

**WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:
Address all correspondence to:

**MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER**

Navrae/Enquiries: C Ganten-Bein
Verw.Nr./Ref. No: 12/3/1/11



Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022) 4338400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address :
westcoastdm@wcdm.co.za

**APPLICATION FORM FOR ATMOSPHERIC EMISSION LICENCE / PROVISIONAL ATMOSPHERIC
EMISSION LICENCE IN TERMS OF CHAPTER 5 OF THE NATIONAL ENVIRONMENTAL
MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004), AS AMENDED**

Name of Enterprise: West Point Processors (Pty) Ltd

Declaration of accuracy of information provided:

Application for an atmospheric emission licence / provisional atmospheric emission licence as envisaged in chapter 5 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), as amended.

I, Jan-Taljaard Marx [delegated by the
Accounting Officer], declare that the information provided in this application or attached to the application is, to the best of my knowledge, in all respects factually true and correct. I am aware that the supply of false or misleading information in the application form is a criminal offence in terms of section 51(1)(f) of the Act.

Signed at St Helena Bay on this 13 day of June 2025

SIGNATURE

ACO (OHSE Manager)
CAPACITY OF SIGNATORY

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NB: PLEASE COMPLETE ALL SECTIONS. KINDLY MARK WITH AN X IN SPACES WHERE APPLICABLE. IF THE SPACE PROVIDED IS INSUFFICIENT, THE REQUIRED INFORMATION MAY BE SUBMITTED IN THE FORM OF A MEMORANDUM. ATTACH REQUIRED MAPS AND SKETCHES. GRAPHICS MUST BE CLEAR, LABELED AND, WHERE APPLICABLE.

1 TYPE OF APPLICATION

	New Application		Transfer
	Renewal	X	Variation/Amendment/Review

Current Atmospheric Emission Licence Number:	WCWD001205
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Variation Application Outline

The variation application is for the following amendments in the AEL:

Item 5.1 from: The process entails the operation of a fish meal processing plant producing fish meal product. Production relates to Total Allowable Catch by vessel approved by Regulatory Authorities and fish material from the cannery process. Fishmeal is produced by processing raw pelagic fish by using the following unit processes:

To: The process entails the operation of a fish meal processing plant producing fish meal product. Production relates to Total Allowable Catch by vessel approved by Regulatory Authorities and material from fish processing. Fishmeal is produced by processing fish using the following unit processes:"

PS 4 and PS 7 reporting frequency in Table 7.4 a) and 7.4 b) from: Bi-annual – twice per annum

To: Twice per annum

Change of the PM maximum release rate for PS1 in Table 7.2 a) from: 120

To: 250

The respective specialists confirmed (Appendix 1) that the Air Impact Assessment conducted 2024 results (Appendix 2) are still applicable and that the assessed impact will not change with the inclusion of additional fish material type processing.

2 ENTERPRISE INFORMATION

Enterprise Name	WEST POINT PROCESSORS (PTY) LTD
Trading As	WEST POINT PROCESSORS (PTY) LTD
Type of Enterprise, e.g. Company/Close Corporation/Trust, etc	Company
Company/Close Corporation/Trust Registration Number (Registration Numbers if Joint Venture)	1990 / 007321 / 07

Registered Address	FIRST FLOOR 2 KIEPERSOL CLOSE PLATTEKLOOF WESTERN CAPE 7500
Postal Address	PO BOX 15109 PANORAMA PAROW WESTERN CAPE 7506
Telephone Number (General)	022 736 1100
Fax Number (General)	022 736 1282
Industry Type/Nature of Trade	Processing of fish for fishmeal and oil.
Land Use Zoning as per Town Planning Scheme	Fishing Industry Zone
Land Use Rights if outside Town Planning Scheme	

Responsible Person Name or Emission Control Officer (where appointed)	Dudley Lesch
Telephone Number	022 736 1100
Cell Phone Number	-
Fax Number	022 736 1282
E-mail Address	dudley@saldanha.co.za
After Hours Contact Details	-

3 SITUATION AND EXTENT OF PLANT

3.1 Location and extent of plant

Physical Address of the Plant	Main Road, St Helena Bay
Description of Site (Where No Street Address)	Erf 1097, Slipper Bay; St Helena Bay
Coordinates of Approximate Center of Operations	North-south: 32° 46' 40.1" East-west: 18° 02' 57.4"
Extent (km ²)	0.153
Elevation Above Mean Sea Level (m)	± 5 m
Province	Western Cape
Metropolitan/District Municipality	West Coast District Municipality

Local Municipality	Saldanha Bay Municipality
Designated Priority Area	N/A

3.2 Description of surrounding land use (within 5 km radius)

Provide a description of the surrounding land use within a 5 km radius, specifically noting the names and proximity of residential and commercial areas in relation to the site of the works.

