

Saldanha Iron Ore Handling Facility: Air Quality Permit Amendment

Draft Basic Assessment Report

Report prepared for:
Transnet Limited

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Saldanha Iron Ore Handling Facility: Air Quality Permit Amendment Draft Basic Assessment Report

Transnet Limited

SRK Project Number 399449

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Section 1: Summary Report



1. Introduction

Transnet Limited (“Transnet”) proposes to increase the throughput of iron ore at the existing Iron Ore Handling Facility (IOHF) at the Port of Saldanha to 60 million tonnes per annum (MTPA). This requires an amendment of Transnet’s provisional emissions licence for the IOHF.

The Port of Saldanha lies approximate 120 km north of Cape Town in Saldanha Bay on the West Coast of South Africa (see Figure 1).

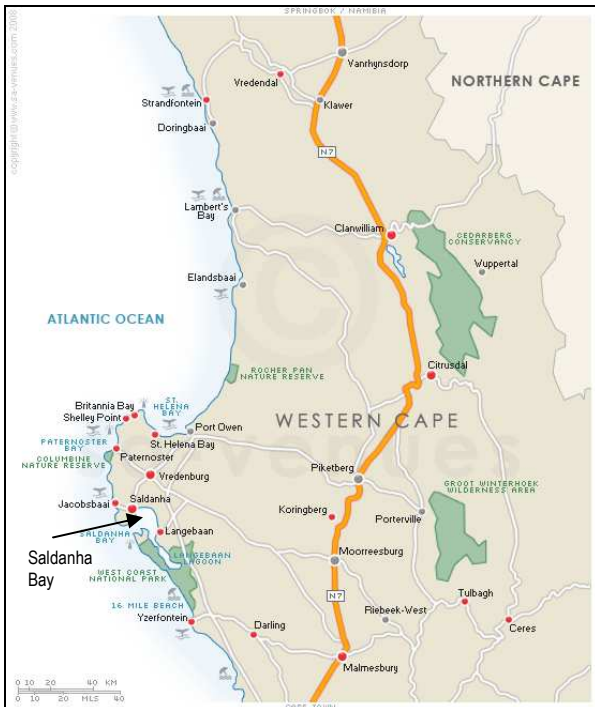


Figure 1: Location of Saldanha Bay

In terms of the National Environmental Management Act 107 of 1998 (NEMA), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2006, a Basic Assessment must be undertaken for certain listed activities, including the amendment to a licence or permit for the release of emissions, as proposed by Transnet.

SRK Consulting has been appointed by Transnet as the independent Environmental Assessment Practitioners (EAP) to undertake the required Basic Assessment process.

2. Purpose and Structure of this Basic Assessment Report

The NEMA EIA Regulations were promulgated to put into practice the environmental management principles espoused in the Act. This Basic Assessment Report (BAR) provides the competent authority with all relevant information about the proposed activity, as well as an assessment of the potential impacts in order to inform the decision as to whether the activity should be approved and, if so, under what conditions.

The BAR comprises four sections, of which Sections 2 to 4 are mandatory in terms of the requirements for a Basic Assessment. The Summary Report in Section 1 is intended to provide a summarised and easily accessible version of the application¹.

¹ Note that the full report is a collation of sections and not a sequential compilation of report chapters.



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The BAR contains the following sections:

Section 1: Summary Report

Section 1 provides an introduction to the project, describes the approach to the Basic Assessment process and provides a description of the activity. It also describes the public consultation process undertaken during the process, the key findings and recommendations and the way forward. In effect, this section provides a **summary** of key elements of the Basic Assessment.

Section 2: Completed Basic Assessment Application Form

Section 2 of the report contains the completed Basic Assessment Application form, as prescribed by the Department of Water and Environmental Affairs (DWEA), which is submitted as the formal application for environmental authorisation under the NEMA EIA regulations.

Section 3: Completed BAR Form

Section 3 contains the completed BAR form, as prescribed by DWEA, submitted in support of the application for environmental authorisation of the activity under the NEMA EIA regulations

Section 4: Appendices

Section 4 contains supplementary information in support of the report, as required by the BAR.

3. Approach to the Basic Assessment

The EIA Regulations contained in Government Notice R 386 of April 2006 list activities which require that a Basic Assessment process be followed prior to their commencement. The proponent must obtain authorisation for the proposed activity from the designated competent authority. As Transnet is a State-owned company, the competent authority is the national DWEA.

