



Councillor Siyabulela Mamkeli
Mayoral Committee Member

T: 021 400 1290 M: 078 159 1251
E: Siyabulela.Mamkeli@capetown.gov.za

29 APRIL 2016

Dear Ms Kiara Worth,

Letter of reply to complainant: - Fresh Air for Hout Bay: official letter to government regarding Oceana's odour pollution

The City has been engaging with Lucky Star and the Western Cape Government: Department of Environmental Affairs on the matter. Lucky Star has committed to upgrading its chemical scrubber (odour filtration system) to replace the existing unit with a more efficient, higher capacity unit.

The necessary due diligence for this upgrade has been completed and Lucky Star has been granted authority to commence the design, procurement and commissioning of this new unit. The process will, however, take some months to complete. Once the new unit has been installed, Lucky Star will be required to conduct independent in-stack emissions testing pre- and post-the scrubbing system in order to demonstrate the efficiency of the unit.

The World Health Organisation (WHO) Guidelines advise that 'the lowest-adverse-effect level of hydrogen sulphide is 15 mg/m³ (15 000 ug/m³), when eye irritation is caused. In view of the steep rise in the dose-effect curve implied by reports of serious eye damage at 70 mg/m³ (70 000 ug/m³), a relatively high protection (safety) factor of 100 is recommended, leading to a guideline value of 0,15 mg/m³ (150 ug/m³) with an averaging time of 24 hours.

The 24-hour means for hydrogen sulphide, as recorded by the Western Cape Government's continuous air quality monitoring station located at Sentinel School just 200 m from the factory, is significantly lower than this guideline value.

The City of Cape Town, as the licensing authority for issuing Lucky Star with their emissions licence, needs to work within the legislative framework prescribed in the Air Quality Act and its Listing Notice 893 of 2013.

In terms of the National Environmental Management: Air Quality Act, it is the competency of the National Minister of Environmental Affairs to prescribe emission limits for specified listed activities. With regard to Category 10 Animal Matter Processing Facilities, the Minister has not prescribed any emission limits.

We will be engaging with the National Air Quality Officer with a view to requesting an amendment to the listing notice to include emission limits to be prescribed for animal matter processing facilities. Residents are most welcome to liaise directly with the National government around the legislation.

Yours sincerely,

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Councillor Siyabulela Mamkeli
Mayoral Committee Member for City Health