



***ENVIRONMENTAL IMPACT ASSESSMENT RENEWAL
FOR THE OPERATION OF FACILITIES AND STORAGE
AND HANDLING OF OIL AND PETROLEUM PRODUCTS
(DIESEL) AND FOR THE MATERIALS RECOVERY
FACILITY OF RENT-A-DRUM ON FARM 262 OF THE
FARM SWAKOPMUND TOWN AND TOWNLANDS NO.
41, ERONGO REGION***

May 2024

App - 240531003891

<p>Project Name:</p>	<p>ENVIRONMENTAL IMPACT ASSESSMENT RENEWAL FOR THE OPERATION OF FACILITIES AND STORAGE AND HANDLING OF OIL AND PETROLEUM PRODUCTS (DIESEL) AND FOR THE MATERIALS RECOVERY FACILITY OF RENT-A-DRUM ON FARM 262 OF THE FARM SWAKOPMUND TOWN AND TOWNLANDS NO. 41, ERONGO REGION</p>
<p>The Proponent:</p>	<div data-bbox="625 617 1414 819" data-label="Image"> </div> <p>(Pty) Ltd PO BOX 30735 PIONIERSPARK</p>
<p>Prepared by:</p>	<div data-bbox="574 1039 1455 1276" data-label="Image"> </div> <div data-bbox="574 1297 1455 1375" data-label="Text"> <p>1st floor Bridgeview Offices & Apartments, No. 4 Dr Kwame Nkrumah Avenue, Klein Windhoek, Namibia PO Box 6871, Ausspannplatz, Windhoek</p> </div>
<p>Release Date:</p>	<p>May 2024</p>
<p>Consultant:</p>	<p>C. Du Toit C. Van Der Walt Cell: 0811273145 Email: charlie@greenearthnamibia.com</p>

TABLE OF CONTENTS

1. PROJECT DETAILS	4
2. ACTIVITIES ON SITE	9
3. MUNICIPAL COUNCIL OF SWAKOPMUND APPROVAL	13
4. ENVIRONMENTAL AUDIT - (SELF AUDIT QUESTIONNAIRE)	14
5. OVERVIEW AND GENERAL INFORMATION	14
6. SITE HISTORY AND DETAILS	15
7. PROCESS REVIEW	15
8. LICENSE AND PERMITS	17
9. AIR EMISSIONS	17
10. WATER CONSUMPTION AND WASTEWATER GENERATION	18
11. NOISE POLLUTION	20
12. FUEL CONSUMPTION	20
13. CHEMICAL HANDLING AND STORAGE	21
14. SOLID AND HAZARDOUS WASTE MANAGEMENT	22
15. OCCUPATIONAL HEALTH AND SAFETY	23

LIST OF FIGURES

<i>Figure 1: Site locality map</i>	<i>5</i>
<i>Figure 2: Farm 262, Swakopmund</i>	<i>6</i>
<i>Figure 3: Locality Plan of Farm 262, Swakopmund</i>	<i>7</i>
<i>Figure 4: Project Site</i>	<i>8</i>
<i>Figure 5: Project Site zoomed in</i>	<i>8</i>
<i>Figure 6: Rent-A-Drum Facility</i>	<i>9</i>
<i>Figure 7: Sorting of waste into recyclables</i>	<i>10</i>
<i>Figure 8: Warehouse with activities at Project Site</i>	<i>10</i>
<i>Figure 9: An aerial view of the MRF site</i>	<i>11</i>
<i>Figure 10: Fuel storage on Project Site</i>	<i>11</i>
<i>Figure 11: Rules regarding diesel storage</i>	<i>12</i>

1. PROJECT DETAILS

Green Earth Environmental Consultants have been appointed by Rent-A-Drum (Pty) Ltd (RAD) to attend to and complete an Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) **to renew the Environmental Clearance (EC)** for the operation of a Material Recovery Facility (MRF) and **the facilities and storage and handling of petroleum products (diesel and oil)** on Farm 262 (a Portion of Portion B) of the Farm Swakopmund Town and Townlands No. 41, Swakopmund, Erongo Region as per the requirements of the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012).

