



Environmental Management Plan

CONTINUED OPERATION OF THE EXISTING ENGEN FUEL STORAGE DEPOT IN KEETMANSHOOP, //KARAS REGION

Environam Consultants Trading for | Engen Namibia (Pty) Ltd | January 2023

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ABBREVIATIONS

AIDS	Acquired Immuno-Deficiency Syndrome
ER	Owner's Representative
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
I&APs	Interested and Affected Parties
NHC	National Heritage Council
Reg.	Regulation
S	Section
TB	Tuberculosis

1 Introduction

ENGEN Namibia (Pty) Ltd is a leading marketer of liquid fuels and lubricants in the country. The company has invested in a fuel depot in Keetmanshoop. The facility ensures self-sufficiency to ENGEN in terms of the supply of its products to the whole of southern Namibia, thus augmenting its supply chain.

The operation of the existing fuel storage facility entails:

- Transport of fuel supply with road and rail fuel tankers.
- Dispensing of fuel into road transport tanker trucks; and other approved containers.
- Maintenance of the fuel storage facility and all associated services.

The possible decommissioning of the existing fuel storage facility entails:

- Removal of all infrastructure not reused during future use of land; and
- Rehabilitation of the land.

1.1 Locality

The project site (26.57178°S; 18.12789°E) is located on Erf no. 1379 Swartmodder Street, in Keetmanshoop, //Kharas Region. See **Figure 1**. The fuel storage depot occupies an approximate land size of 10,000m². The site is situated in the industrial area of Keetmanshoop.



Figure 1: Locality of the Engen depot, Keetmanshoop

1.2 Storage Facility and Infrastructure

The installations at the facility include above ground tanks with the following details:

PRODUCT	NUMBER OF TANKS	CAPACITY	TOTAL CAPACITY ON SITE
ULP	5	84m ³	420m ³
50PPM	8	84m ³	672m ³
Water (for firefighting)	2	84m ³	168 m ³

All of the tanks are located in a concrete containment bund wall. In addition to the above, the following associated infrastructure exists;

- Office buildings, storerooms and security office,
- Road Gantry,
- Rail siding,
- Product pump station,
- Fire water pump house,
- An oil water separator

- 2.4m High fence (High density mesh panels).

The facility is constructed and operated according to relevant SANS standards (or better). See **Figure 2** for the existing site layout plan.

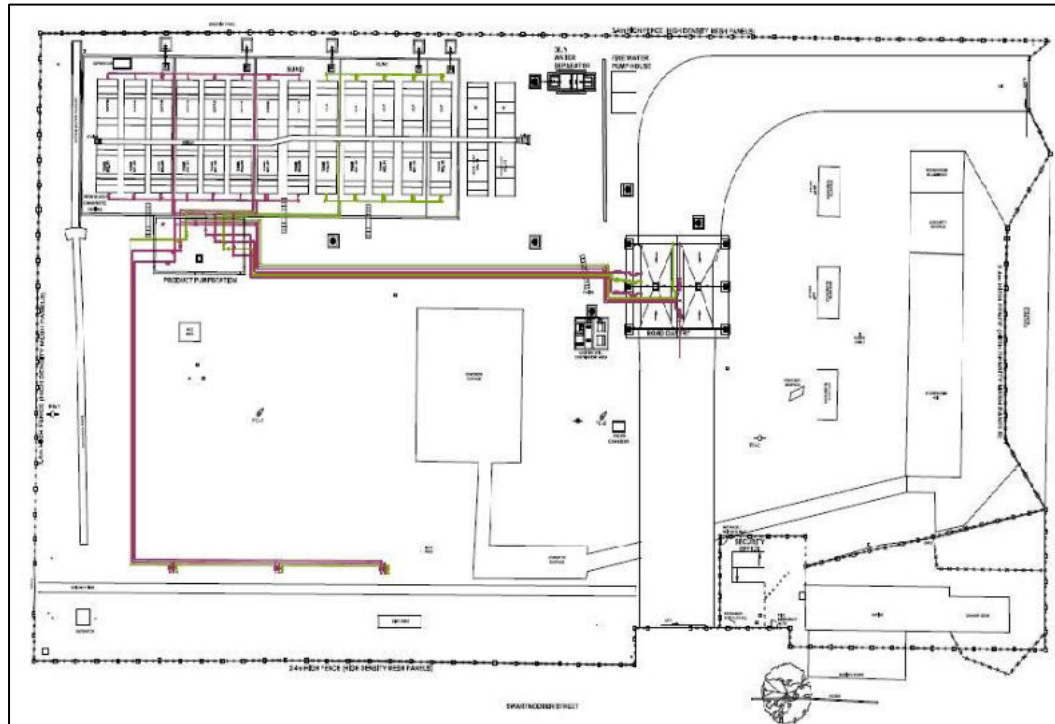


Figure 2: Site layout Plan

1.3 Topography and Drainage

The landscape in the area is characterized by the Nama Karoo Basin. This large, flat-lying plateau dominates much of the southern Namibia. Sedimentary rocks deposited first in the Nama Basin and, later in the same area, in the Karoo Basin form the foundations of the landscape. The basin slopes from the north, where elevations are about 1,400 m above sea level, to the south, where altitudes are approximately 900 m above sea level.

The Fish, Löwen and Konkiep rivers drain the landscape, all flowing south to the Orange River. The relief of significant small dry river courses (streams) running in the area remain relevant, and contribute well to the drainage of surface run-off in the area. Care should be taken to avoid contamination of these surface water bodies in the area, especially during rainy seasons, as water in these bodies is used for aquifer recharge.

1.4 Climate

Classification of climate: semi-arid climate

Average rainfall: Rainfall in the area is averaged between 100 to 150mm per year.

Average evaporation: Evaporation in the area is averaged to be more than 3800mm per year.

Precipitation: The area is prone to periodic and unpredictable, high intensity, highly localised storm events between October and April.

Water Deficit: Water deficit in the area is averaged to be more than 2500mm/a.

Temperatures: The temperatures are highest in January and February with an average of 26.8°C. The lowest average temperatures of 13.4°C occur in July during the year. During the year, the average temperatures vary by 13.4°C.

Wind direction: Wind direction in the area is predominantly northerly, and southerly.

