

1. Summary of proposed changes to conditions

AGR is seeking the removal of conditions managed under Part V of the EP Act or the *Dangerous Goods Safety Act 2004* and proponent commitments so that a contemporary statement can be applied to the Sodium Cyanide Plants (Liquid and Solid) at Kwinana.

AGR requests deletion to the implementation conditions 2,5-1, 6,7,8,9,10 &11, and deletion of all proponent commitments to contemporise and rationalise the implementation conditions for the Sodium Cyanide Plants.

AGR request Condition 4 be replaced with the contemporary condition for compliance reporting.

For the purpose of the assessment of the proposed changes to the proposal, the relevant environmental factors previously identified by the EPA and identified in the Statement of Environmental Principles, Factors and Objectives are:

- Air Quality (previously Atmospheric emissions of ammonia and cyanides)
- Social Surroundings (previously Noise)
- Marine Environmental Quality (previously Wastewater)

Part B: Environmental assessment

1. Identification of existing conditions to be changed (complete for each change)

Condition number and title	Condition 2– Proponent Commitments
Explain the intent of the existing condition	This condition relates to the environmental management commitments documented in schedule 2.
EPA Factor and Objective of existing condition	N/A
New EPA Factor and Objective	N/A

2. Proposed changes to conditions

Define the proposed change to condition and wording of new proposed condition	AGR is seeking deletion of Condition 2 and all of the proponent commitments in schedule 2. All proponent commitments are managed under other regulatory processes.
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	<p><u>Proponent Commitment 1 – Environment Management</u> Proponent Commitment 1 requires the proponent to have in place an Environmental Monitoring and Management System, which details procedures for the management and monitoring of the solid and liquid sodium cyanide manufacturing facility. The system is required to include management of water (surface and waste), solid waste, noise and transport.</p> <p>AAGR requests that this commitment be marked as complete, as AGR has a current Environmental Monitoring and Management System, as per evidence provided in Appendix P1-2.</p>

AGR will continue to maintain the Environmental Monitoring and Management System and requests that this commitment be marked as complete as management of wastewater and surface water, noise and other wastes is managed under Part V of the EP Act.

AGR environmental monitoring and emissions management procedures are included in the Kwinana Environmental Quality Assurance Program (QAP) (Appendix P1-2). The CSBP Kwinana EP Act licence has a condition requiring that the QAP is submitted to DWER with the annual monitoring report. This document is stored on CSBP's document management system where document review dates are specified.

AGR will continue to maintain a Transport Management Plan as described in Proponent Commitment 9 which is reviewed every two years and currently submitted to the DWER with the Annual Compliance and Assessment Report (Appendices P9-P10).

The transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:

- *Explosives and Dangerous Goods Act 1961*
- *Dangerous Goods Safety Act 2004.*
- *Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007*
- *Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007*
- *Dangerous Goods (Transport) Act 1998*
- *Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition)*
- *Main Roads Western Australia (WA) Regulations.*
- *Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007.*
- Department of Mines, Industry Regulation and Safety – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer

Proponent Commitment 2 – Environment Management
Proponent Commitment 2 requires the proponent to review the Environmental Monitoring and Management System at intervals not exceeding 3 years. AGR requests that this commitment be marked as complete, as the Environmental Monitoring and Management System will continue to be maintained and the documents listed under the Environmental Monitoring and Management

System stored on CSBP's document management system where document review dates are specified.

AGR environmental monitoring and emissions management procedures are included in the Kwinana Environmental Quality Assurance Program (QAP). The CSBP Kwinana EP Act licence has a condition requiring that the QAP is submitted to DWER with the annual monitoring report. This document is stored on CSBP's document management system where document review dates are specified.

Proponent Commitment 3 – Water Management

Proponent Commitment 3 requires the proponent to have in place a Water (Surface and Waste) Management Plan which details procedures for the management of water discharged from the site. As per evidence provided in Appendix P3-4, AGR has a current Wastewater Management Plan.

