

Fezile Dabi District Municipality John Vorster Road P.O Box 10 Sasolburg, 1947

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Aiming above the horizon

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Atmospheric Emissions Licence Holder: NATREF (PTY) LTD.

Atmospheric Emissions Licence Reference Number: FDDM-MET-2013-17-P1

ATMOSPHERIC EMISSIONS LICENCE ISSUED IN TERMS OF SECTION 13 OF REGULATION No.893 of 22 NOVEMBER 2013 READ WITH43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY AMENDMENT ACT, 2014, (ACT NO. 20 OF 2014)

This Atmospheric Emissions Licence issued to **National Petroleum Refiners of South Africa (Pty) Ltd**in terms of section 13())of the National Environmental Management: Air Quality Amendment Act, 2014 (Act No. 20 of 2014) List of Activities which result in atmospheric emissions which have or may have as significant detrimental effects on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage: Part 2 General, Postponement of compliance time frames.

The licence is issued in respect of following Listed Activities:

- Subcategory 1.2: Liquid fuel combustion installations
- Subcategory 1.4: Gas combustion installations
- Subcategory 2.1: Combustion Installations
- Subcategory 2.2: Catalytic Cracking Units
- Subcategory 2.3: Sulphur Recovery Units
- Subcategory 2.4: Storage and Handling of Petroleum Products
- Subcategory 7.2: Production of acids

The Atmospheric Emissions Licence is issued on the basis of information provided in Natref's, applicationfor postponement to meet certain minimum emissions in terms of Section 11 of National Air Quality Act: Listed Activities and Minimum Emissions Standards submitted to the National Air Quality Officerand information that became available during processing of the application.

The Atmospheric Emissions Licence is valid until 31 March 2020.

The reason for issuance of the current licence isvarying of the Atmospheric Emission License: FDDM-MET-2013-17 to Atmospheric Emission License: FDDM-MET-2013-17-P1.

The Atmospheric Emissions Licence is issued subject to the conditions and requirements set out below which form part of the Atmospheric Emissions Licence and which are binding on the holder of the Atmospheric Emissions Licence, Natref hereinafter referred to as the ("the licence holder").

1. ATMOSPHERIC EMISSIONS LICENCE ADMINISTRATION

Name of the Licensing Authority	Fezile Dabi District Municipality
Atmospheric Emissions Licence Number	FDDM-MET-2013-17-P1
Atmospheric Emissions Licence Issue Date	Date of signature by AQO
Atmospheric Emissions Licence Type	Atmospheric Emission Licence
Review Date, not later than	31 March 2020

2. ATMOSPHERIC EMISSIONS LICENCE HOLDER DETAILS

Enterprise Name	National Petroleum Refiners of South Africa (Pty) Ltd.
Trading as	NATREF
Enterprise Registration Number (Registration Numbers if Joint Venture)	Company
Registered Address	Northern Industries, Jan Haak Road, Sasolburg
Postal Address	P.O Box 234, Sasolburg, 1947
Telephone Number (General)	016 - 940 9111
Industry Sector	Petroleum Refinery
Name of Responsible Officer	Dayanand Rajaram (Senior Vice President)
Name of Emission Control Officer	Carl Scholtz (Vice President: SHERQ)
Telephone Number	016 - 940 2596
Cell Phone Number	083 630 4619
Fax Number	016 940 2503
Email Address	carl.scholtz@natref.com
After Hours Contact Details	0836304619
Land Use Zoning as per Town Planning Scheme	Industrial

3. SITUATION AND EXTENT OF PLANT

3.1 Location and extent of the plant-

Physical Address of the Premises	Northern Industries, Jan Haak Road, Sasolburg
Description of Site (Erf)	N/A
Coordinates of Approximate Centre of Operations	North-south: S26°48'21.46" East-west: E27°51'26.87"
Extent	2.037 km²
Elevation Above Mean Sea Level (m)	1498m
Province	Free State
District Municipality	Fezile Dabi District Municipality
Local Municipality	Metsimaholo Local Municipality
Designated Priority Area	Vaal Triangle Airshed Priority Area (VTAPA)

3.2 Description of Surrounding Land Use within 5 km radius

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.

- North of Natref: Agriculture (Currently limited to horse, cattle & crop farming activities). Boundary of Vaalpark residential area is 2.5 km North of Natref
- South of Natref: Open land owned by Sasol with Zamdela Township 8 km South of Natref.
- East of Natref: Industrial Area occupied by Safripol, SÜD Chemie, Sascrete and Omnia. These industries are all
 within a 1-km radius of Natref with open agricultural farm land 2 to 5 km further East.
- West of Natref: There is partially occupied Light Industrial Area with a truck stop on the south west. The closest residential home is in Sasolburg which is 2 km west of Natref main stack.

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4. GENERAL CONDITIONS

4.1. Process and ownership changes

The holder of the atmospheric emissions licence must ensure that all unit processes and apparatus used for the purpose of undertaking the listed activity in question, and all appliances and mitigation measures for preventing or reducing atmospheric emissions, are at all times properly maintained and operated.

Building, plant or site works related to the listed activity or activities used by the licence holder shall be extended, altered or added subject to the applicable requirements for an environmental authorisation from the competent authority as per the provisions of the National Environmental Management Act 1998 (Act No. 107 of 1998) (NEMA), as amended read with the Environmental Impact Assessment Regulations thereunder. The investigation, assessment and communication of potential impact of such an activity must follow the required assessment procedure as prescribed in the Environmental Impact Assessment Regulations published in terms of section 24(5) of the National Environmental Management Act.

Any changes in processes or production increases which may have an impact on atmospheric emissions, by the licence holder, will require prior approval by the licensing authority.

Any changes to the type and quantities of input materials and products, or to production equipment and treatment facilities which may have an impact on atmospheric emissions will require prior written approval by the licensing authority.

The licence holder must, in writing, inform the licensing authority of any change of ownership of the enterprise. The licensing authority must be informed within 30 (thirty) days after the change of ownership.

The licence holder must immediately on cessation or decommissioning of the listed activity inform, in writing, the licensing authority.

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4.2. General duty of care

The holder of the licence must, when undertaking the listed activity, adhere to the duty of care obligations as set out in section 28 of the NEMA.

The licence holder must undertake the necessary measures to minimize or contain the atmospheric emissions. The measures are set out in section 28(3) of the NEMA.

