

6 August 2024

[REDACTED]
Manager, Process Industries (Major Projects)
Department of Water and Environmental Regulation
Prince House, 8 Davidson Terrace
Joondalup, WA, 6027

Dear [REDACTED],

RESPONSE TO REQUEST FOR FURTHER INFORMATION – WORKS APPROVAL APPLICATION - CATEGORY 58A BULK MATERIALS HANDLING FACILITY (DWER REFERENCE: DER2024/000324)

On 17 July 2024, BCI Minerals Ltd (BCI Minerals) received a request from the Department of Water and Environmental Regulation (DWER) for further information in relation to the Works Approval Application (WAA) submitted for the Mardie Project under Category 58A as outlined in Schedule 1 of the *Environmental Protection Regulations 1987*.

The details of the request for further information (RFI) from the DWER and BCI Minerals response are outlined in Table 1 below and the respective attachments provided with this letter.

We trust the details in Table 1 and the attachments provided with this letter address the request for additional information.

Yours sincerely,

[REDACTED]

[REDACTED]

MANAGER ENVIRONMENTAL APPROVALS & COMPLIANCE

Attachments:

1. Letter of confirmation from Pilbara Ports Authority (PPA) confirming the Infrastructure Delivery Agreement (IDA) which was executed between the PPA and Mardie Port Pty Ltd (as trustee for the Mardie Port Trust)
2. Revised Figure 1 (Location) and Figure 2 (Design)
3. List of coordinates that define the prescribed premise boundary, zip file "20240729_Bulk_Handling_Facilities"
4. Stockyard Proposed General Arrangement

Table 1: BCI Minerals response to the DWER request for further information

Relevant part of application form	Information requirements	Rationale	BCI Minerals Response
Section 2.8: Attachment A	Please provide evidence of lease agreement with Pilbara Port Authority.	Demonstrates Applicant as legal occupier.	Referring to Attachment 1, BCI has provided a letter from Pilbara Ports Authority (PPA) confirming the Infrastructure Delivery Agreement (IDA) which was executed between the PPA and Mardie Port Pty Ltd (as trustee for the Mardie Port Trust) on 18 December 2023.
Section 3.3: GPS (latitude and longitude) coordinates:	Please provide a GIS shapefile of the premises boundary and a list of coordinates (easting/northing) that define the premises boundary.	Coordinates are used to define the legal boundary within the works approval.	The "20240729_Bulk_Handling_Facilities" zip file provided with this RFI submission contains the GIS shapefile with the revised prescribed premise boundary, as displayed in revised Figure 1 and Figure 2 (provided in Attachment 2)
	The premises boundary should be revised to encompass all infrastructure/operations that are the subject of this application. This includes any landside infrastructure (dozer traps/conveyors), transshipment vessel (TSV) loading areas, TSV transport route and OGV transfer areas/anchorage.		A list of coordinates that define the prescribed premise boundary is provided in Attachment 3. Provided in Attachment 2 is an updated Figure 1 (Location) and Figure 2 (Design) which reflects the revised prescribed premise boundary as requested by the DWER.
Section 4.9: Estimated / actual throughput for each category applied for	Please confirm the volume of SoP product to be handled during each monthly ship loading operation and time required to complete loading operations.	Information is required to fully understand the proposed and inform the assessment of associated risks and support condition setting	As stated in Section 3B.1.1 of the Supplementary report for the application, it is anticipated that at least one day per month will be dedicated to handling and loading SoP. The total volume of SoP product to be handled is 140 kilotonnes per annum or an average of 12 kilotonnes per month. The TSV has a hold capacity of 14,000 tonnes and the loading facility has a capacity of 3,500 tonnes per hour. It is anticipated it would take roughly 6 hours to complete the loading of the TSV.

