PUBLIC MEETING

To facilitate comment on draft documents

Application for postponement of compliance timeframes in terms of Regulation 11 of the Section 21 NEM:AQA Minimum Emissions Standards for Sasolburg Operations and Natref facilities



Sasol – Sasolburg Operations

Natref



Agenda

- 1. Welcome and introduction
- 2. Health and safety arrangements
- 3. Rules of Engagement
- 4. Objectives of the meeting
- 5. Project Team
- 6. Natref
 - a. Background to Natref's application
 - b. Overview of Natref's operations
 - c. Reasons for postponement application
 - d. Overview of the results of the Draft Atmospheric Impact Report
 - e. Questions
- 7. Sasolburg Operations
 - a. Background to Sasolburg Operations' application
 - b. Overview of Sasolburg Operations
 - c. Reasons for postponement application
 - d. Overview of the results of the Draft Atmospheric Impact Report
- 8. Overview of the Stakeholder Engagement Process
- 9. Discussion and Questions
- 10. Way Forward and Closure

Facilitator: Elna de Beer



Objectives of the meeting

Foster engagements and build trust relationships with host communities.

Share information on Natref and Sasol, their activities and Air Quality impacts relating to their respective postponement applications.

Provide an explanation for why further postponements are required.

Provide an opportunity for the community to raise any issues regarding the postponement application processes.

Facilitate comments on the Motivation Reports and AIRs.



Presentations

- 1. Project Team SRK
- 2. Natref Natref
 - a. Background to Natref's application
 - b. Overview of Natref's operations
 - c. Reasons for postponement application
 - d. Overview of the results of the Draft Atmospheric Impact Report ("AIR")
- 3. Sasolburg Operations Sasol
 - a. Background to Sasolburg Operations' application
 - b. Overview of Sasolburg Operations
 - c. Reasons for postponement application
 - d. Overview of the results of the Draft Atmospheric Impact Report ("AIR")

srk consulting

Facilitator: Elna de Beer 4. Overview of the Stakeholder Engagement Process - SRK



Legal Requirements

Postponement of Compliance Timeframes in terms of Regulations 11 and 12 of the Section 21 NEM:AQA Minimum Emissions Standards ("GN893")

5 year postponement per application

In accordance with Regulation 11 of GN. 893

Atmospheric Impact Report compiled by an independent specialist

Report in accordance with the Atmospheric Impact Report Regulations (GN. 747) of October 2013 *Dispersion Modelling in accordance with GN. 533 of July 2014*

Reasons and justifications for applications

Public Participation Process

In accordance with Chapter 6 of the Environmental Impact Regulations (GN. 982) of December 2014







NATREF











- Inland Crude Oil Refinery located in Sasolburg, Free State
- Two Shareholders:
 - SASOL OIL (63.64%)
 - TOTAL (36.36%)
- Refinery founded in 1968, commissioned in 1971
- Employs ±720 permanent employees
- During large turnaround and inspection shutdowns the number of people working on site can temporarily increase to 3000 to 4000







Sasol

Natref's Location









Natref's activities in the fuel value chain













Natref's points of compliance



TOTAL









Previous Postponement Application

- At the time the 2014 application commenced, the point of compliance for Natref was the main stack. Changes to the MES in late 2013 resulted in changes to the point of compliance, and Natref did not have sample results available on all 9 newly defined points of compliance feeding to the main stack
- Natref requested postponement until 1 March 2018 to allow sufficient time to install sample points and implement projects to achieve the requisite improvements
- This has since been completed and sampling results are awaited.
- Anticipated project schedules were shared in the previous postponement application, which extend beyond 2018









- A singular solution per compliance point will be implemented to meet 2015 and 2020 standards simultaneously
- Resource availability and constraints are key drivers for the requested extended compliance time frame:
 - Statutory shutdown schedule

Tie-ins/modifications can only be done during planned shutdown windows

• Inland fuel supply considerations

Shutdown windows are planned taking into account country wide fuel availability









Project due diligence obligations Typical retrofit project lifecycle including Gate Governance requirements







Category 2.1 – Combustion Installations

- CDU/VDU furnaces 3 years to 2021 to meet existing and new plant standards
- Vacuum pre-flash off-gas furnace 3 years to 2021 to meet existing and new plant standards
- Boilers and hot oil heater 2 years to 2020 to meet existing and new plant standards

Category 2.2 – Catalytic Cracking Units

• FCC – 4 years to 2022 to meet existing and new plant standards

Category 2.4 – Storage and Handling of Petroleum Products

• LSR Tanks – 1 year to 2019 to meet to meet special arrangement for prescribed technologies

In 2014, Natref submitted a postponement application requesting a 5 year postponement. A 3 year postponement was granted. Monitoring has been implemented and results will be available by 1 April 2018. Natref is now requesting a further postponement of the compliance timeframes in order to implement the identified and proposed solution/technology intervention to achieve compliance with existing and new plant standards.