Failure to comply with the above condition is a breach of the duty of care, and the licence holder will be subject to the sanctions set out in section 28 of the NEMA.

4.3. Sampling and/or analysis requirements

Measurement, calculation and/or sampling and analysis shall be carried out in accordance with any nationally or internationally acceptable standard. A different method may be acceptable to the licensing authority as long as it has been consulted, been provided with the documentation necessary to confirm the equivalent test reliability, quality and equivalence of analyses and has agreed to such method.

The licence holder is responsible for quality assurance of methods and performance. Where the holder of the licence uses external laboratories for sampling or analysis, accredited laboratories shall be used.

4.4. General requirements for licence holder

The licence holder is responsible for ensuring compliance with the conditions of this licence by any person acting on his, her or its behalf, including but not limited to, an employee, agent, sub-contractor or person rendering a service to the holder of the licence.

The licence does not relieve the licence holder to comply with any other statutory requirements that may be applicable to the carrying on of the listed activity.

A copy of the licence must be kept at the premises where the listed activity is undertaken. The licence must be made available to the environmental management inspector representing the licensing authority who requests to see it.

The licence holder must inform, in writing, the licensing authority of any change to its details including the name of the emissions control officer, postal address and/or telephonic details.

A definite offset implementation plan to reduce PM and SO₂ pollution in the ambient / receiving environment is to be presented to the NAQO and the licencing Authority by 30 June 2015 and followed by an appropriate public participation process. The conditions associated with this will be included as an annexure to this AEL.

4.5. Statutory obligations

The licence holder must comply with the obligations as set out in Chapter 5 of the Act.

4.6. Annual payment of atmospheric emissions licence processing fee

The licence holder must, for the period of validity of the licence, pay the processing fee annually to the licensing authority. Alternatively the licence holder can pay the emissions licence processing fee once off.

4.7 Variation of Atmospheric Emissions Licence

The Air Quality Officer reserves the right to by notice, in writing, set and adjust the emissions limit value or standards after consultation with the holder.

4.8 Non- Compliance with Conditions

If the holder fails to comply with the conditions or requirements of this Atmospheric Emissions License, the Air Quality Officer may by notice in writing call upon such a holder to comply with such conditions or requirement within a reasonable period specified in the notice, and in the event of failure on the part of such holder to comply with the said conditions or requirement within the period so specified, the Air Quality Officer may cancel the Atmospheric Emissions License or suspend the operation thereof for such period as he or she may deem fit.

NATURE OF PROCESS

5.1. Process description

General

NATREF serves a market that has a limited requirement for heavy fuel oil products. The refinery therefore has a process configuration that allows significant conversion of the bottom-of-the-barrel crude to products, e.g. sulphur, Liquid Petroleum Gas, gasoline, jet fuel, diesel, fuel oil and bitumen. With its inland location and due to the abundance of coal, the refinery's market for heavy fuel oil is quite limited. As a result, it was designed to get the most out of crude oil and equipped with suitable technology. The refinery uses the bottoms up-grading refining process using medium gravity crude oil and giving the refinery the capability of producing 20 percent more white product than other refineries that have market outlets for heavy fuel oil. Conversion of vacuum residue to white products (diesel, petrol, jet fuel and LPG) was a necessity from the start. Thus, in addition to a conventional fluid catalytic cracking (FCC) unit, the refinery is equipped with a Distillate Hydro Cracker (DHC) and black oil Reduced Crude Desulphurisation (RCD) Unit.

The Crude Distillation Unit comprises 4 distillation columns, i.e. the Crude Preflash Column the Crude distillation Column and the Splitter Column and the Splitter Column

Raw Crude Oil (incorporating all fractions from LPG Gas, i.e. C₃, C₄ gas, Light and Heavy Naphtha, Kerosene, Diesel, Gas Oils, Vacuum Gas Oils and Vacuum Residues) is fed into the unit. The Oil feed is heated and at various stages within the plant, different products are fractionated from the feed stream. LPG Gas and Light Naphtha are the first to be separated in the Crude Preflash Column. Within the Crude Distillation Column itself, Heavy Naphtha is recovered at the top, Kerosene at the 2nd product draw tray, Light Diesel at the 3rd product draw tray, Heavy Diesel at the 4th product draw tray and Atmospheric Gas Oil at the 5th product draw tray. The remainder, Atmospheric Residue, is fed through to the Vacuum Distillation Unit. The nameplate design feed of the CDU is 720 m³/h however; this is dependent on the type of Crude fed to the unit.

2 Vacuum Distillation Unit

The Vacuum Distillation Unitcomprises the Vacuum Preflash Column and the Vacuum Column where both columns operate under vacuum conditions Atmospheric Residue is initially fed to the Vacuum Preflash Column where Vacuum Heavy Diesel and Gas Oil are recovered.

Most of the remaining product, Vacuum Preflash Bottoms, is heated further and fed to the Vacuum Column where Medium Vacuum Gas Oil (MVGO), Heavy Vacuum Gas Oil (HVGO) and Slop Wax are recovered. Approximately 12% of the feed is recovered as Vacuum Preflash Bottoms.

The LPG, Light Naphtha and Heavy Naphtha are fed through to the Debutaniser where the LPG (C3's and C4's) are removed. This stream is sent to the LPG Merox for Sulphur Compound Removal.

The Light and Heavy Naphtha fractions are split in the Splitter Column. Light Naphtha (LSR) is sent through the LSR Mericat for conversion of mercaptan compounds (sulphur compounds with a strong odour) to disulphides (low smell).

The Heavy Naphtha is routed to the Naphtha Unifiner and Platformer.

Kerosene is routed through the KeroMeroxes for mercaptan conversion and removal of water. It is then routed to final product tanks.

Light Diesel can be routed to Diesel Unifiner or blended into final product.

Heavy Diesel is routed through the Diesel Unifiner in order to reduce the concentration of sulphur.

AGO is route to Distillate Hydrocracker (DHC) for cracking and sulphur removal.

Vacuum Heavy Diesel is routed to the Diesel Unifiner in order to reduce the concentration of sulphur.

Gas Oil and MVGO are routed to the Diesel Unifiner in order to reduce the concentration of sulphur.

HVGO is normally routed to the FCC for cracking.

VR is routed to RCD for metals, nitrogen and some sulphur removal and part cracking.