The Environmental Management Act (No 7 of 2007) requires that an Environmental Impact Assessment Renewal be conducted to request a Clearance Certificate Renewal for the following “listed activities”:

ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES

- *The construction of facilities for the refining of gas, oil and petroleum products.*

HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE

- *The storage and handling of dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.*
- *Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.*

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- *The construction of facilities for waste sites, treatment of waste and disposal of waste.*
- *The import, processing, use and recycling, temporary storage, transit or export of waste.*

Green Earth Environmental Consultants conducted and submitted an EIA and EMP on behalf of the Proponent for ‘the construction and operation of a Material Recovery Facility (MRF)’ for this site. **An ECC for the activity was issued on 18 May 2021. The project is in operation and expanding.**

It is the intention of the proponent to continue to use Farm 262, Swakopmund for the MRF and to operate a facility for storage and handling of petroleum products (diesel and oil) to fill up the fleet of vehicles. Farm 262 is located adjacent to Swakopmund’s municipal landfill site which lies 7 km north east of the Swakopmund Town Centre and is 1.0270ha in extent and zoned ‘undetermined’.

See below *Maps* showing the locality of the Project Site:

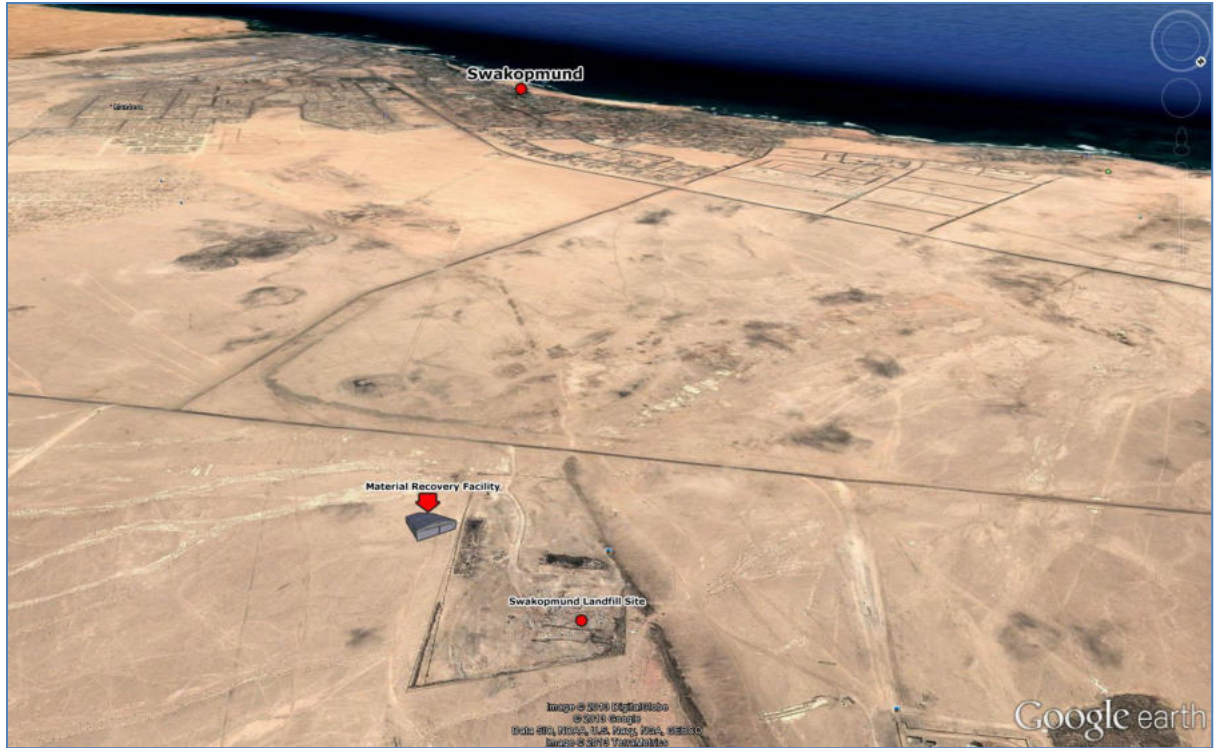


Figure 1: Site locality map

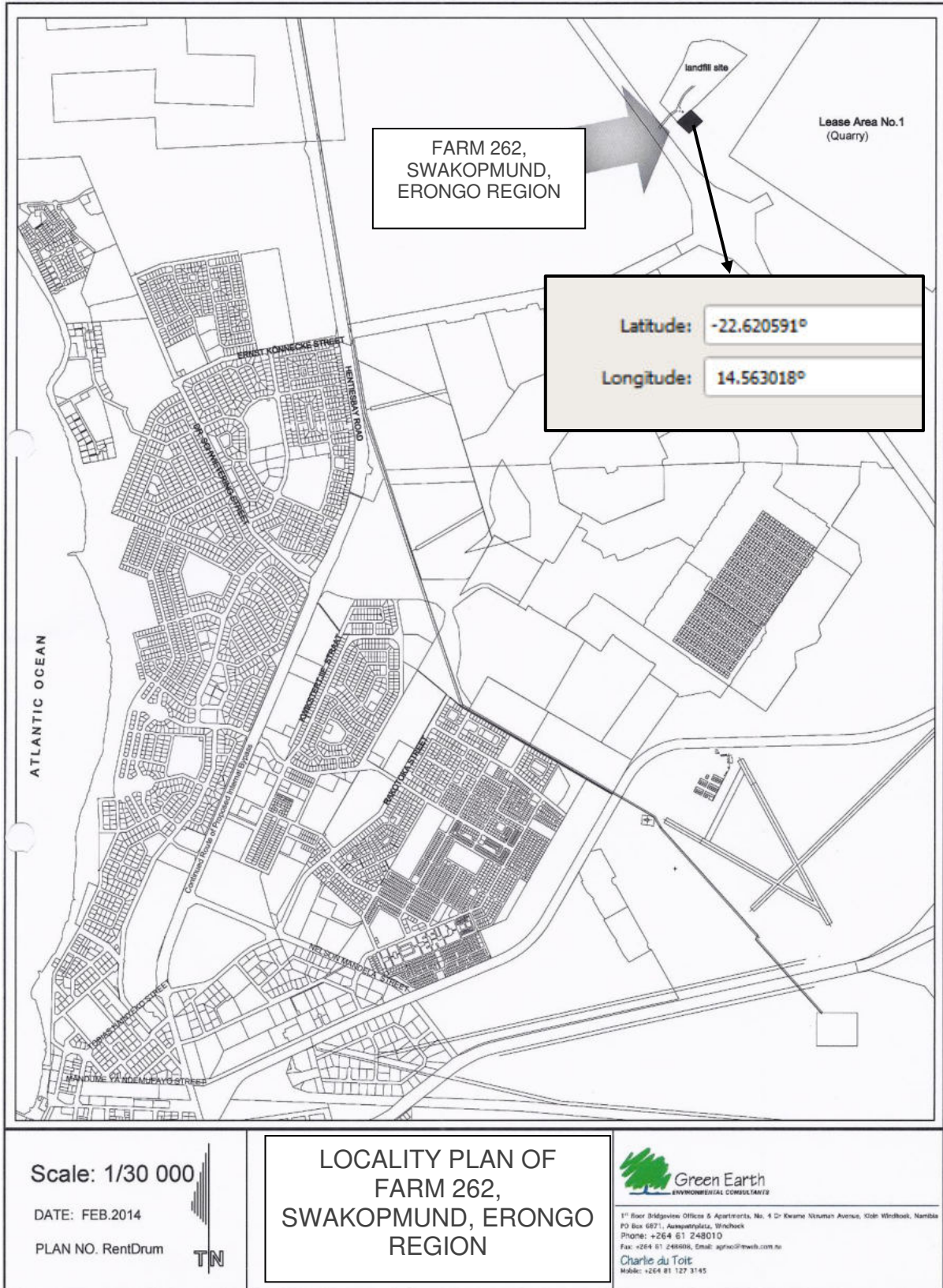
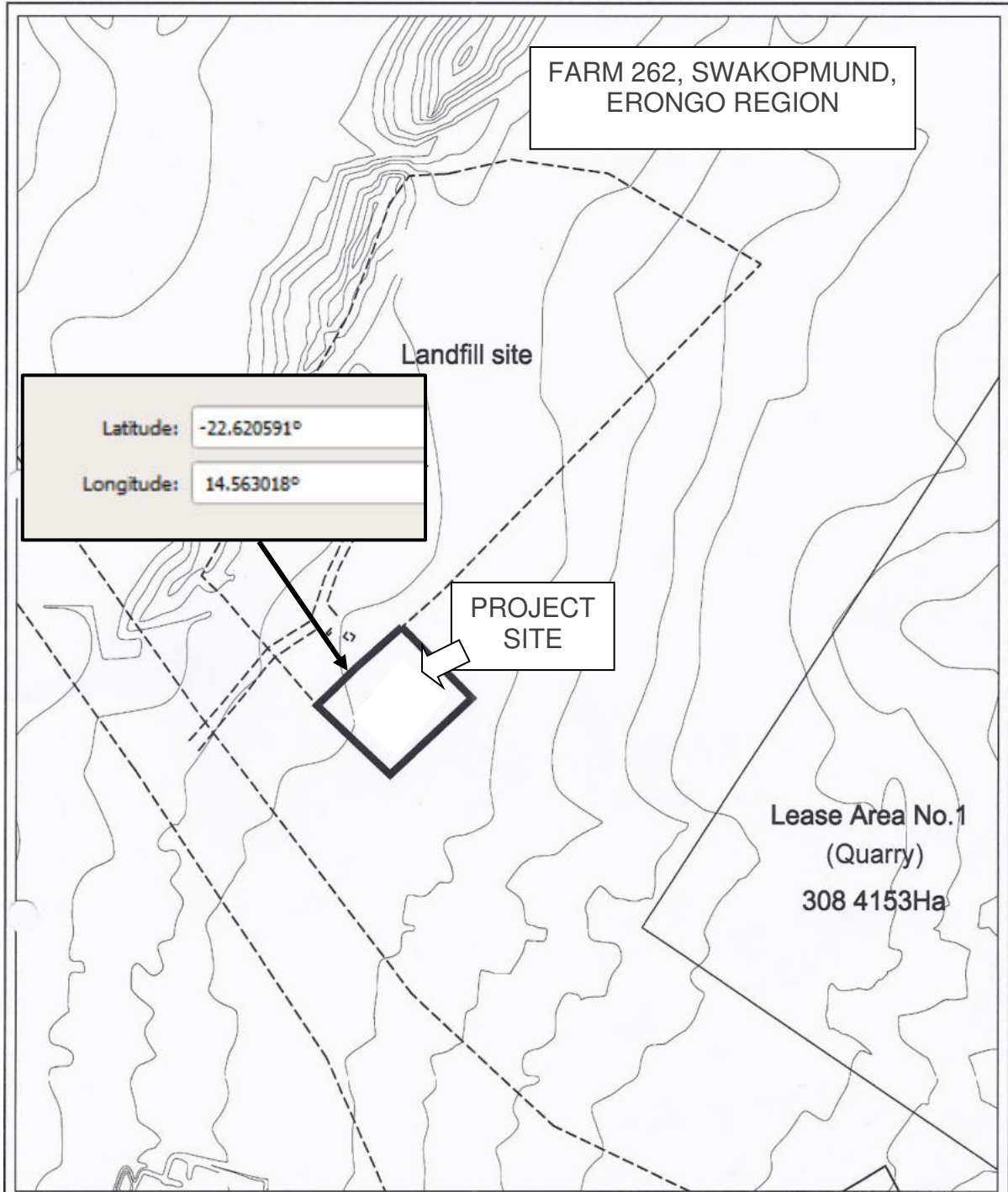


