



Messrs Vince Puccio and Merv McDonald
Co-Chairs
Community Alliance for Positive Solutions Inc.
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Dear Messrs Puccio and McDonald

ALCOA WAGERUP ALUMINA REFINERY – CONTAMINATION, WATER USAGE AND PARTICULATE EMISSIONS

Thank you for your letter dated 27 February 2015 in response to my letter of 15 January 2015.

The Department of Environment Regulation (DER) was requested by the Community Alliance for Positive Solutions Inc. to respond to relevant questions that were directed to the Department of Water. DER considers it has responded accordingly. On the matter of access to Contaminated Sites records, the *Contaminated Sites Act 2003* and supporting regulations set out a statutory process for access to Contaminated Sites information held by the Department, which requires completion of the prescribed form and payment of the prescribed fee. Please refer to my letter dated 15 January 2015 for further information on the 'Form 2 – Request for a detailed summary of records in respect of land.'

DER notes that the document titled "Wet Cooling Towers Guidance for Particulate Matter" was issued for the purpose of estimating emissions under Canada's National Pollutant Release Inventory. Information relating to Australia's equivalent system (National Pollution Inventory) is available at www.npi.gov.au, where estimates for particulate emissions at all three of Alcoa of Australia Limited's refineries at Wagerup, Pinjarra and Kwinana can be found. DER does not consider that calculating particulate emissions from cooling towers using the supplied Canadian estimation method is suitable for the purpose of compliance and regulatory control.

Licence requirements at the Wagerup refinery dictate that Alcoa monitors major particulate matter emissions from a number of point sources continuously. Emissions from fugitive and minor sources on the refinery are not monitored directly as the monitoring is often not justified or suitable to provide accurate results. In this instance, DER considers that the most appropriate path to regulate particulate emissions (from all three refineries) is to monitor major emissions and to operate ambient dust monitors around the refineries (including the residue storage areas) to measure impacts. Alcoa is required to submit reports annually that are reviewed by DER, and further monitoring has not been prescribed as it would not be effective in regulating particulate emissions from the refinery.

The report *Wagerup 2009 Air Quality Study*, Department of Environment and Conservation, May 2011 included PM_{2.5} investigations and is published on DER's website at www.der.wa.gov.au.

Yours sincerely



Jason Banks
DIRECTOR GENERAL

30 March 2015
