



## 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](mailto: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:	L6217/1983/15	Licence file number:	2012/007237-7~2
Licence holder name:	Alcoa of Australia Limited		
Trading as:	Alcoa of Australia Limited		
ACN:	004 879 298		
Registered business address:	181-205 Davy Street BOORAGOON WA 6154		
Reporting period:	01 / 01 / 2024 <b>to</b> 31 / 12 / 2024		

### 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)

☐ Yes – please complete:

- section C;
- section D (if required); and
- sign the declaration in Section F.

☒ No – please complete:

- 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
<i>*Refer to Attachment 1 for supporting documentation for the below quantities</i>	
Category 46 – Bauxite refinery	██████ tonnes of refined alumina
Category 52 – Electric Power Generation	613,159 MWhr total or average 70.00MW per day of power generated using natural gas
Category 64 – Class II or III putrescible landfill site	793 Tonnes to Class II landfill
Category 67 – Fuel burning	39,916 kg/hr (natural gas with Sulphur content less than or more than 0.25%)

**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
<i>*Refer to Attachment 1 for supporting documentation for the below quantities</i>	
Category 46 - Bauxite refinery	██████ tonnes of bauxite residue (tailings)

**Section E – Details of non-compliance with licence condition**

Condition no:	A22 (a)	Date(s) of non-compliance:	10/01/2024, 11/04/2024
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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<sup>st</sup> January – 30<sup>th</sup> June 2024 applied a procedural deviation to one element of the stack testing method USEPA Method 2 which Alcoa is required to follow under licence condition A22(a). This deviation is summarised below:

A barometer is used to measure atmospheric pressure at the sampling point as required by USEPA Method 2. It was identified that the barometer calibration, was taken at ground level and was not adjusted using the Jandakot airport barometric reference point (30m above ground level). The calibration failed to adjust the barometer calibration in accordance with section 6.5 note of USEPA Method 2, whereby an adjustment of  $\pm 2.5$  mmHg per 30m of elevation must be made to correct the readings.

This difference in readings did not have an impact on Alcoa's reporting under L6217/1983/15 as further detailed the AER.

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 USEPA Method 2 did not account for the elevation difference during calibration of barometer.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

The stack testing company has amended their procedures to prevent future deviations. Alcoa will conduct regular internal audits of the stack emissions testing contractor to ensure that any deviations to methods are discovered and corrected in a timely manner.

Section E – Details of non-compliance with licence condition	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/01/2025

Section E – Details of non-compliance with licence condition			
Condition no:	A23(a)	Date(s) of non-compliance:	11/01/2024, 12/01/2024, 14/01/2024, 15/01/2024, 10/04/2024, 13/04/2024, 14/04/2024, 19/05/2024, 20/05/2024, 31/05/2024, 17/06/2024
Details of non-compliance:			
<p>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.</p> <p>Alcoa has identified that the stack emission testing company that completed the testing between 1<sup>st</sup> January – 30<sup>th</sup> June 2024 applied procedural deviations to three elements of the stack testing methods which Alcoa is required to follow under licence condition A23(a). These deviations are summarised below:</p> <p>A barometer is used to measure atmospheric pressure at the sampling point as required by USEPA Method 2. It was identified that the barometer calibration, was taken at ground level and was not adjusted using the Jandakot airport barometric reference point (30m above ground level). The calibration failed to adjust the barometer calibration in accordance with section 6.5 note of USEPA Method 2, whereby an adjustment of <math>\pm 2.5</math> mmHg per 30m of elevation must be made to correct the readings. This difference in readings did not have an impact on Alcoa's reporting under L6217/1983/15 as further detailed the AER.</p> <p>USEPA M18 tube (USEPA Method 18) section 8.2.4 - The collected condensate solution was not analysed for volatile organic compounds (VOCs). This deviation did not have an impact on Alcoa's reporting associated with condition A2(a)] under L6217/1983/15.</p> <p>USEPA MMT05 (USEPA Method 0011) - Polyethylene and high-density polyethylene wash bottles were used instead of Teflon or glass and a titanium probe liner was used instead of borosilicate glass. This deviation did not have an impact on Alcoa's reporting under L6217/1983/15.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No environmental impact is known or suspected at this time.			
Cause (or suspected cause) of non-compliance:			

**Section E – Details of non-compliance with licence condition**

The USEPA Method 18 failed to analyse condensate samples along the benzene analysis.

The USEPA Method 0011 used a titanium liner in sampling train instead of the glass liner as per method.