The site is located 1.2 km northwest of Lainville and 500 m southeast of a small retail area at the entrance of St Helena Bay. The site is surrounded by small residential and open spaces areas.



Figure 1: Context plan of the site situated on Erf 1097



Figure 2: Locality Map of the site

Attach map(s), satellite image(s) or aerial photograph(s) detailing location of premises in relation to surrounding community.

4 NATURE OF PROCESS

4.1 Process description

Please provide a detailed description of the entire production process including reference to the overall balance sheet of inputs, outputs and emissions at the site of the works.

Fish sources, offloading and storage:

Raw fish is caught with fishing vessels and offloaded by means of a vacuum system into the fish holding facility. Trimmings are directed to the fish holding facility for processing.

Fish cooking and dewatering:

The raw fish is transported into the processing plant directly from the fish holding tanks into the continuous steam jacketed cookers. The fish is cooked in the cookers and all excess liquids are extracted with dewatering screens and presses and decanters.

Separation and evaporation:

The liquid phase is put through centrifuges where the oil is separated from the stick water. The oil is polished by adding hot water to the oil and putting through a centrifuge. Separating equipment are Separators and Oil polishers.

The stick water is evaporated in a Waste Heat or steam evaporating plant into concentrate which is added back into the solid press cake before it is dried.

Drying:

The meal is partially dried with Disc steam driers and then dried in the Rotor Tube driers. The dryer function is seen as one drying step that can be utilised in various configurations.

Milling and bagging:

The meal is then conveyed to the bagging plant where it is milled using Hammer mills. The final product is bagged into 50kg or bulk bags. Dust generated in the bagging plant is removed by a cyclone and bag filters

Meal Warehouses:

The bagged fish meal is stored in the warehouses.

Steam generation:

Steam required and used for cooking and evaporating of liquids from the process is generated by coal and HFO boilers.

Seawater scrubber and chemical scrubber:

The water vapour collected from the plant is sent to the Seawater scrubber where steam is condensed and odour carrying particulate matter is removed.

The remaining air from the Seawater scrubber is then routed to the Chemical scrubber for the removal of odour before it is released into the atmosphere.

4.2 Listed activities

List all Listed Activities, as published in terms of section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), proposed to be conducted at the premises in terms of this application:

Listed Activity Number	Category of Listed Activity	Sub-category of the Listed Activity	Name of the Listed Activity	Description of the Listed Activity
1	10	N/A	Animal Matter	Processes for the rendering, cooking,

			Processing	drying, dehydrating, digesting, evaporating or protein concentrating of any animal matter not intended for human consumption.
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4.3 Environmental Authorisations/Licenses Issued

List all listed activity related environmental license/authorisations/rights/permits issued to the facility by competent authorities. (e.g. EIA environmental authorisations, Waste Licenses, Mining Rights, etc)

Authorisation	Brief description of the authorisation	Date of Issue	Issuing Competent Authority
E12/2/3/1-F4/19-0551/08	Plant upgrades to increase efficiency.	22 November 2010	Department of Environmental Affairs and Development Planning
16/3/3/1/F4/20/3005/22	Expansion of the west point fish meal processing plant.	27 July 2022	Department of Environmental Affairs and Development Planning
16/3/3/1/F4/20/3024/22	Establishment of a reverse osmosis plant.	11 November 2022	Department of Environmental Affairs and Development Planning
WCWD001205	AEL renewal for the processing of animal matter.	8 August 2024	West Coast District Municipality
2014/021/WC/West Point Processors	Renewal of the CWDP for discharge.	3 March 2025	Department of Forestry, Fisheries and the Environment

4.4 Emission Units (EU)

List all emission units associated with the listed activities in operation at the premises by the atmospheric emission licence holder, highlighting unit processes proposed in respect of this application:

For Area Source Emission units such as stockpiles, gravel roads or any other fugitive emission sources, please complete section 5.4.5

EU Code	Emission Unit Name	Emission Unit Process Function	Batch or Continuous Process
EU02	HFO boiler	Steam Generation	Continuous
EU03	HFO boiler	Steam Generation	Continuous
EU05	16T Coal Boiler	Steam Generation	Continuous
EU07	Chemical Scrubber	Secondary treatment of condensable and non-condensable compounds	Continuous
EU08	20T Coal Boiler	Steam Generation	Continuous
TBA	20t Coal Boiler	Steam Generation	Continuous

***Emission Unit** means a single component (equipment) with identifiable inputs and outputs within a process flow. A series of unit processes make up the full manufacturing process, for example, boiler, furnace, distillation column, etc.

