

ANNEXURE A:

MODIFIED DIRECTIVE COMPLIANCE AUDIT

Case: Pollution of the Diep River Estuary and Milnerton Lagoon

Reference Number: 14/1/1/E1/1/2/3/0627/19

Date of Directive: 21/09/2020

Date of Modified Directive: 22/01/2021

DEA&DP Special Notes:

1. Column labeled “Directive Conditions”

- 1.1. Wording highlighted in **red** is the wording of the original Directive dated 21/09/2020.
- 1.2. Wording highlighted in **black** is the additional points/amendments added in the modified Directive date 22/01/2021.

2. Column labeled “Comments”

- 2.1. City's comments in **blue** and **dark red**.
- 2.2. DEA&DP's response to City's comments in **orange**.

No.	Directive Condition	Compliant/ Partial compliant/ Non- compliant	DEA&DP initial Comments	City's Comments/ Response	DEA&DP's Response to City's comments
1.	<p>5.1.1. Ref: Diep 111 (Item no. 801 - 803) – expedite the investigation of illicit discharge into the stormwater drainage systems and surrounding water courses, and submit a report of the City's findings and proposed actions to prevent ongoing pollution to the Department within 60 (sixty) calendar days of receipt of this Directive;</p>	<p>PARTIALLY COMPLIANT</p>	<p>(See report from City dated 23 March 2021)</p> <p>Item 801: Investigate & regulate illicit discharges into the stormwater drainage systems, rivers and water bodies. The various activities regarding the investigation and regulation of illicit discharges into the Lower Diep river have been documented and submitted to DEA&DP (Annexure A)</p> <p>Item 802: Investigate & regulate racehorse facilities at Milnerton Racehorse Stables. This investigation was concluded in 2020 and the report and photographic evidence were submitted to DEA&DP (Annexures B1 and B2).</p> <p>Item 803: Montague Gardens industrial illicit discharge. The engagement with DWS was undertaken on 10 & 11 November 2020 (Annexure A).</p>	<p>Item 801: Complete & Compliant</p> <p>Item 802: Complete & Compliant</p> <p>Item 803: Complete & Compliant</p> <p>Refer to Ad 3.2.3 and 3.2.4</p>	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>Whilst it is noted that the City is investigating these pollution sources regularly and the City have submitted a report, there are however notable sources of pollution that has not yet been investigated. The representation received thus far, and the investigation into the illegal discharge into stormwater drainage systems, are not adequate in addressing the additional sources of pollution.</p> <p>The City therefore needs to provide an updated report that contains an action plan on the investigation into illicit discharge into the stormwater drainage system and surrounding watercourses, which must include the City's findings and proposed actions to prevent pollution of the Diep River Catchment.</p> <p>The City must submit the updated report within 30 calendar days of receipt of this updated compliance audit report.</p>

No.	Directive Condition	Compliant/Partial compliant/ Non-compliant	Comments	City Response	Implantation
2.	<p>5.1.2. Ref: Diep 113 – submit the revised pollution incident protocols and contingency plans for the Facility, Koeberg and Sanddrift Pump Stations to the Department's Directorate: Pollution and Chemical Management ("D: P&CM") for review and comment, within 30 (thirty) calendar days of receipt of this Directive, to address future incidents which may occur while the upgrade of the aforementioned facilities are in progress;</p>	<p>PARTIALLY COMPLIANT</p>	<p>Incidence protocols and contingency plans submitted in February 2021. Over-arching document & appendices are completed. Work in progress on specific practical implementation protocol to physically deal with spillages. Pollution incident protocols to be revised/ re-drafted covering (i) sewer gravity system, (ii) sewer pump stations, & (iii) WWTW (review) to be submitted by end of October 2021.</p>	<p>i. Sewer Gravity System SOP.</p> <p>Annexure 2A and 2B Pollution Response Protocol is in place, the latest version is attached as Annexure K.</p> <p>ii. Sewer Pump Stations SOP (Koeberg Road PS & Sanddrift East PS)</p> <p>Currently applying the generic protocol however in the process of developing the site-specific protocols. First draft for Sanddrift East PS is aimed to be complete by end August 2021, and for the Koeberg Road Pump Station, first draft completed by end September 2021.</p> <p>iii. Potsdam WWTW</p> <p>Two protocols have been compiled and are in place for the Potsdam WWTW which are attached hereto for the Department's scrutiny, viz.</p> <p>a. Long Pond Emergency Incident Management Protocol (Annexure M)</p> <p>b. General Incident Management Protocol (Annexure N)</p> <p>The City's Pollution Response protocol is currently, being developed further using the "RACI" responsibility assignment matrix to give further practical effectiveness to the implementation of the protocols.</p>	<p>The City is partially compliant with this condition, for the following reasons:</p> <p>The City has submitted the documentation. However, whilst the Department notes that the City is implementing numerous interventions and upgrades, the current contingency plans are not adequate in addressing the ongoing pollution. The current contingency plan outlines to record and sample the pollution, but do not prevent the pollution from occurring.</p> <p>The City is therefore requested to submit an updated contingency plan within 30 calendar days from receipt of this updated compliance audit report.</p> <p>Furthermore, kindly indicate by when the City's Pollution Repose protocol with the "RACI" responsibility assignment matrix will be completed and submitted to the Department?</p>

