

# Proposed Provision of a Third Tippler and Associated Infrastructure at the Port of Saldanha: Basic Assessment Report

## APPENDIX E3: COMMENT AND RESPONSE REPORT

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### INTRODUCTION

This Comment and Response Report (IRR) holds all comments received from Interested and Affected Parties (I&APs) during the Public Participation Process (PPP) for the Basic Assessment for the proposed expansion of the Port of Saldanha tippler facility. It holds comments received during all phases of the PPP including the I&AP Registration Process, and the public review of draft Basic Assessment Report.

### CONTRIBUTIONS BY I&APs

Comments have been received from a number of I&APs during the PPP to date. Table 1 lists these contributors.

Table 1: Stakeholders from who comments have been received

No	Name	Organisation
<b>Comments Received During the Initial I&amp;AP Registration Period</b>		
01	Gideon van Niekerk	Resident
02	Mr Pieter Stegmann	Resident
03	Ms Wilene Smit	Resident
04	Mnr James Matthee	Resident
05	Ms Alana Duffell-Canham	Cape Nature
06	Mr Quinton Dollman	Afrisam
07	Mr Pieter Fabricius	Municipal Manager of West Coast District Municipality
08	Ms René de Kock	SANRAL
09	Mr Morgan Smit and Mr Willie Goosen	Ratepayers Association of Vredenburg
10	Peter Stegmaan	Resident
11	Andrae Nieuwoudt	Resident

No	Name	Organisation
<b>Comments Received During the Initial I&amp;AP Registration Period</b>		
12	Keith Harrison	West Coast Bird Club (WCBC)
13	Pieter Jantjies	School of Knowledge
14	Pippa Haarhof	West Coast Fossil Park
15	Troy Smuts	Heritage Western Cape

## 1. COMMENTS RECEIVED DURING THE I&AP REGISTRATION PERIOD (14 June – 16 July)

No	Date	NAME AND ORGANISATION	ISSUES/COMMENTS	RESPONSE
01	14 June 2013	Gideon van Niekerk	<p>Comments and concerns:</p> <ol style="list-style-type: none"> <li>1. I am in favour of this port development and its associated economic benefits to the West Coast. However, I do not want any adverse environmental impacts effecting the surrounding area and residential properties.</li> <li>2. In the past, a residential property owner's forum was established which held frequent discussions with Saldanha Port Authorities and which eventually lead to the Port Authority paying for the re-painting of residential properties effected by the air borne iron ore dust, emanating from the port operations.</li> <li>3. I urge you to obtain the information list of all Saldanha residents who used this monetary payment to re-paint their properties and which gave feedback of such actions in accordance with the Saldanha Port Authority procedure.</li> <li>4. I then urge you to contact all those people on the list and enquire regarding the current state of the properties i.e. defacement of exterior wall surfaces, as well as to conduct a survey to evaluate for yourself the effect of the air borne iron ore dust over the past couple of years.</li> <li>5. The agreement with Portnet was that only those property owners who used the money to re-paint their houses and gave proper feedback and proof of such work, will be able to claim for re-painting their properties again in future, if exterior walls were again defaced by iron ore dust, due to iron ore dust pollution and/or non-compliance to the relevant Saldanha Port environmental procedures.</li> </ol> <p>I will await your feedback and actions in this regard.</p>	<p>1. By following the procedures set in the environmental impact assessment regulations and other applicable legislation, the Environmental Assessment Practitioner is ensuring that the proposed project is socially, environmentally and economically sustainable.</p> <p>With regards to points 2 – 5: Your comments on the impact of dust pollution have been noted. This Basic Assessment will be focusing on impacts stemming from the installation of a third tippler and will not be addressing historic issues.</p>
02	18 June 2013	Pieter Stegmann Resident	<ol style="list-style-type: none"> <li>1. No addition or expansion to Transnet Saldanha Terminal can be done before major changes to the infrastructure is made.</li> <li>2. Tippler 3 will require an extension to the open sided conveyor belt system and an increase in the number of open air stockpiles. This will result in an increase in iron ore dust emission.</li> <li>3. The approval of the 1 July 2011 Atmospheric Emission Licence (AEL), to increase the export volume from 47 to 60 million tons, WITHOUT ANY CHANGE TO THE CURRENT INFRASTRUCTURE have increased the dust emission drastically. The dust pollution extent now 10/15 km North and 10/15 km South of the Terminal.</li> <li>4. The licensing authority, West Coast District Municipality, has failed to execute their duty according to the Air Quality Act and is now under</li> </ol>	<ol style="list-style-type: none"> <li>1. Your submission is interpreted such that you cannot agree to additions or expansions of the Saldanha Terminal until Transnet has addressed existing environmental impacts. More specifically the nuisance of rust-coloured iron dust fallout some distance from the Terminal. You wish for Transnet to increase its efforts in minimising the generation of red dust. This general principle of responsible environmental management is also supported in the text of the Basic Assessment Report.</li> <li>2. In addition to the third tippler new sections of railway lines and other infrastructure will be required. Please refer to Section 1 Project Description of the basic assessment report. A new conveyor belt will link Tippler 3 to the stockpiles in the port. At this stage, no new stockpiles are proposed.</li> <li>3. The impact of dust emissions from Tippler 3 have been assessed by an air</li> </ol>