Please provide any other unit processes currently conducted at the site of works.

Name of the Unit Process	Description of the Unit Process
Cooking	Cooking of raw fish
Pressing	Dewatering of cooked fish
Drying	Drying cooked fish to fish meal
Dry Milling	Size reduction of fish meal
Packing	Packing of fish meal into 50 kg or 1000 kg bags for storage, bulk storage and / or transport
Oil Separation	Separating press water into stick water and fish oil
Stick Water Evaporation	Concentration of stick water

4.5 Graphical process information

Attach the following for the entire operation being undertaken at the site of the works:

- Simplified block diagram with the name of each unit process in a block; showing links between all unit processes or blocks.

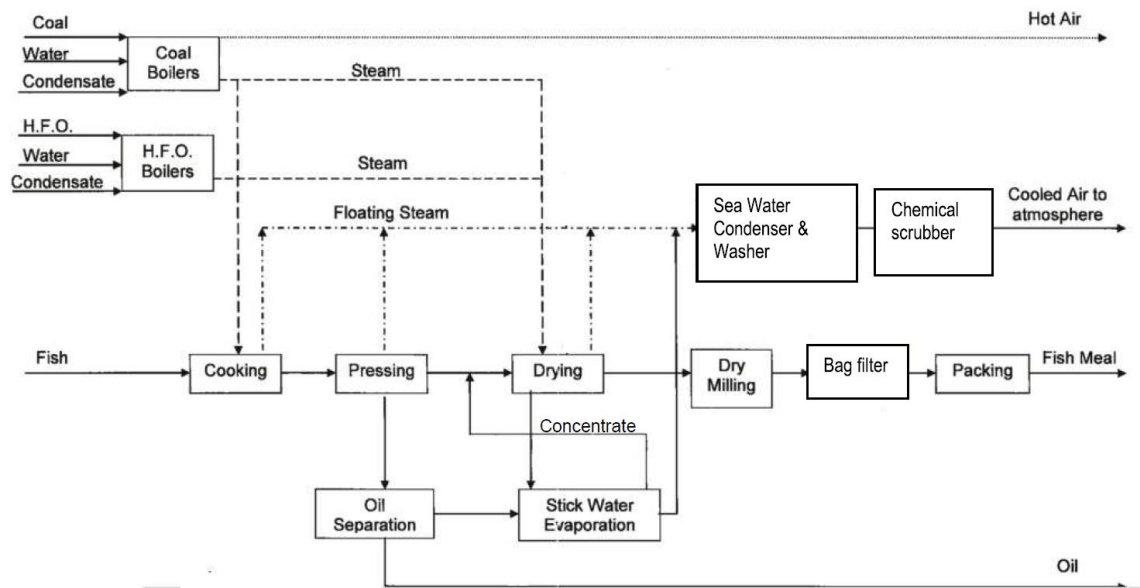


Figure 3: Simplified block diagram of each unit process

- Process flow chart(s) clearly indicating inputs, outputs and emissions at the site of works, including points of potential fugitive emissions and emergency releases.