Improvements 2000 - present



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Pollutant	2000-2014	2014-Present	Future Projects
SO ₂	SO ₂ reduced by 72% since 2000		Amine treating of Vacuum Pre-flash and Vacuum Off-gas
	Optimised sulfur recovery and routed SWS off-gas to SRU	Reduction in fuel oil firing	Refinery Fuel Oil Phase Out
	Switch to lower sulphur crude oil		SRU Availability Improvement Project
PM	CDU/VDU furnace revamp / replacement	FCC Cyclone replacement	Installation of PM reduction technology on the FCC
		Reduction in fuel oil firing	Refinery Fuel Oil Phase Out
NOx	Diesel Unifiner upgrade installed new heaters with low NOx burners	Reduction in fuel oil firing	Refinery Fuel Oil Phase Out
VOC	Installation of geodesic domes or double tanks	e mechanical seals on	VOC Reduction on LSR Tanks
		Installation of new sample points at new points of compliance	
Sasol 💑		18	TOTAL

Atmospheric Impact Report (AIR) Natref



February 2017

Reneé von Gruenewaldt Terri Bird



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INTRODUCTION

- What do these applications mean for air quality?
- Impacts of Sasol and Natref's postponement application is compiled in the AIR which is informed by the MES and NAAQS









Monitoring station



Combined impact

Monitoring station



AIR METHODOLOGY

- Regulations Prescribing Format of Atmospheric Impact Report (GN747 of 2013)
- Regulations Regarding Air Dispersion Modelling (GN533 of 2014)
- Section 21 NEM:AQA Minimum Emissions Standards (GN893 of 2013)
- National Ambient Air Quality Standards (GN 1210 of 2009)
- National Ambient Air Quality Standard for PM_{2.5} (GN 486 of 2012)
- National Dust Control Regulations (GN 827 of 2013)



CURRENT STATE OF AMBIENT AIR QUALITY – SO₂ (2013-2015)



CURRENT STATE OF AMBIENT AIR QUALITY – NO₂ (2013-2015)



CURRENT STATE OF AMBIENT AIR QUALITY – PM₁₀ (2013-2015)



CURRENT STATE OF AMBIENT AIR QUALITY – PM_{2.5} (2013-2015)



CURRENT STATE OF AMBIENT AIR QUALITY – Benzene (2013-2015)



RECEPTORS (Prediction Points)











EMISSION SCENARIOS



SIMULATED RESULTS: SO₂ (hourly)



Alł

SIMULATED RESULTS: NO₂ (hourly)



AIR:

SIMULATED RESULTS: PM (daily)



Д
SIMULATED RESULTS: Benzene (annual)



AIRSH

SIMULATED RESULTS: Benzene (annual)



AIF

CONCLUSIONS ANALYSIS OF IMPACTS ON HUMAN HEALTH

- PM₁₀/PM_{2.5}
 - Measured ambient air quality
 - Exceeds NAAQS
 - Simulated impacts from Natref
 - Within NAAQS
- SO₂
 - Measured ambient air quality
 - Exceeds NAAQS at Leitrim and AJ Jacobs
 - Simulated impacts from Natref
 - Within NAAQS
- NO₂
 - Measured ambient air quality
 - Within NAAQS
 - Simulated impacts from Natref
 - Within NAAQS
- Benzene
 - Simulated impacts from Natref
 - Within NAAQS