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			<p>investigation by the Public Protector. Transnet have applied for the renewal of their licence that expired 31 March 2013.</p> <p>5. The e-mail below and the next e-mail tomorrow explain the present AEL application situation with legal consequences and possible strict infrastructure changes at the Terminal.</p>	<p>quality specialist. Dust emissions from the conveyors can be reduced through wetting of iron ore, use of chemical suppressants and enclosing the conveyors where practical. According to the results of the modelling conducted by the air quality specialist, the proposed third tippler may increase the maxima for fine and extra fine dust particles in the atmosphere by 3% and 4 %, respectively. Fallout is similarly predicted to increase by 3%. The specialist report contains charts showing modelled fallout across the region. Pieter Stegmann can check his claimed dust pollution extents with the use of said charts.</p> <p>4. The application for an Air Emissions License is running in parallel with this Basic Assessment.</p> <p>5. The EAP has no knowledge of the e-mails referred to. We will refer this to Transnet.</p>
03	18 June 2013	Wilene Smit Resident	<p>I would like to register? How do I proceed? I also want to send you my complaints with photos of evidence. I also would like to know when will they come and paint my house?</p>	<p>The GIBB public participation office confirmed Ms Smit's registration via email. This Basic Assessment process will investigate the impacts resulting from the construction and operation of Tippler 3 and associated infrastructure. The Basic Assessment process will not be addressing historical issues. The basic assessment aims to identify the impacts associated with the proposed project and methods to mitigate these impacts. The BA process will not assess any impacts associated with existing terminal operations.</p>
04	20 June 2013	James Matthee Resident	<p>Aangeheg 'n opsomming van my korrespondensie met Transnet sedert 2006. Ten spyte van hulle erkennings en ondernemings, het hulle nog GEEN pogings aangewend om my te vergoed vir my skade nie. Aangeheg ook onlangse foto's – nadat my huis reeds 2 maal oorgeverf is. Duidelik het die besoedeling nie verbeter sedert “ regstellende maatreels” gedoen is nie – dit het vererger. Transnet verkies om my skrywes te ignoreer, of maak lee beloftes Hierdie voorgestelde derde “ tippler” sal beslis die besoedeling verder vererger en Transnet weier om verantwoordelijkheid te aanvaar vir die skade – ondanks erkenning daarvan..</p> <p><u>English translation:</u></p> <p>Attached is a summary of my correspondence with Transnet since 2006. In spite of their acknowledgments and undertakings, they have still done NOTHING to reimburse me for my damage. Attached are also recent photo's-after my house has been painted twice. Obviously the pollution has not improved since correctional measures have been instated-it has got worse.</p>	<p>Your comments on the impact of dust pollution have been noted. This Basic Assessment will be focusing on impacts stemming from the installation of a third tippler and will not be addressing historic issues or impacts associated with existing Port operations.</p> <p>An air quality specialist has been engaged to assess the impact of a third tippler on dust emission from the Port of Saldanha. The specialist study found that the third tippler will result in the increase of the maxima for fine and extra fine dust particles in the atmosphere by 3% and 4 %, respectively. Fallout is similarly predicted to increase by 3%.</p>

