant	The first bi-annual	It is recommended that

³ Letter dated 10 April 2014 from Eskom to Gert Sibande District Municipality

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	<i>an environmental/health consultation forum meetings with affected and interested parties bi-annually to give feedback on the impact of the facility on related matters, and must provide written proof of such consultation to the licensing authority bi-annually.</i>	<p>annual environmental /health consultation forum meetings that have been held by Eskom with affected and interested parties to give feedback on the impact of the facility?</p> <ul style="list-style-type: none"> Should that be the case, has Eskom provided written proof bi-annually of such consultation to the licensing authority? 		<p>environmental/Health consultation forum meetings were held on 27th August 2015. According to the Emission Control officer the invitation to attend the meeting was published in three different local newspapers. The attendance register was signed. However, no proof of such meeting was submitted to the licensing authority.</p>	<p>written proof of consultation forum meeting must immediately be submitted to the licensing authority.</p>
<p>4.6 Annual payment of atmospheric emission licence processing fee</p>	<p><i>The licence holder must, for the period of validity of the licence , pay or make arrangements for the payment of the prescribed processing fee or district licence tariff to the licensing authority in line with the District tariff by-law or tariff policy in terms of MFMA(Act no.56 of 2003) and NEMA:QA(CHAPTER 5(37)</i></p>	<p>Has Eskom paid or made payment arrangement with the licensing officer for the prescribed processing fee or district licence tariff in line with the District tariff by-law or tariff policy in terms of MFMA?</p>	<p>Compliant</p>	<p>According to the Emission Control Officer, a licensing fee was paid to the licensing authority when an application for the license was submitted. The license would not have been issued if the fees were not paid.</p> <p>The Emission Control Officer indicated that payment will be made again before the end of March 2016.</p>	<p>Camden must ensure that it pays the prescribed processing fee.</p>

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5.1-5.5 <i>Nature of the process</i>	<i>Process Description</i>		Not auditable.		
6.1 <i>Raw Materials Product</i>	<i>Raw Material used</i>	What is the maximum consumption rate of the coal and fuel oil per month?	Compliant	According to the Emission Control Officer and the report which was provided to us the Power Station does not exceed the maximum permission rate for coal which is 550 000 tons per month. According to the report provided, the fuel oil consumption rate does not exceed 5000 tons per month.	
6.2	<i>Production rates of electricity is 1600 MW Maximum Production Capacity of Electricity Permitted is 1600MW</i>	Does Eskom exceed the maximum production capacity permitted?	Not verified	According to the Emission Control Officer the power station does not exceed the 1600 MW that is permitted.	Records must be kept in a readily accessible way and manner.

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				No records were provided to verify this information	
6.3	<i>Material used in energy sources</i>	<ul style="list-style-type: none"> • Is the actual consumption rate for the coal 550 000? • Is the actual consumption rate for Fuel oil 5000? • Is the material characteristic of the coal <2% (sulphur content), 25-35% (Ash content), CV=19.56 MJ/Kg? • Did Eskom provide the licensing authority with the characteristic of the Fuel oil 	Compliant	The maximum permitted consumption rate for the coal is 550 000. According to the report provided, the fuel oil consumption rate does not exceed 5000 tons per month.	.
6.4.1	<i>Point source parameters</i>		Not auditable		
	<i>Source of Atmospheric emission</i>				
	<i>Area and or line source</i>		Compliant	Information was provided	

6.4.2	<i>parameters.</i>			to the licensing authority on 28/10/2015.	
7.1 <i>Appliances and measures to prevent air pollution</i>	<i>Appliances and control measures.</i>	<ul style="list-style-type: none"> • Did Eskom provide the appliance serial numbers? • Has Eskom provided the abatement equipment names and models? • Has Eskom provided the Abatement technology type and the manufacturing date? • Is the minimum control efficiency of the abatement equipment 95%? • Is the minimum utilization of the abatement equipment 100% 	Compliant	Information was provided to the licensing authority on 28 th October 2015.	
7.1.1 <i>Point source – operating requirements</i>	<i>The licence holder must ensure that all abatement equipment is operated 100% of the time during normal operation.</i>	Is the abatement equipment operated 100% of the time during normal operation?	Compliant	The abatement equipment is operated 100% of the time during normal operation.	