CONCLUSIONS ANALYSIS OF IMPACTS ON THE ENVIRONMENT

- Critical levels for vegetation assessed using the international methodology
 - potential off-site exceedances of the most stringent level for SO₂ and NO₂ for "Existing Plant MES" scenario
- Dustfall rates estimated from simulated particulate concentrations
 - off-site compliance with National Dust Control Regulations
- Corrosion rates estimated from simulated pollutant concentrations
 - Maximum of 110 µm per year for steel (onsite)
 - No benchmark for acceptability
- Literature findings suggest that grassland ecosystems of the Highveld are not yet affected by sulfur and nitrogen deposition.
- Literature review of potential effects of benzene on environment provided
 - No benchmark for acceptability

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Alternative Emissions Limits Requested to Apply During Postponement Period



Alternative 2020 **Proposed Roadmap Emission Limit** New Plant **Postponement request** Solution/Technology Description Cat. **Standards** requested date intervention mg/Nm3 at 10% O2 273 K and 101.3 kPa CDU/VDU 1 April 2018 to $SO_2 - 1000$ SO₂ - 2 200 VDU off-gas amine treating 2.1 31 March 2021 furnaces Vacuum pre-Vacuum pre-flash off-gas 1 April 2018 to $SO_2 - 1000$ SO₂ - 7 000 flash off-gas 2.1 31 March 2021 amine treating furnace **Boilers** and $SO_2 - 1000$ SO₂ - 3 500 1 April 2018 to hot oil Refinery fuel oil phase out 2.1 31 March 2020 PM - 70 PM - 350 heater 1 April 2018 to Electrostatic precipitator FCC PM - 900 PM - 1002.2 31 March 2022 installation Installation of a VRU or 1 April 2018 to LSR Tanks **TVOCs** equivalent prescribed 2.4 31 March 2019 technology

Note - the alternative emission limits proposed are based on calculations. The final motivation report will include the verified sampling results (currently awaited) as informed by samples taken at the recently installed sampling points. The concentrations measured at these points are a function of ordinary process variations like oxygen and moisture content, and do not necessarily have any bearing on the tons of emissions from the main stack. This is why the AIR is based on actual emissions to atmosphere measured at the main stack, rather than fluctuating emission concentrations at the points of compliance.





SASOLBURG OPERATIONS





Sasol's operations in South Africa



Coal, crude oil and natural gas sold to open market

Schematic illustration of Sasol's operations at Sasolburg





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Sasol's location in Sasolburg

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Reasons for applying for postponements for certain sources



Previous Postponement Application

- A feasible solution to meet the 2013 MES had not been identified yet for the incinerators at the time of the 2014 Postponement Application.
- Regulation 13 of the MES allows for a postponement period up to 5 years per application.
- Sasol therefore legitimately anticipated that 5 years would be granted to allow sufficient time for the investigation of options to achieve compliance, as motivated in the 2014 postponement application.
- The NAQO however granted postponement for the incinerators for three years only until 31 March 2018.
- Investigations have since been undertaken to identify potentially feasible options to achieve compliance.
- The three year postponement period granted did not allow sufficient time to identify and implement the most feasible solution and hence a further extension of the compliance time frame is required.

Reasons for applying for postponements

sasol 🚜

Project due diligence obligations

Typical retrofit project lifecycle including Gate Governance requirements





Modifying a brownfields operation

- 1. Modifying an existing brownfields operation is considerably more challenging than building a new greenfields plant.
- 2. Every modification or retrofit has to be developed around the existing plant with a retrofit.
- 3. There is very little available space around the Thermal Oxidation Plant, limiting the options for equipment and introducing access limitations for both construction teams and the equipment required.
- 4. Maintenance programs, necessary for statutory compliance and safety, compete for access and working space, requiring careful scheduling.
- 5. An existing site poses safety hazards that do not exist on a greenfields site.
- 6. These challenges mean that implementation of brownfields retrofits take substantially longer than greenfields installations.





Sasol previously submitted a postponement application requesting a 5 year postponement (2014 Postponement Application). In these instances a 3 year postponement was granted for the above mentioned sources. For these sources Sasol is now requesting a further postponement of the compliance timeframes to allow the necessary time to conclude on feasibility studies and select the optimal compliance solution, and thereafter, to allow for the safe execution of the associated projects, which will bring about compliance with the prescribed existing plant standards



Monitoring and Improvements (Since 2014)

- 1. In accordance with its Air Quality improvement roadmaps Sasol has made significant progress towards achieving commitments to certain emissions abatement interventions as part of the Vaal Triangle Priority Area Air Quality Management Plan.
- 2. Conducted quarterly sampling campaigns on incinerator B6990.
- 3. Feed stream analyses has confirmed that the bulk of the samples contain negligible values of mercury and low concentrations of chlorides confirmed by results of the isokinetic sampling.
- 4. Installed online monitoring equipment at all three incinerators and a to continuously monitor the visibility of the B6990 plume.
- 5. Investigations into alternative waste management solutions for the waste.