No.	Directive Condition	Compliant/Partial Compliant/ Non-compliant	Comments	City Response	Comment
3.	<p>5.1.3. Ref: Diep 114 (Item no. 105 – 107) – Update to enable the expediting of the upgrade of the Facility, which must be completed by 31 August 2025, in order to prevent/minimise further pollution of the lower Diep River/ Milnerton Lagoon; The DEA&DP must be kept informed of the progress of the implementation of this measure in the monthly reports that are bring submitted by the City.</p>	<p>PARTIALLY-COMPLIANT</p>	<p>Potsdam WWTW upgrade – in design and tender stage</p> <p>The Potsdam WWTW will be increased from 47MI to 100MI/d upon completion of the upgrade works in 2025. The membrane bioreactor (MBR) will be installed with sufficient.</p> <p>Report from D:P&CM dated 20 April 2021 indicates that plans for Potsdam WWTW upgrade have been put forth and the area for the addition to the plant has already been designed on site. Mr Nell stated that he will be drafting a more detailed timeframe for this upgrade, which will be sent to the Department. Mr Nell indicated that the City would endeavor to comply with the timeframe set in the Directive.</p> <p>The WQIP TAP states that civil/mechanical and electrical works were to start in Jan 2021 – the city has not made mention of any progress in this regard but from the Department's inspections this has clearly not started. The TAP also states that the WW dept was to provide a summary of the project programmes for each of the project phases.</p> <p>The City is not fully compliant in this respect as they have not provided the Department with enough details and seem to be behind project schedule.</p>	<p>Refer to Ad 3.1.2</p> <p>The project programme is attached hereto as Annexure B.</p>	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>The City indicated in the correspondence dated 27 August 2021, that the project upgrades will only be completed by 2028. This is outside of the extended timeframes as per the modified Directive dated 22 January 2021.</p> <p>The Department is therefore concerned that the City will not be able to meet the timeframes specified in the modified Directive. Whilst the City recently indicated a delay in the procurement process (at CoCT-WCG Diep River Task Team meeting held virtually on 22 August 2021) it should be noted that the extended timeframes, as per the modified Directive, has been motivated by the City during the appeal process.</p> <p>The City is requested to advise on what measures has been put in place to expedite the procurement process to meet these timeframes and provide reasons why these timeframes will not be met.</p> <p>The City is requested to submit the above-mentioned reasons within 30 calendar days of receipt of this updated compliance audit report.</p>