For the proposed increase in iron ore throughput at the IOHF at the Port of Saldanha, the following applicable listed activity requires a BA to be undertaken:

25. *The expansion of or changes to existing facilities for any process or activity, which requires an **amendment of an existing permit or license** or a new permit or license in terms of legislation governing the release of emissions, pollution, effluent.*

The proposed activity will lead to the amendment of Transnet's emissions licence as required in terms

of the Atmospheric Pollution Prevention Act 45 of 1965 (APPA) for the IOHF. The existing licence authorises the handling of 47 MTPA of iron ore at the facility.

The first step in the BA process is the submission of a Notice of Intent to Submit an Application for the proposed activity. The Notice was submitted to DWEA on 14 August 2009 and accepted on 8 September 2009.

The second step entails the assessment of the activity and the production of a BAR (this document) for public comment. Issues and concerns raised by the public will inform the Final BAR which, together with the prescribed Comment and Responses Report, will be submitted to DWEA for a decision.

The Basic Assessment process is depicted in Figure 2 below.

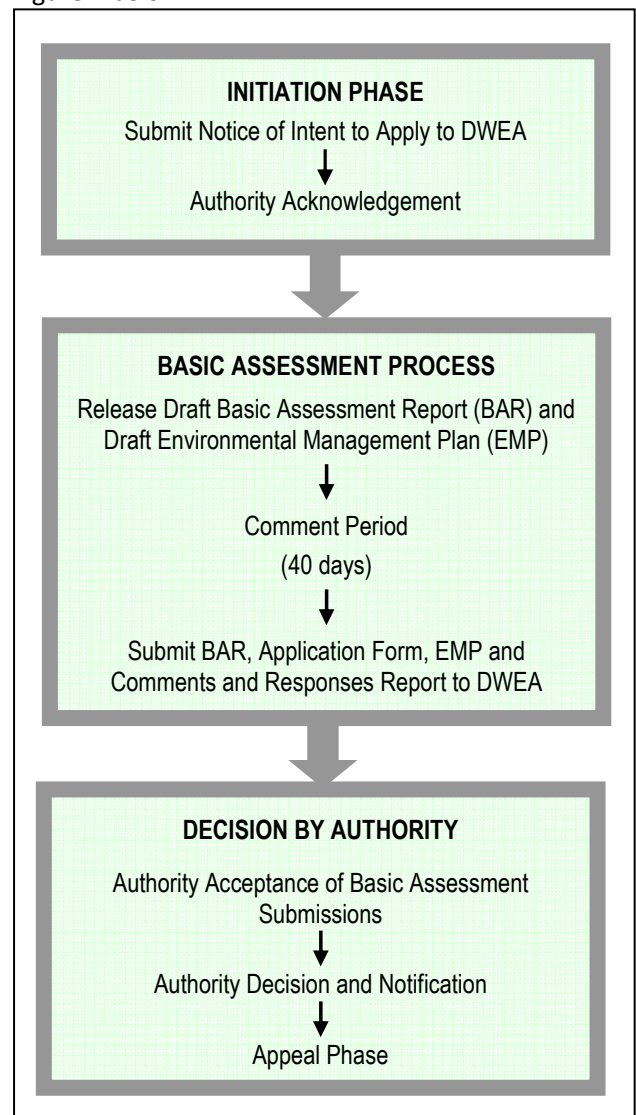


Figure 2: Basic Assessment Process.

4. Prescribed Requirements for the Basic Assessment Report

The BAR provides information about the proposed activity, a description of the affected environment (including ecological, land use and socio-economic aspects), a description of the process undertaken in order to consult the public on the activity, as well as a basic assessment of the potential impacts of the activity on the receiving environment.

Several appendices to the BAR are required as supporting documentation. These include:

- A Comments and Responses Report from the public consultation process;
- Data such as a location map, site plans and relevant photographs;
- Any necessary permits or licences, including the landowner's consent for the activity, should the applicants not own the proposed site;
- Any specialist reports that were undertaken during the basic impact assessment process; and
- A draft Environmental Management Programme.

This information is contained in Section 4 of this report.

5. Description of the Affected Environment

The IOHF is located at Saldanha Bay, some 120 km north of Cape Town on the West Coast of South Africa. The Langebaan Lagoon is located to the south of, and connected to Saldanha Bay. Saldanha Bay contains five offshore islands: Malgas, Jutten, Marcus, Meeuw and Schaapen.

