



**ENVIRONMENTAL AUTHORISATION AUDIT REPORT  
AFROX / GASFIT (PTY) LTD, WORCESTER**

**July 2021**

**DEA&DP Reference Number: 16/3/3/1/B2/32/1020/20**

**SEC Reference Number: 019097**

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## EXECUTIVE SUMMARY

Sillito Environmental Consulting (Pty) Ltd (SEC) was appointed by Afrox / Gasfit (Pty) Ltd, Worcester to conduct an Environmental Authorisation (EA) Audit at their operations located on Erven 5875 and 5876, Samuel Walters Street, Worcester Industrial Zone, Worcester, Western Cape.

This was required to evaluate the Facility against the conditional requirements of the current Environmental Authorisation, reference number 16/3/3/1/B2/32/1020/20, issued by the Western Cape Department of Environmental Affairs and Development Planning, dated 23 November 2020.

The findings of this audit were that the overall environmental and the level of housekeeping at the Facility are all very good. Activities take place with good operational control and management is also committed to address any environmental non-compliance as soon as possible.

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## GLOSSARY OF TERMS AND ABBREVIATIONS

DEA&DP	Department of Environmental Affairs and Development Planning
EA	Environmental Authorisation
ECO	Environmental Control Officer
EMPr	Environmental Management Programme
I & AP	Interested and Affected Party
LPG	Liquefied Petroleum Gas
m <sup>3</sup>	Cubic meters
SANS	South African National Standards
SEC	Sillito Environmental Consulting

# 1 INTRODUCTION AND TERMS OF REFERENCE

Sillito Environmental Consulting (Pty) Ltd (SEC) was appointed by Afrox / Gasfit (Pty) Ltd, Worcester to conduct an Environmental Authorisation (EA) Audit at their operations located on Erven 5875 and 5876, Samuel Walters Street, Worcester Industrial Zone, Worcester, Western Cape.

This was required to evaluate the Facility against the conditional requirements of the current Environmental Authorisation, reference number 16/3/3/1/B2/32/1020/20, issued by the Western Cape Department of Environmental Affairs and Development Planning, dated 23 November 2020.

Information for this audit was obtained by means of a walk over assessment of the Afrox / Gasfit (Pty) Ltd, Worcester premises located on Erven 5875 and 5876, Worcester, a review of documents and interviews with Willem van Rooyen (owner of the Facility).

The Facility is owned and operated by Gasfit management. Currently the Facility is storing and distributing filled LPG cylinders (of various sizes) filled by the Afrox Epping branch in Cape Town and transported to Worcester by road transport. The site also distributes other air gases and gas products in limited quantities.

In order to be able to sustain future projected volumes, Gasfit installed an additional 70m<sup>3</sup> LPG bulk storage tank on site together with necessary filling equipment in April 2021 so that cylinders can be filled on site in Worcester rather than truck filled cylinders from Cape Town.

## 2 SCOPE OF WORK

### *Environmental Audit*

The scope of the work was to conduct an environmental authorisation audit within three months after the construction of the 70m<sup>3</sup> LPG bulk storage tank was completed.

A physical site audit was conducted by Gabriel Roux, representing SEC, on 9 July 2021. The prevailing weather conditions on the day were sunny and mild.

The environmental authorisation audit consisted of a site walk assessment of the installation and a desktop review of documentation encompassing the following:

- i. The conditions as per the Environmental Authorisation (Ref No: 16/3/3/1/B2/32/1020/20) dated 23 November 2020.
- ii. The compliance inspection on 9 July 2021. Willem van Rooyen (owner of the Facility) accompanied the SEC auditor.
- iii. Review of available documentation.

