

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.: 15/2/3/5/2



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08 October 2024

Public Participation Office
WSP Group Africa (Pty) Ltd
P.O. Box 2613
Cape Town
8000

Via e-mail: gld.pp@wsp.com

Dear WSP Group Africa (Pty) Ltd: Public Participation Office

COMMENTS RE: APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION AND ATMOSPHERIC EMISSION LICENCE AMENDMENT FOR THE PROPOSED LOGISTICS HUB AT THE SALDANHA STEEL FACILITY, WESTERN CAPE

Your correspondence dated 26 September 2024, electronically received on 27 September 2024, regarding the public participation process in relation to the application for an environmental authorisation and atmospheric emission licence amendment for the proposed logistics hub at Saldanha Steel facility, Western Cape, is hereby acknowledged and this office has the following comments:

1. It is noted that:

- a. The application is made to accommodate a warehouse for storage and handling of bulk material commodities, not exceeding 5,000,000 tons per annum, for export through the Transnet Port Terminals. It is noted that the proposed warehouse will be linked to existing handling and conveyancing systems.
- b. The bulk material commodities will be stored and handled within a fully enclosed warehouse and activities will take place within the warehouse, with the exclusion of a rotary tippler and the conveyor extending from the rotary tippler to the enclosed warehouse.
- c. The Logistics Hub proposes to store and handle the following commodities:
 - Manganese Ore (maximum tonnage: 4,000,000 tpa)
 - Phosphate Concentrate (maximum tonnage: 1,200,000 tpa)
 - Garnet Sands (maximum tonnage: 500,000 tpa)
 - Zircon Sands (maximum tonnage: 500,000 tpa)
 - Lead Concentrate (maximum tonnage: 250,000 tpa)
 - Copper Concentrate (maximum tonnage: 250,000 tpa)
 - Zinc Concentrate (maximum tonnage: 250,000 tpa)

The individual bulk commodity quantities may fluctuate, depending on the bulk commodity required for export, although importantly, the total quantity of material handled, when operations are underway, will not exceed the threshold stipulated of 5,000,000 tpa.

- d. Up to 4,000,000 tpa will comprise of Manganese (Mn) ore. Of the 4,000,000 tpa Mn ore, up to 50% will be delivered via rail (2,000,000 tpa), with the remaining amount being delivered by truck (2,000,000 tpa).

2. Comments:

Preparation, construction and rehabilitation phase:

- a. Fugitive dust resulting from the preparation, construction and rehabilitation phases must be prevented at all times and if it cannot be prevented then it must be kept to a minimal level.
- b. Dust mitigation measures must be implemented and operational prior to the preparation, construction and rehabilitation phases.
- c. Dust mitigation measures must continue to be implemented and operational during the preparation, construction and rehabilitation phases.
- d. If at any time the implemented dust mitigation measures fail or are not minimising fugitive dust, additional dust mitigation measures must be immediately implemented.
- e. A complaints register must be put in place prior to the preparation, construction, operation and rehabilitation phases and be submitted to the licencing authority on a monthly basis.

Operational phase:

- a. No open air stockpiles will be allowed. All commodities that have the potential to generate fugitive dust must be stored and handled within the enclosed warehouse.
- b. Road sweeping is not recommended as fugitive dust is generated if material on roads are dry.
- c. The air quality mitigation and management measures as mentioned in the EMPr and the AEL application will be further considered and addressed as conditions within the AEL.
- d. All mitigation and management measures as per the EMPr must be applied and maintained at all times. Additional measures to be implemented if the current measures fail or are inadequate.

Atmospheric Emission Licence (AEL):

- a. No open air stockpiles will be allowed. All commodities that have the potential to generate fugitive dust must be stored and handled within the enclosed warehouse.
- b. Road sweeping is not recommended as fugitive dust is generated if material on roads are dry.
- c. The air quality mitigation and management measures as mentioned in the EMPr and the AEL application will be further considered and addressed as conditions within the AEL. This will include conditions such as but not limited to:
 - i. Loading of trucks and skips must take place within the fully enclosed warehouse(s).
 - ii. Skips and trucks must be clean of material dust and spillages before exiting the warehouse and while on route to TPT. This includes tyres, wheel arches and undercarriages.
 - iii. Skips and trucks must be clean of material dust, spillages and other material obtained from destination while in transit returning to the Saldanha Steel site. This includes tyres, wheel arches and undercarriages.
 - iv. Skips and truck must be covered at all time while in transit to and from the port, even if empty, and/or while containing a commodity.
 - v. Skips and trucks must be kept in such a manner to prevent windblown fugitive dust even when empty and/or while in storage.
 - vi. A cleaning procedure must be compiled and implemented for the cleaning of skips, trucks and warehouses.
 - vii. Spillages on the Haul road leading from Saldanha Steel to TPT must be contained and removed for disposal on a daily basis and as soon as possible after each shipment.
 - viii. Spillages that may result outside the warehouse and at its entrance must be contained and removed on a continuous daily basis.
 - ix. Mitigation measures to capture and contain fugitive dust must be implemented prior to the commissioning of the proposed activity and maintained at all times.
 - x. The internal roads must be kept free from spillages and fugitive dust.
- d. The licencing authority reserves the right to instruct for alternative and/or additional mitigation measures if the current or proposed measures are not effective.

- e. The proposed activity may not commence prior to the issuing of a varied atmospheric emission licence (AEL). The current AEL must be amended to include the proposed activity.
- f. In order for the AEL to be varied, it is required of the licence holder to conduct the following:
 - i. Amend the AEL in terms of Section 46 of NEM: AQA and the National Air Quality Management Framework. The competent licencing authority is the West Coast District Municipality.
 - ii. The applicant must obtain an environmental authorisation (EA) from the Department of Environmental Affairs and Development Planning prior to submitting an application to amend the current AEL.
 - iii. A copy of the granted amended environmental authorisation must be submitted to the licencing authority.
 - iv. The applicant must submit a hard copy AEL variation application form to the licencing authority. The applicant may obtain the prescribe application form from the licencing authority. This form was sent to the applicant.
 - v. The applicant must conduct public participation. This process is underway.
 - vi. Upon completion of this process, the applicant must provide the licencing authority with the comments and response report. The report must also contain proof of advertisement and that the necessary organs of state were inform.
 - vii. A site inspection will be arranged with the applicant.
 - viii. No AEL processing fee is required.
- g. After the public participation process is completed and all supporting documentation is obtained, the licencing authority will have 60 days to process the application and issue a decision.

This office reserves the right to request additional information or revise or withdraw comment at any time.

If you have any concerns or queries, you are welcome to contact this office via email:

[REDACTED]

Yours faithfully



C. GANTEN-BEIN
MANAGER: AIR QUALITY

Mathulwe, Tumelo

From: Cindy Ganten-Bein [REDACTED]
Sent: Tuesday, 08 October 2024 09:18
To: ZA - GLD - PPOffice
Cc: WCDM Correspondence; Celeste J. Minnaar; Surene I. Grootboom
Subject: West Coast DM Comments Re AMA BPO Logistics Hub
Attachments: 41103718_Bidvest Logistic Hub_BID_Final.pdf; WCDM Response Re AMSA Logistics Hub Application.pdf

Good day Public Participation: WSP Group Africa (PTY) Ltd

With reference to the proposed AMSA/BPO logistics hub, please find attached comments from the West Coast District Municipality for your attention.

Regards

C. Ganten-Bein
Manager: Air Quality
West Coast District Municipality
Tel: [REDACTED]
Email: [REDACTED]



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