3 The LSR Mericat

The LSR Mericat is used to convert the mercaptans in the LSR (light Naphtha)

4 KeroMerox

The KeroMeroxis used to convert mercaptans present in Kerosene into disulphides.

5 Bitumen Blower

The Bitumen bloweris used to change the penetration grade of Bitumen feed (VR) to a new desired penetration grade.

6 Sour Water Stripper (SWS) -

The Sour Water Stripper (SWS)is used to remove H₂S and NH₃ from different process waters produced as by-products within the refinery.

7 Fluid Catalyst Cracking (FCC) -

The Natref FCC is a resid-type cracker, whereby the predominant part of the FCC feed is resid material, i.e. RCD products (HFL + CFL) and RCD's feed is AR + VR (atmospheric residue + vacuum residue).

The resid material is converted to various products in the reactor. Predominant reactions are cracking reactions whereby paraffins are converted to shorter paraffin's and olefins. The various products that are produced from the reactor undergo separation and processing via the main column and Gascon unit. The products from the FCC are the following:

- Tailgas to Fuelgas System
- LPG to Alkylation Unit
- LFCC to Petrol Blending
- LCO to Diesel Unifiner or Fuel Oil
- Slurry to Fuel Oil or Sasol Carbo Tar for the production of anode coke.

8 Platformer

The Naphtha Unifiner and Platformer units are designed to upgrade low octane naphtha into high octane motor fuels.

In the complete unit, two different processes are incorporated, Unifying and Platforming.

8.1 Naphtha Unifiner

The main purpose of the Naphtha Unifiner is to remove or convert components in the naphtha stock which will have a deleterious effect on the reforming over platinum containing catalyst, thereby contributing to better catalyst performance as well as prolonging the Platformer catalyst life.

Unifining is a hydrogenation process (hydrogen consuming) employing a catalyst

8.2 Platformer Unit

Platforming is a catalytic reforming process employing a select catalyst, to convert low quality and straight run naphtha in the presence of hydrogen, into high octane motor fuel.

Octane improvement, the main function of the platforming process is brought about by the chemical re-arrangement of the low octane molecules into hydrocarbon components of a high octane value.

9 Diesel Unifiner

Diesel unifining is a catalytic refining process employing alow-sulphur diesel catalyst, together with a hydrogen rich gas to:

- decompose sulphur, nitrogen, oxygen compounds
- to remove metallic compounds found in the hydrocarbon fractions and
- to provide hydrogen saturation of olefinic compounds found in the feedstock.

Diesel unifiner is mainly employed to refine high sulphur diesel product to low sulphur.

The charge stock improvements are attended to with little or no volume yield loss.

Feed to the unit can be from either or all of the following to obtain saleable diesel oil on the consumer market:

- Atmospheric gas oil from the crude distillation unit
- Diesel oil from the crude distillation unit

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 Light cycle oil (a diesel fraction) from the main column of the FCC (Fluid catalytic cracking unit) can be blended with AGO or diesel as a valuable diesel blending component.
 Because of the high sulphur content and the unsaturated nature of the light cycle oil and with the high heat of reaction in the reactor accompanying the use of LCO, it is advisable to use LCO only as a feedstock to the diesel unifiner.

Feed to the diesel unifiner can also be straight run kerosene from the CDU ex storage to make aviation, power or illumination kerosene. Kerosene is only charged to the unit on its own.

The diesel unifiner catalyst employed is the same as that employed in the naphtha unifiner and the reaction processes are similar in activity and results.

One important fact which should be understood at the outset is that the gas streams associated with the diesel unifiner contain high concentrations of hydrogen sulphide (H₂S) an extremely toxic and hazardous gas.

The gas stream which contains a high concentration of H_2S is routed to the Amine section which absorbs the H_2S from the gas then recycled back to the reactor with the hydrocarbon. The H_2S rich amine is then routed to the Amine unit where the H_2S is stripped off and routed to Sulphur Unit.

10 Reduced Crude Desulphurisation(RCD) -

The Reduced Crude Desulphurisation (RCD) process is a catalytic hydrogenation process, which upgrades the heavy petroleum fractions by removing contaminants (sulphur, metals, etc.). Feed to the RCD unit can be obtained from the following sources:

- VR and AR from storage
- AR as rundown from CDU

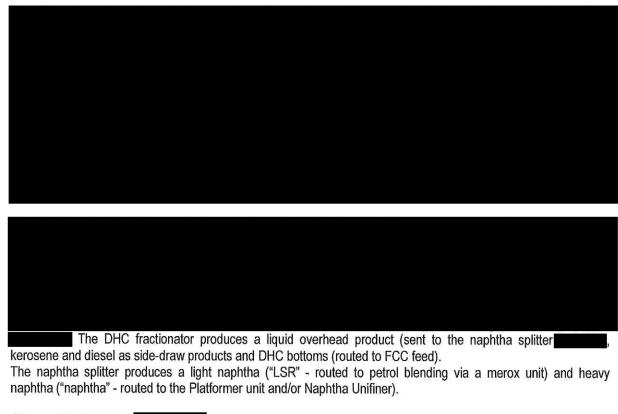
Hydrogen rich recycle gas is heated in the reactor charge heater and is combined with the residue feed which then enters the guard reactor. The reactor system consists of 4 reactors and five catalyst beds. The first two reactors are responsible for demetalization. The third reactor contains transition catalyst for both demetalization and sulphur removal. The final reactor consists of two catalyst beds which remove sulphur and reduce Conradson carbon.

After the reactor section, the product enters a fractionation section. Here the liquid and vapour streams pass through a series of flash drums to obtain the following:

- Recycle gas which is scrubbed and sent to the recycle gas compressor. Make-up hydrogen is also fed into the recycle gas loop.
- Off gas which is sent to the Amine treatment unit
- Cold flash liquid which can be routed to the FCC
- Hot flash liquid which is the main feed source of the FCC.
- Sour water which is sent to the wastewater stripper.

11	Distillate Hydro Cracker	(DHC) -	
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Fresh feed to the Distillate Hydro Cracker (DHC) is brought into the unit from storage or directly from the CDU. After the feed is filtered it passes into the surge drum. The high pressure feed pump takes suction from the feed surge drum. Its discharge combines with the net recycle gas and make-up hydrogen.