### 3 AUDITED DOCUMENTATION

The following documents were audited and reviewed:

- Environmental Authorisation (Ref No: 16/3/3/1/B2/32/1020/20) issued by DEA&DP dated 23 November 2020
- Incident and Complaint Register
- Environmental Management Programme (Appendix H of the EIA) dated 4 September 2020
- IB Steel Engineering Pressure Vessel Inspection Report (Report No: REP-GR25877) dated 13 March 2021.
- Certificate of Conformity for Gas Installation: Occupational Health & Safety Act, 1993 (Certificate No: 715427) dated 19 April 2021
- DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021
- I&AP Notification letter and email dated 25 November 2020
- Boland Bouers Oil Separator letter dated 6 January 2021
- Site Emergency Plan dated 1 January 2021
- Afrox LPG Filling Maintenance Schedule dated 29 March 2011
- Appointment – Environmental Control Officer email dated 5 January 2021
- ECO Reports 1 – 5, dated February 2021 – April 2021
- ECO Closure Report dated 16 April 2021

### 4 AUDIT DISCUSSION

#### 4.1 SITE INFORMATION

The Facility is located on Erf 5875 and 5876, Samuel Walters Street, Worcester Industrial Zone, Worcester, Western Cape and the geographical coordinates for the entrance of the Facility are 33°38'43.38"South and 19°28'31.82"East.

The Facility is located in the industrial area and is typically surrounded by industrial type activities, with and open space adjacent to its southern boundary.

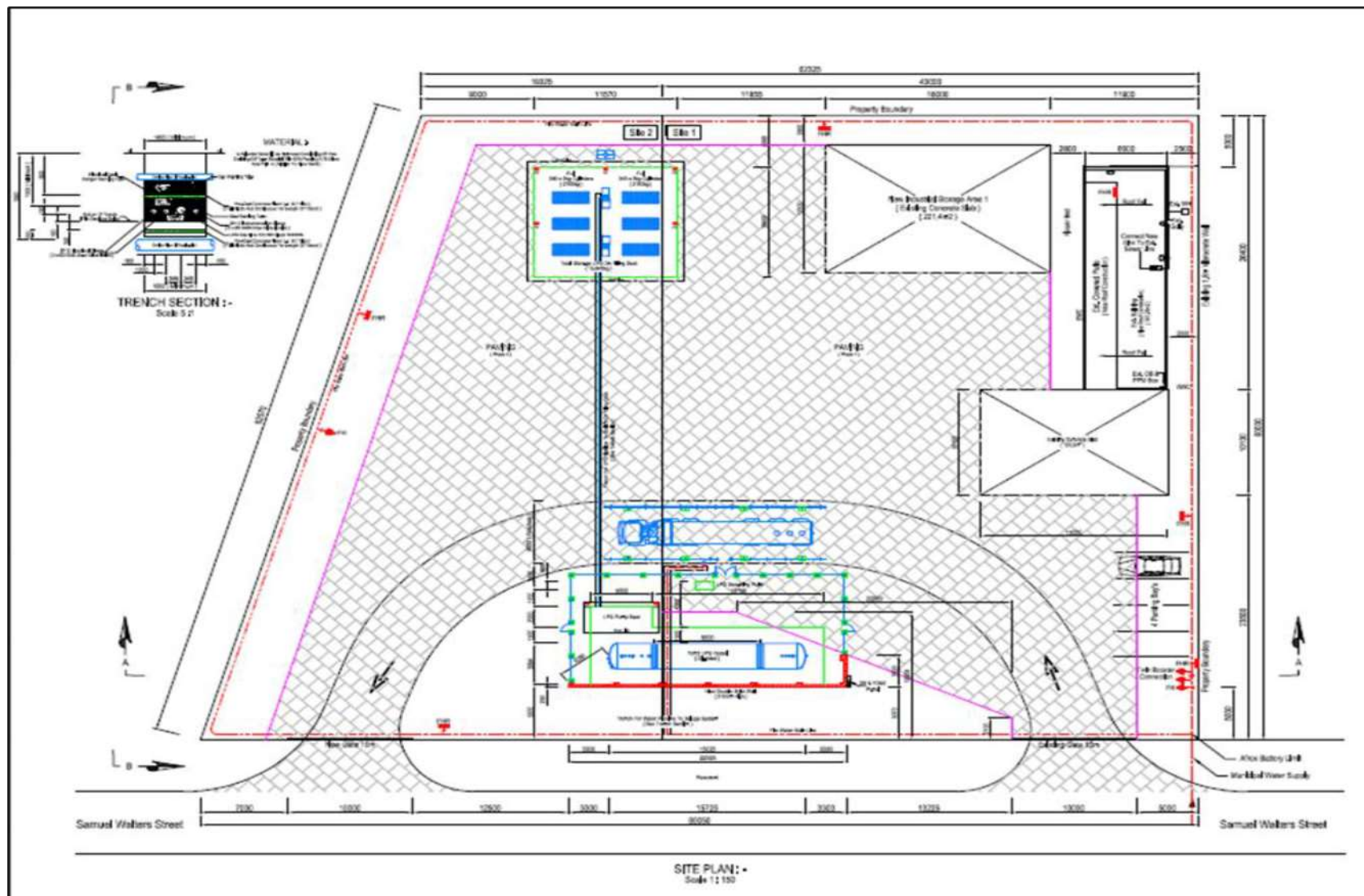
The Facility location details are presented in **Figure 1** below and the Site Layout Plan in **Figure 2** below.



