

Environmental Authorisation for the proposed relocation of the bulk chemical storage facility at Anglo American Platinum's Rustenburg Base Metal Refiners (RBMR)

Environmental Authorisation Application Process

11 August 2020



 **srk** consulting

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Objectives of the Meeting

- Notify the DEDECT of the project and application.
- To discuss and confirm the proposed processes (emergency situation and EA), including the required specialist studies.
- To discuss the stakeholder engagement process to be followed; and
- To discuss any other DEDECT requirements.

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Setting the Scene

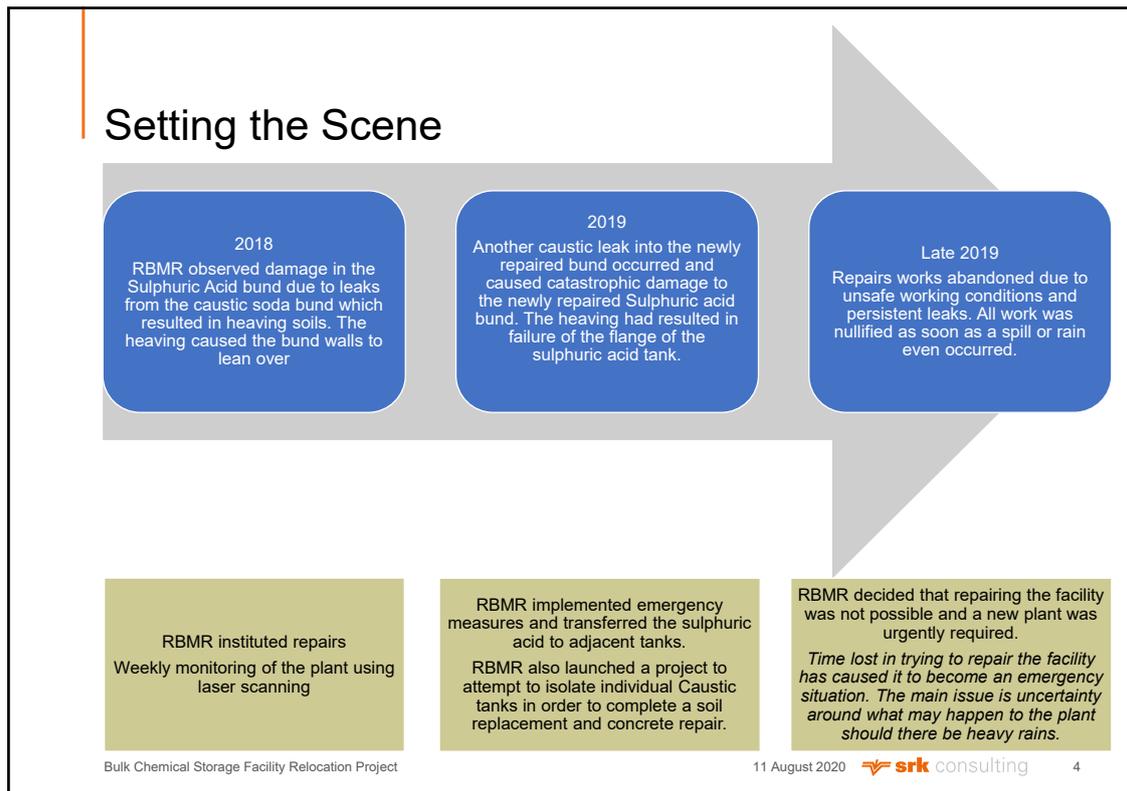
- Anglo American Platinum's Rustenburg Base Metal Refiners (RBMR) requires reagents for processing applications at their Magnetic Concentrator (MC) Plant and BMR plants.
- These chemicals are received, stored and distributed from a centralised bulk chemical storage facility.
- However, continuous leaks and loss of bund integrity have resulted in the contamination of the current site's substrate, resulting in heaving of the foundations.
- The bulk chemical storage facility therefore needs to be relocated.

