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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 New Plant Minimum Emissions Standards (MES) Compliance Timeframes and Atmospheric Emission Licence (AEL) Variation Request for the Port Rex 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 Port Rex Gas Power Station (hereafter Port Rex), which lies 200m from Buffalo River, in East London in the Eastern Cape Province. The last of Port Rex's generating units was commissioned in the late 1970's. In terms of the Integrated Resource Plan and the Eskom Consistent Data Set, Port Rex 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, the National Air Quality Officer (NAQO) may grant an alternate emission limit or emission load if certain conditions are met. The application for any of these requests must be submitted by 31 March 2019. Eskom has however applied and received a condonation for the late submission of a Suspension Application for Port Rex until November 2019 (Ref. ENV19-R233). Eskom subsequently submitted an initial MES application for Port Rex in November 2019 as per the condonation.

Port Rex already achieves the new plant MES limit of 500 mg/Nm³ for Sulphur dioxide (SO₂). Port Rex complies with the existing plant standards for nitrogen oxide (NO_x, 1100 mg/Nm³) and Particulate Matter (PM, 75 mg/Nm³). However, Eskom's Port Rex Power Station will not be able to comply with the 2020 'new plant' MES for nitrogen oxides (NO_x) of 250 mg/Nm³ and particulate matter (50 mg/Nm³), and as such in 2015 Port Rex received postponement to the 2020 new plant limit for NO_x with an approved alternative limit of 600 mg/Nm³ from 2020 to 2025. Eskom is applying to the National Air Quality Officer for a suspension of the 2020 New Plant MES for NO_x and PM, and requesting approval of a continued alternative emission limit of 600 mg/Nm³ for NO_x and an alternative limit of 75 mg/Nm³ for PM, until

decommissioning in 2026, no later than 2030. The emission limits are normalised to 15% O₂ on a dry basis.

As stated above, Eskom submitted an initial MES application for Port Rex in November 2019 (Ref. ENV19-R233) and at that time Eskom undertook to submit an updated Atmospheric Impact Report (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.

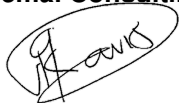
In terms of timing, Eskom is required to submit an AEL variation request parallel to this suspension application. The variation request is prepared based on the assumption that this application is granted by the NAQO. If the NAQO decision is substantially different from that applied for, Eskom reserves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

The following documents are included in the Application for submission:

Port Rex Power Station MES Suspension Application Documents	
1.	Eskom's Final MES Application (August 2020) (Ref: ENV20-R133 Rev 3)
	Annexure A - Atmospheric Impact Report Port Rex (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 Port Rex AEL Variation Request Communication (Ref: ENV20-L177)

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

Yours Sincerely,
Nemai Consulting (PTY) Ltd



Jacqui Davis
Environmental Assessment Practitioner