12 HF Alkylation

The aim of the alkylation unit is to produce high octane motor fuel. The HF alkylation unit receives its feed supply of olefinic material from the Olefin depropaniser to the alkylation reactor system while isomerate from the butamer unit and saturated feed from other refinery sources bypass the reaction process and is charged directly to the isostripper.

The normal butane in these olefin-free streams is enriched with iso-butane in the iso-stripper, the iso-butane being used along with the olefinic material from storage as feed to the alkylation reactor.

Commercially, alkylation processes usually take place in the presence of a strongly acidic catalyst such as hydrofluoric acid, sulphuric acid, phosphoric acid or aluminium chloride. In Natref however, hydrofluoric acid (HF) is used.

In addition to the alkylate produced, normal butane used as a feed to the butamer and propane as a marketable product is also produced.

13 Butamer

The butamer unit is designed to convert normal butane feed into an isomerate product, rich in isobutene. This is accomplished by catalytic isomerisation in which the normal butane feed along with a hydrogen gas recycle is passed through two fixed bed reactors in series.

passed through two fixed bed reactors in series.

14 Olefin Depropaniser and PPU4

This section consists of the olefin depropaniser and the PPU4 units.

14.1 Olefin Depropaniser

The olefin depropaniser receives its ol	lefinic feed from sphere	 The purpose of this 	unit is to separate the
C3's (propane and propylene) from the	C4's (butanes). The overl	heads of this unit (C3's) are	e sent to the PPU4 and
a portion of this stream	is sent to the alkylation uni	t. The bottoms of the olefing	depropaniser are sent
to the alkylation unit.			

14.2 PPU4

This unit receives the C3's (mixture of propane and propylene) from the olefin depropaniser overheads. The feed is passed through a C2/C3 splitter where the light ends (C2's) are sent to the fuel gas. The C3's are then sent to the C3=/C3- (propylene/propane) splitter where the propylene is separated from the propane. The overheads of the C3=/C3- splitter is propylene and this is sent to either majority of the time) or to the alkylation unit (when the propylene is offspec

The bottom of the C3=/C3- splitter has 3 routings:

- this is propane in the vapour phase
- Fuel gas this is propane in the vapour phase
- · Alkylation unit this is propane in the liquid phase

15 Amine Treating

15.1 No. 1 Amine unit:

The Sat gas and unsatgas fromall the different producers (DHC/FCC etc) are routed to this unit; the amine unit is used for stripping off the H_2S from the Sat / Unsat Gas, using MEA. The H_2S -rich stripped gas is routed to the Sulphur unit.

The first priority routing for the Sat gas is as feed to the Hydrogen unit (via a caustic wash column which removes any remaining H₂S).

The remaining Sat Gas and Unsat gas is then routed to the refinery fuel gas pool.

15.2 No. 2 Amine unit:

This unit works on the same principle as the No1 Amine unit, however the feed to the unit is only from the RCD. The unit strips off any H_2S in the gas, and the H_2S -free gas is recycled to the RCD. The H_2S -rich gas is also routed as feed to the Sulphur plant.

16 Reformer

The objective of the unit is to produce hydrogen (at a certain minimum H₂ purity level), for consumption by consumers (DHC/RCD/DU/Butamer).



The H₂ product is then routed to a last reactor where any remaining CO₂ is converted back to methane (CO₂ is harmful to the downstream users).

17 Sulphur Recovery

This section consists of the Claus Sulphur Recovery Unit.

17.1 Claus unit

The purpose of the Sulphur Recovery Unit is to convert H_2S rich gas received from the Amine Units and the Sour Water Stripper Offgas to elemental sulphur. The H_2S rich gas is passed through a combustion chamber in a reductive atmosphere with oxygen. The temperature in the combustion chamber is kept at high levels in order to destroy the ammonia impurities entering the plant together with the feed.

A portion of the H₂S rich gas is converted to SO₂ to achieve a 2:1 H₂S:SO₂ ratio. This ratio is required to ensure maximum conversion to elemental sulphur in the reactors of the Unit. Through a series of condensers, the 2-stage Claus reactors and a control system linked to a tail gas analyser, the plant is able to achieve average recovery efficiencies of 95% when process conditions are within normal parameters.

The Offgas is combusted through a tail gas incinerator where all the remaining H₂S is converted to SO₂ before being released to atmosphere through the main stack. During emergency situations or low feed availability, the H₂S rich gas is routed to B24001, B24002 and the Sour Water Stripper Offgas is routed to B12002 Any excess gas is flared through the No. 3 flare system.

The liquid sulphur is drained into the sulphur pit where temperature is maintained at ± 140 °C using steam coils and tracing in the lines. The liquid sulphur is then transferred once per day to the dispatch tank from where it is dispatched as such at ± 140 °C to external customers.

18 Storage Facilities

The storage facilities consists of intermediate storage and final storage tanks.

Intermediate and final products may be stored inside fixed roof or floating roof tanks depending on the size of the tank, vapour pressure of the product and the service of the tank. Intermediate product may be used for further processing or for blending into final product from where it may be dispatched via road, rail or pipeline.

Floating roof tanks with a diameter of greater than 20 m are equipped with primary and secondary seals to minimise fugitive emissions.

5.2. LISTED ACTIVITY

Listed Activities, as published in terms of Section 21 of the AQA, authorised to be conducted at the premises by the licence holder:

Category of	Sub-category of the	Listed Activity Name	Description of the Listed
Listed Activity	Listed Activity		Activity
1	1.2	Combustion installations	Liquid fuel combustion installations

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1	1.4	Combustion installations	Gas combustion installations
2	2.1	Petroleum Industry	Combustion Installations
2	2.2	Petroleum Industry	Catalytic Cracking Units
2	2.3	Petroleum Industry	Sulphur Recovery Units
2	2.4	Petroleum Industry	Storage and Handling of Petroleum Products.
7	7.2	Inorganic Chemical industry	Production of acids(Use of HF acid as Catalyst in the Alkylation process)

5.3. UNIT PROCESS OR PROCESSES

List of all unit processes associated with the listed activities to be undertaken at the site of work.

