



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:	L5245/1967/14	Licence file number:	2010/007402-1
Licence holder name:	Alcoa of Australia Limited		
Trading as:			
ACN:	004879298		
Registered business address:	Cnr Davey St and Marmion St 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 5: Processing or beneficiation of metallic or non metallic ore	1,396,671 tonnes (Residue Filtration)
Category 46: Bauxite Refining	0 tonnes (Red Sand plant)
Category 52: Electric power generation	55.1MW
Category 58: Bulk material loading or unloading	
Category 64: Class II or III putrescible landfill site	590.14 tonnes
Category 67: Fuel Burning	52,050 SCM/h (powerhouse gas usage)

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

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 5: Processing or beneficiation of metallic or non metallic ore	1,396,671 tonnes
Category 46: Bauxite Refining	2,942,267 tonnes

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:	Condition P3 (b)	Date(s) of non-compliance:	02 -05/06/2019 (<i>see further detail below</i>)
Details of non-compliance:			
<p>The Kwinana Department of Environment Licence 5245/1967/14 condition E1 relates to the Environmental Protection (Kwinana) (Atmospheric Waste) Policy 1999 Implementation Conditions, and the related condition P3(b) of Attachment 8 which deals primarily with independent ambient sulphur dioxide monitoring undertaken for the Kwinana Industrial Area.</p> <p>Condition P3(b) of Licence 5245/1967/14 states: <i>The licensee shall ensure that the approved monitoring equipment referred to in condition P3(a) is operated and calibrated as approved and is maintained so as to provide reliable data for greater than 90% of the time in every calendar month and for greater than 95% of the time in any period of twelve calendar months, unless special exemption has been provided by the CEO.</i></p> <p>Vandalism of the Kwinana Industries Council Abercrombie Road air quality monitoring station in June 2019 affected the June 2019 monthly availability (51.34%) and rolling annual average for subsequent monthly reporting periods (June- December) was less than 95% as a result of this event and was projected to remain below 95% as a minimum until June 2020. The rolling average normalised to greater than 95% in June 2020.</p> <p>Given the unforeseen nature of the power outage, prior exemption was not practicable, however after detection of the outage and electrical response DWER was informed on 6 June 2019 and acknowledged the advice provided by the monitoring company on 7 June 2019.</p>			
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.			

Section E – Details of non-compliance with licence condition

Based on available information, we do not believe there were any adverse environmental or operational affects associated with this event.



Figure 1. Kwinana EPP Area A and B Boundaries and Monitoring Station Sites

Note: The areas shown on this map are approximate only. The official map is the DEP Map 990902 held by the DEC.

Client: Kwinana Industries Council	ENVIRON	
Project: EPP SO2 Redetermination	Drawn: BB	Date: 15 April 09

Cause (or suspected cause) of non-compliance:

An act of vandalism related to copper cable theft resulting in power outage and equipment damage.

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Followed up with Kwinana Industries Council to ensure that in future should any event of this nature occur that the industries are notified promptly.</p> <p>Kwinana Industries Council submitted correspondence on the matter for DWER's consideration on 26/8/2019.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 06/06/2019
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 06/06/2019

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:	Condition P4 (c)	Date(s) of non-compliance:	2 – 15/6/2019 <i>(see further detail below)</i>
Details of non-compliance:			
<p>The Kwinana Department of Environment Licence 5245/1967/14 condition E1 relates to the Environmental Protection (Kwinana) (Atmospheric Waste) Policy 1999 Implementation Conditions, and the related condition P4(c) of Attachment 8 which deals primarily with independent meteorological monitoring undertaken for the Kwinana Industrial Area.</p> <p>Condition P4(c) of Licence 5245/1967/14 states: <i>The meteorological monitoring system shall be maintained so as to provide reliable data on each meteorological parameter for greater than 90% of the time in every calendar month and greater than 95% or the time in any 12 consecutive calendar months, unless special exemption has been approved by the CEO.</i></p> <p>Vandalism of the Kwinana Industries Council Abercrombie Road air quality monitoring station in June 2019 affected the June 2019 monthly availability (51.34%) and rolling annual average for subsequent monthly reporting periods (June- December) was less than 95% as a result of this event and was projected to remain below 95% as a minimum until June 2020. The rolling average normalised to greater than 95% in June 2020.</p> <p>Given the unforeseen nature of the power outage, prior exemption was not practicable, however after detection of the outage and electrical response DWER was informed on 6 June 2019 and acknowledged the advice provided by the monitoring company on 7 June 2019.</p>			

Section E – Details of non-compliance with licence condition

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.

Based on available information, we do not believe there were any adverse environmental or operational affects associated with this event.



Cause (or suspected cause) of non-compliance:

Section E – Details of non-compliance with licence condition	
An act of vandalism related to copper cable theft resulting in power outage and equipment damage.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Followed up with Kwinana Industries Council to ensure that in future should any event of this nature occur that the industries are notified promptly.</p> <p>Kwinana Industries Council submitted correspondence on the matter for DWER's consideration on 26/8/2019.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 06/06/2019
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 06/06/2019

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:	G2(b) (vi)	Date(s) of non-compliance:	8/1/2020; 13/1/2020; 5/4/2020; 6/4/2020; 7/4/2020; 20/7/2020; 24/7/2020; 31/7/2020; 8/9/2020; 1/10/2020; 2/10/2020; 2/11/2020; 2/1/2020; 8/4/2020; 23/4/2020; 6/7/2020; 1/10/2020; 2/10/2020 8/1/2020; 4/5/2020; 20/7/2020; 13/10/2020
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?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			

Section E – Details of non-compliance with licence condition	
No environmental impact is known or suspected at this time.	
Cause (or suspected cause) of non-compliance:	
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.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
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?	
<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:	A5(a)	Date(s) of non-compliance:	8/1/2020; 13/1/2020; 5/4/2020; 6/4/2020; 7/4/2020; 20/7/2020; 24/7/2020; 31/7/2020; 8/9/2020; 1/10/2020; 2/10/2020; 2/11/2020
Details of non-compliance: Potential			
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.			
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.			
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.			

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Alcoa is currently reviewing if the procedural modifications to the testing methods meet the requirements for those methods.	
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<input checked="" type="checkbox"/> Yes, and	
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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:	2/1/2020; 8/4/2020; 23/4/2020; 6/7/2020; 1/10/2020; 2/10/2020
Details of non-compliance: Potential			
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.			
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.			
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.			

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
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.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
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?	
<input checked="" type="checkbox"/> Yes, and	
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<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:	A14	Date(s) of non-compliance:	8/1/2020; 4/5/2020; 20/7/2020; 13/10/2020;
Details of non-compliance: Potential			
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.			
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.			
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.			

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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 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 ¹ .			
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)	
Position:	VP of Operations - Australia	Position:	Australian Controller Manager
Date:	29/04/2021	Date:	29/04/2021
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.