

## **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 90009457 ('Notice 90009457') as issued to the location by the Victorian Environment Protection Authority ('Authority') on 18 December 2018 and amended on 20 August 2019. This Notice replaced Notice 90005302, which was revoked by the Authority on 18 December 2018. Consistent with the previous notice, this 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. An update to the Authority on any interim clean-up plan must be provided within this report.

## **KEY METRICS**

	YTD (Q3 2019)
Non-Compliance with Laws and Regulations	0 (0)
Identified unacceptable risks to Human Health and Environment	0 (0)

## **NEPM**

### *Activities since closure:*

The Farmlands Environmental Site Assessment (ESA) Report was reviewed and verified by the Auditor during the quarter. This ESA report was submitted to the Authority on 24 July 2019 and represents the fourth zone report completed from a total of six zones for the Pt Henry site.

Of the remaining two zone reports, the draft ESA for the Old SPL/ Salt Dross and General Waste Landfill zone continued to be developed with a number of reviews completed by the Auditor as part of an iterative process. During this period, several sections of this report were finalised.

Work also continued on the draft Industrial site ESA report, inclusive of the Hays Road parcel. The Hays Road appended report was reviewed by Alcoa and submitted to the Auditor for review. The updated Groundwater report was received by Alcoa and is currently being reviewed prior to submission to the Auditor. It should be noted that sections 1 - 6 of the draft Industrial site ESA report and a number of appended reports have already been reviewed by both Alcoa and the Auditor.

With the two remaining ESA reports nearing completion, the recommendations contained within the completed reports continued to be addressed. A comprehensive groundwater and surface water monitoring program was completed across the zones with the results currently being reviewed.

As previously noted, the Surface Water Quality Guidelines report received Auditor's approval earlier in 2019 and has been incorporated into all the draft ESA reports, where the comparison against surface water criteria is relevant. As follow up to the Moolap SPL/ Salt Dross Landfill ESA report submitted in late 2018, a memo applying the revised surface water criteria was developed and reviewed by Alcoa. The memo has been reviewed by the Auditor and feedback provided to Alcoa. The memo is now being finalised.

Given the magnitude of work involved and the time required to develop, review and verify the site assessments, Alcoa submitted an Application to Amend the Clean Up Notice to the Authority on 15 July 2019. The submission requested an extension to the completion date for the environmental site assessment from 30 July 2019, as referenced in Requirements 3.1 and 3.4 of the Notice, to 31 October 2019. Alcoa also requested the continuation of quarterly reporting to the Authority, under Requirement 3.5, be extended from 1 March 2019 to 1 September

2019 inclusive. A letter from the Auditor in support of Alcoa's application accompanied the submission to the Authority. An amended Clean Up Notice was issued to Alcoa on 20 August 2019.

Work was undertaken during the quarter to address the Auditor's comments on the draft Solid Media Management (SMM) Remediation Action Plan (RAP), with the RAP submitted to the Auditor for final review. It is noted from the Auditor's feedback on the SMMRAP that the recovery of sediments in the Alcoa constructed wetlands will be covered by a separate appended RAP specific for the works and will be developed and submitted to the Auditor for review and verification in 2020.

The Auditors review of the draft Onsite Process Material Treatment (OPMT) RAP also continued during the period. In parallel, Alcoa received approval from the Authority for the reclassification of treated underpot material from a Category A Prescribed Industrial Waste to an immobilised Category C Prescribed Industrial Waste. Onsite treatment of the underpot material to the lower waste classification is the activity set out in the OPMT RAP.

#### Planned activities for 1 September 2019 – 30 November 2019:

Alcoa's environmental consultants will finalise the remaining two ESA reports (Old SPL/ Salt Dross and General Refuse Landfill and the Industrial Site) during the period, with the Auditor's feedback addressed and the reports completed. Consistent with the requirements outlined in Notice 90009457, it is expected that these ESA reports will achieve Auditor verification and will be submitted to the Authority.

Work is expected to continue on addressing the Auditors feedback and finalising both the OPMT RAP and the SMM RAP during the quarter. It is anticipated that during this period Auditor verification for both RAPs will be achieved, prior to being submitted to the Authority, consistent with the requirements of Clean Up Notice 90008914. Subsequent to this, it is expected that onsite bioremediation as set out in the SMM RAP will commence late in the quarter. The development of a RAP for the CPL Sludge Disposal area and Salt Dross Landfill remediation is expected to commence during the quarter.

The development of the Human Health Risk Assessment is scheduled to be completed post the completion of the Industrial Site ESA report. The recommendations from the ESAs will continue to be actioned. It is expected that a supplemental investigative monitoring event will be conducted in the Pt Henry wetlands during this period.

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.

### **ENVIRONMENTAL PERFORMANCE**

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

### **IDENTIFIED UNACCEPTABLE RISKS & CLEAN UP PLAN**

There have been no unacceptable risk issues identified in the draft Conceptual Site Models 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 second Point Henry CAB meeting for the year was held on 24 June 2019. An overview of the location's environmental, health and safety metrics and site activities were presented and discussed. Key discussion points included EHS performance, the site demolition activity, transmission line removal, status of the environmental site assessment and strategic environmental remediation activities. A summary of the CPL Landfill ESA and Grasslands/Wetlands reports submitted to the Authority in April and May respectively, were also presented. This

included an extract from each of the Auditor's verification letters accompanying the reports, and the recommended actions from the assessments.

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 30 September 2019.

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

A copy of this quarterly report will be published on the [Alcoa website](#).

## **CONTACT**

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

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