Unit Process	Unit Process Function	Batch or Continuous Process
Crude Distillation Unit	Atmospheric distillation of crude oil	Continuous
Vacuum Distillation Unit	Vacuum distillation is distillation at conditions where the pressure above the liquid mixture to be distilled is reduced to less than its vapour pressure (usually less than atmospheric) causing evaporation of the least volatile liquid(s) (those with the highest boiling points) at lower temperature and hence more energy efficient distillation.	Continuous
Fluidised Catalytic Cracker Unit	The Fluid Catalytic Cracking processes allow for the production of "light" products such as liquid petroleum gas and gasoline from heavier crude oil distillation fractions such as gas oil and residues. Fluid Catalytic Cracking produces a high yield of gasoline and liquid petroleum gas.	Continuous
Merox	Merox treatment is mercaptan oxidation. It is a proprietary catalytic chemical process developed by UOP (Universal Oil Products) and used to remove mercaptans from LPG, Propane, Butane, Kerosene and petrol components by converting the mercaptans to liquid hydrocarbon disulphides.	Continuous
Distillate Hydro Cracker	The Distillate Hydro-cracker Unit catalytically cracks vacuum distillate (lube oil type components) into petrol jet fuel and diesel under a hydrogen partial pressure and a temperature of	Continuous
Diesel Unifiner	The purpose of this unit is to remove sulphur from diesel to reduce the sulphur dioxide (SO ₂) emissions that result from using those fuels in automotive vehicles, aircraft and rail road	Continuous

	locomotives and other forms of fuel combustion.	
Naphtha Unifiner / Platformer	The Naphtha Unifiner removes sulphur and nitrogen compounds and saturate olefins in the light naphtha. The Unifiner uses the hydrogen from platformate to remove the undesirable compounds and supplies the feed to the Platformer. The platforming unit converts the low octane naphtha from Unifiner to high octane reformate by conversion of straight chain compounds into cyclic compounds.	Continuous
Reduced Crude Desulphurisation	The Reduced Crude Desulphurisation unit operates at elevated temperature and pressure The unit catalytically hydro-desulphurises, demetalises and cracks vacuum residue (road tar and heavy fuel oil) into feedstock that can be treated in the fluid catalytic cracking unit where LPG, petrol, kerosene and diesel are produced.	Continuous
Hydrogen Plant and Hydrogen Membrane	At high temperatures and in the presence of a metal-based catalyst , steam reacts with methane to yield carbon monoxide and hydrogen.	Continuous
PPU4	The PPU4 Unit separates propane (sold as a final product) from propylene. The propylene is sold as a feedstock to neighboring industry Safripol.	Continuous
Bitumen Blower	In order to produce bitumen that will soften at a higher temperature than an equivalent penetration Bitumen, severe air blowing is required. The product is therefore also known as 'air-blown' or 'oxidised' bitumen. Typically the blower feedstock has a lower initial boiling point than other bitumen grades.	Batch
Sour Water Stripper	The Sour Water Stripper is used to force both Hydrogen Sulphide and Ammonia out of the water phase into a gas phase. Sulphur is recovered from the gas phase "Acid Gas" in the Claus Sulphur Recovery Unit.	Continuous
Amine Scrubbing and Sulphur Recovery Unit	Hydrogen sulphide present in gas streams is separated by means of selective chemical absorption in the Amine unit and sent to the Sulphur Recovery Unit (SRU) for conversion into elemental sulphur. The resultant "sweet gas" is used as Refinery Fuel Gas. Waste Water Stripper Off gas is also routed to the SRU. The acid gas, rich in H ₂ S, is passed through a combustion chamber to combust ammonia impurities and to convert H ₂ S to liquid sulphur.	Continuous
Alkylation Unit	Alkylation is a process that combines olefins with iso-butane using a catalyst, HF acid in this case, to produce alkylate. Alkylate is highly flammable and is blended into petrol to boost its octane. The unit operates in tandem with the Butamer Unit that produces iso-butane as feed for the Alkylation Unit.	Continuous
Crude, Intermediate, Final Product Tanks, Spheres and Bullets	Storage of raw materials, intermediate and final products used and produced in the refinery.	Continuous
Road and Rail Loading	Facilities for loading road tankers and rail tankers with LPG,	Batch

Facilities	Petrol, Diesel, Jet Fuel, Fuel Oil, Slurry and Bitumen.	
Stacks	Natref has two main stacks, a 145m Main Refinery Stack where refinery off-gasses are vented and a 55m FCCU stack which is used under start-up, shut-down and abnormal operating conditions	Main Stack – Continuous FCCU Stack – Batch
Flares	Flares are used a safety devices to manage abnormal operating conditions and start up and shut down the refinery safely.	Batch

5.4. HOURS OF OPERATIONS

Unit Process	Operating Hours	Days of Operation per Year
Crude Distillation Unit	24-hours/day	365 days/year
Vacuum Distillation Unit	24-hours/day	365 days/year
Fluidised Catalytic Cracker Unit	24-hours/day	365 days/year
Merox	24-hours/day	365 days/year
Distillate Hydro Cracker	24-hours/day	365 days/year
Diesel Unifiner	24-hours/day	365 days/year
Naphtha Unifiner / Platformer	24-hours/day	365 days/year
Reduced Crude Desulphurisation	24-hours/day	335 days/year
Hydrogen Plant and Hydrogen Membrane	24-hours/day	365 days/year
PPU4	24-hours/day	365 days/year
Bitumen Blower	24-hours/day	365 days/year
Sour Water Stripper	24-hours/day	365 days/year
Amine Scrubbing and Sulphur Recovery Unit	24-hours/day	365 days/year
Alkylation Unit	24-hours/day	365 days/year
Crude, Intermediate, Final Product Tanks, Spheres and Bullets	24-hours/day	365 days/year
Road and Rail Loading Facilities	24-hours/day	365 days/year
Stacks	24-hours/day	365 days/year
Flares	24-hours/day	365 days/year

5.5. GRAPHICAL PROCESS INFORMATION

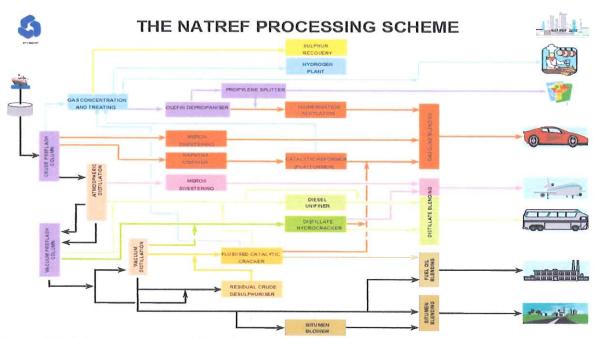


Figure 2: Natref summary process flow diagram:



Figure 3: Natref Site Layout.

