Alcoa Point Henry Clean Up Notice Quarterly Communication Issue 14, Q4 2018



KEY OBJECTIVES

Alcoa of Australia Limited's ('Alcoa') goal for its Point Henry location is to complete environmental assessment work consistent with the requirements of the National Environmental Protection Measure 1999 (Assessment of Site Contamination) (as amended 2013) ('NEPM') and also consistent with the final end land use strategy as it develops.

Alcoa will also ensure compliance to the requirements of the Clean Up Notice 90005302 ('Notice') as issued to the location by the Victorian Environment Protection Authority ("Authority') on 25 March 2015 and with a draft amended Notice issued on November 28 2018. The Notice requires the submission of quarterly reports on the soil and groundwater assessment activities at the Point Henry location and to confirm if any unacceptable risk to the environment has been identified. In the event of identifying contamination posing an unacceptable risk to the environment, Alcoa must develop and implement an interim clean-up plan in response to such an occurrence.

KEY METRICS

	YTD (Q4 2018)
Non-Compliance with Laws and Regulations	0 (0)
Identified unacceptable risks to Human Health and Environment	0 (0)

NEPM

Activities since closure:

Alcoa has continued to work with suitably qualified consultants for the development and execution planning of Preliminary Conceptual Site Models (pCSM) and Work Plans for all zones across Alcoa's landholdings. The aim of these activities is to close out identified data gaps in the Preliminary Site Investigations.

The development of the environmental site assessment (ESA) reports for the Industrial site, the Industrial Landfills (Old SPL/Salt Dross and General Waste Landfill and the CPL Sludge Disposal Area/Salt Dross Landfill), Moolap SPL/Salt Dross Landfill, Grasslands Wetlands and Farmlands continued during the quarter. The Moolap SPL/ Salt Dross Landfill and CPL Sludge Disposal Area / Salt Dross Landfill reports were submitted to the EPA Appointed Auditor for review. Further iterations of the Moolap SPL/ Salt Dross Landfill report were submitted in response to feedback from the Auditor throughout the quarter.

As part of the onsite demolition work on the main Industrial facility, a pH in Concrete Reuse Memo was developed and submitted to the Auditor for review. The memo outlines the approach for back filling of pits, created by the demolition works, and assesses the potential risk to soil and groundwater for re-using the concrete onsite. Further reviews by the Auditor and iterations by the environmental consultant were completed during the quarter. Similarly, the Sediment Investigation and Ecological Screening Level Development report was reviewed by the Auditor and feedback provided to Alcoa and the environmental consultants. This report, once finalised and approved by the Auditor will inform the ESA reports. The draft Grasslands Wetlands report was reviewed by Alcoa and is currently being finalised by the environmental consultant, ready for submission to the Auditor.

Due to the size, complexity and the significant time required to review and finalise these reports, in addition to delays experienced in the site demolition program and with a number of COGG planning permits for various work plan activities, Alcoa submitted an Application to Amend the Clean Up Notice to the Authority. The submission requested an extension to the completion date for the environmental site assessment by December 1 2018, as referenced in Requirements 3.1 and 3.4 of the Notice, to July 1 2019. Alcoa also requested the continuation of quarterly reporting to the Authority, under Requirement 3.5, be extended from December 1 2018 to June 1 2019 inclusive. A letter by the Auditor in support of Alcoa's application accompanied the submission to the Authority. At the time of submission of this quarterly report to the Authority, a draft Clean Up Notice was received by Alcoa for review.

The Authority granted Alcoa a Section 30A exemption during the quarter, enabling an onsite trial for the treatment of underpot materials by a specialised environmental remediation consultancy, treating a Category A smelting

process material to a lower waste category. The results of the trial are now being evaluated by Alcoa and will be included in the Onsite Material Processing Remediation Action Plan, consistent with the requirements outlined in the second Clean Up Notice 90008914; enabling onsite remediation works to be undertaken.

The Auditor conducted an onsite visit of the Pt Henry site on October 16 2018, reviewing the status of the demolition works and the environmental site assessments. The decommissioning works have continued across site as previously advised to the Authority and consistent with the Environmental Aspects and Impacts registers associated with the major work packs. On November 21 2018, the Authority conducted an onsite inspection of the Industrial Landfills, the Moolap Landfill, the wetlands and the Industrial Site to assess licence compliance and to observe and discuss the decommissioning and demolition activities occurring onsite. No compliance issues were identified.

Planned activities for 1 December 2018 – 1 March 2019:

The draft environmental site assessment reports are expected to be received by Alcoa for review during the quarter for the Old SPL/ Salt Dross and General Refuse Landfill. The development of the Farmlands and the Industrial Site ESA report will continue with a staggered submission time to Alcoa and the Auditor during Quarter 2 2019. The Grassland Wetlands report will be submitted to the Auditor for review. The Work Plan for the parcel of Alcoa land located on Hays Road, formerly leased to an external party will developed and executed during the quarter.

The development of the Human Health Risk Assessment is scheduled to be completed post the completion of the Industrial Site environmental site assessment report.

Continued sampling of the remaining onsite transformer pits and utility trenches is expected, along with the continued sampling, analysis and characterisation of the concrete and other material as informed by the Concrete and Debris Management Plan for the onsite reuse of materials.

The development of the Onsite Solid Media Management RAP, and the finalisation of the Onsite Materials Processing RAP, are expected to be completed and will be submitted to the Auditor for review, prior to submission to the Authority, consistent with the requirements of the remediation Notice.

ENVIRONMENTAL PERFORMANCE

No environmental non-compliance issues have been identified during the reporting period.

<u>IDENTIFIED UNACCEPTABLE RISKS & CLEAN UP PLAN</u>

There have been no unacceptable risk issues identified in the draft pCSMs and the Work Plan sampling completed to date.

COMMUNICATIONS UPDATE

During this quarter, engagement continued with the community and key stakeholders.

Alcoa is continuing its Community Advisory Board (CAB) meetings on a quarterly basis. This forum continues to enable community stakeholders the opportunity to ask questions and receive information on the decommissioning, remediation and future land use planning activities underway at Point Henry. The Quarter 3 Pt Henry CAB meeting was held on 24 September 2018. An overview of the location's environmental, health and safety metrics and site activities were presented and discussed. Key discussion points included an EHS status update, a progress report on the physical decommissioning works and an overview of Alcoa's strategic environmental assessment and remediation activities being undertaken across the site - bioremediation, onsite processing of material including underpot materials and the potential consolidation of landfills. An overview was also provided on the status and content of the first and second EPA Clean Up Notice.

As previously reported, CAB dates have been aligned to coincide with the submission of the quarterly reports, so that reports are communicated efficiently to the CAB group. The next CAB meeting is scheduled for 17 December 2018.

Alcoa's <u>website</u> continues to be updated and is a key communication tool. After submission to the Authority, a copy of this quarterly report is made available on the website.

Alcoa has continued to brief Government agencies on the status of the onsite activities.

CONTACT

If you have any questions regarding the project or this update bulletin, please feel free to contact;

Mr. John Osborne Director - Asset Planning & Management - Eastern Australia p. 5521 5250| e. john.osborne@alcoa.com.au

Mr. Warren Sharp Location Manager – Asset Planning & Management – Point Henry p. 5521 5271 | e. warren.sharp@alcoa.com.au

Ms. Nicci Marris EHS Manager – Asset Planning & Management p. 5521 5226 | e. <u>nicci.marris@alcoa.com.au</u>.