No.	Directive Condition	Compliant/ Partially complaint/ Non-compliant	Comments	City Response																						
4.	<p>5.1.4. Ref: Diep 116 (Item 301) – Update to enable the expediting of the upgrade of the Montague Gardens Bulk Sewer Gravity Reticulation Network and screening system by 30 June 2025, in order to prevent sewer network blockages and spillages into the Theo Maria Canal; The City must indicate to the DEA&DP the measures to be undertaken to reduce the blockages as a result of foreign objects entering the sewer reticulation network within 60 Calendar days of this Appeal Directive.</p>	<p>PARTIALLY COMPLIANT</p>	<p>The City employs 17 operational teams in its Region 3 reticulation area which covers Milnerton, Kraaifontein & Brackenfell areas and a sewer reticulation pipe network of 2 603 km. The City produces heat maps from its C3 sewer spill notification system which are used to identify:</p> <p>Areas of the network requiring more frequent or targeted cleaning.</p> <p>Pipes requiring capacity investigation and possible replacement.</p> <p>Areas where awareness interventions such as the City's "Bin it, don't block" campaign door to door education.</p> <p>In terms of the bulk sewer line, a consultant has been appointed and Section 33 process underway with a targeted completion January 2021</p> <p>Koeberg road pump station refurbishment – some of which has been completed (Brian Thomson) and other planned upgrade (Acric Smit) report required. Budget available in 2021/2022. Consultants tender 293C cancelled and planned</p>	<ul style="list-style-type: none"> Quarterly bucket cleaning of main collector sewer (in progress). Focus areas are DuNoon, Joe Slovo/Phoenix, Marconi Beam. Sandtrap De-Silting and Cleaning Sewer Master Plan (currently being reviewed by Master Plan Office) to assess current and future network capacity requirement. Updated Sewer Master Plan will guide the sewer network upgrades. <p>SEWER BLOCKAGES EDUCATION AND AWARENESS CAMPAIGN An awareness campaign related to incidents of sewer blockages and overflows into the stormwater systems was conducted using loudhailers in Joe Slovo, Phoenix and Du Noon areas.</p> <p>Refer to Ad 3.1.2</p> <p>The project programme is attached hereto as Annexure C.</p> <p>All suction isolation valves on the system have been replaced, completed 30 June 2021.</p> <p>Manual screening as a temporary screening measure has already initiated.</p> <p>Anticipated completion date 30 November 2021.</p> <table border="1" data-bbox="1249 1360 2273 1738"> <thead> <tr> <th>Pump station</th> <th>Activity</th> <th>Actioned</th> </tr> </thead> <tbody> <tr> <td>Koeberg pump station</td> <td>Replacement Valve Isolation System</td> <td>Yes</td> </tr> <tr> <td></td> <td>Manual bar screening</td> <td>No</td> </tr> <tr> <td></td> <td>Preventive maintenance – 2020/21</td> <td>Yes</td> </tr> <tr> <td></td> <td>Equipment monitoring</td> <td>Yes</td> </tr> <tr> <td></td> <td>Pump station performance monitoring</td> <td>Yes</td> </tr> <tr> <td></td> <td>Standby power supply</td> <td>Yes</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Implementation of RIMA to manage service requests and track response time (continuous improvement of Service Delivery) Request submitted to Projects Office to re-prioritize Sewer Master plan to include Table View Bulk Sewer 	Pump station	Activity	Actioned	Koeberg pump station	Replacement Valve Isolation System	Yes		Manual bar screening	No		Preventive maintenance – 2020/21	Yes		Equipment monitoring	Yes		Pump station performance monitoring	Yes		Standby power supply	Yes	<p>The City is partially compliant with this condition, for the following reasons:</p> <p>While the Department acknowledges that the City employs operational teams to address day-to-day pollution sources, the current measures are not adequate. The City is requested to improve on the short to medium-term pollution prevention measures in order to reduce the sewer network blockages. The City is requested to provide the Department with updated and alternative measures to improve on the current short to medium-term measures which are already in place to further reduce blockages in the sewer network.</p> <p>It is noted that the City is also unable to meet this extended timeframe as per the modified Directive, dated 22 January 2021. The City is requested to advise what measures has been put in place to expedite the current procurement process in order to meet the timeframe as stipulated in the modified Directive.</p> <p>The City is requested to submit the above-mentioned reasons within 30 calendar days from receipt of this updated compliance audit report.</p>
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Koeberg pump station	Replacement Valve Isolation System	Yes																								
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			<p>refurbishment design to start after September 2021 when the replacement tender is awarded.</p>	<ul style="list-style-type: none"> To commence earlier than 2025 Dedicated sewer crew is operating daily in DuNoon Quarterly bucket cleaning of main collector sewer (in progress). Focus areas are DuNoon, Joe Slovo/Phoenix, Marconi Beam. Sandtrap De-Silting and Cleaning <p>Some of this is ambiguous, as frequent and targeted cleaning will prevent / reduce sewer blockages & spillages?</p>	
5.	<p>5.1.5. Ref: Diep 117 - Update to enable the expediting of the upgrade of the Du Noon and Doornbach Sewer Gravity Reticulation Network (which includes plan, design, and construction of stormwater to sewer diversion/s) by 31 December 2023, in order to prevent sewer network blockages and spillages into the lower Diep River via the stormwater drainage system and the two outflow channels; The DEA&DP must be kept informed of the progress of the implementation of this measure in the monthly reports that are</p>	<p>PARTIALLY COMPLIANT</p>	<p>Electric power supply source investigation completed.</p> <p>City programme dates: 1 July 2020 – 1 June 2023</p> <p>Designs completed by CSRM and approved by Relic – pending budget & project implementation.</p> <p>The City indicated that the project upgrades will only be completed by 2024. This is, however, outside of the extended timeframes as per the modified Directive</p>	<p>Refer to Ad 3.1.2</p> <p>The project programme is attached hereto as Annexure C.</p>	<p><u>The City is partially compliant with this condition.</u></p> <p>Whilst the City is currently compliant with the requirements, the proposed project schedule indicates that the upgrade will only be completed in 2027. This is outside the timeframes indicated in the modified Directive.</p> <p>The City is to provide reasons why these timeframes will or will not be met.</p> <p>The City is requested to submit the above-mentioned reasons within 30 calendar days from receipt of this updated compliance audit report.</p>