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7.1.2	<i>The licence holder must ensure that all operating equipment is operated within their designed operational capacity and safety levels at all times.</i>	Is the operating equipment operated within its designed operational capacity and safety levels at all times?	Compliant	The operating equipment is operated within its designed operational capacity and safety levels at all times. Proper systems are in place to ensure compliance with this condition.	
7.1.3	<i>The licence holder must ensure that all operators have undergone compulsory training to operate the equipment and have attended induction training on the plant environmental management and air quality plans, which must be incorporated into plant SHE training.</i>	Have all the operators undergone compulsory training to operate the equipment and have they attended the induction training on the plant environmental management and air quality plans, which must be incorporated into plant SHE training?	Compliant	The operators have undergone compulsory training to operate the equipment and have they attended the induction training on the plant environmental management and air quality plans. ⁴	
7.1.4	<i>The license holder will be required to comply with greenhouse emission standards after their promulgation</i>		Not auditable	The greenhouse emission standards will be complied with after they have been promulgated.	Eskom must comply with the greenhouse emission standards once they have been promulgated.
7.1.5	<i>Existing plants shall submit atmospheric impact reports to the licensing authority on its</i>	Are there any atmospheric impacts	Compliant	Atmospheric report was submitted to the licensing	

⁴ See Atmospheric Emissions License and New Emissions Procedure training dated 18th September 2014.

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	<i>Particulate Matter impact annually.</i>	reports on Particulate Matter impact which have been submitted to the licensing authority?		authority on 17 th February 2015. ⁵	
7.2 Point Source – maximum emission rates (under normal working conditions)	<p><i>Point Source Code: Stack 1-4, U1-8.</i></p> <p><i>Pollutant Name: PM (175 milligrams per cubic meter) to be achieved immediately.</i></p> <p><i>Pollutant Name: SO2 (4000 milligrams per cubic meter) to be achieved immediately.</i></p> <p><i>Pollutant Name: Nitrogen Oxides (1700 milligrams per cubic meter) to be achieved immediately.</i></p>	What are the current maximum release rates for PM, SO2, and Nitrogen oxides?	Compliant	According to the Generation Production Report dated 30 th November 2015 the pollutants are constantly monitored and no exceedances were observed.	
7.2.1 Point source – General Operating Requirements	<i>The licence holder must ensure that all abatement equipment is operated 95% of the time during normal operation.</i>	Is the abatement equipment operated 95% of the time during normal working hours?	Compliant	The abatement equipment is operated 95% of the time during normal operation.	
7.2.2	<i>The licence holder must</i>	Is the operating	Compliant	The operating equipment	

⁵ See Camden Power Station Atmospheric Impact Report dated February 2014.

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	<i>ensure that all operating equipment is operated within the designed operational capacity and safety levels at all times.</i>	equipment operated within its designed operational capacity and safety levels at all times?		is operated within its designed operational capacity. Proper systems are in place to ensure compliance with this condition.	
7.2.3	<i>The licence holder must ensure that all operators have undergone compulsory training to operate the equipment and have attended induction training on the plant environmental management and air quality plans, which must be incorporated into plant SHE training.</i>	Have all the operators' undergone compulsory training to operate the equipment and have they attended induction training on the plant environmental management and air quality plans, which must be incorporated into the SHE training.	Compliant	Records were provided indicating that the operators have undergone compulsory training to operate the equipment and have they attended the induction training on the plant environmental management and air quality plans.	
7.2.4	<i>The license holder will be required to comply with green house emission standards after their promulgation.</i>		Not auditable		
7.2.5	<i>This operation is in the Highveld Priority Area (HPA), a designed national air pollution priority area; hence, further stricter conditions may be introduced.</i>		Not auditable		
7.2.6	<i>All units must be fitted with continuous emission monitoring equipment for PM, SO₂ and Nitrogen Oxides by 2015</i>	Has Eskom fitted all the units with continuous emission monitoring equipment for PM, SO ₂ and NO _x ?	Compliant	All units are fitted with continuous emission monitoring equipment for PM, SO ₂ and NO _x in order to monitor emission levels.	