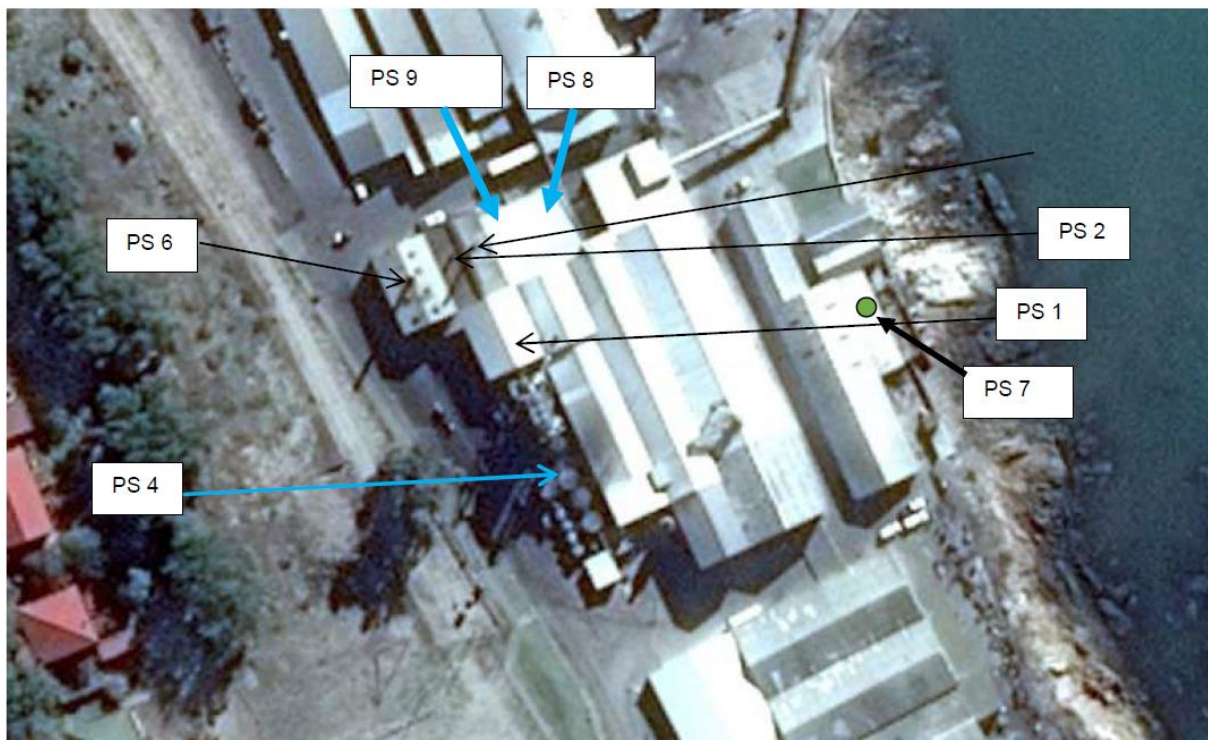


Figure 4: Locations of Point Sources

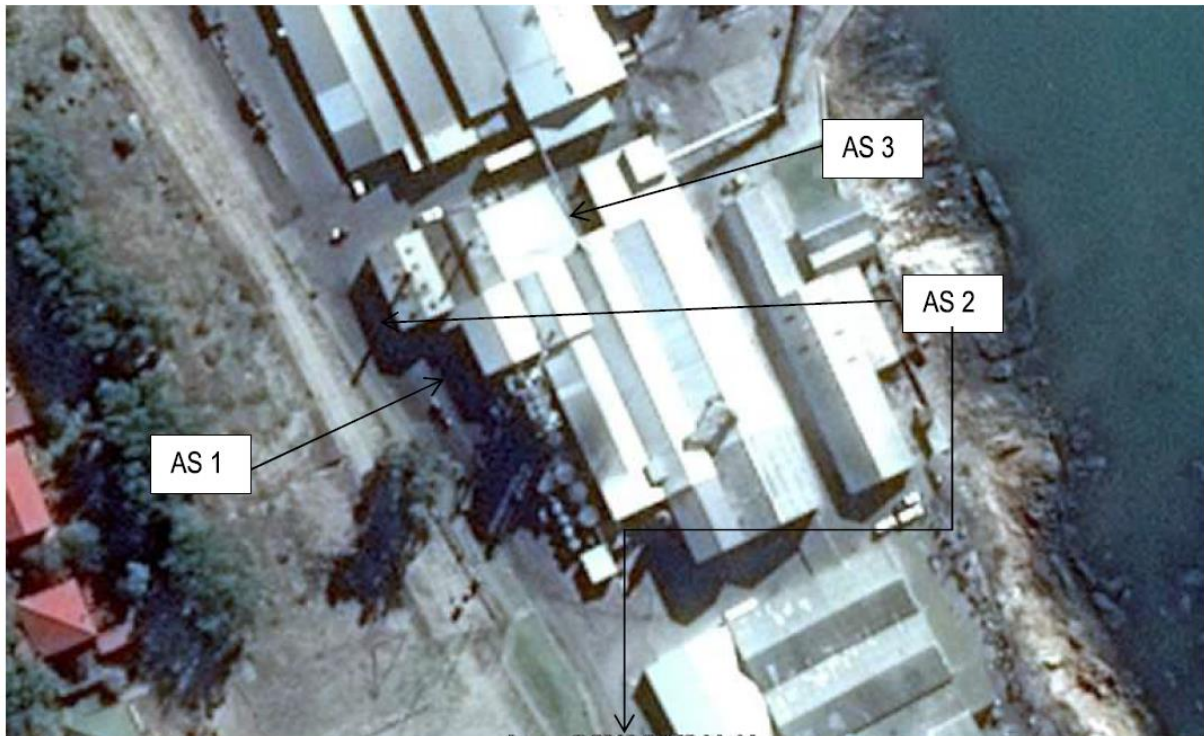


Figure 5: Locations of area sources

- Site layout diagram (plan view and to scale) indicating location of unit processes, plants, buildings, stacks, stockpiles and roads (include true north arrow and scale).