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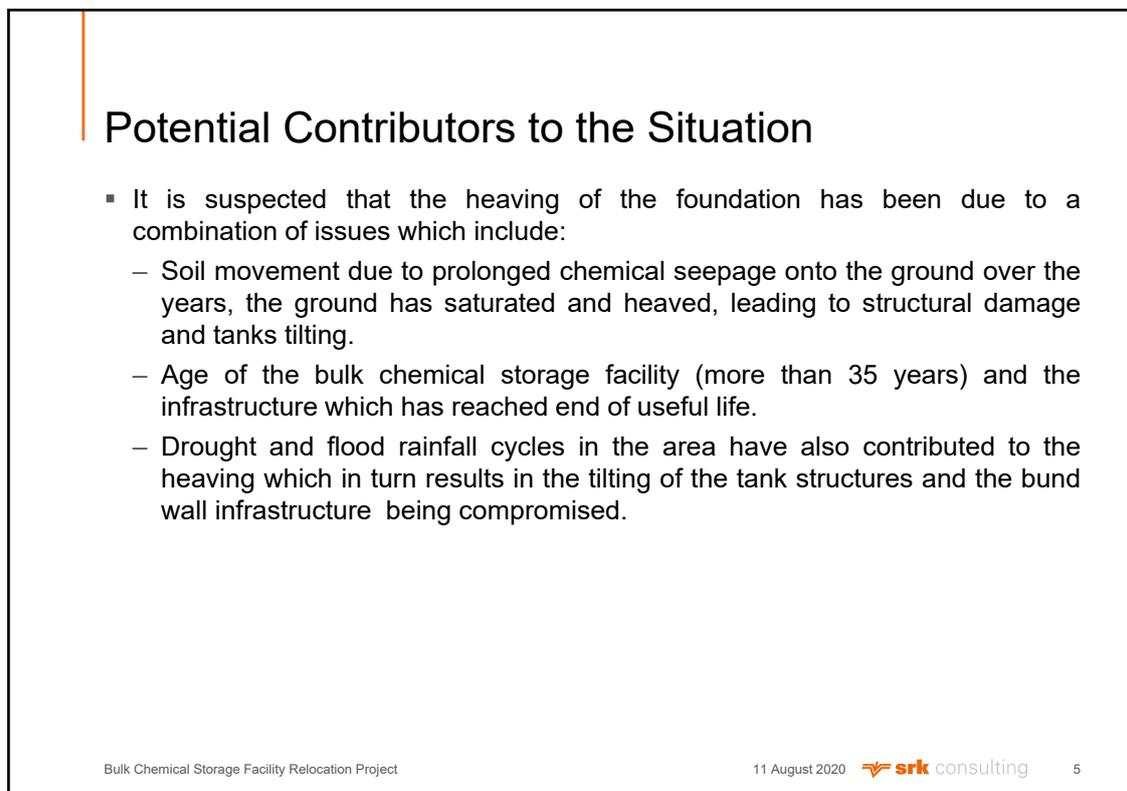
Setting the Scene



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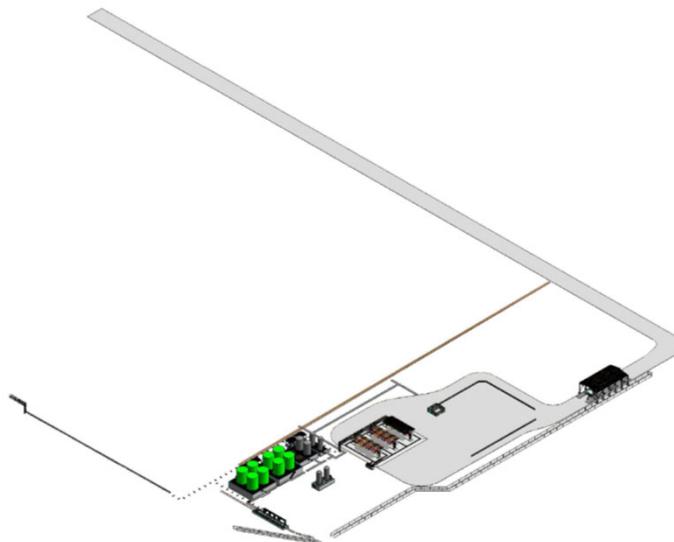
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Location of the current and proposed bulk chemical storage facility



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Layout of the proposed bulk chemical storage facility