1.5 Hydrogeology of the Study Area

Surface geology in the area consists of a sandy soil cover (clayey with depth in some areas), having an unknown thickness. The above is underlain by dolerite sills and dykes [Jd] of Jurassic to Cretaceous age, intruded into tillite, boulder shale, shale, sandstone and limestone of the Dwyka Formation [Cd] (Karoo Sequence) and, shale and mudstone [Pp] (Karoo Sequence) of the Ecca Group to the east and west of the site respectively. Groundwater flow would be mostly along fractures, faults (secondary porosity) and other geological structures present within the formations however no major faults are observed near the site on the 1:1000 000 geological map.

Water to Keetmanshoop town is supplied by Namwater and is sourced from the Naute Dam, situated approximately 50km southwest of Keetmanshoop. According to the Department of Water Affairs (DWA) database, no boreholes exist within a 5km radius from the site; however, the presence of 5 boreholes was recorded during a hydrocensus conducted of the area a few years ago.

All of these boreholes belong to the municipality and are used for dust suppression on the gravel roads. Depth to water table is expected to be less than 12mbs in the area. The area does not fall within a water control area; however, groundwater

remains the property of the Government of Namibia. This means that government controls the exploration and usage of this resource.

1.6 Surface-and Groundwater use & users

Surface and groundwater are essentially one resource, physically connected by the hydrologic cycle. Streams interact with groundwater in three basic ways, i.e., streams gain water from inflow of groundwater through the streambed, streams lose water by outflow through the streambed, or they do both depending upon the location along the stream. It is the groundwater contribution that keeps streams flowing between precipitation events. As a result, surface and groundwater pollution monitoring must form an integral part of the Environmental Management Plan (EMP). Surface water pollution at the site is currently mitigated by surface water run-off drainage systems with a built-in oil-water separator present at the facility. Visual inspection of surface water pollution should be adopted, with support of water sampling at specific locations as guided by visual inspections.

Engen Namibia (Pty) Ltd has installed three (3) monitoring boreholes at the fuel storage facility. The purpose of these boreholes is to quantify levels of any pollution in the subsurface and to monitor the migration of possible pollution off site (if any).

Baseline water samples were collected from the boreholes immediately after drilling was completed, in order to represent baseline conditions at the site. As such, these conditions are important in forecasting potential environmental impacts during the operations of the facility, and these has become measurements against which future changes are compared. The boreholes are monitored on a regular basis.

2 Background

In terms of the Environmental Management Act 7 of 2007 (Government Notice No. 29), certain activities may not be undertaken without an Environmental Clearance Certificate (ECC). This activity is included in the above-mentioned list, with particular reference to the following activities of the gazetted Namibian Government Notice No. 30 Environmental Impact Assessment Regulations:

Activity 9.4 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.

Activity 9.5 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. It is against this background that Engen Namibia (Pty) Ltd applied for and obtained an ECC for this facility. The ECC is valid for a period of three (3) years and has expired. Engen thus appointed Environam Consultants Trading (ECT) to apply for the renewal of the ECC on its behalf.

Key to the issuance of an Environmental Clearance Certificate is the submission of an Environmental Management Plan (EMP) which provides for a description of how an activity might impact on the natural environment in which it occurs and clearly sets out commitments from the proponent on how identified impacts will be avoided, minimised and managed so that they are environmentally acceptable.

An EMP is one of the most important outputs of the Environmental Assessment process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. As part of the application for a renewal of the ECC, Environam Consultants Trading has developed an EMP that will outline the appropriate actions.

An EMP will generally detail the mitigation and monitoring actions to be implemented during the following phases of a development:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- Construction – the period during which the owner, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the development of services infrastructure as well as any other construction process(s) within the development area;
- Operation and Maintenance – the period during which the services infrastructure and other structures will be fully functional and maintained.

The installations at the site already exist and in use, therefore the EMP will only cover the operation and maintenance aspects, and include the decommissioning phase.

3 ROLES AND RESPONSIBILITIES

Engen Namibia (Pty) Ltd is ultimately responsible for the implementation of the EMP. The proponent may delegate this responsibility as the project progresses through its life cycle. In this case the delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Owner’s Representative;
- Environmental Control Officer; and
- Contractor (Operations and Maintenance).

3.1 OWNER’S REPRESENTATIVE

The owner may assign the responsibility of managing all aspects of this development to a designated member of staff, referred to in this EMP as the Employer’ Representative (ER). The owner may decide to assign this role to one person for the full duration of this development, or may assign a different ER to each of the development phases. The ER’s responsibilities are as follows:

Table 1: Responsibilities of ER

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in Table 3 are obtained/adhered to.	Throughout the lifecycle of this development
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> • Operation and maintenance
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> • Construction • Operation and maintenance

3.2 ENVIRONMENTAL CONTROL OFFICER

The ER may assign the responsibility of overseeing the implementation of the whole EMP on the ground during the operation and maintenance phase to a designated member of staff, referred to in this EMP as the Environmental Control Officer (ECO). The PR /Proponent may also decide to assign this role to an independent environmental consultant. The ECO will have the following responsibilities during this development:

- Management and facilitation of communication between the Owner, ER, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is bi-monthly) of all infrastructure maintenance areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Submitting bi-annual reports to the office of the Environmental Commissioner;
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the ER on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the ER with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

3.3 CONTRACTOR

Contractors appointed by the owner are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 3** applies to contractors appointed during the operation and maintenance phase. In order to ensure effective environmental management the aforementioned chapters should be included in the applicable contracts for outsourced operation and maintenance work.

3.4 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the information presented by the proponent. ECT will not be held responsible for the potential consequences that may result from any alterations to the existing infrastructure.

4 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of this development are listed in **Table 2** below. The legal instrument, applicable corresponding provisions and project relevance details are provided.

Table 2: Legal provisions relevant to the proposed development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.” Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	The development should be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	Activity 9.4 The storage and handling of a 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. Activity 9.5 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.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the owner in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.
Water Act No. 54 of 1956	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.	The pollution of water resources should be avoided during the operation of the development.
The Ministry of Environment, Forestry and Tourism (MET) Policy on HIV & AIDS	MEFT has recently developed a policy on HIV and AIDS. In addition it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The owner and its contractor have to adhere to the guidelines provided to manage the aspects of HIV/AIDS.
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Village, Town or Municipal Council.	The development has to comply to provisions of the Local Authorities Act
Labour Act no 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated
Public Health Act no 36 of 1919	Section 119 prohibits persons from causing nuisance.	Contractors and users of the facility are to comply with these legal requirements.
Petroleum Products And Energy Act, 1990 Petroleum Products Regulations (2000)	These legislations provides for the application of wholesale licences	The facility should have a wholesale licence from the Ministry of Mines and Energy

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
Water Quality Guidelines for Drinking Water and Waste Water Treatment	Details specific quantities in terms of water quality determinants, which waste water, should be treated to before being discharged into the environment (see Appendix A).	These guidelines are to be applied when dealing with water and waste water treatment.