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			This proposed 3rd tippler will make the pollution even worse and Transnet refuses to take responsibility for the damage.	
05	21 June 2013	Alana Duffell-Canham Cape Nature	<p>The site for the proposed tippler was historically covered by Saldanha Flats Strandveld.</p> <p>Although the tippler site has been largely transformed, natural vegetation could still be impacted on by the associated infrastructure and services that will be required and this should be taken into consideration. Other vegetation types such as Saldanha Limestone Strandveld may also be impacted.</p>	The EAP is aware of the conservation implications of this development. The vegetation on site has been assessed and mitigation measures have been provided.
06	21 June 2013	Quinton Dollman Afrisam	<ol style="list-style-type: none"> <li>1. Presentation of a dust dispersion model indicating the dust fallout on Farm 1139 downwind and to the north-west of the proposed tippler. This site is earmarked for our proposed cement factory currently subject of an EIA.</li> <li>2. The implications of the new Duferco bridge over rail on the infrastructure to the west of the rail line and how this new bridge will link with the existing Duferco private road.</li> </ol>	<ol style="list-style-type: none"> <li>1. Airshed Professional Planning have compiled a draft air quality specialist report for the installation and operation of Tippler 3. Please refer to section 5 Dispersion Modelling Results of the report included under Appendix D of the Basic Assessment Report.</li> <li>2. To accommodate the new Duferco Bridge a section of the haul road linking Namakwa Sands to the port will be relocated onto property owned by Arcelor Mittal. Transnet will ensure that road users are consulted and will endeavour to accommodate requirements into final designs</li> </ol>
07	27 June 2013	Pieter Fabricius	<p>With regards to your advertisement in the "Weslander" of 13 June 2013 it was noted that you have made no mention of the need to obtain authorization in terms of the National Environmental Management:Air Quality Act,2004 (Act 39 of 2004).</p> <p>This proposal will require an amendment to the Provincial Atmospheric Emission License of Transnet Port Terminals and should have been mentioned in your advertisement. It is recommended that you conduct your public participation process required for both authorizations simultaneously. In order for you to obtain a reference number from the licensing authority, in this instance the West Coast District Municipality; you will have to submit an application on the prescribed form that is available on councils website. <a href="http://www.westcoastdm.co.za">www.westcoastdm.co.za</a></p>	<p>An Air Emission License (AEL) to include the third tippler will be prepared concurrently with this Basic Assessment process.</p> <p>The content and results of the AEL application will be included in the final BAR provided the application is processed in time for the submission of the final BAR.</p>
08	04 July 2013	René de Kock	The South African National Roads Agency SOC Limited (SANRAL) has no comment with regard to the above application, as no national road will be affected.	Noted
09	04 July 2013	Morgan Smit & Willie Goosen	We as the Ratepayers association of Vredenburg is an interested and affected party to this matter. We would like to respond in saying we do not see the necessity for more tipplers in the port, because the two that are there makes	The third tippler will serve as a backup when one of the existing tipplers is out of service for maintenance or repair.