Relevant part of application form	Information requirements	Rationale	BCI Minerals Response
			<p>As the facility will be operated 24 hours a day 7 days a week, to accommodate loading during low tides, the TSV is fitted with a duck system to record the raft between the vessel and the sea floor.</p> <p>Given the varying sizes of the OGV, timeframes for loading will vary based on the size of each specific vessel.</p>
4.1 Prescribed premises infrastructure and equipment	Please provide further information regarding the operations of the port infrastructure indicating hours of operation (e.g. 24/7, restricted to daylight hours, etc.) and whether salt loading is campaign based or continuous.		<p>Port operations will be 24 hrs a day, 7 days a week, with planned shutdowns for annual repairs and maintenance.</p> <p>Salt loading will be continuous.</p>
Part 9: Emissions, discharges and waste	<p>The Application is not fully clear on what infrastructure is included for assessment. Please provide a list of all infrastructure that is the subject of this application including the salt stockpile reclaimer, SoP dozer traps, conveyors, shiploader, etc.</p> <p>A map/diagram clearly showing (with labels) all relevant infrastructure should also be provided.</p>		<p>Provided in Attachment 2 is a figure with the following clearly labelled relevant infrastructure included in the application:</p> <ul style="list-style-type: none"> • OGC anchorages • TSV loader • Conveyor belt from stockyard to ship loader, which will be fitted with one scraper at the top and bottom of the conveyor to ensure the return belt is clean of product. • Port stockyard. <p>Provided in Attachment 3 is a figure of the proposed general arrangement of the port stockyard, with clearly labelled relevant infrastructure included in the application</p> <ul style="list-style-type: none"> • Motor control centre (MCC). • Automatic Product sampler. • Self-cleaning tramp removal magnet to ensure there are no metals in the product. • Stage 1 reclaim feeder (dozer trap)

Relevant part of application form	Information requirements	Rationale	BCI Minerals Response
			<ul style="list-style-type: none"> • Cross over walkway to allow personnel to walk up and over the conveyor to conduct inspections. • Salt and SoP product reclaim conveyor. • Stage 2 reclaim feeder (dozer trap). • Scraper which will be fitted with at the top and bottom of the conveyor to ensure the return belt is clean of product <p>Operating within the port stockyard will be:</p> <ul style="list-style-type: none"> • 2-3 x D10 dozers for loading the salt and SoP onto the conveyor. • 1 x 992 loader for stockpile management. • 1 x Feed hopper.
	Please confirm the number of TSVs and OGVs that are loaded at any one time during loading of salt and SoP.		<p>Only one TSV will be loaded with either salt and/or SOP at any one-time.</p> <p>As stated in Section 3B.1.1 of the Supplementary report for the application, it is anticipated that at least one day per month will be dedicated to handling and loading SoP, while the remaining days will be dedicated to handling and loading of salt.</p> <p>Per annum, it is anticipated there will be approximately 2,200 TSV movements and 100 OGV movements.</p>
	Please confirm whether the TSV cargo holds are fully enclosed once loaded.		The TSV cargo holds are fully enclosed once loaded, to prevent the ingress of water en route to the OGVs
	Please provide further information relating to the dozer traps – e.g. number, location, measures in place to manage/contain spillage and controls proposed for managing dust during reclaiming of SoP.		<p>Dust control of SoP is controlled by maintaining granule sizes between 2 to 4.5 mm to prevent excessive airborne losses.</p> <p>The feed hopper loading the TSV conveyor is fitted with a scraper that prevents spillage.</p>
	Section 3B.1.3 states “Salt and SoP will be deposited (wet, approximately 3%w/w) into the TSF via a discharge chute”. This is not		Salt and SoP are two different products and are separated to prevent contamination. Each product has different moisture contents, as follows:

Relevant part of application form	Information requirements	Rationale	BCI Minerals Response
	consistent with Table 3 which indicates that SoP is stockpiled dry at <0.5% w/w. Please clarify indicating how water content in product is gained to achieve 3%.		<ul style="list-style-type: none"> • Salt will be discharged on to the TSV at approximately 3% w/w; and • SoP will be stockpiled at 0.5% w/w.
13.3 Proposed works approval fee	The fee calculation is based on the cost of the dozer traps, conveyors and shiploader but excludes other infrastructure associated with loading product such as the salt reclaimer, TSVs, trestle jetty, etc. Please confirm total cost of the project.	To confirm the works approval fee estimate is accurate.	<div style="background-color: black; height: 1.2em; width: 100%;"></div>



