



Ass # 846
Bull # 727
State # 347

WESTERN AUSTRALIA

MINISTER FOR THE ENVIRONMENT

**STATEMENT TO AMEND CONDITIONS APPLYING TO A PROPOSAL
(PURSUANT TO THE PROVISIONS OF SECTION 46 OF THE
ENVIRONMENTAL PROTECTION ACT 1986)**

PROPOSAL: SODIUM CYANIDE (LIQUID) PLANT,
EXPANSION TO 40 000 TPA (DEBOTTLENECKING),
KWINANA (300 / 300-1 / 846)

CURRENT PROPONENT: AUSTRALIAN GOLD REAGENTS PTY LTD

CONDITIONS SET ON: 1 JUNE 1990

CONDITIONS AMENDED ON: 7 MARCH 1991

Condition 1 is amended to read as follows:

1A Proponent Commitments

The proponent has made a number of environmental management commitments in order to protect the environment.

In implementing the proposal, including the modification to allow each plant to produce up to 35 000 tpa as reported on in Environmental Protection Authority Bulletin 727, the proponent shall fulfil the commitments made on 28 March 1990, provided that the commitments are not inconsistent with the conditions or procedures contained in this statement. (A copy of the commitments is attached).

1B Implementation

Changes to the proposal which are not substantial may be carried out with the approval of the Minister for the Environment.

Subject to the conditions in this amended statement, the manner of detailed implementation of the proposal shall conform in substance with that set out in any designs, specifications, plans or other technical material, including the assumptions made in the risk assessments, submitted by the proponent to the Environmental Protection Authority with the proposal. Where, in the course of that detailed implementation, the proponent seeks to change those designs, specifications, plans or other technical material in any way that the Minister for the Environment determines, on the advice of the Environmental Protection Authority, is not substantial, those changes may be effected.

Condition 5 concerning the Kwinana Integrated Emergency Management System is deleted.

The following condition and procedure are inserted following condition 10:

11 Compliance Auditing

In order to ensure that environmental conditions and commitments are met, an audit system is required.

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11-1 The proponent shall prepare periodic "Progress and Compliance Reports", to help verify the environmental performance of this project, in consultation with the Environmental Protection Authority.

Procedure

- 1 The Environmental Protection Authority is responsible for verifying compliance with the conditions contained in this statement, with the exception of conditions stating that the proponent shall meet the requirements of either the Minister for the Environment or any other government agency.
- 2 If the Environmental Protection Authority, other government agency or proponent is in dispute concerning compliance with the conditions contained in this statement, that dispute will be determined by the Minister for the Environment.

Kevin Minson MLA
MINISTER FOR THE ENVIRONMENT

15 MAR 1994

Environmental Management Commitments

**SODIUM CYANIDE (LIQUID) PLANT,
EXPANSION TO 40 000 TPA (DEBOTTLENECKING),
KWINANA (300 / 300-1 / 846)**

AUSTRALIAN GOLD REAGENTS PTY LTD

SODIUM CYANIDE PLANT - EXPANSION TO 40 000 tpa (DEBOTTLENECKING)

SUMMARY OF MANAGEMENT COMMITMENTS

The commitments which the proponent has made to environmental management during the design, construction and operation of the expanded facilities are as follows:

1. Prior to implementing any modifications to the design of the existing plant, the following safety checks will be undertaken:
 - (1) referral of the proposed modification to the process licensor, Roehm GmbH;
 - (2) liaison with the risk consultant on the proposed changes if they are likely to affect the risk analysis; and
 - (3) HAZOP analysis of the proposed modifications to the plant design.
2. Construction of the proposed expansion will be undertaken in accordance with a Construction Stage Management Report similar to that prepared for the existing plant, but recognising the potential hazards of the existing plant, together with relevant conditions imposed by the Environmental Protection Authority.
3. All construction materials and practices will be in accordance with the relevant Australian codes and international standards where appropriate.
4. The plant design will ensure that emissions of nitrogen oxides during normal operating conditions will be within the National Health and Medical Research Council (NH&MRC) recommended guidelines and will also comply with guidelines adopted by the Victorian Environment Protection Authority.
5. Safety features incorporated in the existing plant will be incorporated in the expanded facilities.
6. Wastewater from the plant will be managed according to the wastewater management strategy approved by the Environmental Protection Authority for the existing plant.
7. The process and storage areas will be sealed and banded so that any washings, contaminated stormwater run-off or spills will be collected and directed to the wastewater treatment plant sump, and analysed and treated prior to disposal. Any discharge of treated wastewater into Cockburn Sound will comply with the criteria specified in Bulletin No. 103 or the terms of the Environmental Protection Authority licence.
8. Approval for any additional storage of sodium cyanide will be sought from the Chief Inspector, Explosives and Dangerous Goods, Department of Mines.
9. A fire protection system will be incorporated in the expanded facilities in accordance with the requirements of the plant design and the Western Australian Fire Brigades Board. CSBP works personnel will be trained in the appropriate fire-fighting techniques. In addition to the fire-fighting capability of CSBP's Kwinana works, the fire-fighting co-operative established by the industrial operators in the Kwinana district will be available for emergency assistance.

10. All employees will be trained in the safe work practices and emergency procedures appropriate to the operation of the plant and handling of all associated materials. The management structure for the expanded facilities will incorporate at least two tiers of personnel technically qualified to manage hazardous chemical operations.
11. On-site emergency facilities at CSBP's Kwinana works will continue to include a dedicated emergency response vehicle, fire tender and an ambulance at all times, and an occupational health sister will be in attendance during normal working hours.
12. A detailed operating manual has been prepared for the existing plant from information supplied by the licensor, covering all process work, including start-up, shut-down, plant testing, inspection and emergency action. The procedures manual will be amended as necessary to include the expanded facilities.
13. The proponent will arrange for observers from the licensor to be at the plant during commissioning of the expanded facilities if it is deemed necessary by the licensor and the proponent.
14. The expanded facilities and any interconnections to the existing plant will be subject to a full HAZOP study and follow-up prior to commissioning.
15. Stocks of neutralizing agent (ferrous sulphate) are located along the transport routes at agreed locations. They will be inspected regularly to ensure that they are kept in good order.
16. Emergency response practice sessions will take place on a basis agreed with the relevant authorities.
17. The plant operator will maintain a dedicated emergency response vehicle at the Kwinana works and this will be available to service any off-site incident involving the transport of sodium cyanide.
18. Upon commissioning, monitoring of the existing plant will be undertaken in accordance with a comprehensive Environmental Monitoring and Management Programme, and the proposed expansion will be incorporated into this Environmental Monitoring and Management Programme to the satisfaction of the Environmental Protection Authority.
19. Liaison with local Shires, the Environmental Protection Authority, the Department of Mines, Westrail and counter-disaster groups will occur as appropriate in regards to proposed changes to the agreed transport routes or the addition of new market areas.
20. The proponent will prepare a Total Hazard Control Plan to the satisfaction of the Chief Inspector, Explosives and Dangerous Goods, Department of Mines, for the sodium cyanide plant and the expanded facilities at Kwinana.