The USEPA Method 2 did not account for the reference elevation difference during calibration of barometer.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

The stack testing company has amended their procedures to prevent future deviations. Alcoa will conduct regular internal audits of the stack emission testing contractor to ensure that any deviations to methods are discovered and corrected in a timely manner.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 31/01/2025

**Section E – Details of non-compliance with licence condition**

Condition no:	A23(b)	Date(s) of non-compliance:	12/01/2024, 15/04/2024
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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<sup>st</sup> January – 30<sup>th</sup> June 2024 applied procedural deviations to three elements of the stack testing methods which Alcoa is required to follow under licence condition A23(b). These deviations are summarised below:

A barometer is used to measure atmospheric pressure at the sampling point as required by USEPA Method 2. It was identified that the barometer calibration, was taken at ground level and was not adjusted using the Jandakot airport barometric reference point (30m above ground level). The calibration failed to adjust the barometer calibration in accordance with section 6.5 note of USEPA Method 2, whereby an adjustment of  $\pm 2.5$  mmHg per 30m of elevation must be made to correct the readings

USEPA M18 tube (USEPA Method 18) section 8.2.4 The collected condensate solution was not analysed for volatile organic compounds (VOCs). This deviation did not have an impact on Alcoa's reporting associated with condition A2(a)] under L6217/1983/15.

USEPA MMT05 (USEPA Method 0011) - Polyethylene and high-density polyethylene wash bottles were used instead of Teflon or glass and a titanium probe liner was used instead of borosilicate glass. This deviation did not have an impact on Alcoa's reporting under L6217/1983/15.

Section E – Details of non-compliance with licence condition	
What was the actual (or suspected) environmental impact of the non-compliance?	
<b>NOTE</b> – 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:	
<p>The USEPA Method 18 failed to analyse condensate samples along the benzene analysis.</p> <p>The USEPA Method 0011 used a titanium liner in sampling train instead of the glass liner as per method.</p> <p>The USEPA Method 2 did not account for the reference elevation difference during calibration of barometer.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The stack testing company has amended their procedures to prevent future deviations. Alcoa will conduct regular internal audits of the stack emission testing contractor to ensure that any deviations to methods are discovered and corrected in a timely manner.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/01/2025

Section E – Details of non-compliance with licence condition			
Condition no:	A25(a)	Date(s) of non-compliance:	11/01/2024, 19/03/2024, 14/04/2024, 29/04/2024
Details of non-compliance:			
<p>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.</p> <p>Alcoa has identified that the stack emission testing company that completed the testing between 1<sup>st</sup> January – 30<sup>th</sup> June 2024 applied procedural deviations to certain elements of some of the stack testing methods pertinent to licence condition A25(a), These deviations are summarised below:</p> <p>A barometer is used to measure atmospheric pressure at the sampling point as required by USEPA Method 2. It was identified that the barometer calibration, was taken at ground level and was not adjusted using the Jandakot airport barometric reference point (30m above ground level). The calibration failed to adjust the barometer calibration in accordance with section 6.5 note of USEPA Method 2, whereby an adjustment of <math>\pm 2.5</math> mmHg per 30m of elevation must be made to correct the readings.</p>			

Section E – Details of non-compliance with licence condition	
<p>USEPA M18 tube (USEPA Method 18) section 8.2.4 The collected condensate solution was not analysed for volatile organic compounds (VOCs). This deviation did not have an impact on Alcoa's reporting associated with condition A2(a)] under L6217/1983/15.</p> <p>USEPA MMT05 (USEPA Method 0011) - Polyethylene and high-density polyethylene wash bottles were used instead of Teflon or glass and a titanium probe liner was used instead of borosilicate glass. This deviation did not have an impact on Alcoa's reporting under L6217/1983/15.</p>	
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – 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>	
<p>Cause (or suspected cause) of non-compliance:</p>	
<p>The USEPA Method 18 failed to analyse condensate samples along the benzene analysis.</p> <p>The USEPA Method 0011 used a titanium liner in sampling train instead of the glass liner as per method.</p> <p>The USEPA Method 2 did not account for the reference elevation difference during calibration of barometer.</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>The stack testing company has amended their procedures to prevent future deviations. Alcoa will conduct regular internal audits of the stack emission testing contractor ensures that any deviations to methods are discovered and corrected in a timely manner.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date:</p>
<p><input checked="" type="checkbox"/> Reported to DWER in writing</p>	<p>Date: 31/01/2025</p>

