



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

WESTERN CAPE REGION

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WULA Ref no: WU40913

INTERNAL MEMO

Attention: Stuart Barrow

REQUEST FOR COMMENTS IN TERMS OF SECTION 21 C&I WATER USES FOR THE PROPOSED EXPANSION OF THE FUEL STORAGE FACILITY ON ERF21594, KRAAIFONTEIN

Reference is made to a pre-application meeting conducted 21/01/2025. The comments provided are only related to section 21 (c) and (i) water uses as defined in the National Water Act (Act 36 of 1998).

The documents reviewed are:

- i. Aquatic Ecosystem Assessment Report compiled in July 2024 updated February 2024 by Freshwater Consulting
- ii. Risk Assessment Matrix compiled June 2024 by Stuart Barrow

Background information

MOOV Fuel (Pty) Ltd (applicant) operates a fuel and lubricants storage and distribution facility on property described as Erf 21594, Kraaifontein. The applicant intends increasing their on-site storage capacity of petroleum products by an additional 2 454m³ to ensure strategic stock of petroleum products to prevent supply disruptions and improve supply efficiency.

The proposal will entail the removal of two existing diesel aboveground storage tanks (ASTs) with a combined capacity of 46 m³ and installation of three new ASTs with a combined capacity of 2 500 m³, with the configuration as follows:

- i. 2 x 1 000 m³ aboveground tanks for the storage of diesel; and
- ii. 1 x 500 m³ aboveground tank for the storage of petroleum

Discussion & Recommendations

The proposed above ground storage tanks are limited to the existing developed footprint that is bunded with impermeable floor lining. An authorisation in terms of section 21c&i water uses stipulated on the National Water Act 1998 (Act 36 of 1998) as Amended is thus not triggered. It must however be noted that additional activities out of the existing developed footprint must be applied for and obtained prior to commencing with the activities by following <https://www.dws.gov.za/ewulaas/>



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As a pollution preventative measure, the bunded area is designed to accommodate 1 000m³ of diesel spill. Furthermore, a leak detection system will be installed on the tanks.

No surface, ground or storm water may be polluted as a result of activities on the site. In the event that pollution does occur, this Department must be informed immediately. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources. All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding pollution management must be always adhered to.

This Directorate reserves the right to amend and/or add to the comments made above in the light of subsequent information received.

Please do not hesitate to contact the above office should there be any queries.

Sincerely,

Lelethu Zepe (Pri.Sci.Nat)
Resource Protection
Date: 24/03/2025