The Langebaan Lagoon is a wetland of internationally recognised importance in terms of the RAMSAR Convention. Together with the islands in the bay it falls within the boundaries of the West Coast National Park.

The area is characterised by dry warm summers and wet cool winters. The wind at Saldanha is predominantly south-south east during summer, spring and autumn, with a dominant northerly and north-north westerly component during winter. Average wind speeds are higher during the warmer months.

Within the last 30 years, Saldanha Bay has been transformed from a minor fishing port into a significant centre of heavy industry within the Western Cape. The IOHF is located within the Port of Saldanha, a designated industrial area. It is surrounded by other large scale industries that use the general cargo facilities at the Port of Saldanha, e.g. Namakwa Sands, Mittal Steel and the Duferco Steel Mill.

A number of residential areas are located in the vicinity of the IOHF. The closest is Blue Water Bay, approximately 2.2 km to the west. Saldanha is located 5 km west of the IOHF and also harbours South Africa's largest commercial fishing fleet, the South African Military Academy and SAS Saldanha, a naval training base. Club Mykonos and the surrounding residential areas are located approximately 6 km east of the IOHF. Vredenburg lies approximately 10 km north of the IOHF inland. Langebaan lies some 11 km south-east of the Port, at the mouth of the Langebaan Lagoon, and is a popular tourist destination.

The entire Saldanha Bay Local Municipality, which encompasses the above areas, had an estimated population of approximately 81 000 in 2006.

6. The Proposed Project

The IOHF at the Port of Saldanha is currently being upgraded as part of the approved 'Phase 1B' expansion, which is expected to increase the throughput of iron ore at the facility to 45 MTPA in 2010.

By optimising the efficiency of handling procedures at the facility, Transnet estimates that a throughput of 60 MTPA of iron ore can be achieved without the need for construction of any additional infrastructure.

Kumba, the main supplier of iron ore to the IOHF, is currently in the process of developing its new Sishen-South iron ore mine, which is expected to increase the iron ore supply available to the IOHF to 60 MTPA.

The proposed project does not involve the installation of any additional infrastructure at the IOHF. The increase in volume of iron ore that will be handled by the facility will, however, require more trains and ships to call at the Port to deliver and export the additional ore. Existing infrastructure will also operate more frequently (e.g. for longer

periods of time) to handle the additional ore volume.

The proposed increase in throughput is not expected to generate additional employment at the Port.

Activities considered in this BA extend from the Salkor Yard to the bay. Impacts relating to any required upgrade of the rail corridor between the mines and Salkor Yard are being investigated in a separate assessment that has been commissioned by Transnet.

As the existing processes at the IOHF will simply be run more efficiently, no viable alternatives in terms of location or activity to achieve the proposed iron ore throughput of 60 MTPA have been identified. An alternative site would entail additional infrastructure and either create a new footprint or expand the footprint of the existing facility. Transnet therefore motivates for the exemption from having to assess site and activity alternatives in the BA.

7. Public Consultation Process

A public participation process aimed at providing the public with an opportunity to comment on the proposed development and participate in the environmental process is being undertaken.

Advertisements were placed in the local and regional press on 12 November 2009 to notify the public of the basic assessment process and availability of the Draft BAR for public comment and to invite Interested and Affected Parties (IAPs) to register on the project database. The advertisements also provided details of the proposed public open day to be held on 26 November 2009. In addition, some key stakeholders were notified in writing.

More information on further opportunities for IAPs to become involved of is provided in Section 10.

8. Assessment of Potential Environmental Impacts

A number of potential impacts of the proposed development were identified by the project team and specialists. Concerns raised by IAPs in previous environmental assessment processes for upgrades of the IOHF were also taken into account.

The following specialist studies were undertaken to assess the impacts of the proposed development:

- Air quality study;
- Health study;
- Noise specialist input; and
- Shipping risk specialist input.

Potential impacts were assessed by SRK and the specialists using SRK's standard impact assessment methodology. The **significance** of an impact is defined and assessed by specialists as a combination of the **consequence** of the impact occurring (**based on its extent, intensity and duration**) and the **probability** that the impact will occur.

For all potentially significant impacts, mitigation measures were identified and the significance of the anticipated impact was rated without and with implementation of the recommended mitigation measures. This information is presented in Table 1², which summarises:

- The impacts that were assessed;
- Their significance following the implementation of mitigation measures; and
- The key mitigation measures on which the significance rating is based.