ATTACHMENT 1:

LETTER FROM PILBARA PORTS AUTHORITY (PPA) CONFIRMING THE INFRASTRUCTURE DELIVERY AGREEMENT (IDA) WHICH WAS EXECUTED BETWEEN THE PPA AND MARDIE PORT PTY LTD (AS TRUSTEE FOR THE MARDIE PORT TRUST)

Our Ref:

14 February 2024

Dolores O'hare
Senior Legal Counsel
BCI Minerals Limited
GPO Box 2811
WEST PERTH WA 6872

[REDACTED]@ [REDACTED]

Dear Dolores

MARDIE PORT FACILITY – INFRASTRUCTURE DELIVERY AGREEMENT

We refer to the Infrastructure Delivery Agreement between Pilbara Ports Authority (**Pilbara Ports**) and Mardie Port Pty Ltd as trustee for the Mardie Port Trust (**Mardie**) dated 18 December 2023 (**IDA**). Capitalised terms in this letter have the meaning ascribed to them in the IDA unless otherwise defined.

Pursuant to clause 15.2 of the IDA, and subject to the conditions in clause 15.1 being satisfied or waived by Pilbara Ports, Mardie may only use and occupy the Site to undertake the Company's Activities on and from the date of the Construction Licence Commencement Notice.

Pilbara Ports acknowledges that Mardie has previously been occupying the Site and undertaking the Company's Activities under the Preliminary Works Licence between Pilbara Ports and Mardie dated 19 January 2023, the term of which expired on 31 December 2023.

Pilbara Ports hereby gives notice that all conditions in clause 15.1 of the IDA have been satisfied or are otherwise waived by Pilbara Ports and that use of the Site for the undertaking of the Company's Activities commenced under the terms of the IDA from 1 January 2024. Notwithstanding the date of this notice, 1 January 2024 will be the date of the Construction Licence Commencement Notice for the purposes of the IDA.

Pilbara Ports requests that Mardie responds in writing confirming agreeance with the terms of this notice.

Should you have further queries please contact Ash Purd, Pilbara Ports Director
Business and Trade.

