



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\ies 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@mps.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	Renola 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