The impact significance rating should be considered by the competent authority in their decision-making process based on the definitions of ratings ascribed below:

- **Insignificant:** the potential impact is negligible and will not have an influence on the decision regarding the proposed activity.
- **Very Low:** the potential impact is very small and should not have any meaningful influence on the decision regarding the proposed activity.
- **Low:** the potential impact may not have any meaningful influence on the decision regarding the proposed activity.
- **Medium:** the potential impact should influence the decision regarding the proposed activity.
- **High:** the potential impact will affect a decision regarding the proposed activity.
- **Very High:** the proposed activity should only be approved under special circumstances.

² Refer to Section E of the BAR form for a complete list of impacts assessed.

Table 1 provides a list of all potentially significant impacts that were assessed. **Key** relevant observations with regard to the potential impacts are:

- The predicted *low negative impact of dust generated by the IOHF*, which presents a nuisance to residents particularly in Blue Water Bay. Without effective mitigation, impacts due to dust fallout are expected to be high and a fatal flaw to the project;
- The predicted *low negative impact of inhalable small dust particles (Particulate Matter (PM)) generated by the IOHF*, which is not expected to present a health risk in surrounding communities due to the low concentrations under mitigated circumstances. Without effective mitigation, impacts due to PM are expected to be high and a fatal flaw to the project;
- The predicted *low negative impact of more frequent noise*, especially from train shunting, which presents a nuisance to residents particularly in Blue Water Bay, under mitigated circumstances. Transnet is in the process of investigating the feasibility of noise mitigation measures, such as brake wagons and alternative coupling mechanisms, as required by the conditions of authorisation of previous expansion phases. These, or alternative measures such as a noise barrier, must be confirmed and implemented as soon as possible. Without effective mitigation the impact of additional noise is expected to be medium.

9. Summary of Findings

1. Transnet proposes to increase the throughput of iron ore at the IOHF at the Port of Saldanha to 60 MTPA by improving the operational efficiency of the facility.
2. No changes to the existing infrastructure of the IOHF are proposed. However, to deliver, handle and export the additional volumes of iron ore, more trains and ships will call at the facility, and the existing infrastructure will work more continuously.
3. The handling of iron ore at the IOHF results in the generation of dust, including PM, which can reach residential areas beyond the IOHF. The facility also generates noise, particularly from

train shunting, which can be heard in nearby residential areas.

4. With effective mitigation of dust generation at the IOHF, levels of dust and PM that are predicted to reach surrounding residential areas from the facility are relatively small. They do not pose a concern in terms of health, but are expected to continue having a nuisance effect, particularly at Blue Water Bay.
5. The dust levels predicted for Blue Water Bay at an effectively mitigated 60 MTPA throughput scenario are expected to be approximately similar to the current situation, where some 32 MTPA of iron ore are handled, but mitigation is still being implemented.
6. Without effective mitigation of dust generation at the IOHF, dust levels are predicted to be too high, both in terms of nuisance and health impacts.
7. Shunting noise audible in surrounding residential areas, particularly Blue Water Bay, has been an ongoing concern for IAPs. While the noise volume is not expected to change with increased throughput, the frequency of the impulse-type shunting noise will increase relative to the current situation. The implementation of effective mitigation, which is still being investigated by Transnet, is of key importance.
8. IAPs in the Saldanha area have actively participated in previous environmental assessment processes relating to the IOHF at the Port of Saldanha. Concerns and comments made during those processes, mostly relating to the potentially negative impacts of the IOHF on the area's air quality and the marine environment of Saldanha Bay and the Langebaan Lagoon, were taken into account in this BA.

10. Way Forward

This document is not a final report and comments received from IAPs will be reflected in the Final BAR submitted to the authorities. The public participation process is giving IAPs the opportunity to assist with identification of issues and potential impacts and provides an opportunity to gauge 'public acceptance' of the proposed project.

This Draft BAR is being released for a 40-day public and authority review period. Full copies of the report are available for review at the following venues:

- Saldanha Public Library;
- Diazville Public Library;
- Langebaan Public Library;
- Vredenburg Public Library; and
- The offices of SRK Consulting in Rondebosch, Cape Town.

The Draft BAR can also be downloaded from SRK's website www.srk.co.za (via the 'public documents' link).

IAPs are also invited to attend a **Public Open Day**, where the information in the BAR can be discussed with the project team. Details for the Public Open Day are as follows:

Date : 26 November 2009
Venue : Protea Hotel, 51 B Main Road,
Saldanha, Malgas Room
Time : 15h30 – 18h30

Written comments on the Draft BAR should be submitted by **15 January 2010** to:

Sharon Jones

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Comments by IAPs will be reflected in a Comments and Responses Report that will be submitted together with the Final BAR to DWEA for their decision.