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			<p>enough dust that covers our whole area at the moment. We will only agree if the present dust problem can be stopped, and no dust will leave the port in future</p>	<p>If assessed independently the tippler will only result in a 3 - 4% increase in fine and extra fine dust particles in the atmosphere. Dust fallout is similarly predicted to increase by 3%.</p>
10		Pieter Stegmann	<p>I stand by my formal objections addressed in my three e-mails:</p> <p>a. E-mail dated 18 June 2013 (Infrastructure Facts and Questions: Legal Implications). <u>Awaiting verification by WCDM</u>. Transnet cannot implicate themselves to answer my question of how many stockpiles was there at the time they submitted their application. They know exactly how many stockpiles are there at any given date. That is their core business. They refuse to identify and explain the "Transfer Point" sources. The 27 km long conveyor belt do not consist of one or two km long sections therefore the number of 12 "Transfer Points" as source points is suspicious.</p> <p>b. E-mail dated 19 June 2013. (Infrastructure Emission Figures Unreliable) read with three monitor issues below (addendum to this e-mail).</p> <p>c. E-mail dated 24 June 2013 (DA Policy and recommended conditions to the licence).</p> <p>2. The RO Desalination plant is not operational since 1 May 2011 due to "technical problems" a senior Transnet official told the Weslander. Transnet cannot take the risk to pour 43 tons of waste <u>per month</u> into the lagoon (at the end of the pier) in response to my Report 2 dated 11 April 2011.</p> <p>THREE MONITOR ISSUES (Transnet application dust emission figures unreliable)</p> <p>3. Transnet response in general is that they operate according to and within the environmental Laws. The <b>principle issue</b> is: Whether the Ore Terminal is the <u>primary source / cause</u> of dust (<b>any kind of dust</b> including iron ore pink dust) generated by human activity effecting air, sea and land from Vredenburg to Langebaan. <u>The Ore Terminal deny accountability base on the results of their monitors.</u></p> <p>4. Monitors is an aid to measure dust emissions but it is not the ultimate and final means to prove compliance with the Law. The following <b>three monitor issues</b> will proof that the monitor figures supplied by Transnet do not reflect the true and actual dust emission from the Ore Terminal. The figures I use only serve as an example to illustrate the point (three issues) that I want to make.</p>	<p>The comment is noted. The EAP for the Tippler 3 Basic Assessment Report has not seen the 2013 AEL application form and the statements made therein. A response to Mr P. Stegmann will be provided as soon as further information is obtained</p>

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			<p><b>a. VOLUME.</b> A monitor measure a square metre (for argument sake). A figure of 4.63 grams per square metre was allocated to each road (general layer of dust in the full operational area). This is an insignificant figure but most misleading. Example. When one pour a teaspoon of sugar in a coffee mug the sugar cover the bottom area of the mug. Measuring one square <u>millimetre</u> the result is 4 gram. Divide the full bottom area into squares and you have 50 squares of a millimetre each. Multiply 50 squares times 4 gram and the <u>total volume</u> is 200 grams (one tea spoon) in the mug. The Terminal area is 0.69 <u>square kilometre</u> that is <b>6,900 square metre</b>. Multiply 6,900 squares times 4.63 grams per square metre then the <b>total dust volume</b> is <u>31,947 grams within the area</u> of the Ore Terminal. The dust generated within the operational area exceed the legal limit. The one square metre monitor figure present by Transnet in their application <u>do not reflect the volume result</u>. I suspect the operational area is most likely 5 square kilometre including the pier.</p> <p>This <b>significant volume of (iron ore) dust</b> can come from only <u>four "unit" sources</u> within the Ore Terminal (human activity) namely (a) the open air stockpiles with four stacker / extractor machines, (b) the ship loaders pouring ore from a <u>height of four metre</u> through the open air into the ships, (c) the <b>27 km</b> long open sided conveyor belt system and (d) the two tippler baghouses. Open air infrastructure issues. Note re (b): A loaded ship can drop more than 6 meter increasing the ore exposure to wind from the ship loaders to <u>more</u> than 10 metre.</p> <p><b>b. 20% / 80% AIR EMISSION.</b> Monitors within the Terminal area <b>measure only 20%</b> of the <b>average</b> dust released into the air. (20% - giving Transnet the benefit of doubt). The fallout of the most heavy dust particles (20%) occur within the operational area. The lighter particles (80%) escape into the air crossing the monitors and boundaries of the Terminal. The more lighter dust particles are carried 10/15 km far before fallout occur in Vredenburg and Langebaan. Note. Their monitor figures record the average / assume figure as one cannot shift the monitors each time the wind change direction.</p> <p>The <b>continuous 80% dust that escapes</b> the Terminal monitors <u>increase the actual volume</u> dust emission from the Terminal from 31,947 grams (20%) times 4 (80%) equal 127,788 grams! Exceeding their legal limits excessively. The visual pink dust serve as proof that not even the WCDM can deny.</p> <p>Transnet stress compliance with the Law base <u>solely on the average 20% dust emission recorded</u> by their monitors within their operational area. They, with full</p>	