	bring submitted by the City.				
6.	<p>5.1.5. Ref: Diep 120 & 122 – Update to enable the expediting of the upgrade of the Koeberg Road Pump Station (which includes plan, design, and construction of stormwater to sewer diversion/s) to be completed by 31 December 2021, in order to prevent/minimise pollution into the lower Diep River/ Milnerton Lagoon via the stormwater drainage system inlets and underground pipes; This measure falls under the Montague Gardens Bulk Sewer Upgrade project to be completed between 1 July 2022 and 1 June 2024.</p>	<p>PARTIALLY COMPLIANT</p>	<p>The City indicated that the project upgrades will only be completed by 2024. This is outside of the extended timeframes as per the modified Directive.</p>	<p>Directive Condition & Comments of DEA&DP <u>underlined</u> are applicable to 5.6 of the September Directive / 4.2.7 of the Modified Directive.</p> <p>DIEP 122 - Koeberg Road Pump Station Upgrade in concurrence with Montague Gardens Bulk Sewer Upgrade 4.2.6.1. Montague Bulk Gardens to be completed between 1 July 2022 and 1 June 2024</p> <p>Refer to Ad 3.1.2</p> <p>The project programme is attached hereto as Annexure C.</p> <p>Koeberg pump station is planned for upgrade in 2022 as per the masterplan, which will include an emergency overflow pond and screening facility.</p>	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>The City indicated that the project upgrades will only be completed by 2028. This is outside of the extended timeframes as per the modified Directive</p> <p>Kindly also advise what measures has been put in place to expedite the current procurement process in order to meet the timeframe as stipulated in the modified Directive.</p> <p>Furthermore, The City indicated that this upgrade is in concurrence with the Montague Gardens Bulk Sewer upgrade. The City is requested to please elaborate on how this will be done.</p> <p>The City is requested to submit the above-mentioned reasons within 30 calendar days from receipt of this updated compliance audit report.</p>