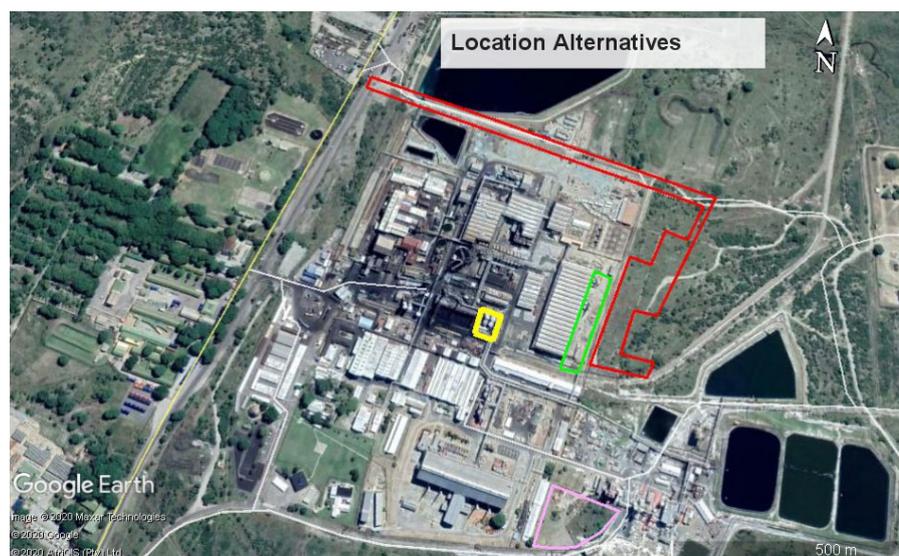
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Project Alternatives

- The following project location alternatives were considered:
 - Preferred Option: Located in a greenfields area outside the RBMR boundary;
 - Alternative 1: Located inside RBMR boundary to the east of the Copper tank house; and
 - Alternative 2: Located within the RBMR boundary (brownfields) to the East of the Nickel Tank House.
- A technical evaluation of the options was undertaken and the preferred option was chosen based on:
 - Reduce vehicle - pedestrian interaction by reducing number of chemical offloading trucks;
 - Eliminate rail deliveries traffic within the RBMR facility; and
 - Reduce congestion at RBMR entrance Gates & Weighbridge.

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Locations of Project Alternatives



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Required Authorisations

- The construction of a new bulk chemical storage facility triggers activities listed in terms of Listing Notices 1 and Listing Notice 2 of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) (as amended) and will require an Environmental Authorisation (EA) from the North West Department of Economic Development, Environment, Conservation (DEDECT).
- It is expected that no other authorisations, licences and/or permits will be required for the project.
- This will however be confirmed by specialists who are currently undertaking their studies

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NEMA Listed Activities triggered

Government Notice and Activity Number	Relevant Activity as per the relevant Listing Notice	Describe the portion of the development as per the project description that relates to the applicable listed activity
Listing Notice 1 (GNR 327): Activity 24	The development of a road— (i) [a road] for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) [a road] with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;	The proposed project will include tarring of an existing gravel access road.
Listing Notice 1 (GNR 327): Activity 27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—	Construction of the proposed bulk chemical storage facility will require clearance of land with a footprint more than 1 hectare and less than 20 ha.
Listing Notice 1 (GNR 327): Activity 31	The decommissioning of existing facilities, structures or infrastructure...	The relocation of the bulk chemical storage facility will require the decommissioning of the existing facility.
Listing Notice 1 (GNR 327): Activity 60	The expansion and related operation of facilities or infrastructure for the bulk transportation of dangerous goods—(ii) in liquid form, outside an industrial complex or zone, by an increased throughput capacity of 50 cubic metres or more per day;	The plant will require pipelines that will be used to transport chemicals from the bulk chemical storage facility to the RBMR facilities where the chemicals will be used.
Listing Notice 1 (GNR 327): Activity 64	The expansion of railway lines, stations or shunting yards where there will be an increased development footprint, excluding—	A railway siding running from the existing railway line running in RBMR will be constructed for the transportation of chemicals to the new bulk chemical storage facility.

