Dear Stakeholder,

Submission of Applications in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) Minimum Emissions Standards

On the 29 November 2019 Eskom submitted applications to the Department of Environment, Forestry and Fisheries (DEFF) for suspension and/or alternative limits of the Minimum Emissions Standards (MES) for Acacia and Port Rex Peaking gas power stations as well as for Grootvlei, Matimba and Medupi coal-fired power stations.

In terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), all of Eskom's coal and liquid fuel-fired power stations are required to meet the Minimum Emission Standards (MES) contained in GNR 893 as amended by GNR 1207 (31 October 2018) which was promulgated in terms of Section 21 of the NEMAQA. These regulations provide arrangements in respect of interalia: a once off postponement with the compliance of minimum emissions for new plant for five years from the date of issue, no once off postponement will be valid beyond 31 March 2025; a once off suspension for plants being decommissioned by 31 March 2030; and that the National Air Quality Officer may grant an alternate emission limit or emission load if certain conditions are met. The application for any of these requests were initially to be submitted by 31 March 2019. The MES amendments in October 2018 have necessitated Eskom to submit these additional unplanned 5 applications in terms of the MES, in addition to the 11 applications that were already submitted in March 2019 this year (***The previous MES applications that were submitted in March 2019 can be accessed via: http://www.naledzi.co.za/public-documents-naledzi.php***)

The relatively late publication of these MES amendments, in conjunction with lengthy procurement processes, resulted in Eskom applying and receiving (in October 2019) a condonation from the Minister for the late submission of these applications with a requirement for submission by November 2019.

As such, applications in terms of the MES were submitted to the National Air Quality Officer on the 29 November 2019, in compliance with this requirement. The applications will be supplemented with supporting documentation (revised Atmospheric Impact Reports and further Public Consultation) which is anticipated will be provided by the end of May 2020 – as it was not practically possible to prepare these documents by March 2019.

Table 1 provides a summary of Eskom's 2019 MES Applications in terms of the GNR 1207 (31 October 2018).

Table 1: A summary of Eskom's November 2019 MES applications

PowerStation	Pollutant (limits presented) in mg/Nm^3		
Coal-fuelled - mg/Nm^3 under normal conditions of **10% 0_2**, 273 Kelvin and 101,3 kPa.			
	Particulate Matter	**Nitrogen Oxide**	**Sulphur Dioxide**
Grootvlei	None- Eskom will comply	Suspension of the MES 'new plant' limits	Suspension of the MES 'new plant' limits
Matimba	Alternate monthly limit of 50 mg/Nm^3 from 2020 until decommissioning	Alternate monthly limit of 750 mg/Nm^3 from 2020 until decommissioning	Alternate monthly limit of 4000 mg/Nm^3 from 2020 until decommissioning
Medupi	None- Eskom will comply	None- Eskom will comply	Alternate monthly limit of 4000 mg/Nm^3 from 2020 until 31 March 2030. Thereafter (from 1 April 2031) Alternate monthly limit of 1000 mg/Nm^3 until decommissioning
Gas/liquid fuelled - mg/Nm^3 under normal conditions of **15% 0_2**, 273 Kelvin and 101,3 kPa.			
	Particulate Matter	**Nitrogen Oxide**	**Sulphur Dioxide**
Acacia	None- Eskom will comply	Suspension of the MES 'new plant' limits	None- Eskom will comply
Port Rex	Suspension of the MES 'new plant' limits	Suspension of the MES 'new plant' limits	None- Eskom will comply

Eskom believes that the applications are appropriate for a number of reasons which are described in the applications, and key reasons include:

- For Acacia and Port Rex the suspensions and alternative limit request will have limited air quality impact given the very low use of the station (generally less than 1 day a year), the intent to close the stations by 2030 and the cost of the upgrades to enable compliance, estimated as in excess of R100 million.
- Compliance upgrades at Grootvlei Power Station would cost in excess of R11 billion and for a station which is scheduled for decommissioning by not later than 2030, and given the limit air quality impact, full compliance to the MES is not seen as appropriate.
- Medupi Power Station will comply with most of the required emission limits, however the Flue Gas Desulphurisation (FGD) project which is required to support compliance to the Sulphur Dioxide limits is behind schedule and Eskom has requested alternative limits until the project is completed by 2030, and thereafter until decommissioning.
- In order to support meeting the Sulphur Dioxide standards in particular, FGD would be required at Matimba Power Station. Eskom does not believe that given the limited air quality impact and considering the significant volumes of water required, the additional waste produced and a cost of between R15 and R26 billion for FGD, that installing the technology is appropriate for Matimba. Eskom is thus requesting an alternative limit for Sulphur Dioxide for the station.

The Applications and supporting information can be accessed on the Eskom website or via this link https://www.eskom.co.za/MESapplications/Pages/default.aspx

The public participation process for the Medupi and Matimba applications have commenced and will continue in early 2020. Public participation processes for Acacia, Port Rex and Grootvlei will begin early 2020. Stakeholders will be informed of these processes through the media and emails. The inputs from the public participation and updated technical studies will be provided to the authorities as additional information into the applications submitted in November.

In terms of legislation Eskom is required to vary the stations Atmospheric Emission Licenses in support of the MES application and details of the variation are provided on the links above.

4 December 2019