5 ENVIRONMENTAL MANAGEMENT PLAN

5.1 Training and Induction

Engen Namibia (Pty) Ltd is bound to be responsible for ensuring that environmental awareness education of all employees and contractors is done satisfactorily. Engen Namibia (Pty) Ltd should ensure that employees and contractors are made aware of the environmental requirements of the project.

The EMP should form part of the Terms of Reference for all contractors, sub-contractors and suppliers. All contractors, sub-contractors and suppliers will have to sign an agreement to assure that they understood the EMP and that they will comply. All senior staff should familiarise themselves with the full contents of the EMP and its implications. Senior staffs (Depot Manager/Supervisor) are expected to train and assist the rest of the employees on the contents of the EMP.

5.2 Environmental Incident Reporting

All environmental incidents occurring at the facility shall be recorded. The incident report should include time, date, location, and nature of the incident, extent of the incident, actions taken, and personnel involved. All complaints received from the neighbouring properties/communities should be directed to the manager of the Engen Depot and channelled to the ECO officer. Engen Namibia (Pty) Ltd Management should be able to respond to the complainant within a week (even if pending further investigation). It is important that the issues raised are considered and that the complainant feels that their concerns have been addressed to and wherever possible actions taken to address these. All complaints should be entered in the environmental register and all responses and actions taken to address these should be recorded.

5.3 Environmental Monitoring

Periodic environmental monitoring must be taken on a regular basis. Monitoring should be done in order to ensure compliance with all aspects of the EMP. Findings should be liaised with all responsible officers as chain command.

5.4 EMP Administration

Copies of this EMP shall be kept at the site office and should be distributed to all senior staff members, including those of the contractors.

5.5 EMP Amendments

The EMP amendments can only be made with the approval of the ECO officer and ultimately the DEA. Amendments to the EMP should be liaised to all employees and contractors. 17

5.6 Non-compliance of the EMP

Problems may occur in carrying out mitigation measures or monitoring procedures that could result in non-compliance of the EMP. The responsible personnel should encourage staff to comply with the EMP, and address acts of non-compliance and penalties.

Engen Namibia (Pty) Ltd is responsible for reporting non-conformance with the EMP, to the ECO officer. The management of Engen Namibia (Pty) Ltd, in consultation with the ECO officer must, thereafter, undertake the following activities:

- Investigate and identify the cause of non-conformance.
- Implement suitable corrective action as well as prevent recurrence of the incident.
- Assign responsibility for corrective and preventative action.
- Any corrective action taken to eliminate the causes of non-conformance shall be appropriate to the magnitude of the problems and commensurate with the environmental impact encountered.

5.7 Environmental Register

An environmental register should be kept on site in which incidents related to actual impacts are recorded. This will include information related to incidents such as spillages, dust generation and complaints from adjacent neighbours. It should also contain information relating to actions taken. Any party on site may complete the register, however, it is envisaged that the Depot Manager and the ECO will be the main contributors, and who will also be the main parties involved in suggesting mitigation measures.

5.8 Site Management

Areas outside this designated working zone shall be considered “no go” areas. The offloading zones must be clearly demarcated when offloading goods to enhance safety around the proposed development.

5.8.1 Fire and safety management

Hydrocarbons are volatile under certain conditions and their vapours in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise.

No fire, whether for cooking or any other purpose, is to be made at the fuel storage facility. All depot personnel and contractors shall take all reasonable measures and active steps to avoid increasing the risk of fire through activities on site and prevent the accidental occurrence or spread of fire; and shall ensure that there is sufficient fire-fighting equipment on site at all times. This equipment shall include fire extinguishers. All depot personnel and contractors should be prepared for such events.

The Engen Namibia (Pty) Ltd management together with all depot personnel and contractors shall take all reasonable measures to avoid increasing the risk of fire and shall ensure that there is sufficient fire-fighting equipment on site at all times.

5.8.2 Staff management

Engen Namibia (Pty) Ltd and its contractors must ensure that all their employees have suitable personal protective equipment and properly trained in fire fighting and first aid.

5.8.3 Waste management

All waste shall be removed off-site to a designated waste disposal site. Sufficient bins or containers on-site to store any solid or liquid waste produced should be provided by Engen Namibia (Pty) Ltd. The bins and containers should be weatherproof and scavenger-proof.

5.8.4 Hydrocarbons management

If any spillage occurs, contaminated soil shall be collected in a holding tray or drum and will then be disposed at a licensed hazardous waste site. Any spillage of more than 200 litres must be reported to the Ministry of Mines and Energy as per the Petroleum Products Act.

Engen Namibia (Pty) Ltd and its contractors shall take all reasonable measures to prevent surface or groundwater pollution from the release of oils and fuels.

Sufficient space should be left in fuel storage tanks to allow for fuel expansion and to prevent leakage of fuel from the fuel storage facility.

5.8.5 Flood management

Storm water management of the site should be a key aspect of flood management on site. All stormwater systems, culverts and waterways should be kept clean to allow storm water to flow freely.

5.8.6 Accidents on site

Engen Namibia (Pty) Ltd and its contractors shall comply with the Occupational Health and Safety Act and any other national, regional or local regulations with regard to safety on site. The Contractor shall ensure that contact details of the local medical services are available to the relevant construction personnel prior to commencing works.

5.8.7 Emergency advisory procedures

Contractors shall ensure that there is an emergency advisory procedure on site before commencing any operations that may cause damage to the environment. The Contractor shall also ensure that site staffs are familiar with all emergency procedures to be followed.

The Contractor shall ensure that lists of all emergency telephone numbers/contact people are kept up to date, and that all numbers and names are posted at the construction site at all times.

6 MANAGEMENT ACTIONS

The tables in this chapter detail the management measures associated with the roles and responsibilities that have been laid out in **Chapter 2**. The aim of the management actions in this chapter is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

The following tables provide the management actions recommended to manage the potential impacts associated this development:

- Operation and maintenance phase management actions (**Table 3**); and
- Decommissioning phase management actions (**Table 4**).

The owner should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the tables below.