6. RAW MATERIALS AND PRODUCTS

6.1. Raw materials used

Raw Material Type	Maximum Permitted Consumption Rate (Quantity)	Design Consumption Rate (Quantity)	Units (quantity/period)
Crude Oil	6 307 200 m3/year	720 m3/h	As indicated

6.2. PRODUCTION RATES

Product Name	Product Name Maximum Permitted Production Capacity (Quantity)		Units (quantity/period)
Petrol (All Grades)			m³/year
Diesel (All Grades)			m³/year
Jet Fuel (incl Paraffin)			m³/year
Bitumen (All Grades)			m³/year
	BY-PROD	UCTS	
By-Product Name	Maximum Production Capacity Permitted (Quantity)	Design Production Capacity (Quantity)	Units (Quantity/Period)
Fuel Oil (All Grades)			m³/year
LPG			m³/year
Propylene			tons/year
Sulphur			m³/year
Carbon Dioxide			tons/year

6.3. MATERIALS USED IN ENERGY SOURCES

Materials for Energy	Sulphur Content of the Material (%)	Ash Content of Material (%)	Maximum Permitted Consumption Rate (Quantity)	Actual Consumption Rate (Quantity)	Units (Quantity/ Period)
Sasol Residual Gas (tail gas)	ş. -	N/A			ton/year
Natural Gas	:-	N/A			ton/year

Fuel Oil	3.8	0.05	ton/year
Fuel Gas	-	N/A	ton/year
Electricity	0	0	MWH/year
Steam	0	0	Ton/year

^{*} Subject to contractual agreement with Sasol
** Subject to contractual agreement with Eskom

6.4. SOURCES OF ATMOSPHERIC EMISSIONS

6.4.1. Point source parameters

Unique Stack ID	Source 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)
U-28008	Refinery Main Stack	26.48.21.72 S	27.51.28.26 E	145	138	5.5	255	700 000	10
N12460-285- 52"	FCC Stack (when CO boiler is offline)	26.48.18.37 S	27.51.27.46 E	55	47	1.32	710	200 000	30
B-29001	Number 1 Flare	26.48.17.58 S	27.51.39.06 E	29	09	To be confirmed	Not applicable	Flame	147.4 m/s; 0.59 Mach
B-29002	Number 2 Flare	26.48.15.57 S	27.51.40.28 E	29	09	To be confirmed	Not applicable	Flame	258.7 m/s; 0.47 Mach
B-29003	Number 3 Flare	26.48.11.77 S	27.51.34.81 E	110	113	To be confirmed	Not applicable	Flame	121.7 m/s; 0.52 Mach
B14001	NU Fired Heater Stack	26° 48' 25.48"	27° 51' 30.24"	26.51	19.5	1.372	400	22600	5.03
B14002	NU Fired Heater Stack	26° 48' 25.03"	27° 51' 30.53"	24.559	17.5	1.016	280	0096	3.29
B14005	NU Fired Heater Stack	26° 48' 24.38"	27° 51' 29.64"	62.0	55	1.866	230	36900	4.21
B14006	NU Fired Heater Stack	26° 48' 23.92"	27° 51' 31.22"	27.419	20.4	1.676	280	18300	2.48
B17004	DHC Fired	26° 48' 23.38"	27° 51' 25.27"	20.016	13	0.914	310	To be	Measurements

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Actual Gas Exit Velocity (m/s)	planned for FY14 after installation of sampling ports.	Measurements planned for FY14 after installation of sampling ports.
Actual Gas Volumetric Flow (m³/hr)	confirmed	To be confirmed
Actual Gas Exit Temperature (°C)		320
Diameter at Stack Tip / Vent Exit (m)		1.518
Height Above Nearby Building (m)		12
Height of Release Above Ground (m)		19.150
Longitude (decimal degrees)		27° 51' 22.28"
Latitude (decimal degrees)		26° 48' 22.55"
Source Name	Heater Stack	Reformer Stack
Unique Stack ID		B25001

6.4.2. Area and/or line source parameters

Width of Area (m)	200	145	540	
Length of Area (m) Width of Area (m)	300	150	029	
Height of Release Above Ground (m)	0	2.0	41	
Longitude (decimal degrees) of SW corner	E27° 51 47,40"		E 27° 51' 19,45"	
Latitude (decimal degrees) of SW corner	S26° 48' 00,81"		S 26° 48' 34,72"	
Source Description	All fugitive emissions from within the API area	All fugitives emissions from final product loading and offloading activities	All fugitives emissions from within this tank farm area	
Source Name	API Area	Final product loading and offloading activities	South Tank Farm (STF): Intemediate Product Storage	
Unique Area Source ID	N/A	N/A	N/A	

Width of Area (m)	500	82
Height of Release Length of Area (m) Width of Area (m) Above Ground (m)	750	200
Height of Release Above Ground (m)	14	14
Longitude (decimal degrees) of SW corner	E27° 51' 08,04"	E27° 51' 06,90"
Latitude (decimal degrees) of SW corner	S26° 48' 12,76"	S26° 48' 29,95"
Source Description	All fugitives emissions from within this tank farm area	All fugitives emissions from within this tank farm area
Source Name	Strategic Fuel Farm (SFF): Final Product Storage	Bitumen loading Area
Unique Area Source ID	N/A	N/A

APPLIANCES AND MEASURES TO PREVENT AIR POLLUTION 7

Appliances and control measures 7.1.

