



water affairs

Department:
Water Affairs
REPUBLIC OF SOUTH AFRICA

WESTERN CAPE REGION

Private Bag X16, Sanlamhof, 7532, 52 Voortrekker Road, Bellville 7530 Tel: (021) 941 6000, Fax: (021) 941 6077

Warren Dreyer Tel: 021 941 6185 Fax: 086 556 9985 Email: dreyerw@dwa.gov.za
Ref No. 16/1/1/6/6/7

ATTENTION: Ingrid Eggert

Chand Environmental Consultants
P. O. Box 238
PLUMSTEAD
7801

Dear Madam

FRESHWATER ASSESSMENT FOR THE PROPOSED DECOMMISSIONING AND REDEVELOPMENT OF EVERITE ASBESTOS WASTE CONSOLIDATION SITE

Your report dated June 2012 and subsequent site inspection dated 08 May 2013 have reference.

The Department has reviewed the report and after inspection of the site, has determined that the wetland identified in the freshwater assessment is in fact a stormwater detention pond with associated drainage channels. The development can therefore continue provided the following conditions are adhered to:

1. No abstraction of surface or groundwater may occur without the proper and prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use.
2. Please note that no development must take place within the 1:100 year flood line or within 500m from the boundary of any wetland. Should this be unavoidable, an authorisation must be obtained from this Department before commencement of the development.
3. No surface, ground or storm water may be polluted as a result of any activities on the site. Where this is unavoidable, the contaminated water must be treated before disposal at an appropriate facility.
4. Stormwater generated on the property must be captured and if it has been contaminated, must be treated before leaving the property. Stormwater should also not be allowed to mix with contaminated stormwater and should as far as possible be separated from one another.
5. Solid waste should be appropriately managed and disposed of at an authorised solid waste facility in compliance with all relevant legislation.

Should you have any questions please do not hesitate to contact this office.

Your co-operation aimed at the protection of water resources will be greatly appreciated.

Yours faithfully

amSchneider
pp CHIEF DIRECTOR: WESTERN CAPE

DATE: 11 June 2013

FW: Everite Asbestos Site, Brackenfell: Department Comments on Proposed Capping - Message (HTML)

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FW: Everite Asbestos Site, Brackenfell: Department Comments on Proposed Capping

Marielle Penwarden
To: Front Desk
Wed 2020/09/02 12:55 PM

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From: Mishelle Govender <MiGovender@environment.gov.za>
Sent: Wednesday, 02 September 2020 12:49
To: Marielle Penwarden <marielle@chand.co.za>
Cc: Grant Walters <GWalters@environment.gov.za>; Lucas Mahlangu <LMahlangu@environment.gov.za>
Subject: RE: Everite Asbestos Site, Brackenfell: Department Comments on Proposed Capping

Dear Marielle,

Here are comments we have on the proposed capping design that was submitted by J&W in relation to this site.

The proposed capping system in the Jones and Wagner Environmental and Engineering Consultants correspondence, is a perimeter mole cut-off curtain typically used at the side of roads in the Western Cape and is 1m deep – installed to protect base structure (see above right hand photo and the J&W reference to a product data sheet from Kaytech, acknowledgement to PeterD & Associates). The cap is merely a 150mm thick gravel layer plus 300mm soil layer, with the gravel protected by a geotextile filter and separation layer, and in some areas a reinforcing geo-grid. This design may keep mole rats out but does not prevent human excavation in future. In fact, aggregate in the Western Cape is very expensive and rare, and may easily be targeted by poor persons for re-sale as concrete aggregate. Further exposing society to the risk. **The DWS asbestos capping policy used over the past 20 plus years requires a hard, concrete cap or similar to prevent humans and animals excavating into such waste.** That standard has been applied at Ballingh and Thor Chemicals in KZN, Eskom Power Station sites and the TransNet facility in the Western Cape etc. See extract below.

6.3 Landfilling

Application must be made to the Department of Water Affairs and Forestry for permission to dispose asbestos at any site. Information required for full permitting

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6.3 Landfilling

Application must be made to the Department of Water Affairs and Forestry for permission to dispose asbestos at any site. Information required for full permitting include:

- The design plan for the proposed disposal area;
- A operational plan approved by the Department of Labour that the proposed operating procedures comply with the Asbestos Regulations;
- A rehabilitation plan; and
- Proof of Land Zoning

Asbestos can be disposed to a mono-disposal site or a co-disposal site.

6.3.1 Mono-disposal Sites

A mono-disposal site is one solely for the purpose of accepting asbestos and, because asbestos does not pose a pollution risk to water resources, the normal lining requirements for waste disposal facilities, as outlined in the Minimum Requirements for the Disposal of Waste to Landfill [4] do not apply. The liner must be an impregnable layer of at least 500mm, consisting of material such as cement or solidified ash. A mono-disposal site for asbestos must be closed by covering with a 500mm layer of ash followed by an asherete or concrete dome. An asherete dome must consist of at least 10 % by mass of cementitious material, be compacted to ~2 % above

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Marielle Penwarden
To Front Desk

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trench width and length.

This practice was followed by Jones and Wagner for the Eskom Asbestos Disposal sites. It is inexplicable why the different standard is used for the private sector and community at Brackenfell – the cap proposed by J&W engineers is not shown to be mole-rat resistant and is certainly not human resistant, nor termite resistant etc. Further to this, future vegetation easily penetrates a 150mm thick gravel layer by roots which provides preferential paths. The proposal is considered an expensive dysfunctional option that fails to protect human health. Note that both the present situation and future solution require compliance with the Department of Labour Regulations as well.

Thus there are two issues that require immediate attention and are as follows:

1. With immediate affect the area must be kept moist by means of dust suppression or other to prevent the asbestos fibres becoming airborne in winds etc, and the Department of Labour Regulations should be complied with including warning signs and exclusion of human activity.
2. Within the short term, an acceptable design should be implemented, such as a 0,5m thick cement stabilised and compacted sandy soil with perimeter cut-off wall to prevent human and animal access and resultant exposure to fibres as well as erosion resistance. The site should be demarcated into zones of potential development and no development and recorded inter alia in the deeds office allowing future development under appropriate conditions that maintain the isolation of fibres from further spreading albeit for particular footing and services although these can be designed for above cap installation by competent engineering.

Please take these comments into consideration when designing the cap for this site.

Regards
Mishelle

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