



AIR POLLUTION COMPLAINTS PROCEDURE

2009

The administration of the Complaints Procedure is the responsibility of the Management Committee (Manco).

1. Complaints Logging

- 1.1 A complaint received during working hours by the respective RBCAA recipient will be sent to the RBCAA Project Manager via the complaint's e-mail address i.e. complaints@ecoserv.com. The complaint will be relayed to all relevant RBCAA members, within 24 hours, via the above e-mail address.
 - 1.1.1 The Project Manager will keep the complaints e-mail address updated.
 - 1.1.2 The Project Manager will keep a detailed complaints log.
 - 1.1.3 Members will notify the RBCAA of changes in contact details.
 - 1.1.4 Members will notify the RBCAA when e-mail servers are down.
 - 1.1.5 The sender will follow up on any e-mail that fails to be delivered.
- 1.2 Complaints received after hours by industry will be investigated immediately and notification will thereafter be sent to the RBCAA project manager, via the complaint's address.
- 1.3 Complaints received after hours by the local municipality, i.e.; Fire Department, must be relayed to the municipal Environmental Health standby person and immediately investigated. The Fire Department and the Environmental Health standby person must attempt to establish the source prior to contacting any industry\ies. The Environmental Health standby person will notify the Air Pollution Control Officer on the next working day. The Air Pollution Control Officer will then send notification to the RBCAA project manager via the complaint's e-mail address.
- 1.4 All members are to provide the RBCAA and Municipality with an after-hours contact number. **(Refer Appendix)**
- 1.5 Complaints will be logged with the following essential information: Nature of Complaint; Complainants contact details; Location of the complainant; Date, Time and Duration of complaint.

2. Complaints Investigation and Resolution

- 2.1** A complaint's investigation will be undertaken by industry or the local municipality.
- 2.1.1** Members will ensure that on-line data relayed to the RBCAA is valid and accurate.
- 2.2** Complaint's investigation must be initiated immediately and completed within 24 hours. If an industry is unable to complete the investigation within 24 hours then this is to be relayed to the RBCAA via the complaints address. In which case, the respective RBCAA member who logged this complaint must communicate this to the complainant.
- 2.3** In investigating the complaint, consideration must be given to wind direction and wind speed. Wind data should be drawn from the nearest recording station but all wind trends should be reviewed to ensure that the complaint did not take place at a time of a diverging or changing wind pattern. Group trends are available at <http://live.ecoserv.com>, select Reports from the left margin options, Group and then Richards Bay Wind Direction. The 5-minute wind direction data should be drawn for a period of TWO hours prior to and ONE after the reported incident. The most logical source would be the closest source with the reciprocal wind bearing (wind direction plus or minus 180°) from the point of complaint.
- 2.4** Other aspects the investigator should consider:
- Was the wind direction fluctuating at the time of the complaint? This can be determined from observing the trend in all wind directions and the Standard Deviation In Wind Direction (logged for each wind sensor): a deviation of greater than 20° is indicative of a variable wind direction, meaning that a plume might have been dispersed laterally or that sources on a similar vector might have coincided. Note that high standard deviation is normally also indicative of good dispersion so a strong local source would be the most likely cause of the complaint under these circumstances.
 - Was it overcast or raining at the time of the complaint? This can cause plume downwash and, in the case of thunderstorms, strong vertical winds that can bring elevated source emissions to ground. Certain dry materials, if exposed to rain, can release gas. Rainfall data is available from Scorpio.
- 2.5** If the source of the complaint is identified, the industry or local municipality must furnish comprehensive details on the pollution incident to the RBCAA. The report-back must contain the following information; Nature of Complaint; Source and Nature of Emissions; Peak and Average Concentrations of Emissions and Met Conditions (if relevant); Compliance with Permit\; Root Cause of Incident and Corrective Action.

- 2.5.1** Members of Manco are entitled to ask questions or request additional information relating to any report-back. These must be communicated, and responded to, via the complaints address.
- 2.6** If the source of the complaint has not been conclusively identified, a Case Study may be generated by the RBCAA, only with the approval of the Chairman of Manco.
- 2.6.1** All queries regarding Case Studies must be referred to the Chairman of Manco and **not** the Consultants.
- 2.7** All information regarding complaint investigations must be communicated via the complainant's e-mail address.
- 2.8** The respective "guilty party" will communicate the complaint's resolution to the complainant. If no source can be identified then the respective RBCAA member, that logged the complaint, will communicate the complaint's resolution to the complainant.
- 2.9** All complaints information received, investigated and resolved will be administered by the RBCAA project manager and reported in the RBCAA monthly report.

3. Exceedences

- 3.1** In the event of an exceedence of the guidelines a case study will immediately be initiated by the Project Manager without the authority or approval of the Chairperson of Manco.
- 3.2** The Project Manager will notify the RBCAA of the exceedence's via the Complainant's e-mail address.
- 3.3** The relevant industry's will initiate an investigation.
- 3.4** If the possible source's cannot be identified through the Case Study then the Municipality will be requested to investigate further.

