

15 August 2024

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



RESPONSE TO REQUEST FOR FURTHER INFROMATION – WORKS APPROVAL APPLICATION CATEGORY 58A BULK (DWER REFERENCE: DER2024/000324)

On 6 August 2024, BCI Minerals Ltd (BCI Minerals) received a second 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*.

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

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

Yours sincerely,



MANAGER ENVIRONMENTAL APPROVALS & COMPLIANCE

Attachments:

Updated Stockyard Proposed General Arrangement

Table 1: Request for further information and BCI's response

Item	DWER RFI	BCI Response
1	Information provided in relation to W6594/2021/1 indicates that SoP will be transferred from the storage sheds to the port via triple road trains. The truck dump station will then receive the triple road trains which will "bottom dump" SoP into two hoppers connected to a conveyor for loading the TSV. The diagram provided in Attachment 4 of the RFI doesn't show the dump stations and relevant conveyors, or indicate whether the "370,000 tonne product stockpile" is salt or SoP. To assist with DWER's understanding of the proposal, can you please confirm the following:	N/A
a	Is SoP stockpiled at the port or direct shipped once unloaded from the trucks into the dump stations? If stockpiled, please provide further information such as how material is stockpiled, the number of stockpiles, how long it will be stockpiled, etc.	SoP will be direct shipped from the SoP processing plant and will be carted 'just in time' to the port for ship loading. The SoP will be transported from the SoP processing plant to the port via triple side tipping road trains, where it will be offloaded onto a compacted pad, in an enclosed shed (refer to updated stockyard proposed general arrangement figure provided in Attachment 1). If required, the road trains transporting the SoP to the port can be enclosed/tarped to minimise windborne dust. The enclosed shed will have a door opening at one end to allow product access, which can be closed during high wind events to prevent contamination of the SoP product and mitigate dust. Given the short residence time of the SoP in the enclosed shed it is not proposed for the shed to have a dust extraction system that reports to a baghouse. Within the enclosed shed, 988 Caterpillar or equivalent Front End Loaders (FEL) will be used to manage the SoP stockpiles. A FEL will be used to load the SoP via a hopper fitted onto the feed conveyor which takes the SoP product out to the TSV. In the event there is any remaining SoP product within the enclosed shed at the port, the SoP will be covered via tarps to prevent contamination and to mitigate unwanted dust from high winds.

Item	DWER RFI	BCI Response
b	Noting that SoP is only shipped at the port 1 day a month, how many trucks are generally required to transport SoP from the storage shed to the port stockyard and how long does this take (assume <1 day if direct shipping). This is to gauge the duration of potential dust emissions generated from truck movement, loading and unloading.	As the SoP will be direct shipped and carted to the port 'just in time' for loading, it is anticipated there will be approximately 4 trucks over a 20 hour period to transport the SoP from the processing plant to the port.
С	How is material transferred from the enclosed storage sheds into the trucks (at the SoP plant) and what dust management measures are in place (e.g. enclosed conveyors, etc.)?	Within the enclosed storage sheds at the SoP processing plant, the SoP will be loaded onto the triple side tipping road trains via either: a) Direct loading onto the trucks with FELs; or b) A small covered feed conveyor loading the trucks. There would be a minimal gap between the conveyor and the trucks to minimise any dust generation. The feed conveyor will be loaded by FELs.
2	Similar to the above, can you please confirm the method for transferring salt to the port. Again, based on information provided in W6594, it is understood that salt is transferred from the Salt Plant Stockyard to the port via trucks (similar to SoP). It is then transferred via dump stations to the conveyor/stacker stockpiling. Stockpiled material is then reclaimed using dozers and transferred to the ship loading conveyor (via Stage 1 and Stage 2 reclaim feeders shown in Attachment 4 of the RFI). Please confirm.	Salt will be transported from the processing plant via triple side tipping road trains, where it will be offloaded onto salt compacted pad for stockpiling at the port (refer to updated stockyard proposed general arrangement figure provided in Attachment 1). As the salt product has a high moisture content, it is not proposed for the trucks to be covered/tarped during transportation to the port. FEL and Dozers will be used at the port to management the stockpile. Stockpiled salt is then reclaimed using dozers and transferred to the
		ship loading conveyor (via Stage 1 and Stage 2 reclaim feeders shown in the updated stockyard proposed general arrangement figure provided in Attachment 1).
3	Following provision of the above in 1 & 2 above, can you please provide an updated version of Attachment 4 showing all SoP/salt stockpiles, SoP/salt dump stations and any connecting conveyors, stackers, etc.	An updated version of the updated stockyard proposed general arrangement figure is provided in Attachment 1 to show the location of the SoP enclosed shed.
4	W6594/2021/1 authorises processing and storage of SoP within an enclosed system fitted with dust extraction, however, there appears to be minimal dust control infrastructure proposed (e.g. dust extraction, enclosure, etc.) for the transfer of SoP from the enclosed storage shed to the port, and on ship loading equipment.	As noted against item 1a above, the SoP will be direct shipped and will be carted 'just in time' for ship loading from the SoP processing plant to the port. This means the residence time for the SoP within the enclosed shed is very short (i.e. between 5 to 7 days maximum) before it is loaded on the TSV and OGVs.

Item	DWER RFI	BCI Response
	Can you please provide justification for this explaining why open handling at the port is considered suitable when a closed processing/storage system was deemed necessary at the SoP Plant?	
5	With regards to the fee calculation, can you please confirm that the total <u>port</u> related costs (i.e. costs associated with dozer traps, conveyors, shiploader and other infrastructure associated with loading product such as the salt reclaimer, TSVs, trestle jetty, etc.)	BCI Minerals can confirm the total port related costs i.e. costs associated with dozer traps, conveyors, ship loader and other infrastructure associated with loading product such as the salt reclaimer, TSVs, trestle jetty, etc.

ATTACHMENT 1: UPDATED STOCKYARD PROPOSED GENERAL ARRANGEMENT