AGR requests this commitment be marked as complete as the discharge of wastewater is managed under conditions of the licence issued under Part V of the EP Act.

Proponent Commitment 4 – Water Management

Proponent Commitment 4 requires the proponent to review the Water (Surface and Waste) Management Plan at intervals not exceeding 3 years. The Water (Surface and Waste) Management Plan is stored on CSBP's document management system where document review dates are specified.

AGR requests this commitment be marked as complete as the discharge of wastewater is managed under conditions of the licence issued under Part V of the EP Act and the management plan is reviewed as part of CSBP's document management system.

Proponent Commitment 5– Solid Waste Management

Proponent Commitment 5 requires the proponent to have in place a Solid Waste Management Plan which details procedures for the management of solid waste disposal from the site. As per evidence provided in Appendix P5-6 AGR has a current Solid Waste Management Plan.

AGR requests this commitment be marked as complete as solid waste is managed under Part V of the EP Act and the *Environmental Protection (Controlled Waste) Regulations 2004*.

Proponent Commitment 6– Solid Waste Management

Proponent Commitment 6 requires the proponent to review the Solid Waste Management Plan at intervals not exceeding 3 years. The Solid Waste Management Plan is

stored on CSBP's document management system where document review dates are specified.

AGR requests this commitment be marked as complete as solid waste is managed under Part V of the EP Act and the Environmental Protection (Controlled Waste) Regulations 2004. The management plan is reviewed as part of CSBP's document management system.

Proponent Commitment 7– Atmospheric Emissions

Proponent Commitment 7 requires the proponent maintain an emission rate of total cyanide (gaseous and particulate) at or below 0.58 g/sec.

AGR requests this commitment be marked as complete as atmospheric emissions are managed under conditions of the licence issued under Part V of the EP Act. Evidence of compliance with this commitment is provided in Appendix P7 and includes a copy of the EP Act licence for AGR and the Annual Monitoring Report provided to the DWER as per EP Act Licence Condition 6.

Proponent Commitment 8 – Facility Emergency Response

Proponent Commitment 8 requires the proponent be represented in KIMA and KIPS and maintain emergency response capabilities in accord with the Safety Report and approved Transport Management Plan.

AGR requests this commitment be marked as complete as emergency response is part of the Sodium Cyanide Manufacturing Facility Safety Report approved by the Department of Mines, Industry Regulation and Safety in accordance with the *Dangerous Goods Safety Act 2004* and the *Dangerous Goods Safety (Major Hazard Facilities) Regulations 2007* and the transport of sodium cyanide is regulated under the *Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007*. Department of Mines, Industry Regulation and Safety officers attend six monthly Safety Report performance review meetings on site and emergency response is part of this meeting's agenda.

Proponent Commitment 9 – Transport Management Plan

Proponent Commitment 9 requires the proponent have in place a transport management plan which details procedures for the management of transport of solid and liquid cyanide.

AGR requests that this commitment is marked as complete as the transport management plan is in place and is reviewed as part of CSBP's document management system. The transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:

- *Explosives and Dangerous Goods Act 1961*
- *Dangerous Goods Safety Act 2004.*
- *Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007*
- *Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007*
- *Dangerous Goods (Transport) Act 1998*
- *Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition)*
- *Main Roads Western Australia (WA) Regulations*
- Department of Mines, Industry Regulation and Safety – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer

Proponent Commitment 10 – Transport Management Plan

Proponent Commitment 10 requires the proponent to review the transport management plan on a two yearly basis.

AGR requests this commitment be marked as complete as the management plan is reviewed as part of CSBP's document management system.

Proponent Commitment 11 – Solid Export Emergency Response

Proponent Commitment 11 requires the proponent to audit the Stevedore's operations, Safety Management System and Emergency Response Plans for handling of solid sodium cyanide.

