



Mr Alan Byers
A/Chief Executive Officer
Southern Ports Authority
PO Box 1049
WEST PERTH WA 6872

Via email: ceo@southernports.com.au
Attention: Alex.Leonard@southernports.com.au

Dear Mr Byers

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

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.

DWER notes that all four spodumene products will be brought to the Premises by road train and stockpiled in bulk within Shed 4. Front end loaders will be operated within the shed to load spodumene into hoppers that connect to the existing iron ore circuit for shiploading at Berth 3. The first shipment is forecast for January 2019, with additional loading events expected every 27 to 28 days during a 12 month period with some months receiving two ships.

DWER further notes that, based on the information provided in Southern Ports Authority's notification:

- the products do not contain elevated asbestos, respirable silica, naturally occurring radioactive material, wastes, or waste-derived by-products;
- all four products have low concentrations of leachable metals presenting a low risk to the marine environment;
- three of the four products consist of less than 3% finer particles ($\leq 10 \mu\text{m}$ in diameter) with the 6% Lithium fines product consisting of 4.8% fines;
- the moisture content of all four spodumene products will remain above their respective dust extinction moisture levels throughout the trial; and
- the nearest residential receptor, a currently vacant port-owned premises, is located approximately 420 metres from Shed 4 and 660 metres from shiploading activities at Berth 3. DWER has referenced this residential premises as there is the potential for it to become occupied within the nominated trial period of 12 months.

Using the Trial process flow chart in Appendix C of the published [Guideline: Port Authority bulk handling trials](#), Minimum Handling Method 3 is appropriate for all products.

The proposed method of handling aligns with Minimum Handling Method 3 and DWER has determined that the trial presents an acceptable level of risk given the above handling methods, product characteristics and distance to receptors.

During the trial, Southern Ports Authority will 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 PM₁₀), 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 trial is 20 December 2018.

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*

13 December 2018