Figure 2: Farm 262, Swakopmund





<p>Scale: 1/5000</p> <p>DATE: FEB.2014</p> <p>PLAN NO. RentDrum</p> 	<p>LOCALITY PLAN OF FARM 262, SWAKOPMUND, ERONGO REGION</p>	 <p>1st Floor Bridgeview Offices & Apartments, No. 4 Dr Kwame Nourman Avenue, Koth Westhoek, Namibia PO Box 6671, Swakopmund, Windhoek Phone: +264 61 248010 Fax: +264 61 248006, Email: agril@proweb.com.na Charlie du Toit Mobile: +264 81 127 3145</p>
---	---	---

Figure 3: Locality Plan of Farm 262, Swakopmund



Figure 4: Project Site



Figure 5: Project Site zoomed in

2. ACTIVITIES ON SITE

Rent-A-Drum signed a formal agreement with the Municipal Council of Swakopmund to plan, construct and operate a Material Recovery Facility (MRF) on Farm 262, Swakopmund. A copy of the Agreement is in this EIA. The MRF consists of a building which accommodates the processes and machinery for receiving, separating and/or processing of different recyclable materials from waste collected straight from households and businesses. The facility has a weighbridge enabling the recording of the volume of recyclable materials received, processed and dispatched from the MRF. This MRF enables RAD to sort and bale mixed recyclables in large volumes. The MRF is in operation since 2015.

