



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 / 2021 to 31 / 12 / 2021

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:	<p>G3(ii) <i>(Note: This is the condition no. in the licence that applied from 1-5 January 2021 of the reporting period prior to the 6 January 2021 licence amendment).</i></p> <p>A8 <i>(Note: This is the condition no. in the licence that applied from 6 January to 31 December 2021 of the reporting period following the 6 January 2021 licence amendment).</i></p>	Date(s) of non-compliance:	2021 for quarterly and half-yearly monitoring required by Condition A8 (from 1 January to 31 July 2021).
Details of non-compliance:			
Alcoa contracts an independent stack emission testing company, who are accredited by the National Association of Testing Authorities, Australia, to undertake stack emission monitoring for Alcoa's compliance with the relevant licence conditions.			
Alcoa has identified that the stack emission testing company that completed the testing between 1 January-31 July 2021 applied procedural deviations to certain elements of some of the stack testing methods required in the licence.			
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.			
No environmental impact is known or suspected at this time.			
Cause (or suspected cause) of non-compliance:			
The stack emission monitoring company had used its expertise to independently apply procedural deviations to certain elements of the testing methods contained in the licence.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Alcoa has appointed an alternative independent stack emission testing company to undertake stack emission monitoring for Alcoa's compliance with the relevant licence conditions as of 1 August 2021.			
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 checked="" type="checkbox"/> Reported to DWER in writing		Date: 31 / 03 / 2021	

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:	W2	Date(s) of non-compliance:	26/07/2021
Details of non-compliance:			
It was identified on 27 July 2021 that dilute lake water was present on the Residue Storage Area 4 (RSA4) southern toe drain road along with evidence of dilute lake water and stormwater runoff down the adjacent downslope residue embankment. Dilute lake water had then entered the road drain beside the bore access road, which runs along the southern side of RSA4. Water quality testing was undertaken to confirm the extent the dilute lake water had travelled in the bore access road drain. The water quality testing confirmed the dilute lake water had been isolated to the bore access road drain within the confines of the refinery premises.			
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.			
No known or suspected environmental impact resulting from the non-compliance due to the nature of the released material, isolated extent of release and recovery of material.			
Cause (or suspected cause) of non-compliance:			
Approximately 48.1mm of rainfall within a 24-hour period between (10am 26 July 2021 to 10am 27 July 2021) exceeded the capacity of the RSA4 southern toe drain network to deliver runoff to the perimeter drain.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Immediately following the identification of the event Alcoa recovered spilt material via vacuum truck. To prevent short term recurrence bunds and pumps were installed to redirect material and ensure it stayed within designated containment. Water quality testing was also undertaken to verify the extent to which the material travelled within the bore access road drain to ensure full recovery.			
To prevent future recurrence, drain maintenance was undertaken with a routine established and inspection documents were updated to include verification of acceptable drain condition. A design review was completed which confirmed that the southern toe drain was sufficient to contain a 1:100 year rainfall event if maintained sufficiently.			
Additionally, a culvert pipe is to be shortened to reduce the likelihood of future southern toe drain flow restrictions.			
Was this non-compliance previously reported to DWER?			
No			
Reported to DWER verbally		Date: / /	
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:	R1	Date(s) of non-compliance:	19/10/2021
Details of non-compliance:			
A filter press failure within the residue filtration facility resulted in approximately 9kL of slurry material being released from the press under pressure of which approximately 8.5kL was captured in designated sealed bunding and approximately 500L was released to unsealed ground immediately adjacent to the filtration facility within the refinery premises.			
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.			
No known or suspected environmental impact resulting from the non-compliance due to the immediate recovery of slurry released to unsealed ground.			
Cause (or suspected cause) of non-compliance:			
Detailed engineering investigation found pressure a relief valve was not set up correctly during recent maintenance causing air to build up in the hydraulic oil leading to a hydraulic failure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Alcoa undertook immediate recovery of the released material and disposed of the impacted fill. A Root Cause Analysis has been undertaken on the mechanical failure causing the event. Options for improving bunding, containment and sealing within and surrounding the filtration facility is undergoing review.			
Was this non-compliance previously reported to DWER?			
No			
Reported to DWER verbally		Date: / /	
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:	A15(a)	Date(s) of non-compliance:	2021 financial year for retention of calibration records required by Condition A15 (a) (from 1 July 2021 to 31 December 2021).
Details of non-compliance:			
Paper records for calibration of the Dust Concentration Monitors (DCM) used for continuous monitoring of particulate emissions from Calciner numbers 1, 2, 3, 6 & 7 could not be located. Administrative record keeping requirements are set out in Appendix A of the Continuous Emission Monitoring System (CEMS) code.			
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.			
No known or suspected environmental impact resulted from the non-compliance as maintenance and calibration of the DCMs is managed in accordance with manufacturer’s directions and through Alcoa’s system based maintenance management scheduling program.			
Cause (or suspected cause) of non-compliance:			
Lack of a defined administrative process to manage hard copy DCM calibration records.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Alcoas investigation process determined the cause of this event and has/ is undertaking actions to prevent recurrence. This includes thorough site auditing of the calibration and correlation process (and implementation of resultant action plan), updating procedural control to include system-based record keeping and including in the calibration internal training package.			
Was this non-compliance previously reported to DWER?			
No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> 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 :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	PRESIDENT	Position:	Australia Controller
Date:	07/12/22	Date:	07/12/22
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.