**Figure 1: Locality Map of the Facility (Source: Google Earth, 2021). The property boundary is outlined in red.**



Figure 2: Site Layout Plan.





## 4.2 SITE PHOTOGRAPHS



**Photo 1 & 2:** 70m<sup>3</sup> LPG bulk storage tank installed at the Facility.



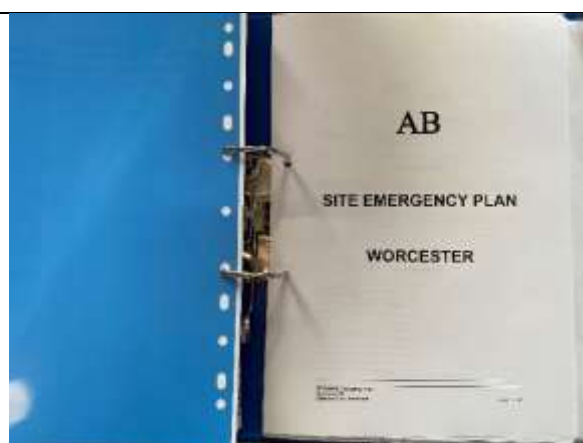
**Photo 3:** Oil separator system installed at the southern corner of the Facility.



**Photo 4:** Fire wall constructed along the eastern boundary of the Facility.



**Photo 5:** A copy of the EMPr kept within the Facility's office.



**Photo 6:** Site Emergency Plan kept within the Facility's office.

## 5 ENVIRONMENTAL AUTHORISATION FINDINGS AND COMPLIANCE

SECTION	CONDITION	STATUS	COMMENTS
<b>Scope of authorisation</b>			
1.	The Holder is authorised to undertake the listed activity specified in Section B above in accordance with and restricted to Preferred Alternative description in the BAR dated 9 July 2020 on site as described in Section C above.	Compliant	Compliant – a desktop analysis (Cape Farm Mapper) was undertaken to confirm that the Facility is located on Erven 5875 and 5876, Worcester as described in Section C of the EA dated 23 November 2020.
2.	The holder must commence with the listed activity on site within a period of <b>five years</b> from date issue of his Environmental Authorisation.	Compliant	Notice was given to DEA&DP regarding the commencement of construction activities at the Facility via email by Eugene Marias (SEC) on 7 January 2021. DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed this condition was complied with.
3.	The development must be concluded within <b>ten years</b> from the date of commencement of the listed activity.	Compliant	An ECO Closure Report dated 16 April 2021 and a DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed this condition was complied with.

