



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L5271/1983/14	Licence file number:	DEC643/3
Licence holder name:	Alcoa of Australia Limited		
Trading as:	Not applicable		
ACN:	004 879 298		
Registered business address:	Premises: Pinjarra Alumina Refinery, South West Hwy Pinjarra WA 6208 Registered business address: Corner Davy and Marmion Streets, Booragoon WA 6154		
Reporting period:	01 / 01 / 2020 to 31 / 12 / 2020		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D (if required);• section E; and• sign the declaration in Section F.

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
Category 46: Bauxite refining	
Category 52: Electric power generation	
Category 64: Class II and III putrescible landfill site	
Category 67: Fuel burning	

Section D – Statement of actual Part 2 waste discharge quantity			
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.			
Prescribed premises category		Actual Part 2 waste discharge quantity	
Category 46: Bauxite refining			

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	G3(ii) <i>(Note: This is the condition no. in the licence that applied for the entirety of the reporting period prior to the 6 January 2021 licence amendment)</i>	Date(s) of non-compliance:	2020 for quarterly and half-yearly monitoring required by Condition A8
Details of non-compliance: Potential			
<p>Alcoa contracts an independent stack emission testing company, who are accredited by the National Association of Testing Authorities, Australia (NATA), to undertake stack emission monitoring for Alcoa's compliance with the relevant licence conditions.</p> <p>After a review initiated by Alcoa, Alcoa identified that the stack emission testing company has used its expertise to independently apply procedural modifications to certain elements of the testing methods contained in the licence. Alcoa is currently reviewing if the procedural modifications to the testing methods meet the requirements for those methods.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No environmental impact is known or suspected at this time.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The stack emission monitoring company has used its expertise to independently apply procedural modifications to certain elements of the testing methods contained in the licence condition.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

Section E – Details of non-compliance with licence condition

Alcoa is currently reviewing if the procedural modifications to the testing methods meet the requirements for those methods.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☒ Reported to DWER verbally

Date: 29 / 03 / 2021

☐ Reported to DWER in writing

Date: / /

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	A8	Date(s) of non-compliance:	2020 for quarterly and half-yearly monitoring required by Condition A8
Details of non-compliance: Potential			
<p>Alcoa contracts an independent stack emission testing company, who are accredited by the National Association of Testing Authorities, Australia (NATA), to undertake stack emission monitoring for Alcoa's compliance with the relevant licence conditions.</p> <p>After a review initiated by Alcoa, Alcoa identified that the stack emission testing company has used its expertise to independently apply procedural modifications to certain elements of the testing methods contained in the licence. Alcoa is currently reviewing if the procedural modifications to the testing methods meet the requirements for those methods.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No environmental impact is known or suspected at this time.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The stack emission monitoring company has used its expertise to independently apply procedural modifications to certain elements of the testing methods contained in the licence condition.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Alcoa is currently reviewing if the procedural modifications to the testing methods meet the requirements for those methods.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 29 / 03 / 2021	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	R7 (Note: This is the condition no. in the licence that applied for the entirety of the reporting period prior to the 6 January 2021 licence amendment)	Date(s) of non-compliance:	29 July 2020 and around 24 September 2020
Details of non-compliance:			
<ol style="list-style-type: none"> On 29 July 2020, there was an unexpected cloth failure on the #5 Filter in the Filtration Facility whilst the filter was undergoing a compression cycle. Residue slurry was unexpectedly released from the filter under high pressure. About 5kL of slurry exited the Filtration Facility via a ventilation vent and contacted unsealed ground around the Facility. The spill was cleaned up immediately and the impacted fill replaced. The ventilation vent was subsequently sealed, and Alcoa is reviewing options to install additional sealing around the Filtration Facility. The event did not cause pollution or environmental harm. On 24 September 2020, an Alcoa employee identified a small area outside of the Filtration Facility where it appeared that washdown water containing residue solids from within the Facility had contacted unsealed ground near Sub Station 10Z. The spill, which was estimated to be less than 20L, was cleaned up immediately. Additional training in correct clean up procedures has been undertaken with the Filtration Facility operators, and signage has been installed in the facility. The event did not cause pollution or environmental harm. 			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Neither event caused pollution or environmental harm.			
Cause (or suspected cause) of non-compliance:			
<ol style="list-style-type: none"> Unexpected cloth failure on the #5 Filter in the Filtration Facility whilst the filter was undergoing a compression cycle. Operator oversight when undertaking cleaning duties. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>For both events, Alcoa undertook immediate cleanup of the spilt material and disposal of impacted fill.</p> <p>Alcoa has sealed the ventilation vent on the Filtration Facility structure and is also investigating options to install additional sealing around the Filtration Facility. Alcoa has provided additional training of operators in correct cleaning procedures and installed signs in the Filtration Facility relating to containing the material during cleaning.</p>			

Section E – Details of non-compliance with licence condition

Was this non-compliance previously reported to DWER?

☐ Yes, and

☐ Reported to DWER verbally

Date: / /

☐ Reported to DWER in writing

Date: / /

Section F – Declaration

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	.
Name: (printed)		Name: (printed)	Australia
Position:	Vice President Operations	Position:	Controller
Date:	30/03/2021	Date:	30/03/2021
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.