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			<p>knowledge, <u>deliberately ignore / deny responsibility, the 80% dust escaping in the air</u>. They attribute this dust to other environment factors in their response!</p> <p><b>c. PERIOD OF 24 HOURS (A DAY).</b> Transnet monitor figures refer to one period of 24 hours only. The figure of 4.63 grams per single square meter <u>per one period of 24 hours (a day)</u> is on its own most misleading. The monitoring period of a single day, supplied by Transnet in their application, ignore deliberately the continuous, day after day, month after month, (iron ore) dust emanating from the Ore Terminal that <b>accumulate over a period of time. Over a period of 30 days the volume of dust escaping the Ore Terminal is 3,833,640 million grams per month!</b></p> <p><b>5. CONCLUSION.</b></p> <p>a. The total VOLUME of dust (4.68 g/c covering 9600 square meter = 31,947 g/c) is the true and actual dust emission figure <u>within</u> the boundaries of the Ore Terminal that exceed the lawful limit of 1,200 (industrial) and 600 (residential - Blue Water Bay residential area within 2 km).</p> <p>b. The monitored figures <b>record only 20 % of the average dust emission</b> generated within the Ore Terminal.</p> <p>c. The monitored <u>figure for a single 24 hours day</u> do not reflect the <b>accumulated result</b> of a continuous 24 hours 7 days a week (application info) dust emission from the Ore Terminal.</p> <p>d. The three monitor issues, volume, 20% / 80% air emission and period of 24 hours (per day) expose Transnet emission figures as unreliable (to put it mildly) and it does not reflect the true and actual dust emission from the Terminal.</p> <p>e. The <b>80% volume</b> of (iron ore) dust released <u>day after day accumulate</u> against buildings in Vredenburg and Langebaan. These three monitor issues for once and all <u>destroy the monitor myth and legal basis</u> of Transnet denying responsibility for (iron ore) dust pollution within Saldanha Bay Municipal area for a radius of 30 km.</p> <p>f. Add to this the fact that Transnet Terminal is the <b>one and only ore operator</b> that handle close to 60 million tons of iron ore.</p> <p>g. The dust pollution did increase with the increase in the export volume since September 2010. Confirm by my formal complaint per registered letter and up to</p>	