6.1 OPERATION AND MAINTENANCE PHASE

The management actions included in **Table 3** below apply during the operation and maintenance phase of this development.

Table 3: Operation and maintenance management actions

Impact	Management Actions
Education and Training	<ul style="list-style-type: none"> • All employees including all contractors appointed for maintenance work on the respective infrastructure and their employees must be made aware of necessary health, safety and environmental considerations applicable to their respective work. • Records of environmental training and incidents should be maintained. • Post instructional/ informational signs regarding storm water pollution around the facility for customers and employees. • Place signs on faucet (hose bibbs) reminding employees and customers to conserve water and not to use water to clean up spills. • Label drains within the facility boundary by paint/ stencil (or equivalent), to indicate whether they flow to an on-site treatment device, directly to the sanitary sewer, or to a storm drain.
Monitoring	<ul style="list-style-type: none"> • An Environmental Practitioner should monitor the implementation of the EMP, and recommend any changes to this document. • The Environmental Practitioner should inspect the site on a regular basis (preferably monthly or bi-monthly). • Biannual reports are to be submitted to the Ministry of Environment and Tourism.
General Facility	<ul style="list-style-type: none"> • Spot clean leaks and drips routinely. • Maintain a spill response plan and keep it current. • The above to take into consideration air, surface and groundwater, and soil quality, as well as the transportation of products to and from the facility. • Inspect and clean storm drain inlets and catch basins within the facility boundary at least once each year. • Ensure adherence to the Covid-19 protocols, as they are applicable from time to time.

Impact	Management Actions
Fuel Dispensing Area	<ul style="list-style-type: none"> • Ensure paving of the land within the confines of the property, priority to be given to concrete slabs as opposed to interlocks especially at the fuel dispensing areas. • Maintained fuel dispensing areas using dry clean-up methods such as sweeping for removal of litter and debris, or use of rags and absorbents for leaks and spills, and never wash down unless the wash water is collected and disposed of properly. • Ensure metering of incoming and outgoing fuel and maintain records. • Ensure metering equipment are calibrated as per industry standards. • Maintain all equipments, such as tanks, pumps, meters, hoses etc. in a clean state (regular inspections to be carried out).
Hazardous Substances	<ul style="list-style-type: none"> • All chemicals and other hazardous substances must be stored and maintained in accordance with the Hazardous Substances Ordinance (No. 14 of 1974), with all relevant licences and permits to be obtained where applicable. • Given the potential harm to human health during handling and use of any of hazardous substances it is essential that all staff be trained with regards to the proper handling of these substances as well as First Aid in the case of spillage or intoxication. • Storage areas for all substances, in particular fuel, should be bunded and capable to hold 120% of the total volume of a given substance stored on site. • Ensure fuel tanks do not leak (regular inspections to be carried out).
Housekeeping	<p>Equipment Cleaning</p> <ul style="list-style-type: none"> • Indoor Cleaning: Clean equipment in a designated area, such as a mop sink, pot sink, or floor area with a drain connected to the sanitary sewer. • Outdoor Cleaning: Clean equipment in a designated covered, bermed area with a drain connected to the sanitary sewer. • Do not clean equipment cleaned outdoors in any area where water may flow to a street, gutter, storm drain, or stream. • Use floor mats that are small enough to be cleaned inside in a mop sink or near a floor drain. • Take floor mats that are too big to be cleaned indoors, to a self-service car wash to clean?

Impact	Management Actions
	<p data-bbox="712 284 1099 316">Grease Handling and Disposal</p> <ul data-bbox="712 320 1957 416" style="list-style-type: none"> <li data-bbox="712 320 1912 352">• Prevent oil, grease, or waste grease from being poured down a storm drain, or into a skip container. <li data-bbox="712 357 1957 416">• Ensure waste grease from grease interceptors and traps are being properly disposed of by a responsible/ recognised disposal company. <p data-bbox="712 485 1167 517">Spill Clean-up and Surface Cleaning</p> <p data-bbox="712 552 920 584">Spill Prevention</p> <ul data-bbox="712 588 1957 879" style="list-style-type: none"> <li data-bbox="712 588 1357 620">• Maintain a Spill Response Plan and keep it current. <li data-bbox="712 625 1615 657">• Minimise the distance between waste collection points and storage areas. <li data-bbox="712 662 1290 694">• Contain and cover all solid and liquid wastes. <li data-bbox="712 699 1957 794">• Ensure absorbent materials and other spill response equipment are maintained in accordance with local regulations and procedures for containment and clean-up of different spills, and that they are easily accessible from anywhere in the facility. <li data-bbox="712 799 1189 831">• Spot clean leaks and drips routinely. <li data-bbox="712 836 1957 879">• Make sure floor drains are connected to or discharge to the sanitary sewer system, and not to the storm drain system. <p data-bbox="712 919 898 951">Spill Clean-up</p> <ul data-bbox="712 956 1700 1051" style="list-style-type: none"> <li data-bbox="712 956 1050 987">• Stop spills at the source. <li data-bbox="712 992 1700 1024">• Prevent wash water from spill clean-up from flowing to a gutter or a storm drain. <li data-bbox="712 1029 1408 1051">• Use granular absorbents (e.g. cat litter) to absorb spills.
Cooling and Refrigeration Equipment Maintenance	<ul data-bbox="712 1054 1957 1118" style="list-style-type: none"> <li data-bbox="712 1054 1957 1118">• Ensure all discharges from cooling and refrigeration equipment are going to the sanitary sewer and not to the street or storm drains.
Access	<ul data-bbox="712 1166 1957 1315" style="list-style-type: none"> <li data-bbox="712 1166 1509 1198">• Provide for painted guidelines in terms of access and exit points. <li data-bbox="712 1203 1957 1283">• Consider the construction of raised islands to prevent motorist from entering and accessing through the wrong lane. <li data-bbox="712 1287 1133 1315">• Provide for pedestrian crossing.