The *Photo* below shows the recycling facility of Rent-A-Drum:



Figure 6: Rent-A-Drum Facility

The operation of the proposed facility involves the following activities:

Operational activities:
Receiving, sorting, baling, packaging and storage of waste
Offloading, loading, and parking of vehicles
Cleaning of vehicles and equipment
Handling (receiving and dispensing) of petroleum products
Storage of petroleum products
Filling of vehicles
Safety and security activities
Administrative activities



Figure 7: Sorting of waste into recyclables



Figure 8: Warehouse with activities at Project Site



Figure 9: An aerial view of the MRF site



Figure 10: Fuel storage on Project Site



Figure 11: Rules regarding diesel storage

3. MUNICIPAL COUNCIL OF SWAKOPMUND APPROVAL

Rent-A-Drum signed a formal agreement with the Municipal Council of Swakopmund to plan, construct and operate a Material Recovery Facility. See extract of the Agreement below:



IT IS MUTUALLY AGREED AS FOLLOWS:

In order to promote Public-Private cooperation and understanding and to foster sustainable environmental development in Swakopmund in particular and in the region in general, the parties agree to co-operate in the areas of innovative municipal environmental services, education and promoting job creation and local industrial development and value addition in Namibia through improved recycling, waste collection and disposal utilising deep collection systems

4. ENVIRONMENTAL AUDIT - (SELF AUDIT QUESTIONNAIRE)

Please Take Note:

1. All questions are mandatory and thus must be fully completed.
2. Knowingly providing false or misleading information is an offence as in terms of Section 43 (1) of the Environmental Management Act, Act No. 7 of 2007.

Activity:



The operation of a Material Recovery Facility (MRF) and the facilities and storage and handling of petroleum products (diesel and oil) on Farm 262 (a Portion of Portion B) of the Farm Swakopmund Town and Townlands No. 41, Swakopmund, Erongo Region.

5. OVERVIEW AND GENERAL INFORMATION	Comments
a) Name of the unit and complete address.	Rent-A-Drum (Pty) Ltd (RAD) Farm 262 of the Farm Swakopmund Town and Townlands No. 41, Swakopmund, Erongo Region -22.620520° 14.562943° PO BOX 30735 PIONIERSPARK
b) What are the main activities carried out on site?	A Material Recovery Facility (MRF) and storage and handling of petroleum products (diesel and oil)

c) Number of people employed on site (temporary + permanent).	39 people						
d) Is a copy of the site layout plan available?	See plan earlier in document.						
e) Are there any other projects in the area having similar activities?	Swakopmund's municipal landfill site adjacent to Rent-A-Drum's site.						
f) Environmental Clearance Certificate (ECC) Number and date issued (if available).	<table border="1"> <tr> <td colspan="2">ECC – 01364</td> </tr> <tr> <td>Issued on the date:</td> <td>2021-05-18</td> </tr> <tr> <td>Expires on this date:</td> <td>2024-05-18</td> </tr> </table>	ECC – 01364		Issued on the date:	2021-05-18	Expires on this date:	2024-05-18
ECC – 01364							
Issued on the date:	2021-05-18						
Expires on this date:	2024-05-18						

6. SITE HISTORY AND DETAILS	Comments
a) When was the facility established?	2015
b) Who owns the facility/industry?	Rent-A-Drum (Pty) Ltd (RAD)
c) Who owns the land and what is the type of the land?	Rent-A-Drum (Pty) Ltd (RAD) owns the land and the type of land is Portion A of Rem/B/Swakopmund Town Land
d) Is the land ownership/lease document available?	Rent-A-Drum signed a formal agreement with the Municipal Council of Swakopmund – see earlier in the document / report.
e) What is the total land area?	1.0270ha in extent
f) What was the previous land use of that area (commercial, residential, industrial or agricultural)?	The previous land use was 'undetermined'.
g) Does the facility have any citations or complaints pending against it?	None
h) Has there ever been any major accidents on-site?	None

