



Application for Works Approval Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Works Approval Number	W6952/2024/1
Works Approval Holder	Australian Gold Reagents Pty Ltd
ACN	009 140 121
File Number	INS-0003019 APP-0030701
Premises	Australian Gold Reagents Lot 20 Kwinana Beach Road KWINANA BEACH WA 6167
	Legal description - Part of Lot 20 on Diagram 78086 Certificate of Title Volume 1918 Folio 222
Date of Report	13/10/2025
Decision	Revised works approval granted

MANAGER, HEAVY INDUSTRIES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Works Approval W6952/2024/1 is held by Australian Gold Reagents Pty Ltd (AGR, Works Approval Holder) for the Stage 1 works associated with Australian Gold Reagents (the Premises), located at Lot 20 Kwinana Beach Road, Kwinana Beach.

The delegated officer has determined to make amendments to works approval W6952/2024/1. This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986*.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Amendment summary

AGR holds licence L6110/1990/13 for the Kwinana Sodium Cyanide Manufacturing Facility (SCMF) located at Part of Lot 20 on Diagram 78086 (the premises) in Kwinana Beach. AGR was granted works approval W6952/2024/1 to undertake Stage 1 expansion works aimed at debottlenecking production processes for both solid and liquid sodium cyanide.

On 21 August 2025, AGR submitted an application to the department to amend Works Approval W6952/2024/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment seeks approval for modifications necessary to accommodate increased waste gas volumes resulting from the authorised expansion.

Currently waste gas from the Sodium Cyanide Plant 1 (SCP1) is directed to a thermal oxidiser (John Zinc incinerator) prior to discharge to atmosphere. As a result of the expansion works, the volume of waste gas directed to the incinerator will increase, however, AGR has identified that the existing combustion air fan is not sufficiently sized to meet the increased air demand required to maintain flame stability at the higher waste gas flowrate. AGR has therefore applied to amend the works approval seeking authorisation to replace the existing combustion air fan with a larger unit rated at 24,341Nm³/hr to achieve the higher combustion air supply and ensure safe and stable operation of the incinerator.

Additionally, the increased combustion activity will result in higher steam generation. The associated higher steam flow will cause a significant pressure drop through the steam piping between the boiler steam drum and the superheater. To mitigate this equipment risk and protect the superheater tubes, AGR proposes replacing the existing steam piping with larger diameter pipework.

AGR has indicated that the proposed works will not alter the nature and quality of air emissions previously assessed under Works Approval W6952/2024/1.

3. Decision

The delegated officer has considered the proposed amendment and determined that it constitutes a minor design change required to facilitate the implementation of previously authorised work. Accordingly, reassessment of air emission risks is not considered necessary. Air emissions from the premises remain subject to the conditions of Licence L6110/1990/13, which includes emission limits and requirements for ongoing monitoring and reporting. These existing regulatory controls are considered sufficient to manage any potential impacts associated with the amended works.

While the replacement of the combustion air fan may result in changes to the noise emissions profile, these are not expected to significantly alter the previously assessed noise risks. The delegated officer notes that an application for a works approval has been submitted by AGR for the proposed Stage 2 works which include similar upgrades to the Sodium Cyanide Plant 2 in addition to the replacement of the Maxitherm incinerator. The delegated officer considers that any noise related risks from the current amendment, can be considered and managed through the assessment of the Stage 2 works approval application.

The delegated officer has therefore elected to amend the works approval, authorising the replacement of the combustion air fan. Compliance reporting upon completion of the works is required in accordance with existing conditions of the works approval.

4. Consultation

Table 1 provides a summary of the consultation undertaken by the department.

Table 1: Consultation

Consultation method	Comments received	Department response
Works Approval Holder was provided with draft amendment on 17 September 2025	No comment was provided relating to the proposed changes. The Works Approval Holder requested an additional amendment: removal of Item 16 of Table 1 which refers to "Upgrades to associated pipework, pipe racks and switchroom" citing that the infrastructure listed is a summary of ancillary items that are not associated with emission or discharge controls and do not pose a negative impact on the environment. The submission of an Environmental Compliance Report (ECR) for these items would be solely for administrative compliance purposes.	The delegated officer considers that removal of this requirement is minor and does not alter the emissions profile of the premises. Component removed from Table 1.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Works Approval/ will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 2 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Works Approval as part of the amendment process.

Table 2: Summary of works approval amendments

Condition no.	Proposed amendments
Condition 1 (Table 1)	Item 6 added authorising the replacement of the combustion fan.
	Item 16 removed (refer to Table 1 above)
Schedule 1	Figure 8 included showing the location of the combustion air fan.

References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.