Alcoa Point Henry Clean Up Notice Quarterly Communication Issue 15, Q1 2019



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. This Notice replaced Notice 90005302, which was revoked by the Authority on 18 December 2018. Consistent with the previous notice, Notice 90009457 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 (Q1 2019)
Non-Compliance with Laws and Regulations	0 (0)
Identified unacceptable risks to Human Health and Environment	0 (0)

NEPM

Activities since closure:

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), Grasslands Wetlands and Farmlands continued during the quarter. The draft ESA reports for the CPL Sludge Disposal Area / Salt Dross Landfill and the Grasslands Wetlands zones were submitted to the EPA Appointed Auditor for review. The review comments were received from the Auditor during the quarter on the CPL Sludge Disposal Area/ Salt Dross Landfill report with the review of the Grasslands Wetlands ESA currently underway.

Sections of the Farmlands and the Old SPL/ Salt Dross and General Waste Landfill ESA reports were submitted to Alcoa for review. During the quarter, work progressed on several sub-reports to the Industrial site ESA. The Light Non-Aqueous Phase Liquid Conceptual Site Model (CSM) section was reviewed by the Auditor and comments provided on the draft report. Work is now underway to address the Auditor's feedback. Similarly, the Surface Water Quality Guidelines report was reviewed by the Auditor and comments received. The Work Plan for the Hays Road parcel of land, which will be included in the Industrial site ESA report, was developed and executed during the quarter. Further sampling was conducted onsite at the former Greenmill area, with the results being analysed and incorporated into a supplemental report to the Industrial site ESA.

The final Moolap SPL/Salt Dross Landfill ESA Report was verified by the EPA Appointed Auditor and submitted to the Authority on 21 December 2018, representing the first of six parts of the total site ESA.

Following earlier updates to the draft pH in Concrete Reuse Memo and the Sediment Investigation and Ecological Screening Level Development report; all final Auditor comments were addressed, and the documents approved. 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 concrete onsite, with the Sediment Investigation and Ecological Screening Level Development report informing the relevant ESA reports.

As previously reported, the Authority granted Alcoa a Section 30A exemption in October 2018, 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 trial was completed, and the results reviewed and reported to the Authority, as required by the Section 30A during the quarter. The results of the trial have been included in the draft Onsite Process Material Treatment Remediation Action Plan (RAP), consistent with the

requirements outlined in the second Clean Up Notice 90008914; enabling onsite remediation works to be undertaken. The draft RAP is now with the Auditor for review.

In addition to the ESA work, the draft Solid Media Management (SMM) RAP was developed and submitted to the Auditor for review. The SMM RAP outlines the process of onsite bioremediation and re-use of the hydrocarbon contaminated media from the site, via the methods of soil spreading and composting. The Auditor completed the review of SMM RAP with the comments now being addressed by Alcoa and its environmental consultants.

Planned activities for 1 March 2019 – 1 June 2019:

Consistent with Notice 90009457 and the completion date of July 30 2019 for the assessments, work will continue to finalise the draft ESA reports for the Old SPL/ Salt Dross and General Refuse Landfill, and the Farmlands, and submission of these reports to the Auditor for review is expected during the quarter. This timeline accounts for internal review by Alcoa, the Auditor reviews and updates to the ESA reports, addressing the Auditor's comments. This process concludes with the ESAs being verified by the Auditor and submitted to the Authority.

The Grasslands Wetlands and the CPL Sludge Disposal Area/Salt Dross Landfill ESA reports are expected to be finalised during the quarter, verified by the Auditor and submitted to the Authority. The remaining sections of the Industrial site ESA will be completed and submitted to the Auditor for review. These sections include Hays Road and the Greenmill supplemental reports.

The development of the Human Health Risk Assessment is scheduled to be completed post the completion of the Industrial Site ESA 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 refinement of the Solid Media Management RAP and the Onsite Process Material Treatment RAP are expected to be completed and will be submitted to the Auditor for verification, prior to submission to the Authority, consistent with the requirements of Clean Up Notice 90008914.

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 CSMs 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 fourth Pt Henry CAB meeting for 2018 was held on 18 December. 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, environmental site assessment and strategic environmental remediation activities. An overview was also provided on the status and content of the first (Notice 90009457) and second (Notice 90008914) 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 25 March 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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