7. PROCESS REVIEW	Comments	
a) Give a detailed description of the production process.	<p>The MRF consists of the following components and structures:</p> <p>Structures: Off-loading areas, sorting, and baling area, preparation area, stockholding areas, offices, ablution facilities, kiosk area, vehicle parking and wash bay.</p>	
b) Total production capacity of the plant/project in terms of ton per annum	Waste recycled – average tons	150/month
	Waste recycled – average tons	1900/year

<p>c) What are the inputs required in the production process (preferably in the form of a list containing name, amount/quantity required and their price?)</p>	<p>Soft plastics, bottles, bottle caps, hard plastics, cans, tins, glass, carton, and papers. The amounts are dependable on supply obtained from the public / businesses / offices / households etc.</p> 
<p>d) What are the outputs produced (including pollutants) and their quantities?</p>	<p>Soft plastics, bottles, bottle caps, hard plastics, cans, tins, glass, carton, and papers compressed and bailed.</p> 
<p>e) Provide a list of all the machinery and utilities used on site along with their capacities number, energy consumption and time in use.</p>	<p>Equipment: various balers with conveyor feed, sorting conveyors with sorting bays, storage cages, tailings conveyor, tailings skips, industrial shredder, granulator, glass crusher and band saw.</p> <p>Weighbridge functions: the weighbridge forms part of the controlled access to landfill site, records all waste and recyclables dumped and removed from the landfill site, weighing facility for transport contracts and other public needs and income generating potential (dumping levies and weighbridge fees).</p> <p>Energy consumption: the entire amount of power used on the Project Site in April 2024, obtained</p>

	from Erongo Red (Swakopmund business rates), through a 18amp 3 phase system amounted to N\$13 800.
g) How often is maintenance work carried out on-site?	Maintenance is carried out daily on site.
h) Does any recycling/reuse of material take place on-site?	Yes, recycling takes place on site, reuse takes place on various other sites.

8. LICENSE AND PERMITS	Comments
a) Does the facility have a valid factory license? If not, has the facility applied for it? Is a copy of the application form available?	The facility only sort, bail and dispatch products therefore no manufacturing takes place.
b) Does the facility have a valid Consent to Operate (CTO) certificate? If not, has the facility applied for it? Is a copy of the application form available?	See Memorandum of Agreement from the Municipality of Swakopmund.
c) Does the facility generate hazardous waste? If it does, does the facility have authorization for storage, handling and transportation of hazardous waste as per the Hazardous Waste (Management and Handling) Rules? If not, has the facility applied for it? Is a copy of the application available?	No hazardous waste is generated on site.

9. AIR EMISSIONS	Comments
a) What are the sources of stack and fugitive emissions in the facility?	No emissions are produced on site.
b) Has stack and ambient monitoring carried out?	Yes, the facility is being kept neat and clean as far as possible.
c) Does emissions meet standards specified in the CTO certificates?	No emissions are being produced.
d) Are monitoring records/reports maintained?	None
e) What are the air pollution control device that has been installed?	Limited to zero air pollution is being produced.

f) What is the frequency of cleaning and maintaining the air pollution control device?	Not applicable.
g) Are site processes and operations free of significant fugitive air emissions?	Yes

10. WATER CONSUMPTION AND WASTEWATER GENERATION	Comments
6.1 Freshwater	
a) What is the source of freshwater? Is it metered or not?	Water is supplied to the site from Swakopmund Municipality's water reticulation system. It is metered.
b) How many boreholes are installed in the site?	No boreholes on site.
c) How many flow meters are installed in the plant? What are their readings?	The April water consumption reading was 82 units amounting to N\$ 1900.
d) Schematic of a raw water treatment plant and DM plant e.g Sceptic tanks, filtering systems etc.	None on site.
e) Latest groundwater quality test reports	No groundwater quality tests were carried out.
f) Specify average daily water consumption of the entire plant and in township/colony (m ³ /day):	82 units ÷ 30 (days average) = 2.7 units per day used.
g) Has the plant / activity studied the impact of its water consumption on respective surface water source and/or groundwater table?	The floors are covered to prevent seepage inside the warehouse.
h) Break-up of average freshwater consumed for last two financial years.	82 units x 24 (months for 2 years) = 1968 units.
i) Specific water consumption values for last two financial years (in m ³ /ton or m ³ /Mwh, etc.):	See above.
j) Chemicals used in water treatment plant with quantity and price:	No water being treated on site.
k) What is the capacity of the demineralization (DM) plant? What is then average quantity of water treated in DM plant (m ³ /day)?	No water being treated on site.