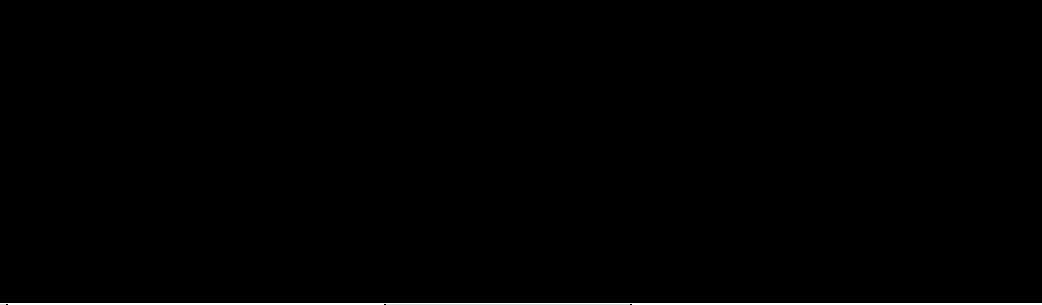
Section E – Details of non-compliance with licence condition			
Condition no:	W2	Date(s) of non-compliance:	12/12/2024
<p>Details of non-compliance:</p>			
<p>10/10/2024 - A detailed site investigation was completed under the contaminated sites regulations on Runoff Collection Pond 1 (ROCP1). The findings of that report indicated that there was a reasonable likelihood that heavily dilute bayer process material had been discharging via groundwater from a decommissioned pond (ROCP1) into an internal drain into a neighbouring surface water body. Based on the information currently available the report concludes that the discharge poses a low environmental risk. Discharge has occurred as a result</p>			

<p>of a historical damaged clay liner</p> <p>Condition W2 States that The licence holder shall minimise the release of contaminated water to the environment by providing containment systems to capture any spillages and minimise contact of process liquors to the ground.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Low risk to human health or the environment, provided the site continues to be managed appropriately.</p>			
<p>Cause (or suspected cause) of non-compliance:</p>			
<p>Damage to clay liner at ROCP1.</p>			
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>			
<p>Continue current BRL management practices and monitor shallow groundwater conditions around ROCP1.</p> <p>Prepare a Site Management Plan including groundwater and surface water monitoring plans.</p> <p>Review and update the risk assessment and management strategies based on future monitoring results.</p> <p>Implement institutional controls such as PPE and management plans for workers in the ROCP1 area.</p> <p>Consider the condition of ROCP1 in any future engineering projects related to the RSAs.</p>			
<p>Was this non-compliance previously reported to DWER?</p>			
<p><input type="checkbox"/> Yes, and</p>			
<p><input type="checkbox"/> Reported to DWER verbally</p>		<p>Date:</p>	
<p><input type="checkbox"/> Reported to DWER in writing</p>		<p>Date:</p>	
<p><b>Section E – Details of non-compliance with licence condition</b></p>			
Condition no:	W5	Date(s) of non-compliance:	12/12/2024
<p>Details of non-compliance:</p>			
<p>10/10/2024 - A detailed site investigation was completed under the contaminated sites regulations on Runoff Collection Pond 1 (ROCP1). The findings of that report indicated that there was a reasonable likelihood that heavily dilute bayer process material had been discharging via groundwater from a decommissioned pond (ROCP1) into an internal drain into a neighbouring surface water body. Based on the information currently available the report concludes that the discharge poses a low environmental risk. Discharge has occurred as a result of a historical damaged clay liner and the discharge point is not the location specified in table 19 referred to in condition W5.</p> <p>Table 19 states that “process water and potentially contaminated stormwater” may only be discharged at the ROWS pond spillway discharge point outlined in Appendix C of the licence.</p>			



What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.	
Low risk to human health or the environment, provided the site continues to be managed appropriately.	
Cause (or suspected cause) of non-compliance:	
Damage to clay liner at ROCP1.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Continue current BRL management practices and monitor shallow groundwater conditions around ROCP1.</p> <p>Prepare a Site Management Plan including groundwater and surface water monitoring plans.</p> <p>Review and update the risk assessment and management strategies based on future monitoring results.</p> <p>Implement institutional controls such as PPE and management plans for workers in the ROCP1 area.</p> <p>Consider the condition of ROCP1 in any future engineering projects related to the RSAs.</p>	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<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 particular <sup>1</sup> .			
I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.			
Signature <sup>2</sup> :			
Name: (printed)			
Position:			
Date:	27/03/25	Date:	27/03/25
Seal (if signing under seal):			



<sup>1</sup> 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.

<sup>2</sup> 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.