Impact	Management Actions
Surface and ground water	<ul style="list-style-type: none"> • It is highly recommended that the premises, especially the area housing the tanks and pumps be paved. • No dumping of waste products of any kind in or in close proximity to any surface water bodies. • Contaminated runoff from the various operational activities such as greases, fuels, oils etc. should be prevented from entering any surface or ground water bodies. • Ensure all stormwater drains or channels are clear of litter or obstructing material. • Remove all excess sedimentation, rubble and any other waste material present in the waterway and dispose of in a suitable manner to ensure proper drainage runoff. • Prevent discharge of any pollutants, such as cements, concrete, lime, and chemicals into nearby water ways and courses. • Contain contaminated water from batching operations and allow sediments to settle before being disposed of as waste water. • Proper containment mechanisms should be installed and be able to contain any spillages that might occur during the operation of the facility. • Stabilise cleared areas as soon as possible to prevent and control surface erosion. • Existing ablution facilities at the site should be used. No urinating outside these designated facilities will be allowed. • Proper environmental awareness and remedial response training of operators must be conducted on a regular basis. • An emergency response plan should be in place on how to deal with spillages and leakages during construction activities. • Ensure that surface water accumulating on-site are channeled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment. • Treat oily water through an oil/water separator before it is drained to the sewer or collected by a licensed contractor. • Prevent fuel spills: look at work practices, staff training, equipment and storage. • Any spillage of hazardous substances including fuel, oil, paint or cleaning solvent must be cleaned up and disposed of at the designated disposal facility.

Impact	Management Actions
	<ul style="list-style-type: none"> • Use drip trays, linings or concrete floors when evidence of leaks are observed on vehicles or equipment. • Consider the use of environmentally friendly degreasers for washing and cleaning. • Regularly monitor underground tanks and supply lines to detect leaks. • Ensure groundwater monitoring wells are regularly monitored and sampled. • Consider the installation of an automatic leak detection system. • The leak detectors must be tested and monitored regularly. • In the instance of an accidental spill, the effluent should be contained as far as possible in a separator pit.
Fire prevention and control	<ul style="list-style-type: none"> • Smoking should not be allowed on the premises. • Ensure availability of sufficient fire hydrants. • Ensure sufficient supply of water for fire hydrants. • Ensure availability of sufficient fire extinguishers. • Control high fire risk activities that have to be carried out such as welding on the premises. • Train employees in the use of fire-fighting equipment. • Store flammable inventory in a secure area with proper firefighting equipment and signage.
Energy efficiency and water management	<p>The owner should consult the relevant national and/or international development guidelines which addresses the following:</p> <ul style="list-style-type: none"> • The incorporation of water saving initiatives and technology within the development in order to reduce water demand. • Ensure sufficient metering systems are in place to monitor the energy and water use. • Train employees on the importance of water and energy savings.
Noise	<ul style="list-style-type: none"> • Do not allow activities that generate excessive noise levels. • Continuous monitoring of noise levels should be conducted to make sure the noise levels do not exceed acceptable limits. • No activity having a potential noise impact should be allowed after 17:00 if possible.

Impact	Management Actions
	<ul style="list-style-type: none"> • Maintain equipment used during the operation and keep them in a good state such that they do not emit noise. • Sensitize vehicle and machinery operators to switch off engines of vehicles or machinery not being used. • Ensure vehicles and equipment to be used at the facility are fitted with mufflers. • Equipment and machinery operators should be equipped with ear protection equipment. • Audio equipment (if any) should not be played at levels considered intrusive by others. • Operations should be strictly between 07Hoo to 17Hoo. • Delivery of fuel products by road and rail tankers should be limited to normal working hours (07hoo to 17hoo). • Loud music from any vehicles and/or trucks accessing the site should be restricted. • Maintain the grievance mechanism to capture public perceptions and complaints with regard to noise impacts, track investigation actions and introduce corrective measures for continuous improvement.
Emissions	<ul style="list-style-type: none"> • Manage activities that generate emissions. • Use vapour recovery equipment and techniques to avoid air pollution and minimise fuel loss. • Vehicle idling time shall be minimised by putting up educative signs. • All venting systems and procedures have to be designed according to SANS standards (SANS 1929:2011) and placed in a sensible manner. • Position vent pipes at points that are far from buildings and adjacent properties. Vent pipes should be placed in such a manner as to prevent impact on potential receptors. • Train fuel area staff in vapour recovery procedures. • Conduct regular air quality monitoring. A complaints register regarding emissions/smell should be kept and acted on if it becomes a regular complaint. • It must be ensured that all vehicles entering the site and machinery used in maintenance and possible decommissioning activities are in good working order to prevent unnecessary emissions. • Encourage reduction of engine idling at the project site. • Excavation, handling and transport of materials must be avoided under high wind conditions.

Impact	Management Actions
	<ul style="list-style-type: none"> • Dust suppression measures (e.g., dampening with water) may be required from time to time, should dust become a nuisance.
Health and Safety	<ul style="list-style-type: none"> • All vehicles, equipment and tools operators shall be equipped with proper and adequate personal protective equipment gear. • Maintenance operations should be strictly between 07H00 to 17H00. First aid and safety awareness training for contractors. • Ensure the general safety and security at all times by providing day and night security guards and adequate lighting within and around the premises. • All personnel and operators at the fuel depot must be properly trained on safety and health issues of the facility. • A well-stocked first aid box which is readily available and accessible should be provided within premises. • 'NO SMOKING' signs must be prominently displayed at the premises. • Workers should be fully equipped with personal protective equipment gear. • The facility must be properly fenced off to prevent unauthorised persons, who could get injured, from accessing the site.
Waste management	<ul style="list-style-type: none"> • Ensure that no excavated soil, refuse or building rubble generated on site are placed, dumped or deposited on adjacent/surrounding properties or land. • Explore recycling solutions for waste. • Provide for adequate number of weather and scavenger proof refuse bins at all pumps as well as around the site. • Use recognized waste management service providers to handle solid waste. • Solid waste to be disposed of at the designated landfill. • Oil-water separator effluent originating from storm water runoff, tank bottoms and washing activities should be separated before disposal of the water. • Regular monitoring of the oil-water separator outflow must be conducted. Water containing soaps and other detergents must not enter the oil water separator as it will place the hydrocarbons in suspension, rendering the oil water separator ineffective.