Figure 6: Location of West Point Processors and the respective departments

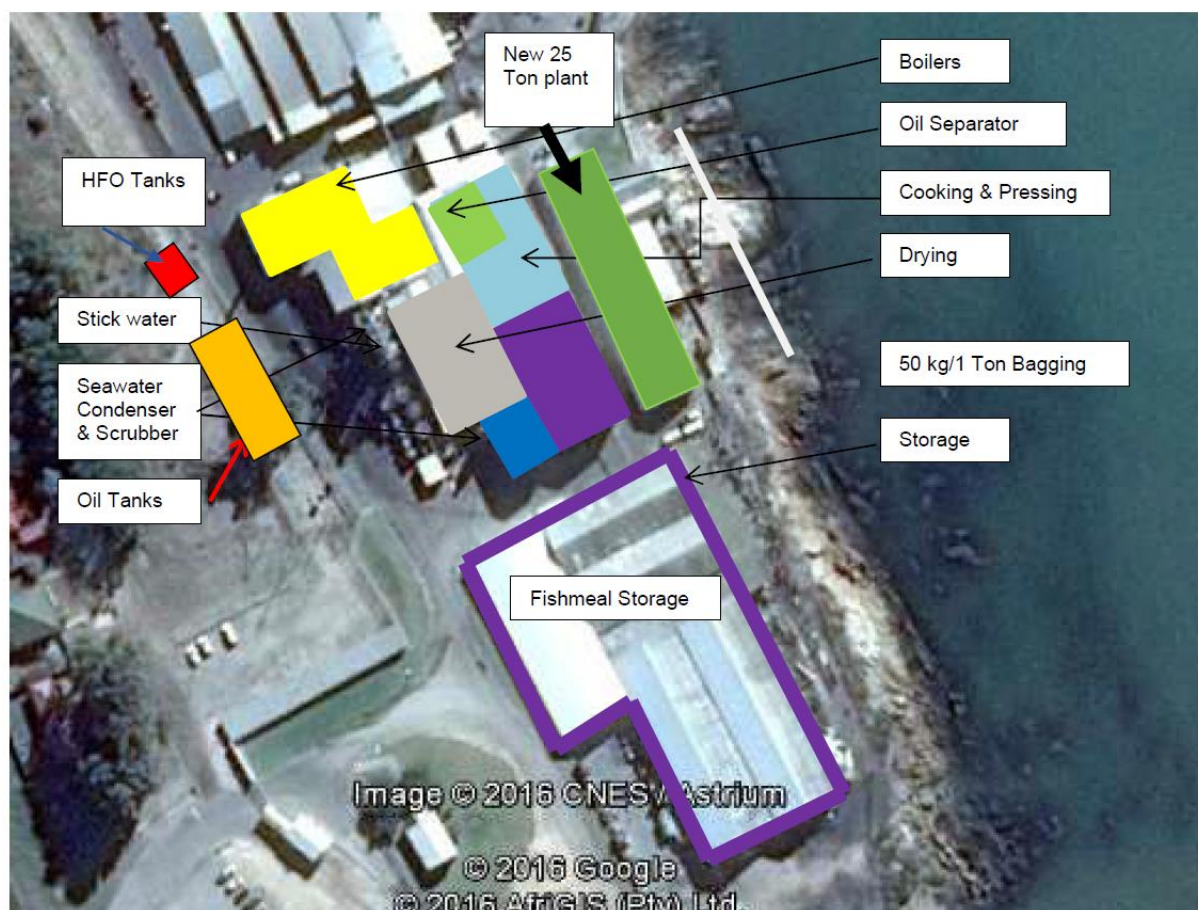


Figure 7: Site layout of West Point Processors

NB: Indicate clearly on the above graphics the listed activity or activities applied for in this application. Alternatively, provide additional graphics for the listed activity or activities applied for.

