Alcoa Point Henry Environmental Action Notice Status Report 1 December 2024



1. Introduction

- With the completion and submission to EPA Victoria (EPA) of the Environmental Site Assessment (31
 October 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 2027.
- Alcoa will ensure compliance to the requirements of the Environmental Action Notice EAN-00003154 (Notice) as issued to the location by EPA on 25 October 2022. The Notice requires the submission of six monthly reports updating EPA on how the clean up and ongoing management of the premises has been or is likely to be achieved to comply with the notice requirements. In the event of identifying any imminent risk to human health or the environment, Alcoa must notify EPA and advise what measures have been put in place to respond to such risks.

2. Environmental Performance

No environmental non-compliance incidents identified during the period.

3. Identified Imminent Risks

No imminent risks to human health or the environment identified during the period.

4. Recent Activities

- With the issuance of the Operating Licence (OL000300060) to Alcoa in April 2024, recovery, transport and placement of waste from the CPL Landfill and other site generated wastes into the new containment cells at Alcoa's Moolap Landfill site commenced on May 29 2024 and continued throughout the reporting period. It should be noted that with EPA's rejection to Alcoa's proposed 6-month trial for the application of day cover only if required, day cover was placed at the end of each day's landfilling activity, per the Operating Licence condition. On July 26 2024, EPA Victoria completed an inspection of the Moolap Landfill site as part of the Authority's 2024/25 Permission Compliance Assessment program for the purpose of assessing compliance with the site Operating Licence OL000300060. No operational issues were identified, and no further action was required.
- With the capacity of Cell 6 being reached at the Moolap Landfill site, capping works commenced in September.
- Continued progress on the collation of validation and backfilling data for the Rolling Mill and the associated soil quality QA/QC data by Alcoa's environmental consultants in readiness for Auditor review.
- Soil sampling and analysis on the Industrial Site was completed in preparation for remediation works,
 providing additional data to support planning in areas where historic exceedances were not well
 delineated or where the historic exceedance was isolated or uncharacteristic of nearby site conditions
 indicating that the historic result may no longer be representative of current site conditions. The results
 were compiled in the Remediation Options Review Data Gap Sampling memo and submitted to the
 Auditor for the review.
- EPA appointed Auditor review and verification was achieved for the eastern foreshore Constructed
 Wetlands Work Plan (a subset to the Auditor verified Solid Media Management Plan) for the engineered
 features remediation task. COGG Planning requirements for the proposed works are currently under
 review, in parallel with the work package being issued by Alcoa to potential remediation contractors.
- Work continued on the draft Development Licence Exemption for the remediation works and capping of the Original Landfill (Old SPL/ Salt Dross and General Refuse Landfill) by Alcoa's landfill design

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consultants. Alcoa reviewed the draft application and is preparing for submission to EPA Victoria expected to be made late November 2024.

- The draft Groundwater Interpretative Reports including a memo covering the 2023 Groundwater
 Monitoring Event for the Industrial Site, the Moolap Landfill and the CPL Landfill were reviewed by the
 EPA appointed Auditor and finalised post addressing all of the Auditor comments. The remaining
 Groundwater Interpretative Reports for the Original Landfill, Grasslands/Wetland and Farmlands were
 reviewed by Alcoa and are being finalised prior to submission to the Auditor for review.
- DEECA granted Alcoa a five-year extension to the Pt Henry Eastern Foreshore existing licence to allow the completion of future remediation activities.
- Under approval granted by both EPA Victoria (A12 interstate consignment application) and Western
 Australia's Department of Water and Environmental Regulation (CW17 application to accept waste into
 WA), all remaining Category A Reportable Priority Waste earmarked for dispatch and receival in Western
 Australia was transported from site, and received and placed in a geological repository facility in WA
 during the reporting period.
- The 2024 Groundwater Monitoring Event was conducted across all areas of the site and completed in November.
- Works continued on the Hays Road Brine ponds remediation with continued reduction in brine volumes in the northern-most pond, and liner removal and validation sampling completed in the centre and southernmost ponds in parallel with remediation planning.

5. Planned Activities: 1 December 2024 – 1 June 2025

- Submission of the Original Landfill Remediation and Capping Works Development Licence exemption to EPA for approval. Planning requirements will be progressed in parallel.
- Recovery and transport of the small amount of residual waste from the CPL Landfill in April 2025, with backfilling works within the landfill footprint to be completed and revegetation works to commence – note this work has been delayed due to DEECA's concerns regarding migratory birds. Recovery of other site generated wastes with placement in the new containment cells is expected, compliant with the requirements set out in the Operating Licence.
- Submission of the Rolling Mill area validation report, inclusive of the QA/QC data for Auditor review.
- Completion of the Auditor review of the Remediation Options Review Data Gap Sampling memo with the
 commencement of hotspot soil remediation across the Industrial Site; as informed by the delineation
 works confirming the extent of the impacted areas and volumes for recovery.
- Planning will continue for the remediation works in the eastern foreshore Constructed Wetlands, including
 engagement of the relevant stakeholders and authorities where appropriate. It is now anticipated that
 works will commence by the end of 2025 (as they need to be completed during the summer period to
 minimise rainfall impacts), subject to regulatory approval processes and timeframes.
- Auditor review of the remaining Groundwater Interpretative Reports will be completed.
- Brine removal is expected to be completed from the northern most pond at the Hays Road site, allowing residual sediment removal and pond liner removal to commence.

6. Community Engagement

During the period Alcoa engaged with the community and key stakeholders about a developer Expression
of Interest process being run related to possible future development of the site consistent with the Alcoa
Freehold Concept Master Plan and the DELWP Moolap Coastal Strategic Framework Plan for the site.

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- A community update was provided to the Alcoa Pt Henry Community Advisory Board database in June 2024 and was published on the <u>Alcoa website</u>. Another update is planned for December 2024.
- Alcoa continued to brief government agencies and key stakeholders on the status of onsite activities, including hosting a number of site tours.
- A copy of this report will be published on the Alcoa website.

7. Contact

Nicci Marris EHS Manager - Asset Planning & Management nicci.marris@alcoa.com