WIND VECTORS

| Area | Bayside Aluminium | Hillside Aluminium | TATA Steel | Mondi Richards Bay | Foskor |
|----------------------------|-------------------|--------------------|------------|--------------------|--------|
| Alton | 191 | 130 | 20 | 260 | 135 |
| Aquadene | 194 | 188 | 202 | 220 | 180 |
| Arboretum | 233 | 250 | 290 | 263 | 235 |
| Arboretum Extension | 235 | 264 | 310 | 270 | 244 |
| Bayside Aluminium | 180 | 30 | 10 | 322 | 50 |
| Birdswood | 234 | 240 | 269 | 253 | 230 |
| Brackenham | 194 | 192 | 204 | 219 | 185 |
| CBD | 220 | 239 | 294 | 257 | 210 |
| Empangeni | 118 | 99 | 85 | 95 | 107 |
| Esikhawini | 45 | 45 | 36 | 30 | 45 |
| Exarro | 120 | 110 | 99 | 112 | 112 |
| Felixton | 69 | 62 | 54 | 54 | 68 |
| Foskor | 235 | 310 | 342 | 285 | |
| Greenhill | 268 | 290 | 306 | 285 | 285 |
| Hillside Aluminium | 216 | | 354 | 274 | 145 |
| Mandlazini Agri-Village | 250 | 260 | 274 | 263 | 254 |
| Meerensee | 259 | 274 | 291 | 275 | 268 |
| Mondi Richards Bay | 145 | 95 | 50 | | 100 |
| Nseleni | 182 | 178 | 178 | 192 | 173 |
| Port of Richards Bay | 280 | 335 | 343 | 305 | 335 |
| Richards Bay Coal Terminal | 310 | 238 | 341 | 315 | 340 |
| Richards Bay Minerals | 225 | 225 | 240 | 240 | 225 |
| Southern Sanctuary | 0 | 13 | 8 | 340 | 23 |
| Tata Steel | 194 | 175 | 180 | 235 | 164 |
| Veldenvlei | 220 | 225 | 265 | 248 | 214 |
| Vulindlela | 68 | 68 | 68 | 68 | 65 |
| Wildenweide | 209 | 210 | 254 | 223 | 191 |

Complaint Contact Details

| Organisation | Representative | Phone | | E-Mail |
|-----------------------------|-------------------|------------------------------|---|--|
| | | W/H | A/H | |
| AAFC | ? | | | |
| Bayside Aluminium | Wendy Muller | 035-9088516 083 272 4226 | Security: 035- 9088166 or 083 272 4226 | Wendy.muller@bhpbilliton.co.za |
| Exxaro | Garth Domingo | 035-902 7945 | 072 231 3315 | Garth.domingo@exxaro.com |
| Felixton Cane Growers Assoc | ? | 035 772 3110 or 772 5477 | - | fxpassn@saol.com |
| Foskor | Dhireen Ramsaroop | 035-9023285 083 626 8063 | 083 626 8063 | DhireenR@foskor.co.za |
| Hillside Aluminium | Wendy Muller | 035-9088516 083 272 4226 | Security: 035-9088166 or 083 272 4226 | Wendy.muller@bhpbilliton.com |
| I V Storage | Mandla Mdletshe | 035 7976700 | 083 658 4048 | mandla@ivstotage.co.za |
| Lafarge Cement | Sanele Ndebele | 035-7974836 082 654 4343 | 082 654 4343 Or 082 616 1867 | Sanele.ndebele@lafarge-za.lafarge.com |
| Mhlathuze Water | Vic Botes | 035-9021011 | - | Vbotes@mhlathuze.co.za |
| Mondi Business Paper | Candice Pett | 035 -9022567 082 405 1688 | Standby: 035-9022207 | Candice.pett@mondigroup.co.za |

| | | | | |
|--------------------------------|---------------------|-------------------------------------|------------------------|--|
| Mondi Packaging (Felixton) | Siyabonga Buthelezi | 035-7916081 or 6000 082 381 9434 | 082 381 9434 | SButhelezi@mpsa.co.za |
| National Ports Authority | Nokuthula.Mcinga | 035-9053033 | 083 425 9147 | Nokuthula.mcinga@transnet.net |
| R.Bay Coal Terminal | Douglas Morris | 035 904 4000 | 083 702 8843 | yhlela@rbct.co.za |
| R.Bay Minerals | Darren Wright | 035-9013191 | 083 565 7760 | Darren.wright@rbm.co.za |
| Tata Steel | Reno;a Naidoo | 035-7514074 or 035-751 4000 | Security: 035-751 4075 | Renola.naidoo@TSKZN.co.za |
| Tongaat-Hulett Sugar | Sagran Govindasamy | 035 791 5107 | 083 269 4595 | sagran.govindasamy@huletts.co.za |
| Transnet Port Terminals (SAPO) | Raymond Van Rooyen | 031-3088052 | 083 500 3986 | Raymond.vanrooyen@transnet.net |