Yours sincerely

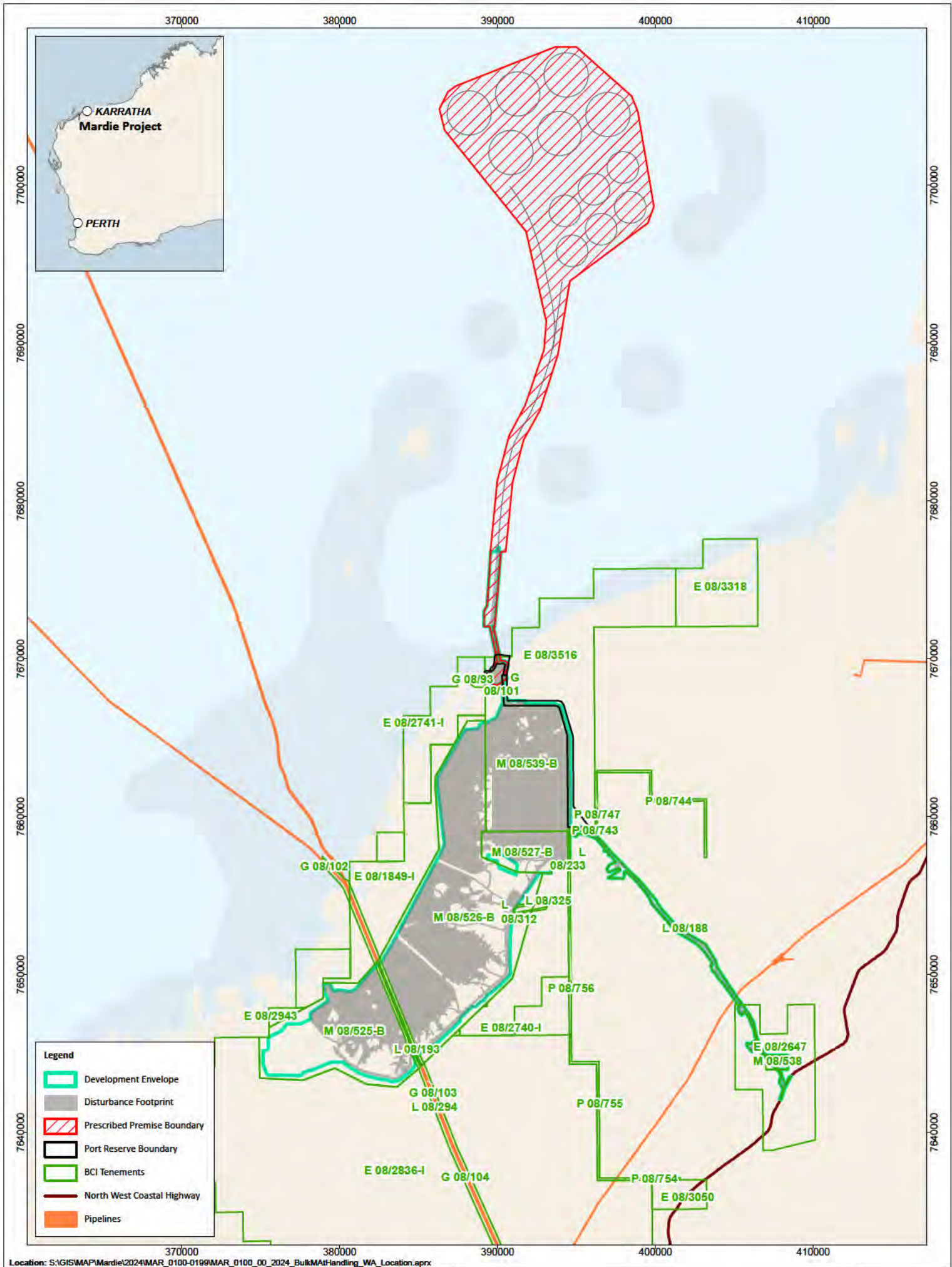


DIRECTOR BUSINESS AND TRADE

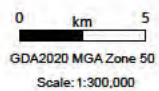


ATTACHMENT 2:

