

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:	L6465/1989/10	Licence file number:	2010/007470-1~1
Licence holder name:	Alcoa of Australia Limited		
Trading as:			
ACN:	004 879 298		
Registered business address:	181-205 Davy Street BOORAGOON WA 6154		
Reporting period:	01 / 01 / 2024 to 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)
<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 05 - Processing or beneficiation of metallic or non-metallic ore	10,484,612 tonnes of bauxite crushed.

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
N / A	N / A

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:	1	Date(s) of non-compliance:	11/03/2024
Details of non-compliance:			
<p>Throughout 2024, the construction of the PFAS Treatment Unit (PTU), pipelines, and associated infrastructure resulted in multiple variations to the requirements in Table 1. The variations are minor in nature and did not impact on the capacity and processing requirements outlined in Table 1. Alcoa considers these variations to be consistent with the intent of the licence condition.</p> <ul style="list-style-type: none"> The PTU met all requirements within Table 1 except that the final design did not match Figure 3 of Schedule 1. The deviations included: <ul style="list-style-type: none"> Rearrangement of the filtration vessels to ensure compliance with Alcoa standards whilst maintaining processing capacity. Additional balance tanks located around the perimeter of the bunded area. Chemical storage area/s and electrical distribution control room consolidated within undercover area and shed on eastern side of bunded area. Chemicals segregated in individual bunds. Air distribution shed, located on the south side of the filter bank. Additional process pumps to allow for water transfer from the additional balance tanks Additional cable and pipe tray runs to suit additional tank and vessel arrangement. The pipelines from Arundel mining area to PTU, and from PTU to McKnoes Brook discharge did not meet the following design requirements in Table 1: <ul style="list-style-type: none"> The pipeline was reduced to 110 mm diameter HDPE to enable a lower discharge flow rate as specified in the licence. Leak detection system was not installed as this is not practicable for an open-ended pipeline. <p>The above variations were noted within the Compliance Commissioning Reports submitted to DWER on 14 February 2025 (pipelines) and 26 February 2025 (PTU).</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.			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Variations in construction of infrastructure against the designs proposed in the Licence.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Compliance commissioning report submitted to DWER outlining the variations. Future licence amendments to be sought where designs vary from the requirements specified in the licence.			
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: 14 / 02 / 2025 & 28 / 02 / 2025	

Section E – Details of non-compliance with licence condition			
Condition no:	2	Date(s) of non-compliance:	28/10/2024
Details of non-compliance:			
<p>In the Licence amendment granted 28 October 2024, the Arundel Workshop 5,000L underground concrete waste holding pit (waste holding pit) was added to Condition 1, Table 1 in relation to the Arundel Workshop and stormwater collection pond (ASW3) infrastructure. Condition 2 of the Licence requires the submission of an audit report against the requirements of Condition 1 to be submitted within 30 days of each item of infrastructure required in Table 1 being constructed. The waste holding pit was deemed to be fully commissioned 23 April 2024, prior to its addition to Table 1 of the Licence and therefore prior to the requirement for submission of an audit report. The remaining infrastructure associated with ASW3 is not expected to be constructed for some time.</p> <p>DWER were notified on 14 February 2025 of this issue and agreed that the submission of a partial compliance report for the waste holding pit would be acceptable.</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>			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Addition of already commissioned infrastructure to Table 1 in the licence amendment in October 2024.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
DWER were notified on 14 February 2025 of this issue and agreed that the submission of a partial compliance report for the waste holding pit would be acceptable. A Partial Compliance Commissioning Report has been drafted for submission.			
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: 14 / 02 / 2025	