5 RAW MATERIALS AND PRODUCTS

Provide raw material information, production and by-production rates and emissions information.

5.1 Raw materials used

Raw Material Type	Design Consumption Rate (Quantity)	Actual Consumption Rate (Quantity)	Units (Tons/annum)
Fish	120 t/h (with future upgrades)	65 t/h	Tons / Hour
Formalin	2.5	1.5	Litre / Tons
Non-Regulated Raw Materials			
Antioxidant in meal (Santiquin)	5	2	Litre / Tons
Antioxidant in oil (Santiquin)	5	2	Litre / Tons

Water	225000	225000	Litre / Hour
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5.2 Production rates

Production Name	Design Production Capacity (Quantity)	Actual Production Capacity (Quantity)	Units (Tons/Annum)
Fish Meal	30	30	Tons / Hour
Fish oil	18	18	Tons / Hour

By-Product Name	Design Production Capacity (Quantity)	Actual Production Capacity (Quantity)	Units (Tons/Annum)
Nil			

5.3 Materials used in energy sources

The applicant must specify the materials used in energy sources, namely, coal, oil, gas or wood.

Materials for Energy	Sulphur Content of the Material (%)	Ash Content of Material (%)	Design Consumption Rate (Quantity)	Actual Consumption Rate (Quantity)	Units (Quantity/ Period)
Coal	0.25 - 0.8 %	15 – 20 %	7.7	4 - 13	Tons / hour
Electricity	N/A	N/A	N/A	3.5 (Plus additional 2 MVA)	MW / hour
HFO	0.2 %	0.4 %	1.5	0.9 – 3.0	Tons / hour

5.4 Sources of atmospheric emission (including all tiers of greenhouse gas)

Provide emissions averaging periods that correspond to the averaging periods as set out in the national ambient air quality standards published under Government Notice No. 1210, Gazette No. 32816 dated 24 December 2009, and/or the minimum averaging periods of the relevant pollutant in relation to its health impact.

5.4.1 Point source parameters

Unique Stack ID (SV)	Stack Name	Latitude (decimal degrees)	Longitude (decimal degrees)	Height of Release Above Ground (m)	Height Above Nearby Building (m)	Diameter at Stack Tip / Vent Exit (m)	Actual Gas Exit Temperature (°C)	Actual Gas Volumetric Flow (m³/hr)	Actual Gas Exit Velocity (m/s)
SVPS1	20T Coal Boiler	-32.776609	18.049740	31	18.8	1.1	197	39888	11.66
SVPS2	HFO Boiler	-32.776510	18.049594	20	4	1.4	220	17000	6.6
SVPS3	HFO Boiler	-32.776490	18.049646	16	8.5	1.2	220	17100	7.0
SVPS4	Chemical Scrubber Stack	-32.776604	18.050106	11	2	1.5	35	54000	2
SVPS6	16T Coal Boiler	-32.776552	18.049502	15	6	1.2	210	45000	9.2
SVPS7	Chemical Scrubber (new 25 t/h plant)	-32.776648	18.050536	15	5	0.5	29	3989	5.65
SVPS8	20T Coal Boiler	-32.776453	18.049837	31	18.8	1.1	197	39888	11.66
SVPS9	20T Coal Boiler	-32.776477	18.049763	31	18.8	1.1	197	39888	11.66

*Point source means a single identifiable source and fixed location of atmospheric pollution, e.g. stack, chimney, etc.

5.4.2 Point Source Emissions

Provide emission values as being measured under normal conditions of 273 K, 101.3 kPa, specific oxygen percentage and dry gas.

The actual data was obtained from the first stack testing conducted in May 2025.