- **REVISED FIGURE 1 – LOCATION**
- **REVISED FIGURE 2 - DESIGN**



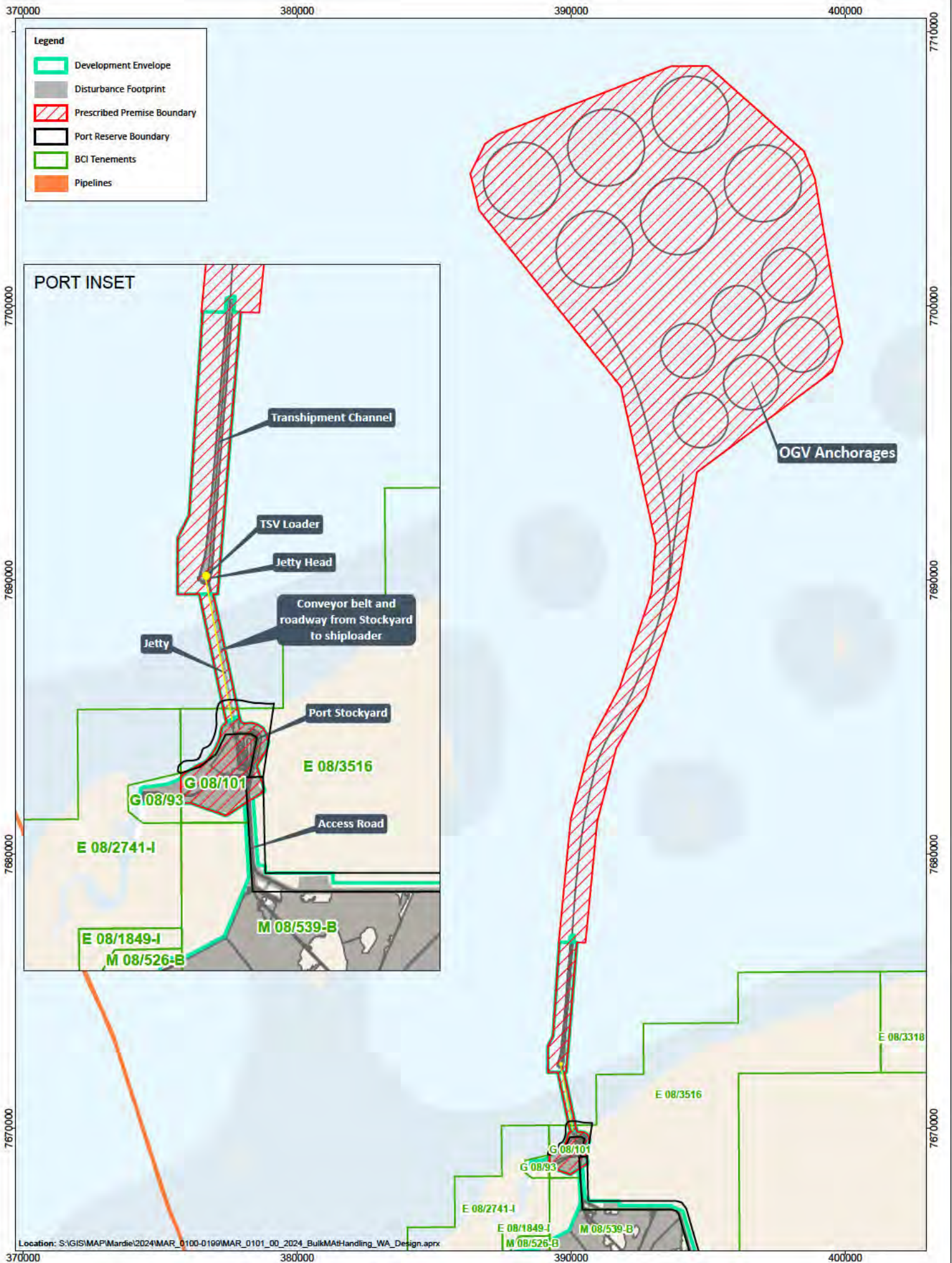
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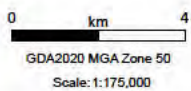
Date: 29/07/2024
Drawn: GIS
Requested: BCI

Mardie Project
Bulk Materials Handling Works Approval - Location

Figure:
1



Location: S:\GIS\MAP\Mardie\2024\MAR_0100-0199\MAR_0101_00_2024_BulkMatHandling_WA_Design.aprx



Date: 29/07/2024
Drawn: GIS
Requested: BCI
Page Size: A4

Mardie Project
Bulk Materials Handling Works Approval - Design

Figure:
2

ATTACHMENT 3: LIST OF COORDINATES THAT DEFINE THE PRESCRIBED PREMISE BOUNDARY

Easting	Northing
390945.1	7681182
390516.1	7676770
390203.4	7676775
389816.6	7672033
389741.4	7672033
390160.3	7670071
390177.9	7669988
390203.9	7669885
390267.2	7669856
390372.4	7669867
390446.9	7669855
390514.5	7669823
390585	7669776
390631.8	7669691
390672.1	7669544
390632.3	7669407
390473.1	7669146
390583.9	7668806
390586.1	7668709
390412.8	7668599
390356.4	7668564
390319.6	7668542
390310	7668536
390268	7668510
389961.2	7668306
389365.5	7668519
389250.4	7668518
389198.8	7668517
389195.9	7668952
389267.6	7669025
389343	7669071
389351	7669075
389486.7	7669157
389587.8	7669201
389634.5	7669240
389678	7669292
389727.7	7669357
389775.3	7669433
389796.9	7669477
389833	7669555