l) Does the plant / project have rainwater harvesting (RWH) system? If it does, is it rooftop, paved or unpaved?	Limited to no potential to receive / obtain rainwater.
m) Method of harvesting rainwater—Storage in artificial tanks/recharge into the pit/ trench/well:	Limited to no potential to receive / obtain rainwater
n) Total rainwater harvesting potential of the plant:	Limited to no potential to receive / obtain rainwater
o) Rainwater harvesting potential of the site developed by the plant:	Limited to no potential to receive / obtain rainwater
p) Total rainwater harvesting done by the plant:	Limited to no potential to receive / obtain rainwater
q) Frequency of monitoring of the groundwater quality and quantity (pre- and post-monsoon) and frequency of cleaning the rainwater harvesting catchment/storage system:	No groundwater quality tests carried out.
r) How is the harvested rainwater utilized by the plant/ project?	Limited to no rainwater is received on site.
s) Key measures taken by the plant/project for water conservation in the past three years and water saving achieved in terms of m3:	Limited water used in process on site.

6.2 Wastewater	
a) Schematic diagram of an Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) along with their capacities (attach):	A French drain is being used on site, the effluent is pumped out and transported to the wastewater treatment plant.
b) Latest laboratory test reports of ETP and STP inlet/outlet streams:	Not applicable
c) Does the plant / project have separate ETP for its different products?	Limited effluent being produced on site, no workers stay / reside on site therefore no treatment of effluent is carried out.
d) Total effluent generated by plant / project (including all products) in last two financial years.	Limited wastewater / waste products are produced since the majority are being recycled.

e) Total sewerage generated by plant / project and colony in last two financial years:	Limited sewerage generated on site.
f) Provide the details of wastewater generation and recycling in the entire facility:	Limited wastewater is generated on site.
g) Does the plant / project monitor the impact of wastewater on the receiving waterbody/ land?	The plant / project is not water based and limited wastewater is produced.
h) What is the total number of outlets for effluent discharge from the plant/ project?	5500 litre effluent per week is pumped out and transported to the Swakopmund treatment plant.
i) Name of WTP unit/s (filtration unit/softening unit/reverse osmosis plant etc.) and its capacity and average quantity of water treated in filtration plant (m ³ /day):	Not applicable.


11. NOISE POLLUTION	Comments
a) Does the facility have a valid factory license? If not, has the facility applied for it? Is a copy of the application form available?	The noise levels at the site are not regarded as a nuisance since the site is situated outside the town of Swakopmund away from any residential or business activities. Limited noise is produced. No earbuds needed, only dust masks, safety glasses, etc.

12. FUEL CONSUMPTION	Comments
a) List the different type of fuel used in different areas of the plant/ project:	Diesel 500ppm will be stored on site and diesel and petrol will be used for vehicles.


<p>b) Quantification of fuel used in each process and its calorific value:</p>	<p>Fuel (diesel) is only used for the company fleet namely mostly trucks (4 x Swakopmund facility, 7 x Husab Mine and 5 x Rossing Uranium Mine). The recycling process uses no fuel, only 3 phase power is used on site.</p> 
<p>c) How is the industry storing the different types of fuel?</p>	<p>Diesel is stored in an aboveground tank. See below image of infrastructure:</p> 
<p>d) If they are using: Gas—Is the supply regular? If not, mention the number of hours. Biomass—Is it available for the entire year? Coal—Are they using low ash coke or high coke and the supply is regular or not?</p>	<p>Gas, biomass and coal will not be used on site.</p>