	Progress reports on the implementation of this measure must be included in the monthly reports submitted to the DEA&DP.				
7.	5.1.6. Ref: Diep 121 – Submit the sewer pump station audit report to the Department's Directorate: P&CM for review and comment, within 60 (sixty) calendar days of receipt of this Directive;	PARTIALLY COMPLIANT	<p>The report titled "Pump Station Awareness October 2020 (Potsdam Mekbosstrand and Wesfleur), which covers the City's sewer pump stations in the Diep River Catchment was provided to DEA&DP in the 23 March 2021 report (Annexure C).</p> <p>The City noted in their report that "this report covering the pump station assessment was to gather data and assess conditions by an independent consultant; it does not produce a remedial plan of action and budget schedule. The findings are being used to update the pump station refurbishment" However, the clause/condition only requests an audit report and not a remedial plan of action.</p> <p>Mr Nell stated that he will be drafting a more detailed report on this and his team is currently looking at the risk values and design of the identified critical pump stations. City to Clarify the various reports on this and when</p>	<p>These statements are mistaken, a pump station pollution risk assessment report is being prepared, based on the pump station assessment report findings. The intention of which is to pursue actions that might be proposed to reduce pollution from pump station failures into the Lower Diep River. A preliminary report has been completed and is under review.</p>	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>A completed pump station assessment report is required as well as an update on the proposed actions to reduce pollution from the pump station failures.</p> <p>The City is requested to submit the above-mentioned report within 30 calendar days of receipt of this updated compliance audit report.</p>