Upon request, full hard copies of the Draft BAR can also be mailed or emailed to stakeholders.

Table 1: Impact rating summary for the proposed increase in iron ore throughput to 60 MTPA at the IOHF at the Port of Saldanha, assuming mitigation

Impact		Key Mitigation Measure	Impact with Mitigation
Dust fallout from the IOHF in surrounding communities	-ve	<ul style="list-style-type: none"> Pave all unpaved roads; Implement effective housekeeping measures, such as sweeping all paved surfaces, scraping conveyor belts and removing loose material so that it cannot generate dust; Maintain iron ore moisture content of 1.2%; 	Low
Health effects on surrounding residents through potential exposure to PM ₁₀ from the IOHF	-ve	<ul style="list-style-type: none"> Cover all transfer points and conveyor belts, where practical, and maintain existing covers; Maintain 50% dust control effectiveness at the transfer points (by using sprayers and covers); Ensure that stack emissions at the tipplers do not exceed 25 mg/Nm³; Amend, where required, and implement the air quality monitoring and management plan; and Monitor dust levels at suitable sites of the Port to continually assess the effectiveness of dust mitigation measures. 	Low
More frequent noise in surrounding residential areas through more frequent use of equipment at the IOHF	-ve	<ul style="list-style-type: none"> Use brake wagons for the elimination of shunting noise, if proven effective; alternatively: Utilise alternative coupling mechanisms for the reduction of shunting noise; and/or; Construct a noise barrier to the west of the shunting line after tippler 1; and Monitor noise levels emanating from the shunting lines to assess effectiveness of mitigation measures. 	Low
Increased interference of iron ore carriers with other shipping traffic in the Bay	-ve	<ul style="list-style-type: none"> Follow established procedures for iron ore carrier movements in and around the Bay. Closely observe the presence of small vessels in or near the entrance channel. Warn such vessels. Maintain present Port policy of moving one (piloted) ship at a time within the confinements of the Port. 	Very Low
Disturbance of Saldanha Bay's marine ecosystem from increased ballast water discharge from iron ore carriers	-ve	<ul style="list-style-type: none"> Continue to enforce adherence of vessels with IMO guidelines regarding ballast water management. Regularly monitor compliance with the IMO guidelines and penalise non-compliance. Adopt feasible IMO improved ballast water treatment methods that are currently being tested internationally. 	Very Low

Impact	Key Mitigation Measure	Impact with Mitigation
Increased <i>risk</i> of oil spills in Saldanha Bay associated with more iron ore carriers	<p>-ve</p> <p><u>Minimising the risk of an incident that could lead to an oil spill</u> (these measures will however not reduce the presented impact significance, as this was assessed as <i>if</i> the spill occurs):</p> <ul style="list-style-type: none"> • Alert the captain of a departing vessel of any adverse wave and weather conditions outside of the Port. • Use the Integrated Port Operations Support System (IPOSS) as a support system to decide whether to allow deep-draught ships into the entrance channel at any particular time. • Attend to mooring lines and mooring system (winches) continuously to keep the lines tight and mooring secure. • Maintain all Port equipment, including tug boats, in excellent working condition. • Diminish speed of ore carriers manoeuvring in the Bay sufficiently (to a few knots) to allow tug boats to change the course of the vessel should this be necessary e.g. to avoid a collision, • Ensure ongoing and adequate training of all staff involved in the handling of iron ore carriers. <p><u>Response to an oil spill:</u></p> <ul style="list-style-type: none"> • Implement the Port of Saldanha Oil Spill Contingency Plan. • Regularly review and update Port safety guidelines, rules and regulations. 	<p>Low</p> <p><i>(In the unlikely event that a spill occurs)</i></p>
Additional generation of wealth for South Africa	<p>+ve</p> <ul style="list-style-type: none"> • None 	<p>High</p>

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Section 2: DWEA Basic Assessment Application Form

Section 3: DWEA Basic Assessment Report Form

Section 4: Appendices

Appendix A: Site plan(s)

Appendix B: Photographs



Plate 1: Aerial view of the Iron Ore Handling Facility at the Port of Saldanha and Salkor Yard

