

VOLUNTARY MANAGEMENT PROPOSAL UNDER THE CONTAMINATED LAND MANAGEMENT ACT 1997

Part 1

Preliminary Details

1. Proponent's Details

(a) Name and contact details

Generator Property Management Pty Limited ACN: 615 047 295

Phone: 02 4390 8994

Fax: N/A

Email: info@gpmco.com.au

Postal address: PO Box 132 Budgewoi NSW

Postcode: 2262

EPA licence number : 759

(b) Who the EPA should contact with technical enquiries about the proposal

Name: Dougal Mulvey

Employer/Company: Generator Property Management

Position title: Central Coast Site Manager

Type of business: Industrial

Phone (business): 02 4390 8994

Phone (after hours): 0414 361 366

Fax: N/A

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Proponent: Generator Property Management Pty Limited

Site: Part of the Former Munmorah Power Station

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2. Site to which proposal applies

The site to which this Voluntary Management Proposal (VMP) applies is part of the Former Munmorah Power Station located at 301 Scenic Drive, Colongra NSW 2262 (the Site).

Current Lot and Deposited Plan (DP):

- Part Lot 52 DP1204607
- Lot 123 DP1290829
- Lot 111 DP1293105

As shown in **Figure 1**.

Description: The site comprises parts of the Former Munmorah Power Station and associated infrastructures including settling ponds and sedimentation basins.

Local Government Area: Central Coast Council

GPS Coordinates: Approximately -33.212, 151.542

Area of declaration is depicted by the red line and includes Part Lot 52 DP1204607, Lot 123 DP1290829 and Lot 111 DP1293105. The original image was taken from <https://maps.six.nsw.gov.au> and has been adapted by the NSW EPA.



Figure 1 Site Location (red polygon)

3. The contamination

In April 2024, the EPA declared the Site as significantly contaminated land via notice no. 20231103. The contamination at the site was considered significant enough to warrant regulation under the *Contaminated Land Management Act 1997*. Impacted environmental media include soil, groundwater and surface water. The substances of concern (“the contaminants”) are:

- a) Petroleum hydrocarbons including Total Recoverable Hydrocarbons (TRH),
- b) Benzene, toluene, ethylbenzene, xylenes and naphthalene (BTEXN) (on Lot 111 DP1293105 only).
- c) Per- and polyfluoroalkyl substances (PFAS)

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Generator Property Management Pty Limited (GPM) holds Environment Protection Licence No. 759 (the Licence) issued under the Protection of the Environment Operations Act 1997. The Licence authorises the carrying out of activities at the Former Munmorah Power Station, located off Scenic Drive, Doyalson, NSW, 2262 (the Premises).

As part of the remediation works, GPM will operate a Water Treatment Plant (WTP) which will discharge treated water from the premises. The EPA will regulate discharges through licence limits and compliance monitoring.

It is noted that assessment(s) completed to date in relation to PFAS and hydrocarbon contamination have demonstrated that the potential for any off-site risks from the contamination to human health are low.

4. The management proposal

The management proposal ("the proposal") comprises:

- a) the information set out above;
- b) the undertakings set out in Part 2 of this document; and
- c) the performance schedule set out in Part 3 of this document.

Part 2

Undertakings Included in Voluntary Management Proposal

THE PROPOSAL INCLUDES THE FOLLOWING UNDERTAKINGS:

General

- 1) All works or activities carried out in connection with the proposal, including sampling and preparation of associated reports (“the activities”), will be carried out in accordance with applicable provisions of *State Environmental Planning Policy - Resilience and Hazards (2022)* and any requirements imposed under it in relation to the activities.
- 2) All matters listed as relevant to a remediation action plan by the EPA *Consultants Reporting on Contaminated Land – Contaminated Land Guidelines (2020)* will be taken into account in the carrying out of the activities.
- 3) All the activities will be carried out consistently with guidelines made or approved under section 105 of the CLM Act.