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			<p>March / June 2013 published in the Weslander news paper. These reported facts contradict Transnet claim that there was a decline in dust emission the past three years.</p> <p>The above facts <u>confirm the principle issue</u> that Transnet Ore Terminal is the <b>primary source and cause</b> of excessive and unlawful dust emission within the Saldanha Bay Municipal area. That they are fully accountable for the (iron ore) dust that stains and causing damages to state and private properties from Vredenburg to Langebaan.</p> <p><b>6. OBJECTION TO ANNEXURE C: TPT SALDANHA DUST MITIGATION ACTION PLAN</b></p> <p>a. <b>Overall objection.</b> The propose conditions to the renewal licence with timeframes will have <b>no affect</b> on the excessive dust emission from the Ore Terminal. It does not change the currant infrastructure nor change the open air handling of ore from the three priority unit dust sources.</p> <p>b. The propose "conditions" mainly address <u>standard operating and maintenance procedures</u> that do not address the dust pollution at all.</p> <p>c. Serial ERM 009 - monitors to detect dust exceedance from site - confirm (above) that Transnet is fully aware of the volume of dust escaping from the Terminal. No number of border monitors can monitor the dust passing the monitors in the air as explained above.</p> <p>7. Kindly take note that WSP Consultant cannot act as an "appeal" authority. WSP Consultant was <u>appointed by Transnet</u> and is <u>remunerated by Transnet</u> and <u>act on behalf of Transnet</u> (the "trespasser") and cannot therefore <u>act as the neutral appeal authority</u> as has been done with the previous consultant with the 2011 licence.</p>	
11	12 July 2013	Andrae Nieuwoudt	<p>I am a PROPERTY OWNER at 19, Artemis Rd, Paradise Beach, where we suffer from red iron ore dust staining paint on the walls. About 1 year ago TFR investigated and offered to repaint houses or contribute towards houses because of this contamination.</p> <p>This never happened and with more through put this damage as a result of red dust will increase.</p>	<p>Your comments on the impact of dust pollution on your house have been noted. This Basic Assessment will be focusing on impacts stemming from the installation of a third tippler and will not be addressing historic issues or impacts associated with existing Port operations. Mitigation measures will be provided as part of this BA process for any dust related impacts associated with this project.</p>

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			I strongly object to this expansion as TFR have and still is neglecting their responsibility.	
12	12 July 2013	Keith Harrison -West Coast Bird Club (WCBC)	The WCBC supports the project provided:- 1. The proposed position of the fourth tippler is shown on the position map, so that the cumulative effect can be judged for this and the Port Extension (4th Tippler) projects. 2. The technology used for the tippler, and the conveyor belt systems does NOT add to the current red dust problem towards Vredenburg and Louwville.	1. The third tippler will serve as a backup when one of the existing tipplers is out of service for maintenance or repair. 2. With the current technology, it is unavoidable that the operation of the Tippler 3 and its associated conveyor belt system will generate <u>some</u> fugitive dust. An air quality specialist has been engaged to assess the impact of a third tippler on dust emission from the Port of Saldanha. The specialist study found that the third tippler will result in the increase of the maxima for fine and extra fine dust particles in the atmosphere by 3% and 4 %, respectively. Fallout is similarly predicted to increase by 3%.
13	12 July 2013	Pieter Jantjies	We the School of Knowledge really want to thanks you for keep us inform. We wish you well as you take the community in consideration. That make us proud on you for taking our people with in a transparent way.	Noted.
14	14 July 2013	Pippa Haarhof – West Coast Fossil Park	Preliminary concerns would include the following: <ul style="list-style-type: none"> <li>• Modifications to geological features</li> <li>• Disturbance of potential palaeontological deposits</li> <li>• Dust pollution</li> <li>• Potential negative impact on living biota in the affected area</li> </ul> I reserve the right to make further comment.	Construction work for the Tippler 3 is not expected to modify geological features of note if the preferred alternative (Alternative 1) as described in the Basic Assessment Report is selected.  The footprint of Tippler 3 has been cleared previously for construction purposes when the port was built in the 1970s. It is unlikely that any heritage resources remain to present on the surface. Allowance is made in the EMPr for the correct handling of palaeontological resources if uncovered during construction activities.  The potential for an increase in dust pollution is specifically investigated in the Basic Assessment Report and a dedicated air quality specialist study is part of the investigations.  The EAP is aware of the conservation implications of this development. The vegetation on site has been assessed and mitigation measures have been provided.
15	15 July 2013	Troy Smuts, Heritage Officer, Heritage Western Cape	Heritage Western Cape requires a Notification of Intent to Develop (NID) to be submitted regarding the proposed Transnet SOC Ltd expansion of the iron ore tippler facility in the Port of Saldanha, as required by Section 38 of the National Heritage Resource Act (Act 25 of 1999). If this form has not already been submitted, please complete and submit the attached NID form and checklist, and send through one hardcopy and one digital copy (on a CD) along with any	A Notification of Intent to Develop is in the process of being prepared and will be submitted in due course to the Heritage Western Cape.

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			associated documentation to the HWC offices.	