

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 (October 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 April 2021 and consistent with the classification approval 2019/385 (SO 9038128), Alcoa submitted a report to EPA demonstrating compliance with the specified immobilised Category C prescribed industrial waste (PIW) limits for the treated material in June 2021. The Onsite Process Material Treatment (OPMT) process facilitated the treatment of the underpot material from its initial Category A prescribed industrial waste classification to an immobilised Category C prescribed industrial waste (PIW) as set out in the OPMT Remediation Action Plan (RAP). All treated material continues to be stored within the former Carbon Bake building. A report to the EPA appointed Auditor consistent with the OPMT RAP, was also submitted demonstrating no environmental impacts for dust, odour and stormwater as a result of the treatment process.

In accordance with the Solid Media Management (SMM) RAP the onsite bioremediation treatment process for the hydrocarbon impacted soils that commenced in December 2020, continues with more than 20,000 m³ of soil successfully remediated via this process to date. Recovery of impacted soils continued on the Industrial site, with validation sampling completed in the excavated areas. Laboratory analysis was conducted on the remaining soils, with Alcoa's environmental consultants completing a review of the results to ensure compliance with the ecological and human clean up objectives, as approved by the Auditor in the previous reporting period. Once validated, the remediated soils are used to backfill the voids. The SMM bioremediation treatment process continues with further areas on the Industrial site being targeted for soil recovery and remediation required to complement future land use, consistent with the Alcoa Freehold Pt Henry 575 Concept Master Plan.

A memo outlining the proposed management approach to the Constructed Wetlands area east of the Industrial Site was developed during the period and submitted to the Auditor for review, with Auditor's comments subsequently received. The memo sets out the approach for the development of a Work Plan for the remediation works in the Constructed Wetlands, as a subset to the overarching SMM RAP which has already achieved Auditor verification, and submission to the EPA. The memo is currently being updated by Alcoa prior to submission to the Auditor for final endorsement on the approach.

Work progressed on a number of modelling scenarios being developed as part of the hydrological conceptual site model (CSM) for the Old SPL/ Salt Dross Landfill. The CSM outputs are being collated prior to presentation to the Auditor. In parallel, work commenced on the development of a risk assessment framework. The purpose of both the CSM and the risk assessment is to inform potential remediation options for the landfill and the surrounding land area.

Further work was completed on the draft Point Henry Groundwater Quality Management (GWQM) Plan which was also submitted to Auditor for review during the period. The Auditor's feedback was received with work now underway to address the Auditor's comments. A groundwater monitoring event was completed across all zones of the Point Henry site, with the draft reports currently being reviewed by Alcoa. As part of this monitoring program, a number of surface water samples were taken to compliment the GME and to assist in informing the development of the risk assessment for the Constructed Wetlands.

During the reporting period, the auditor verified design documents for the containment cells at the Moolap Landfill (under WA225397) were reviewed by EPA Victoria with construction approval granted on August 26 2021 as part of the landfill consolidation project. The appointment of a Principal Contractor for the containment cells construction, transport and placement of the wastes and capping of the cells was made by Alcoa. The development of the CPL Sludge Disposal Area and Salt Dross Landfill RAP (the 'CPL Landfill RAP') also commenced, and will be submitted to the Auditor for review once finalised.

Planned activities for 31 October 2021 - 30 April 2022:

The CPL Landfill RAP is expected to be finalised and Auditor verification obtained with submission to EPA Victoria, consistent with the Clean Up Notice for remediation. The GWQM Plan is also expected to be finalised with all Auditor comments addressed during the period.

Work is expected to progress on planning for the remediation works in the Constructed Wetlands, including engagement of the relevant stakeholders and authorities on the expected long term land use.

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.

The revised Old SPL/ Salt Dross Landfill hydrological CSM and the risk assessment framework are expected to be further developed and provided to the Auditor for review, with the remediation options for the landfill to be developed in the future as informed by the CSM and risk assessment outcomes.

Construction of the Moolap containment cells is also expected to commence. With the granting of an operational licence by EPA Victoria, Alcoa will also be able to progress with the transport and placement of onsite wastes in the new cells.

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 in light of the ongoing COVID-19 restrictions precluding face-to-face meetings, Alcoa engaged with the Community Advisory Board in August via a written update, enabling interested 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 Update' included the site's environmental, health and safety metrics; updates and photos detailing the ongoing decommissioning works; the status of the environmental site assessment (ESA); and progress updates about the strategic environmental remediation activities including the solid media management/bioremediation 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](http://www.alcoa.com.au).

CONTACT

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

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