13. CHEMICAL HANDLING AND STORAGE	Comments
<p>a) What are the various types of chemicals stored on-site?</p>	<p>No chemicals will be stored on site. The only products used is the following:</p> <ul style="list-style-type: none"> - Magnus degreaser - Taurus (20 litre per month) - Pine gel (20 kg per month)
<p>b) Is a list of chemicals available?</p>	<ul style="list-style-type: none"> - Engine oil (210 litre)

	- Grease (20 kg)
c) How are chemicals transported?	Chemicals are being delivered to the site by Swachem / Bachmus / Puma Chemicals.
d) What kind of containers are there for storing the chemicals?	Sealed containers are obtained and used, and the products are then stored in lockable storage.
e) Are there any above or underground chemical storage tanks on-site?	There are none above or underground storage tanks on site.
f) Are any of the chemicals toxic or harmful? How many of them are hazardous?	All chemicals (especially Magnus) are used with gloves / safety measures.
g) Are all the chemicals labelled?	Yes, all chemicals are labelled.
h) Are the chemical containers' lid closed after use?	Yes, all lids are closed.
i) Are records of chemicals and dyes usage maintained in the logbook?	Yes, a logbook is being kept. All products are booked out when needed.

14. SOLID AND HAZARDOUS WASTE MANAGEMENT	Comments
a) What kinds of solid waste are generated on site?	Only general household waste is produced on site.
b) What is the quantity of solid waste generated?	Limited solid waste is produced on site. Tailings that cannot be recycled or used for the RDF fuel are sent to the landfill site.
c) How is the solid waste disposed of?	<p>Solid waste is sent to the landfill site adjacent to the Project Site and the recycle materials are transported by truck to various destinations to be reused. See below bins used on site:</p> 
d) Is any of the waste reused or recycled?	Yes, most of the waste is reused / recycled.
e) What are the sources of hazardous waste generation on-site?	Limited to no hazardous waste is produced on site.

f) What is the quantity of hazardous waste generated?	Limited to no hazardous waste is generated on site.
g) How is the hazardous waste disposed of?	Not applicable.
h) Are hazardous waste disposal records maintained?	Not applicable.
i) Are any of the hazardous wastes treated on site?	Not applicable.
j) Where are the hazardous waste stored before disposal?	Not applicable currently. It is intended to store oil / gas in the future on site. The storage facilities will be built according to regulations.

15. OCCUPATIONAL HEALTH AND SAFETY	Comments
a) Does the facility have a site emergency plan?	<p>Yes, there is a site emergency plan and weekly Toolbox talks are held on site with personnel. Chemical and oil spill kits are also present on site.</p> 
b) If yes, then has this plan been documented?	Yes, the plan has been documented.
c) What are the recognized hazards in the facility?	Glass crushing, heights, machinery being used, moving forklifts and trucks, etc. Training is given to all personnel and safety harnesses / measures are used.
d) Are fire extinguishers available in the facility?	Yes, fire extinguishers are available on site.
e) What type of fire extinguisher is available?	9 x extinguishers are present on site. The trucks also contain extinguishers. The different sizes of the extinguishers include 9 kg, 5kg, 2kg, 1kg


	
f) Are the fire extinguishers functional?	Yes, the fire extinguishers are functional.
g) Are facility personnel trained in its use?	Yes, the personnel are trained to use all equipment on site.
h) Is personal protective equipment (PPE) available for use?	Yes, PPE is available and used by all staff.
i) Do the workers use PPE?	Yes, PPE is available and used by all staff.
j) Are health check-ups for workers conducted?	Yes, health check-ups are conducted.
k) Do the workers know whom to contact in case of an emergency?	<p>Yes, the Health and Safety Manager on site.</p> 

l) Has any accident ever occurred on-site?	No serious accidents have occurred on site.
--	---

Declarations

I R. Vermeulen..... representing **Rent-A-Drum (Pty) Ltd (RAD) (the Proponent)** understand and agree that the information that I have provided in this questionnaire will be used by the Environmental Commissioner. I accept that the Environmental Commissioner will hold me accountable for any inaccurate or misleading information knowingly provided in this questionnaire and acknowledge that the provision of such information will impede the lawful carrying out of the responsibilities and functions of the Environmental Commissioner.

I declare that the information that I have provided in this questionnaire is to the best of my knowledge, true and reliable.

Signature: .....

Date: 7/6/2024.....