



147 Bram Fischer Drive
FERNDAL
2194

P O Box 1673
SUNNINGHILL
2157

Tel: 011 781 1730
Fax: 011 781 1731
www.nemai.co.za

Reference: 10711-20200826

26 August 2020

National Department of Environment, Forestry and Fisheries
Chief Director: Air Quality Management Services
473 Steve Biko & Soutpansberg Roads
Arcadia
Pretoria
0083

ATTENTION: Dr Thulie N Khumalo

RE: Application for Suspension of the NO_x New Plant Minimum Emissions Standards (MES) and Atmospheric Emission Licence (AEL) Variation Request for the Acacia Power Station

Dear Dr Khumalo,

Eskom, as South Africa's public electricity utility, generates, transmits and distributes electricity throughout the country. Eskom's principal generation technology is pulverised coal, however, just under 6% of Eskom's totalled installed capacity is from gas turbine generated power stations, predominantly located in the Western and Eastern Cape. These Gas power stations form part of the peaking electricity generation fleet. Peaking power stations operate during peak periods or during times when demand is higher than that which the base load power stations (that operate continuously) can supply. One such peaking power station is the Acacia liquid-fuelled Power Station (hereafter Acacia), which lies in the City of Cape Town Metropolitan Municipality in the Western Cape Province. The last of Acacia's generating units was commissioned in 1976. In terms of the Integrated Resource Plan and the Eskom Consistent Data Set, Acacia is intending to decommission its units in 2026, and no later than 2030.

In terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEM:AQA), all of Eskom's coal and liquid fuel-fired power stations are required to meet the MES contained in Government Notice (GN) R 1207 on 31 October 2018, which were promulgated in terms of Section 21 of this Act. GNR 1207 provides arrangements, in respect of inter alia: a once-off suspension for plants being decommissioned by 31 March 2030, and the National Air Quality Officer (NAQO) may grant an alternate emission limit or emission load if certain conditions are met. An application for any of these requests must be submitted by 31 March 2019. Eskom had however applied and received a condonation for the late submission of a Suspension application for Acacia until November 2019. A postponement application was issued to Acacia in 2015 which is reflected in the stations current AEL however with the amendment of the MES regulations in October 2018 it is necessary to further submit this application. This Application is an update of the 2019 applications with some revised information (in particular an updated Atmospheric Impact Report (AIR)) as Eskom committed to in the November 2019 application (Ref. ENV19-R232).

Acacia already achieves the new plant MES limit of 50 mg/Nm³ for Particulate Matter (PM₁₀) and 500 mg/Nm³ Sulphur dioxide (SO₂). Acacia complies with the existing plant standards for nitrogen oxide (NO_x -1100 mg/Nm³). However, Eskom's Acacia Power Station will not be able to comply with the 2025 new plant MES for nitrogen oxides (NO_x) of 250 mg/Nm³. In 2015 Acacia received postponement to the 2020 new plant limit with an approved alternative limit of 600 mg/Nm³ – this was granted and valid until 2025. Eskom is requesting suspension of the need to comply with the NO_x emission limit from the

new plant limit of 250 mg/Nm³ and continuation of the alternative 600 mg/Nm³ NO_x emission limit until decommissioning in 2026, no later than 2030. The emission limits are normalised to 15% O₂ on a dry basis.

Eskom submitted an initial MES application for Acacia in November 2019 (Ref. ENV19-R232), and at that time Eskom undertook to submit an updated AIR and Public Participation report when these were available. As such, an updated AIR, completed in April 2020, supports the present application. The public participation report has also been updated to reflect the 2nd round of consultation over July/August 2020. Eskom has also updated the application motivation included in this submission to reflect the updated AIR and new information since the submission of its initial application in November 2019.

In terms of timing, Eskom is required to submit an AEL variation request parallel to this suspension application. The variation request is prepared based on the assumption that this application is granted by the NAQO. If the NAQO decision is substantially different from that applied for, Eskom reserves its right to amend its variation request. The Acacia Power Station AEL variation communication is herewith included with the submission.

The following documents are included in the Application for submission:

Acacia Power Station MES Suspension Application Documents	
1.	Eskom's Final MES Application (August 2020) (Ref: ENV20-R132 Rev 3)
	Annexure A - Atmospheric Impact Report Acacia (2020)
	Annexure 1 - A Health Impact Focused Cost Benefit Analysis (Highveld MES applications 2019)
	Annexure 2 - Eskom's Summary Atmospheric Impact Report (Highveld MES Applications 2019)
	Annexure 3 - The 2nd Round of Public Participation for the MES Application (Aug 2020)
2.	Eskom's Acacia AEL Variation Request Communication (Ref: ENV20-L178)

If you require further information, please do not hesitate to contact the undersigned.

Yours Sincerely,
Nemai Consulting (PTY) Ltd



Jacqui Davis
Environmental Assessment Practitioner