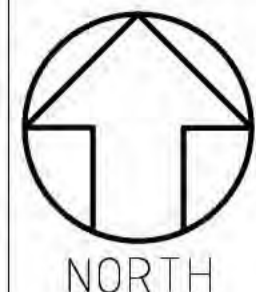


Easting	Northing
389854.4	7669630
389881.6	7669779
389903.3	7669814
389941.6	7669846
389965.6	7669866
389961.4	7669880
389508	7672033
389141	7672032
389143.6	7672982
389333.2	7673356
389563	7676783
389541	7676783
389975.6	7681253
390723.4	7684122
391757.3	7686069
392934.2	7689567
393083.7	7691350
391801.8	7697064
386641.1	7703485
386315.7	7704829
386853.9	7705911
387348.6	7706273
393647.1	7708749
394995.3	7708757
398493.4	7705636
398887.3	7704651
398887.3	7704651
399899.2	7698647
399517.6	7697603
394579.3	7693930
393831.6	7689295
392700.6	7685740
391644	7683864
390945.1	7681182

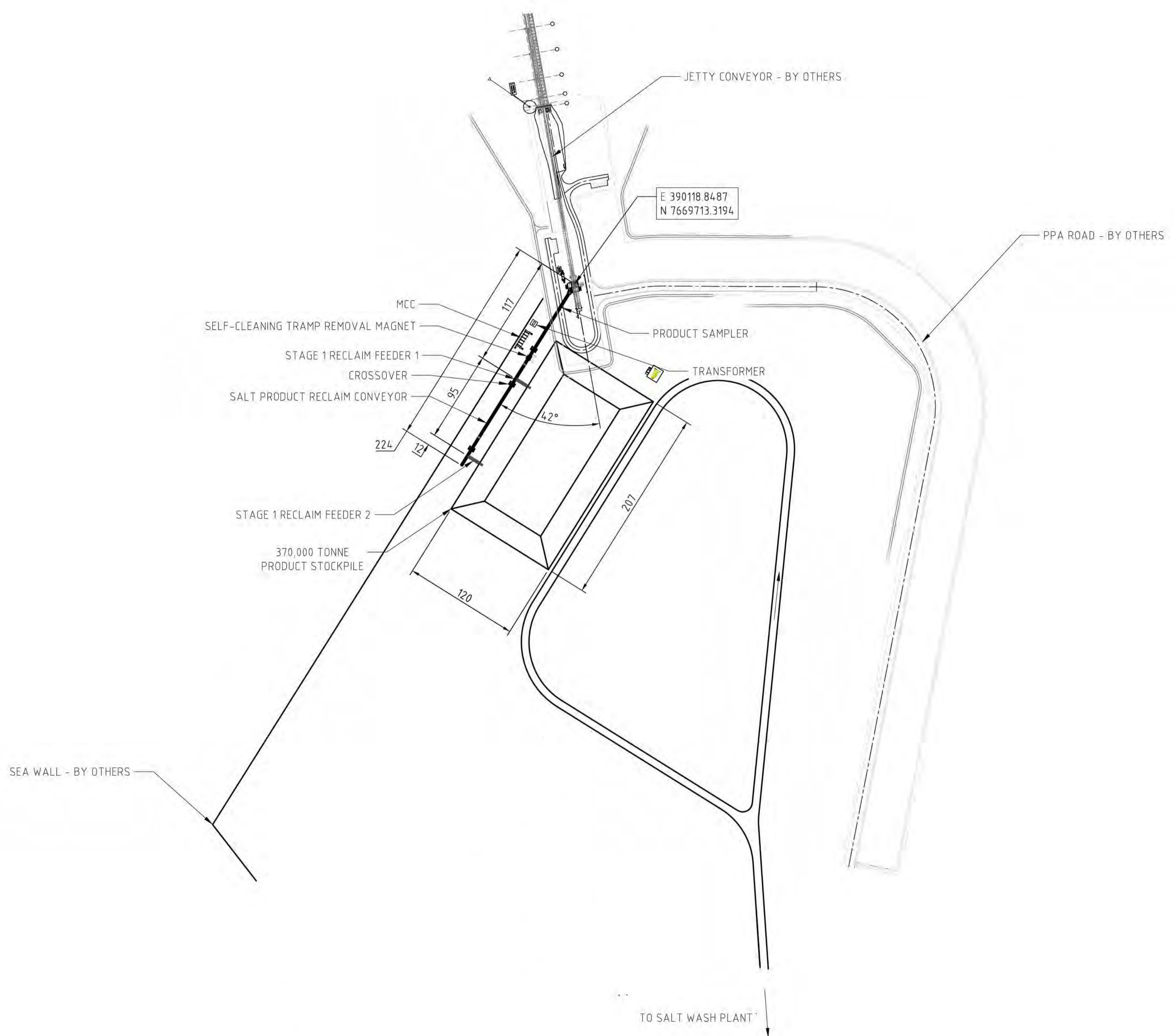




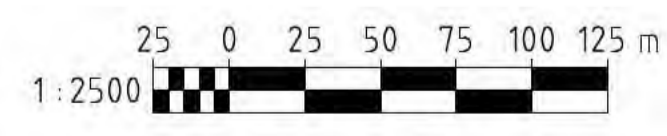
ATTACHMENT 4: STOCKYARD PROPOSED GENERAL ARRANGMENT



- NOTES:
1. EXTENT OF STOCKYARD PROJECT BOUNDARY AS DEFINED BY BCI.
 2. PROJECT BOUNDARY TO EXTEND ALONG PRODUCT LOAD OUT CONVEYOR PATH TO TRANSFER INTERFACE ON JETTY CONVEYOR.
 3. RECLAIM INFRASTRUCTURE BY OTHERS - SPACE ALLOCATION 50M X 100M & POSITION AS SPECIFIED BY BCI.