(See www.epa.nsw.gov.au/clm/guidelines.htm)

- 4) All the activities will be carried out in compliance with applicable NSW environmental legislation, and in particular:
 - a) All the activities, including:
 - i) the processing, handling, movement and storage of materials and substances used to carry out the activities; and
 - ii) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activities will be carried out in a competent manner;
 - b) All plant and equipment installed at the site or used in connection with the activities:
 - i) will be maintained in a proper and efficient condition; and
 - ii) will be operated in a proper and efficient manner.
- 5) All the activities at the site will be carried out in a manner that prevents or minimises the emission of dust, odour and noise from the site.
- 6) Waste generated or stored at the Site will be assessed and classified in accordance with the EPA’s Waste Classification Guidelines Part 1: Classifying

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Waste. (See www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm)

- 7) All waste transported from the Site that is required by the Protection of the Environment (Waste) Regulation 2014 to be tracked must be tracked using the EPA's Integrated Waste Tracking Solution (IWTS) or an alternative tracking system approved in writing by the EPA.

(See <https://www.epa.nsw.gov.au/your-environment/waste/integrated-waste-tracking-solution>)
- 8) The proponent will make this voluntary management proposal available to the public free of charge and consents to the EPA placing this proposal on its public website.
- 9) The proponent will make all documents referred to in, and required to be prepared under, this voluntary management proposal available to the public free of charge, unless the proponent identifies commercial-in-confidence or private/personal information (including information relating to a third party) within those documents. In these cases, the proponent will remove such information from the documents to make the documents suitable for public release.
- 10) The proponent will:
 - a) prior to the implementation of the proposal provide for the EPA's approval a strategy for communicating about that implementation, particularly the actual management works, with members of the public who are likely to have a real interest in or be affected by that implementation; and
 - b) implement the strategy as approved in writing by the EPA.

Monitoring, Record Keeping & Reporting

- 11) At least until the EPA has notified the proponent that the EPA no longer considers that the contamination is significant enough to warrant regulation under the *Contaminated Land Management Act 1997*, GPM will record and retain all monitoring data and information and provide this record to the EPA at any reasonable time if so requested by the EPA and as specifically provided under the proposal.
- 12) The EPA will be informed in writing within 7 days of the proponent becoming aware of information or data indicating a material change:
 - a) in conditions at the site, or
 - b) in its surrounding environment,which could adversely affect the prospects of successful management of the site or result in harm to the environment.
- 13) The EPA will be informed in writing within 7 days of the proponent becoming aware of any failure, either by the proponent or any other person, to comply with any term of the proposal.
- 14) If the proponent becomes aware that they will not meet a key milestone or

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reporting requirement, then they must notify the EPA in writing at least 21 days before the specified deadline. The notification must include:

- (a) detailed reasons for not meeting the milestone requirement,
 - (b) a revised time period within which the milestone or requirement will be met, and
 - (c) a statement explaining why compliance action should not be taken
- 15) The EPA will be informed in writing as soon as practicable of any notification by the proponent, its employees or its agents to an appropriate regulatory authority other than the EPA of any pollution incident at the site within the meaning of the *Protection of the Environment Operations Act 1997*. It is noted that monitoring, record keeping and reporting requirements outlined under EPL 759, where applicable, takes precedence over the above.

(See <http://www.epa.nsw.gov.au/licensing/dutytonotify.htm>)

Performance Schedule

- 16) The performance schedule which is in Part 3 of this document will be adhered to.

Part 3

Performance Schedule

1. Objectives of the proposal

This proposal is Phase 1 of a two-phase plan for the site. The two-phase plan consists of:

- Phase 1 which involves further characterisation of contamination to refine the conceptual site model and confirm the appropriate remedial approach; and
- Phase 2 which involves implementing and validating the remedial approach finalised under Phase 1

A two-phase plan is being implemented because it is most likely that development consent under the *Environmental Planning and Assessment Act 1979* (NSW) will be required to authorise Phase 2 and, accordingly, timing for Phase 2 remains subject to applying for and obtaining development consent. This performance schedule only relates to Phase 1. Phase 2 will be the subject of a second VMP which will be prepared and implemented upon completion of Phase 1 to the satisfaction of the NSW EPA and obtaining the required development consent.