			they can be expected by DEA&DP.																										
8.	5.1.7. Action: Increase frequency of refuse collection and area cleaning - submit a plan to the Department's Directorates Waste Management and D: P&CM for approval, within 30 (thirty) calendar days of receipt of this Directive, to address the littering and solid waste pollution occurring through wind dispersion, illegal dumping and within the stormwater drainage systems (including the	PARTIALLY COMPLIANT	<p>(compliant in submitting on time but unclear whether this report included the increased frequency of refuse collection and area cleaning or solid waste management measures in general)</p> <p>IMS catch pit cleaning programme/winter readiness programme in place –Killarney Depot cleans the river/canal banks on a bi-monthly basis, but it is very costly.</p> <p>Twice/monthly frequency cleaning the Bayside canal banks in terms of litter and solid waste</p>	<p>Directive Condition & Comments of DEA&DP <u>underlined</u> are applicable to 5.6 of the September Directive / 4.2.7 of the Modified Directive.</p> <table border="1"> <thead> <tr> <th>Type of Service</th> <th>Area Name and Classification</th> <th>Frequency</th> <th>Exclusion</th> </tr> </thead> <tbody> <tr> <td rowspan="2">240litre wheelie bin collection</td> <td>Dunoon – Formal and Backyard dwellers</td> <td>Once a week</td> <td>None</td> </tr> <tr> <td>Joe Slovo & Phoenix</td> <td>Once a week</td> <td>Backyard dwellers</td> </tr> <tr> <td rowspan="4">Area Cleaning and litter picking</td> <td>Dunoon Formal and Backyard dwellers</td> <td>Daily</td> <td>None</td> </tr> <tr> <td>Dunoon Informal</td> <td>Daily</td> <td>None</td> </tr> <tr> <td>Doornbach Informal</td> <td>Daily</td> <td>None</td> </tr> <tr> <td>Joe Slovo/Phoenix</td> <td>Daily</td> <td>None</td> </tr> </tbody> </table>	Type of Service	Area Name and Classification	Frequency	Exclusion	240litre wheelie bin collection	Dunoon – Formal and Backyard dwellers	Once a week	None	Joe Slovo & Phoenix	Once a week	Backyard dwellers	Area Cleaning and litter picking	Dunoon Formal and Backyard dwellers	Daily	None	Dunoon Informal	Daily	None	Doornbach Informal	Daily	None	Joe Slovo/Phoenix	Daily	None	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>The City's has presented good interventions, relating to swop-shops and interventions where the local community will be involved and take ownership of their settlements, however, the Department has not yet received a detailed report of interventions implemented to assist the City's shortfall of subcontracted services.</p> <p>Whilst it is noted that frequency has been increased there is still a major problem relating to illegal dumping and, pollution within the catchment</p>
Type of Service	Area Name and Classification	Frequency	Exclusion																										
240litre wheelie bin collection	Dunoon – Formal and Backyard dwellers	Once a week	None																										
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	<p>lack of proper waste collection services for "back yard dwellings") within Du Noon, Doornbach and Joe Slovo Park. The plan must include clear action deliverables, proposed budgets and adequate timeframes.</p>		<p>In February 2021 solid waste management measures <u>that are being implemented were submitted to DEA&DP for nets procured but no plan in place for the nets and no interim response plan has been provided to deal with the trapping and clean-up while the planning and identifying of outlets is underway.</u></p> <p>There are still numerous complaints being received regarding dumping, frequency of refuse removal, blockages etc.</p> <p>The current plans in place are not adequate.</p>	<p>The Dunoon/ Doornbach and Joe Slovo areas are serviced via service contract and increased service cannot be provided any more than what is currently provided for as per the Service specified within the contract's scope. The maximum staffing has been allocated and are currently performing the functions they are meant to do within these areas.</p> <p>The City's Solid Waste department current waste management plan provides the following waste management services to Joe Slovo / Phoenix, Doornbach and Dunoon:</p> <p>The current refuse removal and area cleaning plan, excluding the wheelie bin service, is undertaken 7 days a week employing the resources tabled below:</p> <table border="1" data-bbox="1249 520 2288 842"> <thead> <tr> <th>Area</th> <th>Budget</th> <th>Number of workers</th> </tr> </thead> <tbody> <tr> <td>Dunoon (Formal)</td> <td>R 1 004 478.48 per annum</td> <td>15 v</td> </tr> <tr> <td>Phoenix/Joe Slovo (Formal)</td> <td>R 949 887.24 per annum</td> <td>16 v</td> </tr> <tr> <td>Dunoon (Informal)</td> <td>R 8 124 000 per annum</td> <td>90 v</td> </tr> <tr> <td>Phoenix/Joe Slovo (Informal)</td> <td>R 1 034 664 per annum</td> <td>20 v</td> </tr> <tr> <td>Doornbach</td> <td>R 3 674 729 per annum</td> <td>31 v</td> </tr> </tbody> </table> <p>The above plan is supported by the specialised services from the depots on a daily basis to remove illegal dumping. The above services are already undertaken 7 days a week and there is little leeway to increase the frequency thereof.</p>	Area	Budget	Number of workers	Dunoon (Formal)	R 1 004 478.48 per annum	15 v	Phoenix/Joe Slovo (Formal)	R 949 887.24 per annum	16 v	Dunoon (Informal)	R 8 124 000 per annum	90 v	Phoenix/Joe Slovo (Informal)	R 1 034 664 per annum	20 v	Doornbach	R 3 674 729 per annum	31 v	<p>and enforcement of non-compliance with the by-laws.</p> <p>The City's Solid Waste Department will have to provide reasons why areas such as Joe Slovo and Phoenix (i.e. Milky Way Detention Pond and surrounds), that have a negative impact on the Diep River Catchment, are still having problems with litter and waste as was confirmed during recent site inspections conducted by the Department.</p>
Area	Budget	Number of workers																					
Dunoon (Formal)	R 1 004 478.48 per annum	15 v																					
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9.	<p>5.2. Conduct a thorough clean-up of the sludge within the Diep River at the Final Effluent discharge point of the Facility, within 14 (fourteen) calendar days of receipt of this Directive;</p>	COMPLIANT	<p>Report submitted to DEA&DP on 05 February 2021.</p>	Compliant	<u>The City is compliant with this condition.</u>																		
10.	<p>5.3. Add an additional sampling point at Final Effluent discharge point of the Facility (at the point of entry into the Diep River), in order to reflect the water quality of the final</p>	NON-COMPLIANT	<p>During the ICTT meeting with DWS on 13 October 2021 and site inspection at Potsdam with DWS on 20 October 2021, it was indicated that an additional sampling point is not necessary, and that the City should just ensure that they are sampling at all of the outlets. DEA&DP to</p>	<p>Ad 3.1.4: The issue around the media used for the laboratory testing of E.Coli was not an issue of the correct media, but an issue around the availability of the media, which earlier this year was in short supply this did not hinder routine sampling but ad hoc sampling within the City. The City's Scientific Services Branch has confirmed that there is no longer an issue with the supply of the media.</p> <p>DWS approved in their letter dated, 22 June 2021 (Annexure G) that the "official" monitoring point is in the channel after the UV disinfection plant.</p>	<p>Whilst this condition is currently non-compliant. The City indicated that this is not necessary as it will occur in the mixing zone and will give a similar reading as the current sampling point.</p> <p>The DEA&DP will obtain more clarity from the DWS regarding this before making a decision on the enforcement of this condition.</p>																		