Section E – Details of non-compliance with licence condition			
Condition no:	12 (licence valid 20/02/2024 – 27/10/2024) 12 (licence valid 28/10/2024 – 31/12/2024)	Date(s) of non-compliance:	10/06/2024 26/07/2024 26/08/2024
Details of non-compliance:			
<p>On 26 August 2024, it was identified that the Arundel pre-treatment dam (APTD) 2 had less than 1000mm freeboard, followed by APTD 1 being identified as having less than 1000mm freeboard on 5 September 2024. Freeboard requirements for the APTDs was not achieved for APTD2 until the 13th November 2024, and for APTD1 until the 24th November 2024. Freeboard requirements for both APTD 1 & 2 were maintained for the rest of 2024.</p> <p>On 10 June 2024, it was identified that OS3 had less than 50% freeboard as required by condition 12 of the Licence. Again, on the 26 July 2024, it was identified that OS3 had less than 50% freeboard following consecutive rain events combined with a requirement to transfer water from a haul road sump into OS3 to prevent the haul road sump's overflow to the environment.</p> <p>The 30% freeboard requirements for OS1 and OS2 were also not met between 30 May 2024 and 23 September 2024. Amendment of the Licence to remove the freeboard requirement became effective from 28/10/2024.</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>			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> The Arundel pre-treatment dams were unable to meet freeboard requirements due to a delay in the commissioning of the PTU. The capacity to transfer water from OS3 to an offsite disposal facility via trucks was limited by contractor availability. In addition, a delay in the commissioning of the PTU prevented transfer of water to the APTD's via trucks. OS1 and OS2 were unable to meet freeboard requirements due to the large collection area, relatively small size of the sumps and the original intended design of the sumps to operate in a series with OS3 and OS4. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> Focus on trucking of water from OS3 to an offsite facility reduce freeboard levels and prevent overflow to OS4. Once freeboard in OS3 established, trucking of water from APTD2 to an offsite facility commenced. PTU began commissioning in November 2024. Licence amendment submitted to remove freeboard requirements for OS1 and OS2. Licence amendment received in October 2024. 			
Was this non-compliance previously reported to DWER? Not applicable.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of non-compliance with licence condition			
Condition no:	24, 25 & 28 (licence valid 20/02/2024 – 27/10/2024) 25, 26 & 29 (licence valid 28/10/2024 – 31/12/2024)	Date(s) of non-compliance:	20/02/2024 – 31/12/2024
Details of non-compliance:			
Analysis for Perfluoro-1-octanesulfonamidoacetic acid (FOSAA) was not able to be undertaken as labs in Australia were unable to complete the assessment. MeFOSAA and EtFOSAA was used as a substitute in 2024. Licence was amended in October 2024 to allow for non-NATA accredited methods of analysis for this analyte. However, laboratories were still unable to complete analysis at the time.			
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.			
Cause (or suspected cause) of non-compliance:			
Labs in Australia unable to undertake analysis.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Licence amendment submitted to remove this requirement. Licence amendment received in October 2024 to allow for non-NATA accredited methods of analysis for this analyte. Labs have since established a non-NATA accredited method and FOSAA analysis commenced December 2024.			
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: 03 / 05 / 2024	

Section E – Details of non-compliance with licence condition			
Condition no:	24 & 28 (licence valid 20/02/2024 – 27/10/2024)	Date(s) of non-compliance:	20/02/2024 – 27/10/2024
Details of non-compliance:			
<p>Due to a lack of water at some sample points, sampling under condition 24 was unable to be completed in some months (March, April, May). The licence valid between 20/02/2024 and 27/10/2024 did not allow for instances where no sampling could occur due to lack of water.</p> <p>Similarly, sampling under condition 28 was unable to be completed at all sampling points (March) and at discharge locations (all months) due to a lack of water, no discharge occurring or damaged bores. The licence valid between 20/02/2024 and 27/10/2024 did not allow for instances where no sampling could occur due to lack of water or damage.</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>			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Licence did not allow for sampling that was unable to be undertaken due to lack of water or access at sample points.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Licence amendment submitted to allow for times when sampling may not occur due to various reasons. Licence amendment received in October 2024.			
Was this non-compliance previously reported to DWER? Not applicable.			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 03 / 05 / 2024	

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:		Position:	
Date:	27/03/2025	Date:	27/03/2025
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.