



Dow Altona Update – May 2020

Operations during COVID restrictions

The Dow Altona site continued operation of the distribution facilities and ongoing remediation operations through the COVID-19 period. There have been no cases of COVID-19 at Dow to date. The site implemented several measures including maintaining social distancing, improved hygiene practices, enhanced cleaning and screening of people entering the site, (including temperature screening).

The site has also progressed work of the decommissioning of the Propylene Oxide Derivatives (POD) plant and related utilities systems following the closure of the POD operations late in 2019. All chemicals have been removed from the plant and Dow will work with the MFB and Worksafe to complete de-registration as a Major Hazard Facility during Q2 this year.

Community Relations

Dow is the main event partner for WalkWest 2020 which is a fundraising event to support Western Health in improving health of the people of Melbourne's west. Unfortunately due to COVID-19 restrictions this event was postponed to Sunday 18 October. Anyone interested to register to participate, or donate to Western Health can do so at <https://www.walkwest.com.au>

Relating to COVID-19 support, Dow will also be donating 31,000 meals to needy families through Foodbank Victoria. This is part of our commitment to providing ongoing support to the community we work and live in.

Environment Health and Safety Performance

There have been no reportable safety incidents at the Dow site this year, the last reportable injury was a finger injury which required stitches in May 2019.

There have been no spills or process safety incidents in 2020. There was one instance where the trade waste discharge to City West Water did not comply with the discharge agreement. This occurred during a time of very low waste water flow and did not have any impact. The cause has been identified and upcoming modifications on the site will prevent re-occurrence.

Dow has a robust near miss reporting program, with near misses investigated to understand where improvements are needed and also the knowledge gained is shared to other facilities. This near miss reporting program has seen three near miss events investigated during 2020 and results shared with all Dow facilities in Asia Pacific.

Regulatory Interfaces

EPA completed a site inspection visit, reviewing the remediation works and decommissioning activities, there were no major findings from the inspection.

Dow has advised EPA, WorkSafe, MFB and City West Water of the changes to the site as a result of the closure of the POD manufacturing operation, and is progressing to de-register the site as an MHF and update environmental licenses and the trade waste discharge agreement.

Remediation Updates

In late February, the EPA finalised and issued a new Clean Up Notice requesting an environmental audit in accordance with Section 53X of the current Environmental Protection Act 1970. A 53X audit is typically issued by the EPA to verify the condition of a land for all the possible uses (i.e., industrial, commercial or residential). For the Dow Altona site, the EPA requested a 53X audit to assess the condition of the site after the cessation of manufacturing activities. Dow Altona has undergone various forms of environmental assessment and remediation have been conducted since the early 1990s. The Dow remediation team has been working on the first stage of the audit developing a new site-wide sampling and analytical plan. That plan will have to be reviewed by an EPA-Appointed Environmental Auditor and submitted to the EPA later this year.

In parallel, existing monitoring, assessment and remediation works are continuing as, in due course, they will become part of the 53X audit works.

It is also worth noting that due to the COVID-19 pandemic, the commencement of the new Environment Protection Amendment Act 2018 has been moved to 1 July 2021 or on a day to be proclaimed. It is not expected this change will affect any of the environmental works in progress at Dow Altona.

Activities in the Next Quarter

Dow expects to complete decommissioning of the POD plant and utilities systems. There will be additional activity to modify some remaining utility systems to support the operations that will remain on the site post demolition of the decommissioned facilities.

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