Disposal of waste at a hazardous landfill as an alternative to incineration

Source reduction of the waste streams being incinerated

Installation of abatement technology on existing equipment

Installation of new equipment

Use of waste streams as alternative fuels

Integrated Waste solution

Atmospheric Impact Report (AIR) Sasol Sasolburg Operations



February 2017

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RECEPTORS (Prediction Points)



The difference between ceiling and average emission limits

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EMISSION SCENARIOS

AIRSH

SIMULATED RESULTS: SO₂ (hourly)

Alŀ

SIMULATED RESULTS: NO₂ (hourly)

Alł

SIMULATED RESULTS: PM (daily)

Alr

SIMULATED RESULTS: CO (hourly)

AIRSH

58

SIMULATED RESULTS: CO (hourly)

AIRS

CONCLUSIONS ANALYSIS OF IMPACTS ON HUMAN HEALTH

- PM₁₀/PM_{2.5}
 - Measured ambient air quality
 - Exceed NAAQS
 - Simulated impacts from Sasol
 - Within NAAQS
- SO₂
 - Measured ambient air quality
 - Exceed only daily NAAQS at Leitrim and AJ Jacobs
 - Simulated impacts from Sasol
 - Within all NAAQS
- NO₂
 - Measured ambient air quality
 - Within NAAQS
 - Simulated impacts from Sasol
 - Within NAAQS
- CO
 - Measured ambient air quality
 - Within NAAQS
 - Simulated impacts from Sasol
 - Within NAAQS
- Non-criteria pollutants
 - Within health screening levels at all sensitive receptors

CONCLUSIONS ANALYSIS OF IMPACTS ON THE ENVIRONMENT

- Critical levels for vegetation assessed using the international methodology
 - Potential off-site exceedances of the most stringent level for SO₂.
 - Off-site NO₂ levels below the critical levels for all vegetation types.
- Dustfall rates estimated from simulated particulate concentrations
 - off-site compliance with National Dust Control Regulations
- Corrosion rates estimated from simulated pollutant concentrations
 - Maximum of 47 µm per year for steel (onsite)
 - No benchmark for acceptability
- Literature findings suggest that grassland ecosystems of the Highveld are not yet affected by sulfur and nitrogen deposition.

FURTHER DETAIL CONTAINED IN THE AIR

- Methodology (peer review feedback in motivation report);
- Model validation;
- Results per receptor and the percentage change in ground-level concentrations between scenarios;
- Long-term simulated results (daily and annual);
- **Contour plots** of simulated results;
- Results for other **non-criteria** pollutants.

Alternative Emissions Limits Requested to Apply During Postponement Period

Component	2015 Existing Plant Standards	2020 New Plant Standards	B6930	B6993	B6990
PM	25	10	100	360	600
SO ₂	50	50	3 600	340	1 500
СО	75	50	NA	1 700	NA
NO _x	200	200	880	420	640
Metals	0.5	0.5	16	20	60
Cd+Tl	0.05	0.05	0.06		
Hg	0.05	0.05			
NH ₃	10	10			
HF	1	1			3.3
HCI	10	10			
тос	10	10	15	20	15
Dioxin & Furan	0.1	0.1			
Flue gas temperature	200 ºC	200 ºC			500 ºC - 1 000 ºC₀

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Stakeholder Engagement Process

Public comment period:

06 February 2017 – 8 March 2017

Public Meetings 21-23 February 2017

We are Here

Way Forward

Overview of Public Participation Process

Draft Reports will be available for public comment until 8 March 2017

Invitation to comment

- Should you wish to register as an interested and affected party or comment on the postponement application documents
- Please complete the registration and comment forms and submit it to SRK, by 8 March 2017 provided at the meeting or available from
 - Sasol: <u>http://www.srk.co.za/en/za-sasol2017postponement</u>
 - Natref: <u>http://www.srk.co.za/en/za-natref2018postponement</u>
- Or complete the online survey at:
 - Sasol: <u>https://survey123.arcgis.com/share/c184b4cc3de04665aa0befaef1c7eea2</u>
 - Natref: <u>https://survey123.arcgis.com/share/772ba28ebd18442ab7a04d6dfc03457f</u>

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🐦 srk consulting 🛛 😽

Definitions in terms of NEM:AQA and MES (GN 893) that have relevance to this application:

Existing Plant – Any plant or process that was legally authorised to operate before 1 April 2010 or any plant where an application for authorisation in terms of the National Environmental Management Act (Act No.107 of 1998) was made before 1 April 2010.