4.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	Compliant	Willem van Rooyen verbally confirmed during the site audit that this condition is complied with.
5.	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	N/A	Willem van Rooyen (owner of the Facility) advised during the site audit that no such changes have taken place. This condition could not be reviewed.
<b>Written notice to the Competent Authority</b>			
6.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities.	Compliant	Notice was given to DEA&DP regarding the commencement of construction activities at the Facility via email by Eugene Marias (SEC) on 7 January 2021. DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed this condition was complied with.

6.1	The notice must make clear reference to the site details and EIA Reference number given above.	Compliant	Notice was given to DEA&DP regarding the commencement of construction activities at the Facility via email by Eugene Marias (SEC) on 7 January 2021. The notice made clear reference to the site details and EIA Reference number. DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed this condition was complied with.
6.2	The notice must also include proof of compliance with the following conditions described herein: Conditions: 7, 8, 11, 17 and 20.	Compliant	Notice was given to DEA&DP regarding the commencement of construction activities at the Facility via email by Eugene Marias (SEC) on 7 January 2021. DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed these conditions were complied with.
<b>Notification and administration of appeal</b>			
7.	The holder must in writing, within 14 (fourteen) calendar days of the date of this decision–	Compliant	An I&AP Notification letter and email dated 25 November 2020 was reviewed during this audit.
7.1	Notify all registered Interested and Affected Parties (“I&APs”) of –	Compliant	An I&AP Notification letter and email dated 25 November 2020 was reviewed during this audit. The letter complied with all the required conditions.
7.1.1	The outcome of the application;		
7.1.2	The reasons for the decision as included in Annexure 3;		
7.1.3	The date of the decision; and		

7.1.4	The date when the decision was issued.		
7.2	Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 detailed in Section F below;	Compliant	An I&AP Notification letter and email dated 25 November 2020 was reviewed during this audit. The letter complied with this condition.
7.3	Draw the attention of all registered I&APs to the manner in which they may access the decision;	Compliant	An I&AP Notification letter and email dated 25 November 2020 was reviewed during this audit. The letter complied with this condition.
7.4	The name of the holder (entity) of this Environmental Authorisation,	Compliant	
7.4.1	Name of the responsible person for this Environmental Authorisation,	Compliant	An I&AP Notification letter and email dated 25 November 2020 was reviewed during this audit. The letter complied with all the required conditions.
7.4.2	Name of the responsible person for this Environmental Authorisation,		
7.4.3	Postal address of the holder,		
7.4.4	Telephonic and fax details of the holder,		
7.4.5	E-mail address, if any, of the holder,		
7.4.6	The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations.		

8.	The listed activity, including site preparation, may not commence within 20 (twenty) calendar days from the date of issue of this Environmental Authorisation. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.	Compliant	<p>Notice was given to DEA&amp;DP regarding the commencement of construction activities at the Facility via email by Eugene Marias (SEC) on 7 January 2021. Marius Venter (DEA&amp;DP) confirmed via email that no appeals were lodge.</p> <p>DEA&amp;DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 confirmed this condition was complied with.</p>
<b>Management of activities</b>			
9.	The draft or Environmental Management Programme (“EMPr”) submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	Compliant	<p>A copy of the EMPr was kept within the Facility’s office and reviewed by SEC during the audit on 9 July 2021. Willem van Rooyen (Facility’s owner) confirmed that it is expected of site personnel to implement the recommendations contained within the EMPr as part of their daily operations.</p>
10.	The EMPr must be included in all contract documentation for all phases of implementation.	Compliant	<p>A copy of the EMPr which was attached as Appendix H of the EIA, was available onsite and reviewed by SEC during the audit on 9 July 2021.</p> <p>Willem van Rooyen (Facility’s owner) verbally confirmed that the EMPr will be included in all contract documentation for the operational phase.</p>
<b>Monitoring</b>			