Phase 1 (the subject of this VMP)

The objectives of this Phase 1 VMP are to achieve the following outcomes:

- O1. Implementing the Site's Community and Stakeholder Engagement Plan, which has been prepared by GPM to ensure proactive community and stakeholder engagement for the proposal
- O2. Adequately identify and characterise the contamination at the site to refine the conceptual site model (CSM), and
- O3. Evaluate remedial options to develop appropriate approaches to address the significant contamination to mitigate risk to human health and the environment on and off-site.

Phase 2 (to be covered under a separate VMP)

The main objectives of the Phase 2 proposal will be to implement and validate the remedial approach developed as part of Phase 1 to:

- O4. Address the significant contamination, ensuring that the contamination no longer presents a risk of harm to on and off-site ecological receptors
- O5. Demonstrate that residual contamination (after remediation) does not pose an unacceptable level of risk to identified on and off-site ecological receptors.

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A separate VMP for the Phase 2 proposal will be submitted to the EPA for approval following satisfactory delivery of Phase 1.

2. Principal features of the proposal

The principal features of Phase 1 include:

a. Consultants and Site Auditor

- P1. Engage a NSW EPA accredited site auditor and appropriately qualified consultants certified under a scheme recognised by the EPA to carry out the investigations and prepare the plans and reports required under this proposal.

b. Stakeholder Engagement

- P2. Prepare a Community Consultation and Stakeholder Management Plan to provide the continued coordination, and consistent messaging for ongoing communication and engagement with the local community and other identified stakeholders. If a member of the community wishes to contact GPM, they can do so via the GPM Community Engagement Team by calling 04 4390 8994 or emailing gpmcc@gpmco.com.au

c. Sampling Analysis and Quality Plan

- P3. Prepare a Sampling Analysis and Quality Plan (**SAQP**) to determine if PFAS impacts in soil, sediment, surface water and groundwater are attributed to the former fire-fighting training area (FFTA).
- P4. Obtain Interim Site Audit Advice from the Site Auditor confirming the proposed SAQP is appropriate to meet the objective of the works.

d. Detailed Site Investigation

- P5. Complete a detailed investigation of soil, groundwater, surface water and sediments to refine the conceptual site model for the site.
- P6. Prepare a report outlining the findings of that investigation (**DSI Report**).
- P7. Obtain Interim Site Audit Advice from the appointed NSW EPA accredited Site Auditor confirming the DSI report has refined understanding of PFAS sources and migration pathways in the surrounding environment.

e. Data Gap Sampling Analysis and Quality Plan(s)

- P8. Prepare a Sampling Analysis and Quality Plan(s) (**SAQP**) to close out relevant data gaps that have come to light post completion of the DSI inclusive of PFAS and other relevant COPCs (e.g. TRH, BTEX).
- P9. Obtain Interim Site Audit Advice from the Site Auditor confirming the proposed SAQP is appropriate to close the identified data gaps.

f. Data Gap Investigation(s)

- P10. Complete a Data Gap investigation(s) of soil, groundwater, surface water and

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sediments to address the data gaps identified as part of the previous DSI.

P11. Prepare report(s) outlining the findings of the investigation(s) (**DGI Report(s)**).

Separate reports (split by geographical area) may be prepared depending on the outcome and complexity of the findings.

P12. Obtain Interim Site Audit Advice from the appointed NSW EPA accredited Site

Auditor confirming the DGI report(s) adequately characterised the nature and extent of all identified contamination issues to inform an appropriate remedial strategy.

g. Water Treatment

P13 Commissioning of a Water Treatment Plant (WTP) to treat contaminated water(s) prior to discharging to Hammond Canal. Discharges will be regulated through an amendment to the site's environment protection licence. Monitoring results will be made publicly available.

h. Develop Remedial Action Plan(s) for the site

P14. RAP(s) will be developed for the site that will detail the remedial approach as defined by the remedial goals and objectives considering the contaminants stipulated in the Declaration, or any others that may be identified as requiring remediation. The RAP(s) will include a remedial options assessment (with potential field activities if required) and may be split into different site areas.