Impact	Management Actions
	<ul style="list-style-type: none"> • Care should be taken when handling contaminated material. The cradle to grave principal should be kept in mind during waste disposal. • Any non-biodegradable hazardous material (i.e., oil cans and containers etc.) generated should be properly stored in containment structures, collected and transported to the nearest approved hazardous waste disposal facility. • All hazardous waste to be collected and disposed of as per industry standards. • Provide suitable on-site ablution facilities to cater for all personnel, contractors and customers using the facilities. No urinating outside these designated facilities. • No burning and/or burying of waste on site shall be allowed. • Hazardous waste storage is to be clearly marked to indicate the presence of hazardous substances, and the protocols associated with handling of such hazardous wastes shall be known by all relevant staff members. • Keep spill cleanup materials handy near the tank and loading areas.
Visual Impact	<ul style="list-style-type: none"> • Use colours that blend in with the natural environment for the painting of buildings. • Contractor should maintain tidiness on site at all times. Take cognition when parking vehicles and placing equipment. • Workers should be attentive to the importance of not littering. Littering is unsightly and has a negative visual impact. • Sufficient waste bins must be provided onsite and must be emptied regularly.

6.2 DECOMMISSIONING PHASE

There is an inherent environmental risk with fuel storage and handling, therefore the removal of redundant infrastructure should be done expeditiously. While residual leftovers in the storage and handling of fuel may represent a small portion of the total capacity, those seemingly insignificant small amounts of product can pose a serious health and safety risk to personnel and the surrounding environment. Hence decommissioning activities require close management. **Table 4** delineates requirements and processes to be followed without serious impact to the surrounding environment, this also include procedures for identifying pollution during the decommissioning process. Due to non-availability of local guidelines, we have looked at international best practice (adapted from Directorate of Environment and Heritage Policy Development, Australia 2017).

Table 4: Decommissioning phase management actions

Impact	Management Actions
A decommissioning environmental management plan (DEMP) should be prepared prior to commencement of decommissioning works.	<p>The DEMP should address the following, where relevant:</p> <ul style="list-style-type: none"> • Time frame for remediation works • Site access restriction and signage requirements • Soil contamination assessment requirements, including sampling and analytical requirements to: <ul style="list-style-type: none"> ○ Identify the type and distribution of soil contamination ○ Quantify levels of soil contamination ○ Classify soils in accordance with relevant guidelines for disposal of contaminated soil • Site remediation requirements • Waste management, containment, transportation and disposal • Erosion and sediment control • Noise management • Dust suppression and control

Impact	Management Actions
	<ul style="list-style-type: none"> • Equipment decommissioning, isolation, storage and transportation requirements (including provisions for solid and liquid waste containment during works) • Management of environmental releases / accidents • General housekeeping requirements during decommissioning works • Record keeping and documentation. <p>The DEMP will require input from appropriately qualified and experienced environmental professionals. Where possible, national or regional environmental personnel will take on this role, but if this is not appropriate then a qualified environmental consultant should be engaged to prepare the DEMP and undertake any sampling and analytical plans and contamination assessments.</p>
<p>Decommissioning of Above-ground Storage Tanks (ASTs) and (Underground Storage Tanks) USTs should be undertaken in accordance with acceptable standards.</p>	<p>All tank removals must be undertaken by a suitably qualified and experienced contractor who should be aware of and have control measures for the specific hazards associated with removal, transport and disposal of petroleum storage systems (eg ASTs and USTs), including:</p> <ul style="list-style-type: none"> • Unexpected release of product during decommissioning and removal • Flammable vapours • Product toxicity • Excavations • Confined spaces <p>Prior to decommissioning, all product remaining in the tank (including piping and hoses) should be removed and appropriately disposed of. All vapours should be removed from tanks and a Lower Explosive Limit (LEL) of less than 5% should be confirmed using a calibrated detector. Labelling, transport and disposal of decommissioned tanks should be undertaken in accordance with national or otherwise acceptable international requirements. Appropriate supports and strapping should be used to stop movement of the tank during transport. Where USTs are to be decommissioned in-situ, they should be completely filled with an inert material after removal of associated infrastructure and purging of product and vapours. After tanks are decommissioned, soil and groundwater validation testing should occur prior to reinstatement of the ground surface. Should soil or groundwater contamination be identified the Environmental Commissioner should be contacted for more information. Records of abandonment, in-situ decommissioning or removal must kept.</p>

Impact	Management Actions
	All staff undertaking tank removals should be aware of specific requirements for decommissioning of (Underground Petroleum Storage Systems) UPSS.
Any environmental assessments undertaken must include a comprehensive review of current and historical site activities to determine the extent of environmental impacts.	<p>The review should:</p> <ul style="list-style-type: none"> • Identify activities which may have resulted in environmental impacts • Identify areas of potential contamination • Identify contaminants of potential concern • Outline recommendations for further investigation, if required. <p>Where further investigation works confirm levels of environmental contamination above relevant and applicable environmental criteria / guidelines, the Environmental Commissioner should be informed and remedial works conducted to ensure areas identified as contaminated are effectively managed and remediated to the extent practicable.</p>

Appendix A - Environmental Clearance Certificate



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

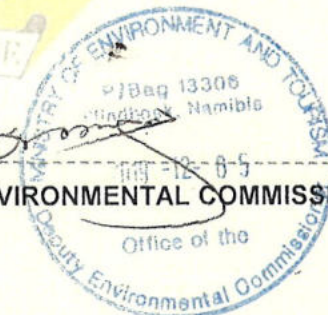
TO

Engen Namibia (Pty) Ltd
P.O. Box 201, Windhoek.

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Continued Operation of the Existing Engen Fuel Storage Depot in Keetmanshoop, //Karas Region.

[Signature]
DEPUTY ENVIRONMENTAL COMMISSIONER



Issued on the date: 2019-12-05
Expires on this date: 2022-12-05

(See conditions printed over leaf)

Reduce

Reuse

Recycle



Appendix B - Water Quality Guidelines

THE WATER ACT, 1956 (ACT 54 OF 1956) AND ITS REQUIREMENTS IN TERMS OF WATER SUPPLIES FOR DRINKING WATER AND FOR WASTE WATER TREATMENT AND DISCHARGE INTO THE ENVIRONMENT

1. INTRODUCTION

The provisions of the Water Act are intended, amongst other things, to promote the maximum beneficial use of the country's water supplies and to safeguard water supplies from avoidable pollution.

The drinking water guidelines are not standards as no publication in the Government Gazette of Namibia exists to that effect. However the Cabinet of the Transitional Government for National Unity adopted the existing South African Guidelines (461/85) and the guidelines took effect from 1 April 1988 under the signature of the then Secretary for Water Affairs.

The sections of the Water Act that relate to the discharge of industrial effluents are:

- Section 21(1) which states that
 - The purification of waste water shall form an integral part of water usage and
 - that purified effluents shall comply with the General Standard Quality restrictions as laid out in Government Gazette R553 of 5 April 1962 and
- Section 21(2) which further stipulate that this purified effluent be returned as close as possible to the point of abstraction of the original water.