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NEMA Listed Activities triggered

Government Notice and Activity Number	Relevant Activity as per the relevant Listing Notice	Describe the portion of the development as per the project description that relates to the applicable listed activity
Listing Notice 2 (GNR 325): Activity 4	The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres.	The proposed bulk chemical storage facility will have storage capacity of more than 500m ³ .
Listing Notice 2 (GNR 325): Activity 7	The development and related operation of facilities or infrastructure for the bulk transportation of dangerous goods— ii) in liquid form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with a throughput capacity of more than 50 cubic metres per day; or	The plant will require pipelines that will be used to transport chemicals from the bulk chemical storage facility to the RBMR facilities where the chemicals will be used.

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Proposed Approach

- A two pronged approach is being requested for the project as follows:
 - Due to the situation at the current plant and associated socio-economic, environmental and health and safety impacts that could occur due to a failure of the plant, RBMR is requesting the DEDECT to declare it an emergency situation and issue a directive allowing RBMR to commence with construction of the new plant whilst the EIA is underway; and
 - An EIA for the proposed bulk chemical storage facility.
- RBMR and SRK have compiled a motivation for the DEDECT to consider and make a decision on declaring the current bulk chemical storage facility an emergency situation
- Preliminary specialist field work (Heritage Resources and Biodiversity) found no fatal flaws and red flags associated with the proposed site.

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Stakeholder Engagement

- NEMA Chapter 6 process including:
 - Stakeholder identification.
 - Development of a stakeholder database.
- Project Announcement (notification of stakeholders through notification letters, newspaper advertisement and on-site notices).
- Draft Scoping Report:
 - Notification letters and SMSes; and
 - 30-day public review and commenting on the Draft Scoping Report.
- Draft EIA Report:
 - Notification letters and SMSes; and
 - 30-day public review and commenting on the Draft EIA Report.

Anticipated Key Impacts

Element of Environment	Potential Impact Descriptions
Socio-Economic	Possible limited and temporary job opportunities during the construction phase of the Bulk Chemical Storage Facility
Hydrogeology	Possible groundwater contamination from hydrocarbons leaking from construction vehicles.
Surface water	Possible, but unlikely surface water contamination.
Air Quality	Possible, but unlikely impact on air quality in the area.
Noise	Possible generation of noise during the construction phase of the bulk chemical storage facility
Heritage Resources	Possible, but highly unlikely impact on heritage resources
Visual	It is not anticipated that any additional visual impacts will be associated with the proposed bulk chemical storage facility
Soils/Land Use/Land Capability	Localised loss of soil resource and change in land capability and land use due to the construction of the plant is expected.
Traffic	Possible impacts on traffic due to transportation of construction material
Biodiversity	Loss of biodiversity due to vegetation clearance for construction.
Wetland	None, there are no wetlands that are located on the proposed Bulk Chemical Storage Facility site.

Specialist Studies

- The DEA Screening Tool identified terrestrial biodiversity specialist studies as the only specialist study required
- However, since the area is a greenfields area, a heritage resource impact assessment will also be undertaken.
- RMBR also appointed a specialist to assist with the Stormwater Management Plan (SWMP) which will link into the current RBMR SWMP
- Other project related impacts will be based on:
 - Existing information (specialist studies, monitoring reports, audit reports and EIA reports); and
 - EAP team experience in the area.

Potential Implications of not declaring an emergency situation

Environmental Implications including:

- Potential water contamination (surface and groundwater)
- Potential contamination of land

Health and Safety implications for the RBMR personnel

Socio-economic impacts including:

- Loss of revenue in terms of interest of deferred cash (approx. R11 Billion/month)
- Impact on RBMR's image and reduced market image
- Loss of employment

Way Forward

- Submission of the emergency situation motivation
- Submission of the application for an EA.
- Compilation / finalisation of the draft Scoping Report for public and authority review and comment.
- Incorporation of comments into the final Scoping Report.
- Submission of final Scoping to DEDECT for decision making.
- Compilation / finalisation of the draft EIR and EMPr for public and authority review and comment.
- Incorporation of comments into the final EIR and EMPr.
- Submission of final EIR and EMPr to DEDECT for final decision making.

Thank You

Anglo American Platinum's Rustenburg Base Metal Refiners (RBMR)
CA Pre-Application Meeting EIA Bulk Chemical Storage Facility
Relocation

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