11.	The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before commencement of any land clearing or construction activities to ensure compliance with the provisions of the EMPr and the conditions contained herein.	Compliant	Appointment – Environmental Control Officer email dated 5 January 2021, confirmed SEC was appointed as the ECO for the Facility.
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12.	A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activity, and must be made available to anyone on request, including a publicly accessible website.	Compliant	<p>The following documents and records were maintained and reviewed during the audit:</p> <ul style="list-style-type: none"> <li>• Environmental Authorisation (Ref No: 16/3/3/1/B2/32/1020/20) issued by DEA&amp;DP dated 23 November 2020</li> <li>• Incident and Complaint Register</li> <li>• Environmental Management Programme (Appendix H of the EIA) dated 4 September 2020</li> <li>• IB Steel Engineering Pressure Vessel Inspection Report (Report No: REP- GR25877) dated 13 March 2021.</li> <li>• Certificate of Conformity for Gas Installation: Occupational Health &amp; Safety Act, 1993 (Certificate No: 715427) dated 19 April 2021</li> <li>• DEA&amp;DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021</li> <li>• I&amp;AP Notification letter and email dated 25 November 2020</li> <li>• Boland Bouers Oil Separator letter dated 6 January 2021</li> <li>• Site Emergency Plan dated 1 January 2021</li> </ul>
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			<ul style="list-style-type: none"> <li>• Afrox LPG Filling Maintenance Schedule dated 29 March 2011</li> <li>• Appointment – Environmental Control Officer email dated 5 January 2021</li> <li>• ECO Reports 1 – 5, dated February 2021 – April 2021</li> <li>• ECO Closure Report dated 16 April 2021</li> </ul>
13.	Access to the site referred to in Section C above must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	N/A	<p>Willem van Rooyen verbally confirmed no audit has been carried out by DE&amp;DP at the Facility.</p> <p>This condition could not be reviewed.</p>
<b>Auditing</b>			

14.	<p>In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014.</p> <p>The holder must undertake an environmental audit and submit an Environmental Audit Report to the Competent Authority after the construction phase is completed. The Environmental Audit Report must be submitted to the Competent Authority within three months after the development is completed.</p> <p>The holder must, within 7 days of the submission of each of the above-mentioned reports to the Competent Authority, notify all potential and registered I&amp;APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).</p>	Compliant	Sillito Environmental Consulting (Pty) Ltd (SEC) was appointed by Afrox / Gasfit (Pty) Ltd, Worcester on 25 June 2021 to conduct an Environmental Authorisation (EA) Audit.
<b>Specific Conditions</b>			

15.	<p>Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.</p> <p>Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p>	N/A	<p>Willem van Rooyen (Facility's owner) verbally confirmed during the site audit that no heritage or archaeological artefacts has been found at the Facility. This condition could not be audited.</p>
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16.	A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	N/A	Willem van Rooyen (Facility's owner) verbally confirmed during the site audit that no heritage or archaeological artefacts has been found at the Facility. This condition could not be audited.
17.	An oil separator system must be installed in the southern corner of the site prior to construction taking place to separate hazardous liquids from the stormwater prior to discharging onto the adjacent land.	Compliant	During the site audit it was noted that an oil separator system was installed at the southern corner of the Facility.  A Boland Bouers Oil Separator letter dated 6 January 2021, ECO Reports 1 – 5, dated February 2021 – April 2021, ECO Closure Report dated 16 April 2021 and a DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 also confirmed this condition was complied with.