 4. WASHDOWN PAD SPACE ALLOCATION 20M X 20M
 5. PRODUCT STOCKPILES TO BE CIRCA 19M HIGH.



PLAN
STOCKYARD AREA



CONTRACTOR DRG No: 11755-0000-G-SK-002

REFERENCE DRAWINGS	DWG No	REV	DATE	REVISIONS	DRN	CHK	DSGN	TECH APP	PROJ APP
JETTY / RECLAIM CONVEYOR INTERFACE	1800-TE-DWG-002	B	18.06.24	LAYOUT UPDATED - CONVEYOR SHORTENED	B.T.	B.T.			
OVERALL PROJECT EXTENT GA	0000-TE-DWG-001	A	04.06.24	ISSUED FOR INTERNAL REVIEW	B.T.	B.T.			

WHEN IN DOUBT-ASK
DO NOT SCALE

This drawing is confidential proprietary information and furnished for the sole use of the recipient. Acceptance of the same constitutes an agreement that it will not be copied or reproduced in any form, or given to any other party without written permission from BCI MINERALS LIMITED
1 Allana Street West Perth WA 6005.



DRAWN	B.TAYLOR
CHECKED	B.TAYLOR
DESIGNED	R.SIMMONS
TECH APP	I.MCBRIDE
PROJ APP	XX
CLIENT APP	

MARDIE SALT & POTASH PROJECT SALT WASH PLANT AND STOCKYARD FEED PROPOSED ALTERNATIVE RECLAIM CONVEYOR GENERAL ARRANGEMENT			
A1	SCALE 1:2500	PROJECT No MAR178	DRG No 11755-1800-G-SK-002
			REV B