<p>7.3 Point source – maximum emission rates</p>	<p><i>Maximum emission rates (under start up , maintenance , shut down conditions)</i></p>	<p>Did the normal start-ups, maintenance, upset and shut downs conditions exceed a period of 48 hours?</p>	<p>Compliant</p>	<p>The normal start ups, maintenance and shut down conditions have never exceeded even a period of 10 hours.</p>	<p>The Power Station is advised to record the shut down and start up conditions and keep the records.</p>
<p>7.4 Point source-emission monitoring and reporting requirements</p>	<p><i>Stack 1-4 Emission sampling/Monitoring Method should be in line with No. 37054 Government Gazette 22 November 2013.</i></p> <p><i>Sampling Frequency to be in line with No. 37054 Government Gazette 22 November 2013.</i></p> <p><i>Sampling Durations to be in line with No. 37054 Government Gazette 22 November 2013.</i></p> <p><i>Parameters to be measured to be in line with No. 37054 Government Gazette 22 November 2013.</i></p> <p><i>Parameters to be reported to be in line with No. 37054 Government Gazette 22 November 2013.</i></p>	<p>Is the emission sampling, sampling frequency, sampling duration, parameters to be measured, parameters to be reported and reporting frequency in stack 1-4 in line with No. 37054 Government Gazette 22 November 2013?</p>	<p>Compliant</p>	<p>According to the Emission Control Officer, the emission sampling, sampling frequency, sampling duration, parameters to be measured, parameters to be reported and reporting frequency in stack 1-4 in line are in line with No. 37054 Government Gazette 22 November 2013.</p>	

	<i>Reporting Frequency to be in line with No. 37054 Government Gazette 22 November 2013.</i>				
7.5 Area and or line source	<i>Area and or line source-management and mitigation measures.</i>	Are management and mitigation measures at Coal stockpile, Fuel oil tanks, Ash dump, conveyer belts, unpaved roads in line with No 307054 Government Gazette 22 November 2013, approved EMP, Dust Management Plan and Eskom's operational manuals?	Non-compliant	The Fuel Oil tanks are not included in the Dust Management Plan. The Dust Management Plan is currently under review.	It is recommended that the review of the Dust Management Plan be finalised so as to ensure compliance with this item.
7.5.1	<i>Leak detection and repair (LDAR) programme to be instituted</i>	Is there any leak detection and repair programme that has been instituted?	Non-compliant	There is an application for the variation of this condition.	A follow up of the application must be made as soon as possible as delays prolong the non-compliance findings.
7.5.2	<i>True vapour pressure of the content at storage temperature</i>	Is the true vapour pressure of content at storage temperature in line with the	Non-compliant	There is an application for the variation of this condition.	

		requirements of the license?			
7.5.3	<i>Type of tank or vessel</i>	Are the storage vessels for liquids in line with the requirements of the license?	Non-compliant	There is an application for the variation of this condition.	A follow up of the variation application must be made as soon as possible as delays prolong the non-compliance findings.
7.6 Routine reporting and record-keeping Complaints register	<i>The licence holder must maintain a complaints register at its premises, and such register must be made available for inspections. The complaints register must include the following information on the complainant, namely, the name, physical address, telephone number, date and the time when the complain was registered. The register should provide space for noise, dust and offensive odours complaints.</i>	<ul style="list-style-type: none"> • Does Eskom keep complaints register at its premises? Is the register made available for inspection? • Does the register include the following information on the complainant, namely, the name, physical address, telephone number, date and the time when the complainant was registered? • Does the register also provide space for noise, dust and offensive odours 	Compliant	There is a complaint register in place and there are no complaints that have been registered.	