Fugitive emissions - emissions to the air from a facility, other than those emitted from a point source.
Licencing Authority – refers to an authority responsible for implementing the licensing system.
Listed activity – In terms of Section 21 of the NEM:AQA, the Minister of Environmental Affairs has listed activities that require an AEL. Listed Activities must comply with prescribed emission standards. The standards are predominantly based on 'point sources', which are single identifiable sources of emissions, with fixed location, including industrial emission stacks, called a "point of compliance".
Minister – The Minister of Environmental Affairs.

New Plant – Any plant or process where the application for authorisation in terms of the National Environmental Management Act (Act No.107 of 1998) was made on or after 1 April 2010.

Point of compliance – means any point within the off gas line, where a sample can be taken, from the last vessel closest to the point source of an individual listed activity to the open-end of the point source or in the case of a combination of listed activities sharing a common point source, any point from the last vessel closest to the point source up to the point within the point source prior to the combination/interference from another Listed Activity.

Point source – A single identifiable source and fixed location of atmospheric emission, and includes smoke stacks.

Priority area - means an area declared as such in terms of Section 18.

Priority area air quality management plan - means a plan referred to in Section 19.

Total volatile organic compounds (VOCs or TVOCs) – means organic compounds listed under US-EPA Compendium Method TO-14.

Additional definitions provided for the purpose of clarity:

Alternative emissions limits – the standard proposed by SSO based on what is considered reasonable and achievable as a consequence of the various technical and environmental assessments conducted and which SO / Natref proposes as an alternative standard to be incorporated as a licence condition with which it must comply during the period of postponement. The alternative emissions limits are specified as ceiling emissions limits or maximum emission concentrations, as defined in this Glossary. In all instances, these alternative emissions limits seek either to maintain emission levels under normal operating conditions as per current plant operations, or to reduce current emission levels, but to some limit which is not identical to the promulgated MES (as defined). Specifically, these alternative emissions limits do not propose an increase in current average baseline emissions.

Ambient standard - The maximum tolerable concentration of any outdoor air pollutant as set out in the National Ambient Air Quality Standards in terms of Section 9(1) of the NEM:AQA.

Atmospheric Emission License – SO Atmospheric Emission Licence: Licence no. FDDM-MET – 2013-23 issued to Sasol in respect of its Sasolburg Operations, formerly Infrachem

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Atmospheric Emission Licence, Licence No. FDDM-MET-2013-17, issued by the Fezile Dabi District Municipality in March 2014, as amended on 30 March 2015, to the National Petroleum Refiners of South Africa (Pty) Ltd. (Natref) for its operations in Sasolburg.

Atmospheric Impact Report - in terms of the Minimum Emission Standards an application for postponement must be accompanied by an Atmospheric Impact Report as per Section 30 of NEM: AQA. Regulations prescribing the format of the Atmospheric Impact Report (AIR) were published in Government Notice 747 of 2013. **Ceiling emissions limit** – Synonymous with "maximum emission concentrations". The administrative basis of the MES is to require compliance with the prescribed emission limits specified for existing plant standards and new plant standards under all operational conditions, except shut down, start up and upset conditions. Whereas average emission values reflect the arithmetic mean value of emissions measurements for a given process under all operational conditions, the ceiling emission would be the 100th percentile value of emissions measurements obtained. Hence, ceiling emission values would be higher than average emission values, with the extent of difference between ceiling and average values being dependent on the range of emission levels seen under different operational conditions. Since the MES specify emissions limits as ceiling emissions limits or maximum emission concentrations, SSO has aligned its proposed alternative emissions limits with this format, to indicate what the 100th percentile emissions measurement value would be under any operational condition (excluding shut down, start up and upset conditions). It is reiterated that SSO does not seek to increase emission levels relative to its current emissions baseline through its postponement applications and proposed alternative emissions limits (specified as ceiling emission limits), but rather proposes these limits to conform to the administrative basis of the MES.