As per 5.4.1 Stack ID	Pollutant Name	Maximum Release Rate				Emissions Hours	Type of Emissions (Continuous / Routine but Intermittent / Emergency Only)
		(mg/Nm ³)	(mg/Am ³)	g/s	Averaging period		
SVPS1	PM	250	149 (actual)	-	1 hour	24 hours	Continuous
	SO ₂	2800	639 (actual)	-	1 hour	24 hours	Continuous
	NO _x	-	241 (actual)	-	1 hour	24 hours	Continuous
	CO	-	135 (actual)	-	1 hour	24 hours	Continuous
SVPS2	PM	-	-	-	1 hour	24 hours	Continuous
	SO ₂	-	-	-	1 hour	24 hours	Continuous
	NO _x	-	-	-	1 hour	24 hours	Continuous
	CO	-	-	-	1 hour	24 hours	Continuous
SVPS3	PM	-	-	-	1 hour	24 hours	Continuous
	SO ₂	-	-	-	1 hour	24 hours	Continuous
	NO _x	-	-	-	1 hour	24 hours	Continuous
	CO	-	-	-	1 hour	24 hours	Continuous
SVPS4	H ₂ S	5	1.05 (actual)	-	1 hour	24 hours	Continuous
SVPS6	PM	250	235 (actual)	-	1 hour	24 hours	Continuous
	SO ₂	2800	635 (actual)	-	1 hour	24 hours	Continuous

As per 5.4.1 Stack ID	Pollutant Name	Maximum Release Rate				Emissions Hours	Type of Emissions (Continuous / Routine but Intermittent / Emergency Only)
		(mg/Nm ³)	(mg/Am ³)	g/s	Averaging period		
	NOx	-	301 (actual)	-	1 hour	24 hours	Continuous
	CO	-	66 (actual)	-	1 hour	24 hours	Continuous
SVPS7	H2S	5	-	-	1 hour	24 hours	Continuous
SVPS8	PM	250	-	-	1 hour	24 hours	Continuous
	SO2	2800	-	-	1 hour	24 hours	Continuous
	NOx	-	-	-	1 hour	24 hours	Continuous
	CO	-	-	-	1 hour	24 hours	Continuous
SVPS9	PM	250	-	-	1 hour	24 hours	Continuous
	SO2	2800	-	-	1 hour	24 hours	Continuous
	NOx	-	-	-	1 hour	24 hours	Continuous
	CO	-	-	-	1 hour	24 hours	Continuous

5.4.3 Point source current emissions monitoring

Provide information on emission monitoring requirements.

[illegible]

5.4.4 Point source emission estimation information

[illegible]

As per 5.4.1 Stack ID	Basis for Emission Rates

5.4.5 Emission Unit: Area and/or line source parameters

Unique Area Source EU ID	Source Name	Source Description	Latitude (decimal degrees) of SW corner	Longitude (decimal degrees) of SW corner	Height of Release Above Ground (m)	Length of Area (m)	Width of Area (m)	Angle of Rotation from True North (°)
AS1	Coal Storage Bunker	Storage area for coal	-32.776698	18.049604	0	25	30	-
AS2	Coal Ash Storage Area	Storage area for coal ash	-32.776579	18.049427	0	25	25	-
AS3	Fish Storage Pits	Storage area for fish pending processing	-32.774419	18.049976	6	40	20	-
AS4	Bag Filters	Filtering the dust from the hammer mills air flow.	-32.776766	18.050259	12	15	16	-

Unique Area Source EU ID	Source Name	Source Description	Latitude (decimal degrees) of SW corner	Longitude (decimal degrees) of SW corner	Height of Release Above Ground (m)	Length of Area (m)	Width of Area (m)	Angle of Rotation from True North (°)

*Area source means air pollution source from a specified area, e.g., pollution from a landfill site, fugitive dust from a process.

*Line source means a moving source of pollutants, e.g., motor vehicles.

5.4.6 Area and/or line source emissions

As per 5.4.5 EU ID	Pollutant Name	Maximum Release Rate (quantity per period)	Average Annual Release Rate (quantity per period)	Emission Hours	Type of Emission (Continuous / Intermittent)	Wind Dependent (Yes / No)
AS1	PM ₁₀	285 µm/m ³	85.5 mg/year	24 hours	Continuous	Yes
AS2	PM ₁₀	285 µm/m ³	85.5 mg/year	24 hours	Continuous	Yes
AS3	H ₂ S	0.87 mg/m ³	261 mg/year	24 hours	Continuous	Yes
	NH ₃	2.6 mg/m ³	780 g/year	24 hours	Continuous	Yes

[illegible]

5.4.7 Area and/or line source – management and mitigation measures

Provide information on management and mitigation measures.