AGR requests this commitment be marked as complete as the Stevedore's operations, Safety Management System and Emergency Response Plans is audited as part of AGR's audit schedule and Solid Export Emergency Response is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:

- *Explosives and Dangerous Goods Act 1961*
- *Dangerous Goods Safety Act 2004.*
- *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*
- *Dangerous Goods Safety (Explosives) Regulations 2007*

Proponent Commitment 12 – Transport Options

Proponent Commitment 12 requires the proponent review other transport options, including road/ rail viability and risk assessment.

	<p>AGR will continue to maintain a Transport Management Plan as described in Proponent Commitment 9 which is reviewed every two years and is currently submitted to the DWER with the Annual Compliance and Assessment Report.</p> <p>AGR requests this commitment be marked as complete as the transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:</p> <ul style="list-style-type: none"> • <i>Explosives and Dangerous Goods Act 1961</i> • <i>Dangerous Goods Safety Act 2004.</i> • <i>Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods (Transport) Act 1998</i> • <i>Australian Code for the Transport of Dangerous Goods by Road and Rail(7th Edition)</i> • <i>Main Roads Western Australia (WA) Regulations</i> • Department of Mines, Industry Regulation and Safety – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer.
<p>Consultation conducted (include discussions relating to changes to licences/permits)</p>	<p>Liquid effluent discharges was deleted from the Key Characteristics Table in Schedule 1 in February 2013 as discharge water quality is regulated under Part V of the <i>EP Act 1986</i>.</p> <p>Gaseous emissions was removed from Table1: Key Characteristics Table in November 2014 as they are managed under conditions of licence issued under Part V of the <i>Environmental Protection Act 1986</i>.</p> <p>Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.</p>
<p>Changes to Environmental Management Plans</p>	<p>There will be no change to environmental management plans.</p>
<p>Provision of spatial information</p>	<p>N/A</p>
<p>3. Identification of existing conditions to be changed (complete for each change)</p>	
<p>Condition number and title</p>	<p>Condition 4 – Compliance Audit and Performance Review</p>
<p>Explain the intent of the existing condition</p>	<p>Compliance Reporting</p>

EPA Factor and Objective of existing condition	N/A
New EPA Factor and Objective	N/A
4. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	AGR is seeking to have this condition revised to the contemporary condition for compliance reporting.
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	N/A
Consultation conducted (include discussions relating to changes to licences/permits)	This has been discussed with Officers from DWER. The requirement to submit a five yearly performance review report is not a requirement in new Ministerial Statements. The DWER officer advice was to request a contemporary condition for compliance reporting.
Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
5. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 5-1– Preliminary Decommissioning Plan
Explain the intent of the existing condition	Within six months following the date of publication of this statement, the proponent shall prepare a Preliminary Decommissioning Plan which provides the framework to ensure that the plant site is left in an environmentally acceptable condition to the requirements of the Minister for the Environment on advice from DWER
EPA Factor and Objective of existing condition	N/A
New EPA Factor and Objective	N/A
6. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	AGR is seeking to have this condition deleted as the Preliminary Decommissioning Plan was submitted to DER in July 2006.
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	N/A
Consultation conducted (include discussions relating to changes to licences/permits)	Correspondence from the Office of the Environmental Protection Authority in 7 April 2010 (Ref DEC1896) marked Condition 5-1 as complete.
Changes to Environmental Management Plans	There will be no change to environmental management plans.

Provision of spatial information	N/A
7. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 6 – Review of Options for the Transport of Solid Sodium Cyanide (Kwinana to Fremantle)
Explain the intent of the existing condition	The proponent shall review the transport options and related matters referred to in commitment 12 by 31 August 2007 and at intervals of two years thereafter.
EPA Factor and Objective of existing condition	Transport was not identified as a relevant environmental factor or principle.
New EPA Factor and Objective	N/A
8. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	<p>AGR is seeking to have this condition deleted as the transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:</p> <ul style="list-style-type: none"> • <i>Explosives and Dangerous Goods Act 1961</i> • <i>Dangerous Goods Safety Act 2004.</i> • <i>Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods (Transport) Act 1998</i> • <i>Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition)</i> • <i>Main Roads Western Australia (WA) Regulations.</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007.</i> • DMP – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Environmental Studies/Supporting Information. Provision of IBSA data package.	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered

	by the Department of Mines, industry Regulation and Safety.
Consultation conducted (include discussions relating to changes to licences/permits)	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
9. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 7 – Transport of Solid Sodium Cyanide (Kwinana to Fremantle)
Explain the intent of the existing condition	The proponent shall transport solid sodium cyanide in a manner that is consistent with the findings of the reviews required by condition 6-1.
EPA Factor and Objective of existing condition	Transport was not identified as a relevant environmental factor or principle.
New EPA Factor and Objective	N/A
10. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	<p>AGR is seeking to have this condition deleted as the transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:</p> <ul style="list-style-type: none"> • <i>Explosives and Dangerous Goods Act 1961</i> • <i>Dangerous Goods Safety Act 2004.</i> • <i>Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods (Transport) Act 1998</i> • <i>Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition)</i> • <i>Main Roads Western Australia (WA) Regulations.</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007</i> • DMP – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer
Relevant EPA Factor and Objective	Transport was not identified as a relevant environmental factor or principle.
Relevant EPA Policy and Guidelines applied	N/A

Identify changes to Schedule 1	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Environmental Studies/Supporting Information. Provision of IBSA data package.	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Consultation conducted (include discussions relating to changes to licences/permits)	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
11. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 8 – Transport of Liquid Sodium Cyanide
Explain the intent of the existing condition	Defines how liquid sodium cyanide may be transported from site. The proponent shall use rail transport of liquid sodium cyanide wherever practicable and defines when road transport may be used.
EPA Factor and Objective of existing condition	Transport was not identified as a relevant environmental factor or principle.
New EPA Factor and Objective	N/A
12. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	<p>AGR is seeking to have this condition deleted as the transport of sodium cyanide is under the control of the Department of Mines, Industry Regulation and Safety and is currently regulated under the:</p> <ul style="list-style-type: none"> • <i>Explosives and Dangerous Goods Act 1961</i> • <i>Dangerous Goods Safety Act 2004.</i> • <i>Dangerous Goods Safety (Dangerous Goods Handling and Storage of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non Explosives) Regulations 2007</i> • <i>Dangerous Goods (Transport) Act 1998</i>

	<ul style="list-style-type: none"> • <i>Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition)</i> • <i>Main Roads Western Australia (WA) Regulations.</i> • <i>Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007</i> • DMP – Dangerous Goods Safety Guidance Note – Route Selection, vehicle stopping and bulk transfer
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in Ministerial Statement in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Environmental Studies/Supporting Information. Provision of IBSA data package.	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Consultation conducted (include discussions relating to changes to licences/permits)	Transport of Liquid and Solid sodium Cyanide was removed from Table 2: Location and authorised extent of physical and operational elements in November 2019 as transport of dangerous goods is regulated under the <i>Dangerous Goods and Safety Act 2004</i> and administered by the Department of Mines, industry Regulation and Safety.
Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
13. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 9 – Noise Management
Explain the intent of the existing condition	AGR has implemented the Noise Management Plan (Appendix and the Sodium Cyanide Plants comply with the <i>Environmental Protection (Noise) Regulations 1997</i> (as amended). This has been marked as complete as per correspondence from the OEPA 7 April 2010 (DEC1896).
EPA Factor and Objective of existing condition	Noise (now Social Surroundings) was identified as a relevant environmental factor or principle.
New EPA Factor and Objective	N/A
14. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	AGR is seeking to have this condition deleted as noise is regulated under the <i>Environmental Protection (Noise) Regulations 1997 (as amended)</i> which is administered by