Criteria pollutants – Section 9 of NEM:AQA provides a mandate to the Minister to identify a national list of pollutants in the ambient environment which present a threat to human health, well-being or the environment, which are referred to in the National Framework for Air Quality Management as "criteria pollutants". In terms of Section 9, the Minister must establish national standards for ambient air quality in respect of these criteria pollutants. Presently, eight criteria pollutants have been identified, including sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), carbon monoxide (CO), lead (Pb), particulate matter (PM₁₀), particulate matter (PM_{2.5}), benzene (C₆H₆). In this document, any pollutant not specified in the National Ambient Air Quality Standards ("NAAQS") is called a "non-criteria pollutant".

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Existing plant standards - The emission standards which existing plants are required to meet. Emission parameters are set for various substances which may be emitted, including but not limited to, for example, PM_{10} , nitrogen oxides (NO_x) and SO_2 .

Fugitive emission monitoring plan – The plan detailing monitoring of fugitive emissions from equipment, pumps, tanks and other non-point sources on the Secunda site and the associated corrective actions to manage these emissions.

GN 551 – Government Notice 551, Gazette No. 38863 dated 15 June 2016, published in terms of Section 21 of the NEM:AQA and entitled 'Amendments to the list of Activities which result in Atmospheric Emission which have or may have a Significant Detrimental Effect on the Environment, including Health, Social Conditions, Economic Conditions, Ecological Conditions or Cultural Heritage'.

GN 893 – Government Notice 893, Gazette No. 37054 dated 22 November 2013, published in terms of Section 21 of the NEM:AQA and entitled '*List of Activities which Result in Atmospheric Emissions which have or may have a Significant Detrimental Effect on the Environment, Including Health and Social Conditions, Economic Conditions, Ecological Conditions or Cultural Heritage*'. GN 893 repeals the prior List of Activities published in terms of Section 21, namely GN 248, Gazette No. 33064 dated 31 March 2010. GN 893 deal with aspects including: the identification of activities which result in atmospheric emissions; establishing minimum emissions standards for listed activities; prescribing compliance timeframes by which minimum emissions standards must be achieved; and detailing the requirements for applications for postponement of stipulated compliance timeframes.

Maximum Emission Concentrations – Synonymous with "ceiling emissions limits". Refer to glossary definition specific to this application for ceiling emissions limits.

Minimum Emissions Standards – Prescribed maximum emission limits and the manner in which they must be measured, for specified pollutants. These standards are published in Part 3 of GN 893, as amended by GN551. These standards are referred to herein as "MES".

New plant standards - The emission standards which existing plants are required to meet, by April 2020, and which new plants have to meet with immediate effect. MES are set for various substances which may be emitted, including, for example, PM_{10} , NO_x and SO_2 .

Postponement – a postponement of compliance timeframes for existing plant standards and new plant standards and their associated special arrangements, in terms of regulations 11 and 12 of GN 893. **Sasol** – refers generally to Sasol South Africa (Pty) Limited and its various operations and operating entities. **Shutdown schedule** - A programme for the scheduled period for which a plant, or a portion thereof or piece of equipment, such as a tank, is out of commission for maintenance for an extended period of time. **Special arrangements** – Any specific compliance requirements associated with a listed activity's prescribed emissions limits in Part 3 of GN 893, as amended by GN 551. These include, amongst others, reference conditions applicable to the prescribed emission limits of the listed activity, abatement technology prescriptions and transitional arrangements.

SO – the applicant in this postponement application, Sasol South Africa (Pty) Limited operating through its Sasolburg Operations.

Natref – National Petroleum Refiners of South Africa (Proprietary) Limited, a joint venture between Sasol Oil (Pty) Ltd (63.64% shareholding) and Total South Africa (Pty) Ltd (36.36% shareholding).
 2014 Postponement Application - Postponement application submitted ahead of the 1 April 2015 compliance timeframe for existing plant standards, for various sources at the Secunda facility and incorporated into the AEL.

2017 Postponement Application – This postponement application to be submitted by SSO to extend the initial three year compliance extension granted ahead of the 1 April 2015 compliance timeframe, for the Phensolvan plant and HOW and Biosludge incinerators.