

Mike Rowe  
Director General  
Department Water and Environmental Regulation  
Locked bag 33,  
Cloisters Square  
WA 6850

11<sup>th</sup> January 2018

Via Email: [info-der@dwer.wa.gov.au](mailto:info-der@dwer.wa.gov.au)

Dear Mr Rowe

**ALCOA OF AUSTRALIA LTD – NEW WORKS APPROVAL W6104/2017/1 – PUBLIC COMMENTS**

We refer to the timing for public comments in relation to Alcoa's application for a new works approval at its Wagerup Alumina Refinery. We note that the period was extended by DWER from 15 December 2017 until 15 January 2018.

Given the holiday period and two other matters requesting public comment in relation to Alcoa's Wagerup Facility, it is disappointing that DWER did not allow more reasonable time frames for public consultation in relation to all three matters relating to the Wagerup Facility.

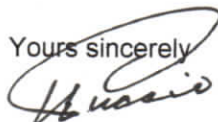
We wish to lodge our objection to DWER determining Alcoa's works approval application W6104/2017 at this time. We request that DWER defers its determination of the works approval application until:

- Alcoa's noise application has been assessed and determined; and
- Alcoa's licence review has been completed and any appeals determined.

We submit that it is not appropriate for DWER to assess further major changes to Alcoa's Wagerup facility given that DWER has not completed its risk assessments in relation to the facility's current operations. Approving further major works will only complicate DWER's assessment and make it increasingly difficult for stakeholders to comment.

We look forward to receiving your response.

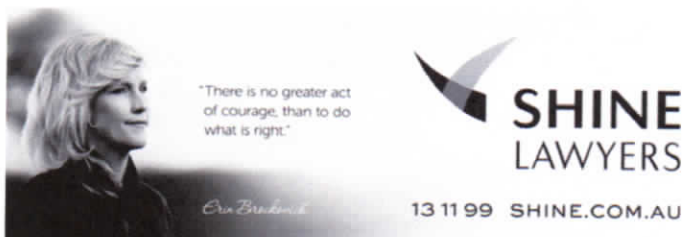
Yours sincerely



**Vince Puccio**

Chairman: Community Alliance for Positive Solutions Inc

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*Erin Brockovich*

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ALCOA OF AUSTRALIA LTD - OXALATE BIOREMOVAL NEW WORKS APPROVAL  
W6104/2017/1

We refer to our submission dated 11 January 2018 in relation to Alcoa's oxalate bioremoval plant works approval application. We wish to make this additional submission.

### **Human Health concerns**

It is not clear what pathogens and bacteria may arise from the bioremoval process and how these pathogens will be contained. We submit that the plant and process should be subject to strict controls and monitoring to ensure these pathogens and bacteria are at safe levels?

We also submit that the Department of Health should be requested to confirm that the bioremoval process has an acceptable risk to human health and determine what standards should apply.

### **Noise approval not yet determined**

The submission by Alcoa in relation to noise levels from the Bioremoval plant which will operate 24 hours, 7 days a week, is based on the noise levels set in the current approval for the Wagerup Facility. This approval is currently under review. CAPS submit that it is not appropriate for DWER to determine the assessment of the works approval application until the noise approval has been finalised. It would be pre-emptive of DWER to approve the Bioremoval plant until the new noise approval has been determined.

12<sup>th</sup> January 2018