As per 5.4.5 EU ID	Description of Specific Measures	Timeframe for Implementation of Specific Measures	Method of Monitoring Measure Effectiveness	Contingency Measure
AS1	Coal Storage bunker containment in bunker, operator to avoid spillage, maintenance, no material is to accumulate outside this area	Already in place	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place	If issue is identified, line manager is notified to rectify immediately, check the following week by ECO
AS2	Coal Ash Storage Area containment in bins or bags, regular removal by contractor. Call for removal when 70% capacity is reached to avoid overflow.	Already in place	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place	If issue is identified, line manager is notified to rectify immediately, check the following week by ECO
AS3	Fish Storage Pits - Regular cleaning, keep covered and contained and maintained, keep all surfaces smoothed out. All raw and waste material must be processed during a specific shift and no build-up of material allowed.	Already in place	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place	If issue is identified, line manager is notified to rectify immediately, check the following week by ECO
AS4	Bag filters are regularly cleaned and replaced on monthly basis	Already in place	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place	If issue is identified, line manager is notified to rectify immediately, check the following week by ECO

As per 5.4.5 EU ID	Basis for Emission Rates

6 APPLIANCES AND MEASURES TO PREVENT AIR POLLUTION

6.1 Appliances and control measures

Provide information on appliances and measures implemented to prevent air pollution for the entire operation at the site of the works, highlighting information for listed activity or activities proposed in respect of this application.

Appliances				Abatement Equipment Control Technology							
Associated Unique Stack ID	Appliance / Process Equipment Number	Appliance Type / Description	Appliance Serial Number	Abatement Equipment Manufacture Date	Abatement Equipment Name and Model	Abatement Equipment Technology Type	Commission Date	Date of Significant Modification / Upgrade	Design Capacity	Minimum Control Efficiency (%)	Minimum Utilization (%)
PS1	20T Boiler #5	20T Coal Boiler	72106	2021	Grid Arresster	Separator	2021	2021	12 m³/s	98	98
PS4	FMP #1	Fish Meal	N/A	2014	Seawater and	Seawater	2017	2017	3.3 m³/s	90	90

[illegible]

6.2 Start-up, maintenance and shut-down conditions

List potential start up, maintenance, shut down, upset conditions and associated responses related to the operations at the site of the works, highlight possible releases and responses for the proposed listed activity or activities in respect of the current application.

Emission Unit	Description of Occurrence of Potential Releases	Pollutants and associated amount of emissions	Briefly Outline Back Up Plan
PS1	Black smoke during boiler start-up	PM, max 250 mg/Nm ³	After 60 minutes, stop the boiler if the abnormality does not stop and repair the breakage.
PS2	Less than one hour of max 17 000 m ³ /hr @ 7 m/s	> 150 mg/Nm ³ of PM ₁₀ > 4500 mg/Nm ³ of SO ₄	After 60 minutes, stop the boiler if the abnormality does not stop and repair the breakage.
PS3	Less than one hour of max 17 000 m ³ /hr @ 7 m/s	> 150 mg/Nm ³ of PM ₁₀ > 4500 mg/Nm ³ of SO ₄	After 60 minutes, stop the boiler if the abnormality does not stop and repair the breakage.
PS4	Elevated odour due to the lowered scrubbing efficiency	H ₂ S, max 5 mg/Nm ³	Scale back or halt operation if <ul style="list-style-type: none"> - Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention with NEM:AQ relating to control of offensive odours - When critical control points such as odour control equipment is non-functional or requires maintenance
PS6	Black smoke during boiler start-up	PM, max 250 mg/Nm ³	After 60 minutes, stop the boiler if the abnormality does not stop and repair the breakage.
PS7	Elevated odour due to the lowered scrubbing efficiency	H ₂ S, max 5 mg/Nm ³	Scale back or halt operation if <ul style="list-style-type: none"> - Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention with NEM:AQ relating to control of offensive odours - When critical control points such as odour control equipment

[illegible]

6.3 Routine reporting and record-keeping

6.3.1 Complaints register

Is there a complaints register maintained on site?

X	Yes	
	No	
	To be initiated, by date:	

Please provide a copy of complaints received and corrective actions taken over the past two years.

7. DISPOSAL OF WASTE AND EFFLUENTS ARISING FROM ABATEMENT EQUIPMENT CONTROL TECHNOLOGY

Provide the following information for any waste and effluent arising from abatement equipment control technology that are currently in place at the site of the works:

Unique Stack or Area ID (As per 5.4.1 or 5.4.5 above)	Waste / Effluent Type	Hazardous Components Present	Method of Disposal
PS1, PS6, PS8, PS9	Fly Ash	Dust	Collect in bags and remove together with coal ash
PS4, PS7	Used seawater	H ₂ S	Discharged to the sea