18.	A 3,6 m high fire wall must be constructed along the eastern boundary of the site, adjacent to the LPG storage tank. The wall must be constructed during the construction phase prior to the installation of the tank.	Compliant	During the site audit it was noted that a 3,6 m high fire wall was constructed along the eastern boundary of the Facility.  ECO Reports 1 – 5, dated February 2021 – April 2021 and ECO Closure Report dated 16 April 2021 as well as a DEA&DP Proof of Compliance with the Condition of the EA letter, dated 9 June 2021 also confirmed this condition was complied with.
19.	<p>The LPG storage tank must be installed according to the following South African National Standards (“SANS”):</p> <ul style="list-style-type: none"> <li>• All relevant electrical works must be compliant with SANS 10108.</li> <li>• All LPG storage and filling installations must comply with SANS 10087-7.</li> <li>• All relevant building works must comply with SANS 10400.</li> <li>• SANS 10087-3 (2008) (English): The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations Part 3: Liquefied petroleum gas installations involving storage vessels of individual water capacity exceeding 500 L.</li> </ul>	Compliant	<p>An IB Steel Engineering Pressure Vessel Inspection Report (Report No: REP- GR25877) dated 13 March 2021 and a Certificate of Conformity for Gas Installation: Occupational Health &amp; Safety Act, 1993 (Certificate No: 715427) dated 19 April 2021 were reviewed during the audit.</p> <p>These reports confirmed that the installation of the LPG storage tank was according to the required listed South African National Standards (“SANS”).</p>

20.	<p>The following plans and procedures must be updated prior to construction taking place, as per the design phase requirements listed in the EMPr. Copies of the updated plans must be submitted to the Department for record purposes:</p> <ul style="list-style-type: none"> <li>• Spill Contingency Plan.</li> <li>• Fire Plan.</li> <li>• Emergency Response Plan; and</li> <li>• Preventative Maintenance Plans.</li> </ul>	Compliant	<p>A Site Emergency Plan (which includes a Spill Contingency, Fire Plan and an Emergency Response Plan), dated 1 January 2021, and an Afrox LPG Filling Maintenance Schedule dated 29 March 2011 was kept within the Facility's office and reviewed during the site audit.</p>
21.	<p>The installation of the Aboveground Storage Tank and associated pipework must comply with the National Building Regulations and Standards Act No. 103 of 1977.</p>	Compliant	<p>An IB Steel Engineering Pressure Vessel Inspection Report (Report No: REP- GR25877) dated 13 March 2021 and a Certificate of Conformity for Gas Installation: Occupational Health &amp; Safety Act, 1993 (Certificate No: 715427) dated 19 April 2021 were reviewed during the audit.</p> <p>These reports confirmed that the installation of the LPG storage tank comply with the National Building Regulations and Standards Act No. 103 of 1977.</p>



22.	The installation must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health and Safety Act (No. 85 of 1993).	Compliant	<p>An IB Steel Engineering Pressure Vessel Inspection Report (Report No: REP- GR25877) dated 13 March 2021 and a Certificate of Conformity for Gas Installation: Occupational Health &amp; Safety Act, 1993 (Certificate No: 715427) dated 19 April 2021 were reviewed during the audit.</p> <p>These reports confirmed that the installation of the LPG storage tank is in accordance with the Occupational Health and Safety Act (No. 85 of 1993).</p>
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## 6 CONCLUSIONS AND RECOMMENDATIONS


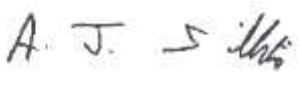
From the audited ECO Reports and ECO Closure Report the contractor, Boland Bouers, has complied with most of the conditions set out in the approved Environmental Management Programme (EMPr) dated 4 September 2020, and complied with the EMPr during the pre-, construction and completion phases of the project. The Afrox / Gasfit (Pty) Ltd Facility has complied with all the requirements/ conditions listed in the Environmental Authorisation (Ref No: 16/3/3/1/B2/32/1020/20) dated 23 November 2020.

Based on the findings of Section 5 of this report, it is evident that the overall environmental and the level of housekeeping at the Facility are all very good. Activities take place with good operational control and management is also committed to address any environmental non-compliance as soon as possible.

## 7 REPORT LIMITATIONS

This report is based upon the application of auditing principles and professional judgment to facts obtained through interviews, discussions and the presentation of objective evidence with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, scope of work, budget, and schedule.

Should you have any further questions please contact the author.

Report compiled by:	Report reviewed by:
	
Gabriel Roux <i>BSc Conservation Ecology</i>	Adrian Sillito <i>Pr.Sci.Nat Registration Number 400046/93</i>