	Minim um Utiliza tion (%)	100%	100%	%56	100 %	100 %
	Minimum Control Efficiency (%)	N/A	N/A	%56	N/A	N/A
	Design Capacity	Nox emission basis (3% 02) <70 mg/Nm³ 22 kw (79.2 MJ/hr)	Nox emission basis (3% 02) <70 mg/Nm³ 22 kw (79.2 MJ/hr)	140 ton/day	Not available	65 t/hr steam
Technology	Date of Significant Modification / Upgrade	2012	2012	Not available	Not available	Not available
pment Control	Commission Date		CallidusScepter 01/12/2012	Not available	Not available	Not available
Abatement Equipment Control Technology	Abatement Equipment Technology Type	Equipment Date Technology Type Callidus Scepter 01/12/2012		Lurgi- Fluor Revamp	Air Products/ AFROX	Babcock
	Abatement Equipment Name and Model	LE-CSGC- 10W Low Nox Burners	LE-CSGC- 10W Low Nox Burners	Sulphur Recovery Plant	CO ₂ Plant	CO Boiler B28001
	Abatement Equipment Manufacture Date	Not available	Not available	Not available	Not available	Not available
	Appliance Serial Number	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Appliances	ssociated Appliance / Appliance Unique Process Type / Stack ID Equipment Description Number	Crude Fired Heater	Crude Fired Heater	Amine Strippers	CO2 Stripper	FCC Regenerat or
App	Associated Appliance / Unique Process Stack ID Equipment Number	B11001A	B11001B	E24005/7	E-25001	D12001
	Associated Unique Stack ID	U-28008	U-28008	U-28008		N12460- 285-52"

POINT SOURCE - MINIMUM EMISSIONS STANDARDS (UNDER NORMAL WORKING CONDITIONS) 7.2.

Duration of	Emissions	Continuous	Continuous			N/A	N/A	
	Average Period	Daily Daily	Daily			N/A	NA	
Maximum Release Rate	Compliance Time Frame	01 April 2015 – 31 March 2018 01 April 2015 – 31 March 2018	01 April 2015 – 31 March 2018			01 April 2015 - 31 March 2020	01 April 2015 - 31 March 2018	
	(mg/Nm³)	PM:180 SO ₂ : 1200	NOx:520			for	Emission reported as part of the site fugitive emissions monitoring plan	
Pollutant Name		PM SO ₂	NOX				H ₂ S	TVOCs
Appliance		Fuel oil fired boilers	Fuel oil fired boilers Fuel gas fired boilers Furnaces Vacuum off-gas furnace FCC					Tank farm
Category		Subcategory 1.2: Liquid Fuel Combustion Installation Subcategory 1.4: Gas Combustion Installation Subcategory 2.1 Combustion Installations Subcategory 2.1 Combustion Installations Subcategory 2.2: Catalytic Cracking Unit					Subcategory 2.3: SRU (integrating amine Sulphur Recovery Unit	Subcategory 2.4: Storage & Handling of Petroleum Products
Point Source	9000	U28008*					U28008	F11009, F11011,

^{*}All minimum emission standards are expressed on a daily average basis, under normal conditions of 273 K, 101.3 KPa, 10% oxygen and dry gas.

120 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	120 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	120 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	120 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous	1700 1st April 2015 Daily Continuous
te mg/Nm³	f mg/Nm ³	Dioxide mg/Nm ³	e mg/Nm³		Dioxide mg/Nm ³	e mg/Nm³	mg/Nm³	Jioxide mg/Nm ³	e mg/Nm³	mg/Nm ³	Jioxide mg/Nm ³
y 2.1:			Subcategory 2.1: Particulate Combustion	Oxides of Nitrogen	Sulphur Dioxide	Subcategory 2.1: Particulate Combustion	Oxides of Nitrogen	Sulphur Dioxide			
B14001 S					=		B14006 S	<u>=</u>			

Continuous	Continuous	Continuous	Continuous	Continuous	Continuous
Daily	Daily	Daily	Daily	Daily	Daily
1st April 2015	1st April 2015	1st April 2015	1st April 2015	1st April 2015	1st April 2015
120	1700	1700	120	1700	1700
mg/Nm³	mg/Nm³	mg/Nm³	mg/Nm³	mg/Nm³	mg/Nm³
Particulate Matter	Oxides of Nitrogen	Sulphur Dioxide	Particulate Matter	Oxides of Nitrogen	Sulphur Dioxide
B17004 Subcategory 2.1: Combustion			Subc	IIIstaliatio IIs	
B17004			B25001		

Conditions applicable:

- Off-gases from the FCC unit will be vented to atmosphere at a height of 145 meters above ground level.
- During plant start-up, shut down and emergency situations the off-gases from the FCC unit will be vented to atmosphere at a height of 55 meters above ground level.
- When the Claus plant is not in operation, the hydrogen sulphide are incinerated in standby incinerators to sulphur dioxide and then vented to atmosphere at a height of 145 meters above ground level. 2 0
 - All alkylation unit relief valves are connected to a KOH water scrubber.
 - he polymer containing fluoride is burnt in a heavy oil furnace and discharged at 145 meters above ground level. 4.007.00
 - The 28 floating roof tanks containing relative volatile materials are fitted with secondary seals.
- Average of all measurements taken during normal operating conditions per reporting period to be used for compliance reporting.
- SO₂ compliance reporting is to be aligned with the approach used in the third party sampling results which informed the postponement decision.

Subcategory 2, 4: Storage and Handling of Petroleum Products

(a) The following transitional arrangement shall apply for the storage and handling of raw materials, intermediate and final products with a vapour pressure greater than 14kPa at operating temperature: -

Leak detection and repair (LDAR) program approved by licensing authority to be instituted, by 01 June 2014.

- (b) The following special arrangements shall apply for control of TVOCs from storage of rawmaterials, intermediate and final products with a vapour pressure of up to 14kPa atoperating temperature, except during loading and offloadingas from 1 April 2018. (Alternative control measuresthat can achieve the same or better results may be used) –
- (c) During the period 1 April 2015 1 April 2018 emissions shall be reported as part of the site fugitive emissions monitoring plan.

The following special arrangements shall apply for control of TVOCs from the loading and unloading (excluding ships) of raw materials, intermediate and final products with a vapour pressure of greater than 14kPa at handling temperature. Alternative control measures that can achieve the same or better results may be used:

(i) All installations with a throughput of greater than 50'000 m3 per annum of products with a vapour pressure greater than 14 kPa, must be fitted with vapour recovery / destruction units. Emission limits are set out in the table below -

Description;	Vapour Recovery Units				
	All loading/ offloading facilities with a th				
Substance or mixture of substances			Plant	mg/Nm ³ under normalconditions of 273 Kelvin	
Common name		Chemical symbol		and 101.3 kPa.	
Total volatile organic	compounds	N/A	New	150	
from vapour recovery/ destruction units using thermal treatment.			Existing	150	
Total volatile organic compounds fromvapour recovery/destruction units using non-		N/A	New	40000	
			Existing	40 000	

For road tanker and rail car loading / offloading facilities where the throughput is less than 50'000 m³ per annum, and where ambient air quality is, or is likely to be impacted, all liquid products shall be loaded using bottom loading, or equivalent, with the venting pipe connected to a vapour balancing system. Where vapour balancing and / or bottom loading is not possible, a recovery system utilizing adsorption, absorption, condensation or incineration of the remaining VOC's, with a collection efficiency of at least 95%, shall be fitted.