Source: Google Earth



Plate 2: Aerial view of the Iron Ore Handling Facility at the Port of Saldanha

Source: Transnet



Stockyards



Stacker / reclaimer



Tippler buildings

Plates 3-5: Existing components of the train side infrastructure

Source: Strategic Environmental Focus (2007)



Ship loader

Source: Transnet



Iron ore carrier berths

Source: Carter (2007a), from Moes (2007)

Plates 6-7: Existing components of the ship loading infrastructure



Online Moisture Analysers



Water cannons



Conveyor covers



Water sprayer at transfer point

Plates 8-11: Existing components of the dust mitigation infrastructure

Source: Transnet



Plates 12-13: Existing components of the temporary waste storage infrastructure

Source: Resource Management Services, 2008

Appendix C: Specialist reports

Appendix C1: Air Quality Specialist Report

Appendix C2: Health Specialist Report

Appendix D: Draft Environmental Management Programme

Appendix E: Other information

Appendix E1: SRK Impact Assessment Methodology

Impact Assessment Methodology

The assessment of impacts was based on specialists' expertise, SRK's professional judgement, field observations and desk-top analysis.

The significance of potential impacts that may result from the proposed project was determined in order to assist decision-makers.

The **significance** of an impact is defined as a combination of the **consequence** of the impact occurring and the **probability** that the impact will occur.

The criteria used to determine impact consequence are presented in the table below.

Rating	Definition of Rating	Score
A. Extent – the area in which the impact will be experienced		
None		0
Local	Confined to project area – the site and surrounding areas (up to 5 km)	1
Regional	Exceeds project area but within the Western Cape region	2
National	South Africa (or beyond)	3
B. Intensity – the magnitude or size of the impact		
None		0
Low	Natural and/or social functions and processes are negligibly altered	1
Medium	Natural and/or social functions and processes continue albeit in a modified way	2
High	Natural and/or social functions or processes are severely altered	3
C. Duration – the time frame for which the impact will be experienced		
None		0
Short-term	Up to 2 years	1
Medium-term	2 to 15 years	2
Long-term	More than 15 years	3

The combined score of these three criteria corresponds to a **Consequence Rating**, as follows:

Combined Score (A+B+C)	0 – 2	3 – 4	5	6	7	8 – 9
Consequence Rating	Not significant	Very low	Low	Medium	High	Very high

Once the consequence was derived, the probability of the impact occurring was considered, using the probability classifications presented in the table below.

Probability – the likelihood of the impact occurring	
Improbable	< 40% chance of occurring
Possible	40% - 70% chance of occurring
Probable	> 70% - 90% chance of occurring
Definite	> 90% chance of occurring

The overall **significance** of impacts was determined by considering consequence and probability using the rating system prescribed in the table below.

Significance Rating	Consequence	Probability
Insignificant	Very Low	& Improbable
	Very Low	& Possible
Very Low	Very Low	& Probable
	Very Low	& Definite
	Low	& Improbable
	Low	& Possible
Low	Low	& Probable
	Low	& Definite
	Medium	& Improbable
	Medium	& Possible
Medium	Medium	& Probable
	Medium	& Definite
	High	& Improbable
	High	& Possible
High	High	& Probable
	High	& Definite
	Very High	& Improbable
	Very High	& Possible
Very High	Very High	& Probable
	Very High	& Definite

Finally the impacts were also considered in terms of their status (positive or negative impact) and the confidence in the ascribed impact significance rating. The prescribed system for considering impacts status and confidence (in assessment) is laid out in the table below.

Status of impact	
Indication whether the impact is adverse (negative) or beneficial (positive).	+ ve (positive – a 'benefit')
	- ve (negative – a 'cost')
Confidence of assessment	
The degree of confidence in predictions based on available information, SRK's judgment and/or specialist knowledge.	Low
	Medium
	High

The impact significance rating should be considered by authorities in their decision-making process based on the implications of ratings ascribed below:

- **INSIGNIFICANT:** the potential impact is negligible and **will not** have an influence on the decision regarding the proposed activity/development.
- **VERY LOW:** the potential impact is very small and **should not** have any meaningful influence on the decision regarding the proposed activity/development.
- **LOW:** the potential impact **may not** have any meaningful influence on the decision regarding the proposed activity/development.
- **MEDIUM:** the potential impact **should** influence the decision regarding the proposed activity/development.
- **HIGH:** the potential impact **will** affect the decision regarding the proposed activity/development.
- **VERY HIGH:** The proposed activity should only be approved under special circumstances.

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