	<p>Furthermore, the licence holder is to investigate and, monthly, report to the licensing authority in a summarised format on the total number of complaints logged. The complaints must be reported in the following format with each component indicated as may be necessary.</p> <ul style="list-style-type: none"> a) Source code/ name b) Root cause analysis c) Calculation of impacts/ emissions associated with incidents and dispersion modelling of pollutants, where applicable d) Measures implemented or to be implemented to prevent recurrence and e) Date by which measure will be implemented. 	<p>complaints?</p> <ul style="list-style-type: none"> • Has Eskom investigated and reported on monthly basis to the licensing authority the total number of complaints lodged? • Are the complaints lodged in the following format: <ul style="list-style-type: none"> a) Source code/ name b) Root cause analysis c) Calculation of impacts/ emissions associated with incidents and dispersion modelling of pollutants, where applicable d) Measures implemented or to be implemented to prevent 	<p>Not applicable</p>	<p>No complaints have been received.</p>	
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		recurrence and e) Date by which measure will be implemented			
	<i>The licensing authority must also be provided with a copy of the complaints register. The record of a complaint must be kept for at least 5(five) years after the complaint was made.</i>	How long is the complaints register kept for?	Not applicable		
Annual Reporting	<i>The licence holder must complete and submit to the licensing authority an annual report. The report must include information for the year under review (i.e. annual year end of the company). The report must be submitted to the licensing authority not later than 60(sixty) days after the end of each reporting period. The annual report must include, amongst others, the following items: a) Pollutant emission trend b) Compliance audit report(s) c) Major upgrades projects(i.e. abatement equipment or process equipment)and</i>	<ul style="list-style-type: none"> • Is there any annual report that has been compiled and submitted to the licensing authority? • Should that be the case ,does the annual report include , amongst others, the following items: a) Pollutant emission trend b) Compliance audit report(s) c) Major upgrades 	Compliant	<p>A report dated 29 May 2014 was submitted to Dr Thulie Mdluli who is a Chief Director Air Quality Management, Department of Environmental Affairs. Ref : CAN-ENV14 EM001</p> <p>The report was submitted on 2nd June 2015 and DEA acknowledged receipt of the report.</p>	

	<p>d) Greenhouse gas emissions.</p> <p>e) Action taken to address complains received</p> <p>f) Compliance status to statutory obligation (4.5) including any other issued authorisations.</p>	<p>projects(i.e. abatement equipment or process equipment)and</p> <p>d) Greenhouse gas emissions.</p> <p>e) Action taken to address complains received</p> <p>f) Compliance status to statutory obligation including any other issued authorisations.</p>			
<p>7.7 Investigation</p>	<p><i>An Atmospheric Emission Management Plan, giving details of measures and specific activities to be adopted in order to achieve the set atmospheric emission standards. This plan must be developed within six (6) months from the date of signature of licence.</i></p>	<ul style="list-style-type: none"> • Does Eskom have an Atmospheric Emission Reduction Management Plan? • Does the plan give details of measures and specific activities to be adopted in order to achieve the set atmospheric 	Compliant	The Atmospheric Emission Management Plan was developed on 4 th November 2015.	

		emission standards?			
	<i>The plan must also include the management of point –source, fugitive emission (including dust) sources and impacts thereof, as well as all sources and impacts of nuisance – causing activities.</i>	Does the plan include the management of point – source, fugitive emission sources and impacts thereof, as well as all sources and impacts of nuisance – causing activities?	Partially compliant	Impacts of nuisance are not included in the plan	The plan must be amended.
8. Disposal of waste and effluent arising from abatement equipment control technology.	<i>The disposal of any waste and effluent arising from any abatement equipment control technology must comply with the applicable legislation and requirements of the relevant Authorities.</i>	Is the disposal of waste and effluent arising from any abatement equipment control technology in line with the requirements of NEMA and any other applicable legislation?	Compliant	According to the Emission Control Officer there is no effluent arising from any abatement equipment control technology. Other form of waste is disposed at Holfontein Site by Roshcon SOC Limited.	

Atmospheric Emission Licence

9. <i>Penalties for non-compliance with license and statutory conditions and or requirement.</i>			Not auditable		

We confirm that as at the date of the audit, the audit process and the audit findings presented above are a true reflection of Camden Power Station’s compliance status with the Atmospheric Emission Licence, as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) NEMAQA, which was issued on the 31st of March 2014

Renqe Kunene Inc

Per: Ms FY Renqe