P15. At the completion of the development of the RAP(s), the NSW EPA accredited Site Auditor will prepare a Section B2 Site Audit Statement (SAS) and Site Audit Report (SAR).

P16. The site auditor will prepare a B4 Site Audit Statement (SAS) and Site Auditor Report (SAR) confirming the objectives of the VMP have been achieved.

i. Submit Development application to authorise remediation works

P17. Subject to the scale and Category of any remediation, apply to Central Coast Council or NSW Department of Planning under the *Environmental Planning and Assessment Act 1979* (NSW) for development consent to authorise the carrying out of all demolition and remediation works subject of the Remedial Action Plan(s). The application may be lodged to the Independent Planning Commission should it be classified as State Significant Development (SSD) (**Development Application**).

3. Key milestones for investigation, remediation and other actions

All works set out in the proposal must be completed by the deadlines specified below:

Works	Deadline
T1. Stakeholder Engagement	Provide updates to property owners adjacent the site and other property owners who may be impacted by off-site contamination:

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Works	Deadline
	<ul style="list-style-type: none"> ○ Within 30 days of the EPA accepting this VMP ○ Within 30 days of submission of the RAP to the EPA
T2. DSI Field work	10/03/2025
T3. DGI Field Work	30/09/2025
T4. Field work for assessment of Remedial Options (if required)	30/01/2026
T5. Commissioning of Water Treatment Plant	30/03/2026 (proposed to operate for up to 24 months from commissioning)
T6. Submit Development Application	30/12/2026

4. Reporting requirements and timeframe for submission of reports

The EPA must be provided with the following reports by the deadlines specified below:

Report	Deadline
R1. Community Consultation and stakeholder Management Plan	02/05/2025
R2. SAQP and Interim Site Audit advice	31/03/2025
R3. DSI Report and Interim Site Audit Advice	30/05/2025
R4. Data Gap SAQP(s) and Interim Site Audit Advice	30/06/2025
R5. DGI Report(s) and Interim Site Audit Advice	19/01/2026
R6. Remedial Action Plan(s) and Interim Site Audit Advice	15/06/2026
R7. Section B2 and B4 Site Audit Statement and Site Audit Report	16/11/2026

R8. Section B4 Site Audit Statement and Site Audit Report	16/11/2026
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Signature of proponent



This application for approval of this voluntary management proposal may only be signed by a person(s) with the legal authority to sign it. The various ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.

Please tick (✓) the box next to the category that describes how this application is being signed.

If the proponent is:		The application must be signed and certified by one of the following:
an individual	<input type="checkbox"/>	the individual.
a company	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	the common seal being affixed in accordance with the <i>Corporations Act 2001</i> , or two directors, or a director and a company secretary, or if a proprietary company that has a sole director who is also the sole company secretary – by that director.
a public authority other than a council	<input type="checkbox"/> <input type="checkbox"/>	the chief executive officer of the public authority, or by a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this application).
a local council	<input type="checkbox"/> <input type="checkbox"/>	the general manager in accordance with s.377 of the <i>Local Government Act 1993</i> ('LG Act'), or the seal of the council being affixed in a manner authorised under the LG Act.

I/We (the proponent):

- **apply for approval of the voluntary management proposal set out in this proposal and in any documents referred to in Part 1.4 of this proposal**
- **declare that the information in this proposal form (including any attachment or document referred to in Part 1.4 of this proposal) is not false or misleading.**

Signature		Signature	
Name (printed)	Helen Margaret Garnett	Name (printed)	Mark Eames
Position	Director	Position	Director
Date	21/2/2025	Date	21/2/2025

Seal (if signing under seal):

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