Alcoa Point Henry Clean Up Notice Six Monthly Report Issue 19, April 2021



KEY OBJECTIVES

With the completion, and submission to the EPA, of the Environmental Site Assessment (October 31, 2019) for the Pt Henry site Alcoa's key objective is to complete an environmental audit report for the site, prepared in accordance with section 53X of the *Environment Protection Act 1970* and consistent with the EPA-approved audit scope by 1 December 2025.

Alcoa will ensure compliance to the requirements of the Clean Up Notice 90011235 ('Notice 90011235') as issued to the location by the Victorian Environment Protection Authority ('Authority') on 23 June 2020. This Notice requires the submission of six-monthly reports, providing an update on how the clean-up and on-going management of the premises has been or is likely to be achieved to comply with the notice requirements. In the event of identifying contamination posing an unacceptable risk to the environment, Alcoa must immediately notify the Authority. Consistent with previous notices, Alcoa will develop and implement an interim clean-up plan in this event.

KEY METRICS

	YTD (April 30 2021)
Non-Compliance with Laws and Regulations	0 (0)
Identified unacceptable risks to Human Health and Environment	0 (0)

KEY ACTIVITIES

Activities last six months:

Following the update provided to the Authority in October 2020, the treatment process as set out in the Onsite Process Material Treatment (OPMT) Remediation Action Plan (RAP) that commenced in early June 2020, concluded in November 2020, with the final analytical testing confirming compliance completed in January 2021. The OPMT process facilitated the onsite treatment of the underpot material from its initial Category A prescribed industrial waste classification to an immobilised Category C prescribed industrial waste (PIW) (under 2019/385 (SO 9038128)). All treated material is stored within the former Carbon Bake building, with a report now prepared demonstrating compliance with the specified immobilised Category C PIW criteria and the Classification requirement for submission to the Authority. Similarly, a report to the EPA appointed Auditor has been prepared demonstrating no environmental impacts for dust, odour and stormwater as a result of the treatment process, inclusive of transportation between buildings.

In accordance with the Solid Media Management (SMM) RAP, submitted to the Authority in December 2019, the onsite bioremediation treatment process for the hydrocarbon impacted soils commenced in December 2020, with more than 8000m3 of soil successfully remediated via this process to date. The SMM bioremediation treatment process continues with further areas on the Industrial site being targeted for soil recovery and remediation.

During the period, the ecological and human health clean up objectives for the site were developed, consistent with the Auditor approved ecological and human health risk assessment framework memorandum. The clean-up objectives are currently being applied to the site informing areas where remediation works are required to complement future land use, consistent with the Alcoa Freehold Pt Henry 575 Concept Master Plan.

Work also progressed on the development of a hydrological conceptual site model (CSM) for the Old SPL/ Salt Dross Landfill. Post the Auditor's review of the model calibration, the model was executed by Alcoa's environmental consultant and is currently being reviewed along with the development of a risk assessment framework document. The purpose of both the CSM and the risk assessment is to inform remediation options for the landfill.

Further work was completed on the draft Point Henry Groundwater Quality Management (GWQM) Plan by Alcoa's environmental consultants. Alcoa completed its review of the GWQM plan during the period with the plan now being finalised ready for submission to the Auditor for review.

In February, Alcoa was advised by the Victorian Civil and Administrative Tribunal (VCAT) that the single objection to the EPA granting Alcoa a Works Approval for the construction of two new containment cells at the Moolap Landfill (WA225397) had been withdrawn. Following this, the Works Approval and the associated Planning Permit as issued by the City of Greater Geelong were reinstated, enabling work to progress on the landfill consolidation project. The EPA Appointed Auditor engaged to assess the design of the containment cells completed their review and verified the design reports, with submission to EPA for construction approval completed in April 2021.

Planned activities for 30 April 2021 – 31 October 2021:

The OPMT report as required by the EPA's Classification approval, will be submitted to the Authority demonstrating compliance with the contaminant criteria set out for immobilised Category C PIW contained within the Classification. A separate OPMT RAP report will be submitted to the Auditor, closing out the remediation activity for the underpot material treatment.

The CPL Sludge Disposal Area and Salt Dross Landfill RAP is expected to be finalised and provided to the Auditor for review. The GWQM Plan is also expected to be submitted to the Auditor for review during the period.

Recovery and treatment of impacted soils on the Industrial site will continue throughout the period, consistent with the SMM RAP, informed by the ecological and human health clean up objectives. It is anticipated that a risk assessment framework memorandum will also be developed to inform remediation options for the wetlands.

The Old SPL/ Salt Dross Landfill hydrological CSM and the risk assessment framework memorandum is expected to be submitted to Alcoa for review with submission thereafter to the Auditor for review, with the remediation options for the landfill to be developed in the future as informed by the CSM outcomes.

Construction approval for the Moolap containments is expected to be received from EPA in May 2021, allowing Alcoa to then progress with engagement of a Principal Contractor and commencement of construction works.

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 environmental site assessments nor the additional work completed to date.

COMMUNICATIONS UPDATE

During the period, and cognisant of COVID-19 restrictions, Alcoa engaged with the Community Advisory Board in December and April via two written updates, enabling community stakeholders the opportunity to receive information on the decommissioning, remediation and future land use planning activities underway at Point Henry.

The 'Community Advisory Board Updates' included the site's environmental, health and safety metrics; updates about the ongoing decommissioning works; the status of the environmental site assessment (ESA); and progress updates about the strategic environmental remediation activities such as the solid media management/bioremediation, onsite material processing, constructed wetlands remediation and landfill consolidation project.

Alcoa also continued to brief Government agencies on the status of 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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