	effluent entering the environment.		request DWS to provide their reasons in writing.		
11.	5.4. Effectively seal-off all historical outlets and underground pipes leading from the Facility (including the maturation ponds) into the Diep River, within 30 (thirty) calendar days of receipt of this Directive, and provide proof to the Department within 7 (seven) calendar days after completion;	PARTIALLY-COMPLIANT	<p>The reed beds were opened on 28 June 2021 as authorised by DWS in their letter of 22 June 2021.</p> <p>DWS to motivate for the reed beds to be kept open. Condition needs to be amended – DEA&DP to find out from appeals unit on how this can be done.</p>	<p>Ad 3.2.1: The reed beds were opened on 28 June 2021 as authorised by DWS in their letter of 22 June 2021 (Annexure G) in response to the City's letter of 27 May 2021 (Annexure H).</p>	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>Currently, the DWS has granted the City with permission to open the outlet pipe from the reed beds. Whilst DWS is the competent authority for the WUL at the Potsdam WWTWs (Facility), the DWS approval conflicts with the instruction of the modified Directive.</p> <p>During a site inspection, dated 20/10/2021, and in an email dated 21/10/2021, the DWS was requested to provide the DEA&DP with more clarity on why the reed beds should remain open, and if they are to remain open, what measure should be put in place by the City to address high levels of pollution from exiting the Facility.</p> <p>Based on the above response from DWS, the DEA&DP will consider whether or not to enforce this condition.</p>
12.	5.5. The standby generators must immediately come online in the event of a power outage, and not have 15 – 30 mins delays, and provide proof to the Department within 7	COMPLIANT	Completed –	Compliant	<u>The City is compliant with this condition.</u>

	(seven) calendar days after completion;				
13.	5.6. Implement measures at strategic stormwater outlets to trap all the general waste from flowing into the Diep River and Milnerton Lagoon (e.g. nets at the mouths of stormwater outlets to capture the general waste, as implemented in the Soet River Catchment), within 30 (thirty) calendar days of receipt of this Directive, and provide proof to the Department within 7 (seven) calendar days after completion. These stormwater outlets must be cleaned regularly in order to prevent blockages;	PARTIALLY COMPLIANT	Nets procured. City is currently investigating the correct placement of the nets. It would be wise to place the nets before the stormwater enters underground pipes. City advised that the placement of these nets is dependent on whether the minor works tender carry's through. City to keep DEA&DP updated on this.	Refer to Ad: 3.1.6	<p><u>The City is partially compliant with this condition, for the following reasons:</u></p> <p>As the DEA&DP agrees with the reasoning provided in the meeting dated 1/10/2021 by the City for alternative placement locations.</p> <p>The City is requested to submit the reasoning as to why the location of the nets at strategic stormwater outlets should be changed.</p> <p>The City is to provide a report, which must include the co-ordinates of the locations for the installation of the nets within 30 calendar days from receipt of this updated compliance audit report.</p>
14.	5.7. Submit an Estuary Management Plan for the Milnerton Lagoon, which must address improving the estuary water quality, marine and coastal ecosystem functions and the overall management of the Milnerton Lagoon Estuary, to this Department for comment and the DEFF	COMPLIANT	There currently is an EMP in place however the City has proposed to update the EMP to include some key elements for pollution management. DEA&DPs coastal management has responded on the proposed update of the EMP. The City will further correspond with DEA&DPs coastal management regarding the processes to be followed and what must be included in the EMP.	Compliant	<p><u>The City is compliant with this condition.</u></p>

	for approval, within 60 (sixty) calendar days of receipt of this Directive;				
15.	5.8. Continue to submit to the Department the monthly update reports on the implementation of the Action Plan as indicated in paragraph 5.1., above, which must include the progress of actions outlined in paragraphs 5.1.3 – 5.1.6., 5.3., and 5.5. above, to this Department; and	COMPLIANT		Compliant	<u>The City is compliant with this condition.</u>
16	5.9. Continue to conduct meetings or engagements with affected groups to communicate and inform the communities along the Diep River Catchment of the City's short-, medium and long-term actions contained in the Action Plan, and provide them with copies of the update reports.	COMPLIANT		Compliant	<u>The City is compliant with this condition.</u>