Point source - operating requirements

7.3. POINT SOURCE OPERATING CONDITIONS (UNDER START-UP, MAINTENANCE AND SHUT-DOWN CONDITIONS)

The following conditions must be adhered to at minimum during start up, maintenance and shut down conditions:

Should normal start up, maintenance and shutdown conditions exceed a period of 48 hours per plant, Section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), shall apply incident shall be reported, if triggered by the exceedance.

7.4. POINT SOURCE - EMISSIONS MONITORING AND REPORTING REQUIREMENTS

Point Source Code	Emissions Sampling / Monitoring Method	Sampling Frequency	Sampling Duration	Parameters to be measured	Parameters to be reported	Conditions under which monitoring should be stopped	Reporting Frequency
U28008	Periodic	Bi-Annually	As per prescribed method	PM, NOx & SO ₂	PM, NOx & SO ₂	Upon written approval by the Air Quality Officer	Bi-Annually
B14001 B14002 B14005 B17004 B25001	Periodic	Bi-Annually	As per prescribed method	PM, NOx & SO ₂	PM, NOx & SO ₂	Upon written approval by the Air Quality Officer	Bi-Annually

7.5. AREA AND/OR LINE SOURCE - MANAGEMENT AND MITIGATION MEASURES

Contingency Measures	
Method of Monitoring Measures Effectiveness	
Timeframe for Achieving Required Control Efficiency	
Description of Specific Measures	
Area and/or Line Source Description	
Area and/or Line Source Code	None

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7.6. ROUTINE REPORTING AND RECORD-KEEPING

Complaints register

The licence holder must maintain a complaints register at its premises, and such register must be made available for inspections. The complaints register must include the following information on the complainant, namely, the name, physical address, telephone number, date and the time when the complaint was registered. The register should also provide space for noise, dust and offensive odours complaints.

Furthermore, the licence holder is to investigate and, monthly, report to the licencing authority in a summarised format on the total number of complaints logged. The complaints must be reported in the following format with each component indicated as may be necessary:

- (a) Source code / name;
- (b) Root cause analysis;
- (c) Calculation of impacts / emissions associated with incidents and dispersion modelling of pollutants, where applicable;
- (d) Measures implemented or to be implemented to prevent recurrence; and
- (e) Date by which measure will be implemented.

The licensing authority must also be provided with a copy of the complaints register. The record of a complaint must be kept for at least 5 (five) years after the complaint was made.

8REPORTING

8.1 Annual reporting

The licence holder must complete and submit to the licensing authority an annual report. The report must include information for the year under review (i.e. annual year end of the company). The report must be submitted to the licensing authority not later than 60 (sixty) days after the end of each reporting period. The annual report must include, amongst others, the following items:

- (a) Pollutant emissions trend;
- (b) Compliance audit report(s);
- (c) Major upgrades projects (i.e. abatement equipment or process equipment); and
- (d) Greenhouse gas emissions.

The holder of the licence must keep a copy of the annual report for a period of at least 5 (five) years.

8.2 Reporting during normal operating conditions

Where an exceedance occurs under normal operating conditions and which falls within the proposed alternative emission limits contained in Natref's postponement applications, those exceedances shall be

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reported to the licensing authority using a template informed by the content of the NEMA Section 30 reporting template.

For the purposes of compliance reporting, all shut down, start up, upset and maintenance conditions are to be excluded for the relevant compliance averaging period

8.3 Reporting of abnormal releases and Emergency Responses

The holder must prevent deviations from normal operating conditions that would result in pollution exceeding specified limit values. If any conditions exist that will result in excessive emissions or nuisance, the licence holder must be immediately reported to the Air Quality Officer. If applicable, a section 30 incident must be reported in terms of NEMA and must also be reported to the Air Quality Officer within 24 hours. Where excessive emissions occur, which could cause adverse health and environmental impacts or nuisance, urgent corrective measures must be taken by the holder to contain or minimise the emissions through operational interventions. Remediation, if required shall be carried out to the satisfaction of the licensing authority and/or any other government agencies.

9. DISPOSAL OF WASTE AND EFFLUENT ARISING FROM ABATEMENT EQUIPMENT CONTROL TECHNOLOGY

The disposal of any waste and effluent arising from the abatement equipment control technology must comply with the relevant legislation and requirements of the relevant authorities.

10. PENALTIES FOR NON-COMPLIANCE WITH LICENSE AND STATUTORY CONDITIONS OR REQUIREMENTS

Failure to comply with any of the licence and relevant statutory conditions and/or requirements is an offence, and licence holder, if convicted, will be subjected to those penalties as set out in section 52 of the AQA.

11. APPEAL OF ATMOSPHERIC EMISSIONS LICENCE

- 11.1 The holder of the authorization must notify every registered interested and affected party, in writing and within five (5) working days of the date of issue, of the holder's receipt of this atmospheric emissions licence.
- 11.2 The written notification referred to in Condition 11.1 above must
 - 11.2.1 Specify the date on which the atmospheric emissions licence was issued;
 - 11.2.2 Inform interested and affected parties of the appeal procedure provided for in Chapter 7 the GN No R543 of 18 June 2010; and
 - 11.2.3 Advise interested and affected parties that a copy of the atmospheric emissions licence and reasons for the decision will be furnished on request.

11.3 An appeal against the decisions contained in this atmospheric emissions licence must be lodged, in writing with the: Director: Environmental Health and EmergencyServices, Fezile Dabi District Municipality, PO Box 10, Sasolburg, 1949, Tel No:016 970 8600, Fax No: 016 973 1582

12. REVIEW

- 12.1 The authority shall have the right to review the licence continuously within the period as stipulated in clause 1 above or as and when such review is deemed necessary by the Air Quality Officer;
- 12.2 Such review shall be done as a result of amendments in legislation or by virtue of findings from regular inspections done by the Air Quality Officer;
- 12.3 The authority shall serve the license holder with a 30(thirty) day notice when such a necessity arises;
- 12.4 The authority shall under no circumstances be barred by license holder from reviewing the license upon receiving notice of review.

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