Where a local authority has undertaken the duty of disposing of all effluents from an industrial process the provisions of Section 21(1) and 21(2) apply to the local authority and not the producer of the effluents. If there is difficulty in complying with these provisions then the applicant may apply for an exemption from the conditions in terms of Section 21(5) and 22(2) of the Water Act. The Permanent Secretary after consultation with the Minister may grant the issuance of a Waste Water Discharge Permit under Sections 21(5) and 22(2) subject to such conditions as he may deem fit to impose.

After independence, the Government of the Republic of Namibia decided that for the interim the existing guidelines will continue to be valid and to remain in use until a proper study has been conducted and new standards have been formulated (Article 140 of Act 1 of 1990).

2. GUIDELINES FOR THE EVALUATION OF DRINKING-WATER QUALITY FOR HUMAN CONSUMPTION WITH REGARD TO CHEMICAL, PHYSICAL AND BACTERIOLOGICAL QUALITY

Water supplied for human consumption must comply with the officially approved guidelines for drinking-water quality. For practical reasons the approved guidelines have been divided into three basic groups of determinants, namely:

- Determinants with aesthetic / physical implications: TABLE 1.
- Inorganic determinants: TABLE 2.
- Bacteriological determinants: TABLE 3.

2.1 CLASSIFICATION OF WATER QUALITY

The concentration of and limits for the aesthetic, physical and inorganic determinants define the group into which water will be classified. See TABLES 1 and 2 for these limits. The water quality has been grouped into 4 quality classes:

- Group A: Water with an excellent quality
- Group B: Water with acceptable quality
- Group C: Water with low health risk
- Group D: Water with a high health risk, or water unsuitable for human consumption.

Water should ideally be of excellent quality (Group A) or acceptable quality (Group B), however in practice many of the determinants may fall outside the limits for these groups.

If water is classified as having a low health risk (Group C), attention should be given to this problem, although the situation is often not critical as yet.

If water is classified as having a higher health risk (Group D), urgent and immediate attention should be given to this matter.

Since the limits are defined on the basis of average lifelong consumption, short-term exposure to determinants exceeding their limits is not necessarily critical, but in the case of toxic substances, such as cyanide, remedial measures should immediately be taken.

The overall quality group, into which water is classified, is determined by the determinant that complies the least with the guidelines for the quality of drinking water.

TABLE 1: DETERMINANTS WITH AESTHETIC / PHYSICAL IMPLICATIONS

DETERMINANTS	UNITS*	LIMITS FOR GROUPS			
		A	B	C	D**
Colour	mg/l Pt***	20			
Conductivity	mS/m !at 25 °C	150	300	400	400
Total hardness	mg/l CaCO ₃	300	650	1300	1300
Turbidity	N.T.U****	1	5	10	10
Chloride	mg/l Cl	250	600	1200	1200
Chlorine (free)	mg/l Cl	0,1- 5,0	0,1 – 5,0	0,1 – 5,0	5,0
Fluoride	mg/l F	1,5	2,0	3,0	3,0
Sulphate	mg/l SO ₄	200	600	1200	1200
Copper	µg/l Cu	500	1000	2000	2000
Nitrate	mg/l N	10	20	40	40
Hydrogen Sulphide	µg/l H ₂ S	100	300	600	600
Iron	µg/l Fe	100	1000	2000	2000
Manganese	µg/l Mn	50	1000	2000	2000
Zink	mg/l Zn	1	5	10	10
pH****	pH-unit	6,0 – 9,0	5,5 – 9,5	4,0 – 11,0	4,0 – 11,0

* In this and all following tables "l" (lower case L in ARIAL) is used to denote dm³ or litre

** All values greater than the figure indicated.

*** Pt = Platinum Units

**** Nephelometric Turbidity Units

***** The pH limits of each group exclude the limits of the previous group

TABLE 2: INORGANIC DETERMINANTS

DETERMINANTS	UNITS	LIMITS FOR GROUPS			
		A	B	C	D*
Aluminium	µg/l Al	150	500	1000	1000
Ammonia	mg/l N	1	2	4	4
Antimonia	µg/l Sb	50	100	200	200
Arsenic	µg/l As	100	300	600	600
Barium	µg/l Ba	500	1000	2000	2000
Beryllium	µg/l Be	2	5	10	10
Bismuth	µg/l Bi	250	500	1000	1000
Boron	µg/l B	500	2000	4000	4000
Bromine	µg/l Br	1000	3000	6000	6000
Cadmium	µg/l Cd	10	20	40	40
Calcium	mg/l Ca	150	200	400	400
Calcium	mg/l CaCO ₃	375	500	1000	1000
Cerium	µg/l Ce	1000	2000	4000	4000
Chromium	µg/l Cr	100	200	400	400
Cobalt	µg/l Co	250	500	1000	1000
Cyanide (free)	µg/l CN	200	300	600	600
Gold	µg/l Au	2	5	10	10
Iodine	µg/l I	500	1000	2000	2000
Lead	µg/l Pb	50	100	200	200
Lithium	µg/l Li	2500	5000	10000	10000
Magnesium	mg/l Mg	70	100	200	200
Magnesium	mg/l CaCO ₃	290	420	840	840
Mercury	µg/l Hg	5	10	20	20
Molybdenum	µg/l Mo	50	100	200	200
Nickel	µg/l Ni	250	500	1000	1000
Phosphate	mg/l P	1	See note below	See note below	See note below
Potassium	mg/l K	200	400	800	800
Selenium	µg/l Se	20	50	100	100
Silver	µg/l Ag	20	50	100	100
Sodium	mg/l Na	100	400	800	800
Tellurium	µg/l Te	2	5	10	10
Thallium	µg/l Tl	5	10	20	20
Tin	µg/l Sn	100	200	400	400
Titanium	µg/l Ti	100	500	1000	1000
Tungsten	µg/l W	100	500	1000	1000
Uranium	µg/l U	1000	4000	8000	8000
Vanadium	µg/l V	250	500	1000	1000

* All values greater than the figure indicated.

