



Mr Mick Cole  
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Dear Mr Byers

**RE: TRIAL NOTIFICATION UNDER LICENCE L5099/1974/14 – SPODUMENE PRODUCTS FROM SHED 4 TO BERTH 3 SHIPLOADER – ADDENDUM**

I refer to Southern Ports Authority's notification to trial the handling of four bulk spodumene products from the Mt Marion Lithium Project using a different handling methodology to that already conducted at the Port of Esperance (the Premises). The trial notification was received by the Department of Water and Environmental Regulation (DWER) on 19 November 2018. On 18 December 2018, DWER provided a response noting that the original trial proposal presented an acceptable level of risk when assessed against the published [Guideline: Port Authority bulk handling trials](#) (the Guideline).

I also refer to SPA's letter received 18 December 2018, proposing an addendum to the original trial notification received 19 November 2018 due to delays in constructing the Shed 4 hardstand. Proposed changes in the addendum include stockpiling spodumene in Shed 5 prior to transfer to shiploading hoppers located within in Shed 4 using front end loaders. DWER notes that this addendum applies only to one shipment in January, following which spodumene will be handled through Shed 4 per the original trial notification. Further that SPA will minimise dust and spillage as a result of additional handling by not overfilling front end loader buckets used to transfer spodumene to Shed 4.

Although product will continue to be received and stored within a shed, aligning with Minimum Handling Method 3 of the Guideline, the altered method of handling more closely aligns with Minimum Handling Method 2 as product will be transported beyond the shed during loading by front end loader. The emission profile of this handling method is expected to be similar to that where product is stockpiled with a moisture content above the dust extinction level and in an open environment.

Therefore DWER has determined that the trial presents an acceptable level of risk for three of the four spodumene products (6% Coarse; 6% 50:50 Blend; and 4% Coarse). The 6% Fine spodumene product presents a higher dust risk as the proportion of particles sized 10 microns or finer is greater than 3% meaning that Minimum Handling Method 3 is required based on the distance to the nearest receptor.

During the trial, Southern Ports Authority will continue to be required to meet the minimum specifications for moisture content, muscovite and respirable silica quartz and obtain product quality data in accordance with Conditions 21, 22 and 23 of the existing Licence (L5099/1974/14). Ambient air quality monitoring for particulate matter and lithium (as PM<sub>10</sub>), as an indicator of particulates generated from spodumene handling, must also be conducted and reported against in accordance with Conditions 26 and 28 of the existing licence.

The earliest start date for the revised proposed spodumene handling method is 17 January 2019.

Note that DWER has already determined the risks presented by the original proposal to be acceptable for all four spodumene products and that these original handling methods proposed may commence at any time.

If you have any queries regarding the above information, please contact Clarrie Green as listed above.

Yours sincerely

Danielle Eyre  
Senior Manager, Industry Regulation (Resource Industries)

*Officer delegated under Section 20  
of the Environmental Protection Act 1986*

18 January 2019