	the Department of Water and Environmental Regulation under Part V of the <i>Environmental Protection Act 1986</i>
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	N/A
Consultation conducted (include discussions relating to changes to licences/permits)	N/A
Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
15. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 10 – Emissions Verification
Explain the intent of the existing condition	To verify that cyanide, ammonia and total particulate emissions from the upgraded plant are consistent with emission estimates used to model impacts on the air quality in the vicinity of the operations.
EPA Factor and Objective of existing condition	Atmospheric emissions of ammonia and cyanides was identified as a relevant environmental factor or principle.
New EPA Factor and Objective	Air Quality
16. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	AGR is seeking to have this condition deleted as cyanide and ammonia are monitored quarterly and reported to the Department of Water and Environmental Regulation annually in accordance with conditions 6 and 8 of the EP Act licence L6110/1990/13 issued under Part V of the EP Act. Particulate emissions are also monitored quarterly, and results are compared to the predicted particulate emissions in the Public Environmental Review document. Particulate emissions are also reported annually in the NPI.
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	N/A
Consultation conducted (include discussions relating to changes to licences/permits)	A Section 45C request for amendment was submitted to remove reference to atmospheric emissions. Reference to atmospheric emissions of ammonia and hydrogen cyanide and sodium cyanide (combined) were removed from Table 1: Key Characteristics Table in November 2014 as they are managed under the conditions of licence issued under Part V of the <i>Environmental Protection Act 1986</i>

Changes to Environmental Management Plans	There will be no change to environmental management plans.
Provision of spatial information	N/A
17. Identification of existing conditions to be changed (complete for each change)	
Condition number and title	Condition 11 – Cyanide Monitoring Atmospheric emissions of ammonia and cyanides (now Air Quality) was identified as a relevant environmental factor or principle.
Explain the intent of the existing condition	To confirm ambient ground level concentrations of cyanide in the vicinity of the operations meet relevant environmental and public health criteria.
EPA Factor and Objective of existing condition	Air Quality - To confirm ambient ground level concentrations of cyanide in the vicinity of the operations meet relevant environmental and public health criteria.
New EPA Factor and Objective	N/A
18. Proposed changes to conditions	
Define the proposed change to condition and wording of new proposed condition	<p>AGR is seeking to have this condition deleted as an Air Quality Impact Assessment was undertaken in September 2019 as supporting information for a Section 45C amendment request to increase liquid plant production to 91,000 tpa. Licence limits were used to model emissions during normal operating conditions. The maximum predicted off site round level hourly average concentrations were 7.3% of the guideline value. (15 ug/m³ – guideline is 199 ug/m³).</p> <p>Cyanide and ammonia are monitored quarterly and reported to the Department of Water and Environmental Regulation annually in accordance with conditions 6 and 8 of the EP Act licence L6110/1990/13 issued under Part V of the EP Act. Monitored cyanide results are well below licence limits so off site ground level concentrations would be even lower than the modelled results.</p> <p>AGR has made a commitment to undertake an Engineering Conceptual Design Review to determine the feasibility of approaches to further reduce emissions during start-up and plant upset conditions. Once the option to reduce emissions during start-up and plant upset conditions is determined a licence amendment or works approval will be sought from DWER.</p>
Relevant EPA Factor and Objective	N/A
Relevant EPA Policy and Guidelines applied	N/A
Identify changes to Schedule 1	N/A
Environmental Studies/Supporting Information. Provision of IBSA data package.	Kwinana Sodium Cyanide Manufacturing Facility Proposed Upgrade – Air Quality Impact Assessment August 2019 and Kwinana Sodium Cyanide Manufacturing Facility Proposed Upgrade – Human Health Risk Assessment September 2019.

<p>Consultation conducted (include discussions relating to changes to licences/permits)</p>	<p>Discussions have been held with DWER regarding boundary cyanide monitoring. Emissions during normal operating are well below guideline values. AGR is planning to undertake monitoring during a planned start-up.</p>
<p>Changes to Environmental Management Plans</p>	<p>There will be no change to environmental management plans.</p>
<p>Provision of spatial information</p>	<p>N/A</p>