Note FOR Table 2 on phosphate: Phosphates are not toxic and essential for all life-forms. Natural water will, however, seldom contain phosphate; it is generally seen as an indicator of pollution and is usually accompanied by other pollutants. Wherever drinking water is combined with or consists wholly of reclaimed or recycled water, it may be expected to contain phosphate. The general guideline for a concentration level to be aimed at is 1 mg/l as P. But in many cases this may be difficult to achieve technically. For this reason the Department will allow a phosphate concentration level of up to 5 mg/l as P in water intended for human consumption. Please refer also to the “Note on Phosphate” under Section 3: General Standards for Waste/Effluent.

2.2 BACTERIOLOGICAL DETERMINANTS

The bacteriological quality of drinking water is also divided into four groups, namely:

- Group A: Water which is bacteriological very safe;
- Group B: Water which is bacteriological still suitable for human consumption;
- Group C: Water which is bacteriological risk for human consumption, which requires immediate action for rectification;
- Group D: Water, which is bacteriological unsuitable for human consumption.

TABLE 3: BACTERIOLOGICAL DETERMINANTS

DETERMINANTS	LIMITS FOR GROUPS			
	A**	B**	C	D*
Standard plate counts per 1 ml	100	1000	10000	10000
Total coliform counts per 100 ml	0	10	100	100
Faecal coliform counts per 100 ml	0	5	50	50
<i>E. coli</i> counts per 100 ml	0	0	10	10

* All values greater than the figure indicated.

** In 95% of the samples.

NB If the guidelines in group A are exceeded, a follow-up sample should be analysed as soon as possible.

2.3 FREQUENCY FOR BACTERIOLOGICAL ANALYSIS OF DRINKING-WATER SUPPLIES

The recommended frequency for bacteriological analysis of drinking water is given in Table 4.

TABLE 4: FREQUENCY FOR BACTERIOLOGICAL ANALYSIS

POPULATION SERVED	MINIMUM FREQUENCY OF SAMPLING
More than 100 000	Twice a week
50 000 – 100 000	Once a week
10 000 – 50 000	Once a month
Minimum analysis	Once every three months

3 GENERAL STANDARDS FOR WASTE / EFFLUENT WATER DISCHARGE INTO THE ENVIRONMENT

All applications in terms of Section 21(5) and 22(2), for compliance with the requirements of Section 21(1) and 21(2) of the Water Act (Act 54 of 1956) that purified water shall comply with the General Standard as laid out in Government Gazette Regulation R553 of 5 April 1962.

TABLE 5 GENERAL STANDARDS FOR ARTICLE 21 PERMITS (EFFLUENTS)

DETERMINANTS	MAXIMUM ALLOWABLE LEVELS
Arsenic	0,5 mg/l as As
Biological Oxygen Demand (BOD)	no value given
Boron	1,0 mg/l as B
Chemical Oxygen Demand (COD)	75 mg / l as O
Chlorine, residual	0,1 mg/l as Cl ₂
Chromium, hexavalent	50 µg/l as Cr(VI)
Chromium, total	500 µg/l as Cr
Copper	1,0 mg/l as Cu
Cyanide	500 µg/l as CN
Oxygen, Dissolved (DO)	at least 75% saturation**
Detergents, Surfactants, Tensides	0,5 mg/l as MBAS – See also Note 2
Fats, Oil & Grease (FOG)	2,5 mg/l (!gravimetric method)
Fluoride	1,0 mg/l as F
Free & Saline Ammonia	10 mg/l as N
Lead	1,0 mg/l as Pb
Oxygen, Absorbed (OA)	10 mg / l as O*
pH	5,5 – 9,5
Phenolic Compounds	100 µg/l as phenol
Phosphate	1,0 mg/l as P - See also Note 1
Sodium	not more than 90 mg/l Na more than influent
Sulphide	1,0 mg/l as S
Temperature	35°C
Total Dissolved Solids (TDS)	not more than 500 mg / l more than influent
Total Suspended Solids (TSS)	25 mg/l
Typical faecal Coli.	no typical coli should be counted per 100 ml
Zinc	5,0 mg/l as Zn

* Also known as *Permanganate Value* (or *PV*).

** In Windhoek the saturation level is at approx. 9 mg/l O₂.

Note (1) on phosphate: Phosphates are not toxic and essential for all life forms. Natural water will seldom contain phosphate; it is generally seen as an indicator of pollution and is usually accompanied by other pollutants. Wherever drinking water is combined with or consists wholly of reclaimed or recycled water, it may be expected to contain phosphate. There is no general guideline for phosphate contained in the Regulation 553. But generally it is assumed that eutrophication or algal bloom in dams is promoted by nutrient concentrations as low as 0,01 mg/l as P; generally a phosphate concentration limit for dams of 0,1 mg/l is recommended. All water that is consumed and subsequently discharged, will eventually end up in rivers, dams or

groundwater – that is why for potable water, a concentration level of 1 mg/l as P is aimed at.

But, again, in many cases of waste and effluent treatment, this may be difficult to achieve technically, or the required waste and effluent treatment infrastructure is not available; as the required infrastructure is sophisticated and expensive. The current situation calls for a compromise and for this reason, this Department will judge each application individually on its merits and allow, in certain cases, a phosphate concentration level of up to 15 mg/l as P in any effluent or waste stream to be discharged into the environment. This regulation is subject to be reviewed every two years, calculated from the date of approval of this document.

Note (2) on detergents, surfactants and ten sides: The MBAS (or methylene blue active substances) – test does not encompass all surface active compounds currently, commercially available. The limit given is therefore only a guideline. Many of the cleaning agents are toxic to biological life-forms in rivers and dams.

It should be taken into consideration that some commercial products interfere with the effective removal of oil, fat and grease by grease and fat traps, by breaking up such long-chain molecules into shorter ones. These cleaning agents thus effectively allow such components to pass through the traps and land into sections of a treatment plant further down the line and interfere with the process there.

Many cleaning agents contain very powerful disinfectants, and/or biocides. Such substances may interact with biological treatment processes. They may reduce the effectiveness of such treatment or 'kill' it completely, if they land in septic tanks, biofilters or even activate-sludge plants. Their activity may be attenuated by dilution.

4. AUTHORIZATION

Herewith, the Guidelines for the Evaluation of Drinking Water for Human Consumption with regard to Chemical, Physical and Bacteriological Quality, as well as the General Standards for Article 21* Permits, amended for detergents, surfactants, ten sides, as well as phosphates, are confirmed and remain in force until further notice.

Issued under my hand with the authority vested in my office, within the Ministry for Agriculture, Water and Rural Development,

PERMANENT SECRETARY
Dr V Shivute

WINDHOEK,

DATE STAMP