ADDENDUM VOLUNTARY MANAGEMENT PROPOSAL UNDER THE CONTAMINATED LAND MANAGEMENT ACT 1997

Part 1

Preliminary Details

1. Proponent's Details

(a) Name and contact details

The Council of the City of Sydney:
Trading as: City of Sydney
ACN: 22 636 550 790

Phone: +61 2 9265 9333
Email: council@cityofsydney.nsw.gov.au
Postal address: GPO Box 1591 Sydney NSW
Postcode: 2000
EPA licence number (if applicable): N/A

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

Name: Anita Rojas
Employer/Company: City of Sydney
Position title: Specialist Project Manager - Environmental Engineer Parks
Type of business: Local Government
Phone (business): +61 2 9265 9333
Phone (after hours): +61 2 9265 9333
Email: ARojas@cityofsydney.nsw.gov.au

2. Site to which proposal applies

The site to which the proposal applies ("the site") is:

Sydney Park and all adjacent pathways and roadways (Declaration Number 20181108; Area number 3433), as shown bounded in blue on Figure 2-1.

The Landfill Gas (LFG) investigation area extends outside of the Sydney Park Declared Area to include potential offsite receptors.

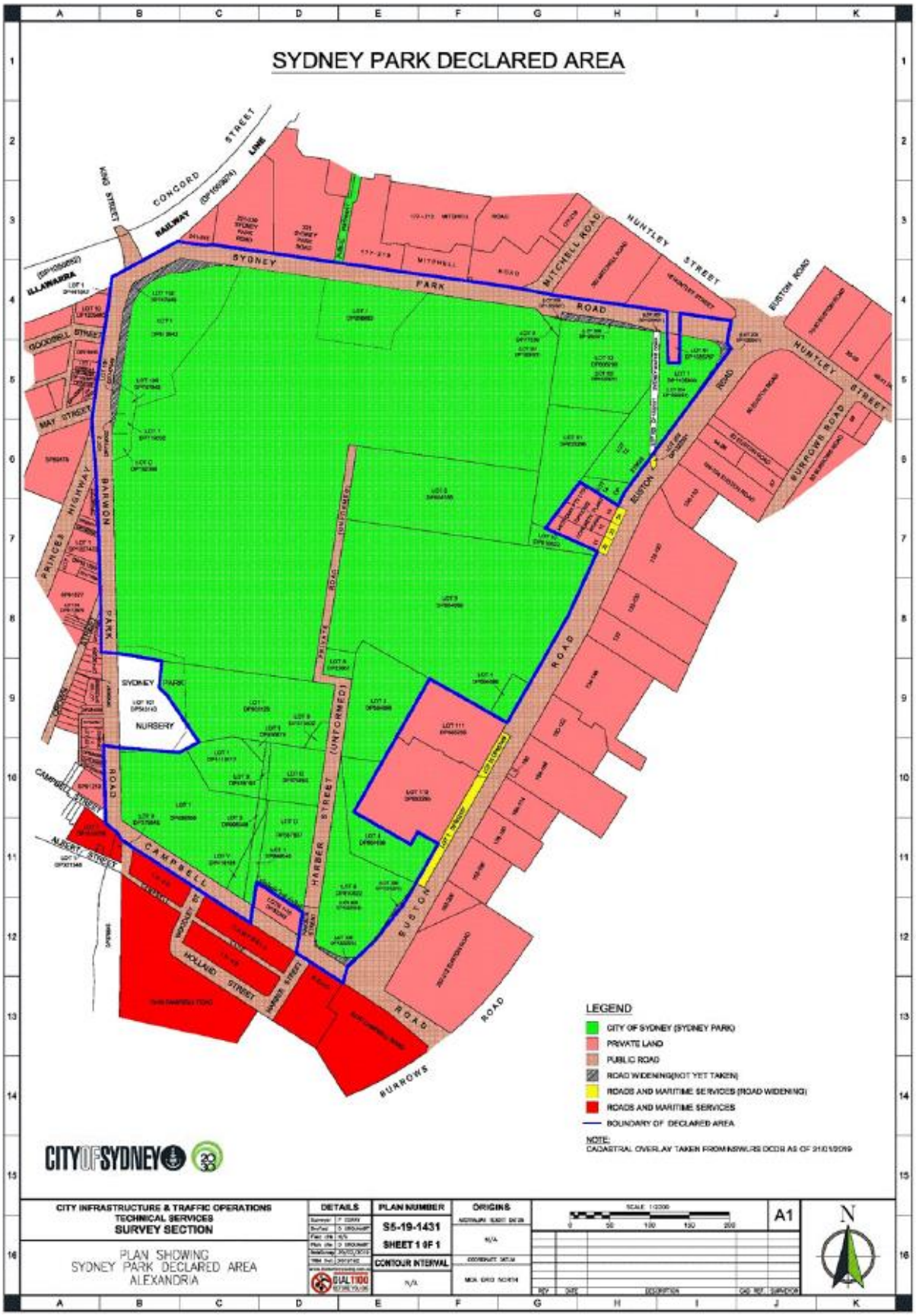


Figure 2-1 - Sydney Park Declared Area (Source: NSW EPA 2022 Amended VMP, Notice No. 20224404)

Proponent: City of Sydney

Site: Sydney Park, Alexandria, NSW 2015

Proposal Date: 10 September 2024

3. The contamination

Historical disposal of putrescible waste at the former landfill on the site has resulted in the production of LFG. LFG contains contaminants of concern at concentrations significant enough to warrant regulation under the *Contaminated Land Management Act 1997*. The substances of concern in LFG ("the contaminants") are:

- Methane
- Carbon Dioxide.

4. The management proposal

The management proposal ("the proposal") comprises:

a) the information set out above;
b) the actions, works and other components set out in the following documents:
    a. Interim Environmental Management Plan – Sydney Park Landfill Gas Management (Cardno, 2020)
    b. Landfill Gas Risk Assessment – Sydney Park Landfill Gas Management (Stantec, 2023)
    c. Landfill Gas Management Plan – Sydney Park Landfill Gas Management (Stantec, 2023)
c) the undertakings set out in Part 2 of this document; and
d) 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
2. State Environmental Planning Policy (Resilience and Hazards) 2021
3. and any requirements imposed under it in relation to the activities.
4. All matters listed as relevant to a remediation action plan by the EPA's *Guidelines for Consultants Reporting on Contaminated Sites* (1997) will be taken into account in the carrying out of the activities.
5. 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)
6. All the activities will be carried out in compliance with applicable NSW environmental legislation, and in particular:
   i) All the activities, including:
      (1) the processing, handling, movement and storage of materials and substances used to carry out the activities; and
      (2) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activities

      will be carried out in a competent manner;
   ii) All plant and equipment installed at the site or used in connection with the activities:
      (1) will be maintained in a proper and efficient condition; and
      (2) will be operated in a proper and efficient manner.
7. 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.
8. Waste generated or stored at the Site will be assessed and classified in accordance with the EPA's *Waste Classification Guidelines Part 1: Classifying Waste*.

   (See www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm)
9. All waste transported from the Site that is required by the *Protection of the Environment (Waste) Regulation 2005* to be tracked must be tracked using the EPA's on-line tracking system or an alternative tracking system approved in writing by the EPA.

   (See www.epa.nsw.gov.au/owt/aboutowt.htm)
10. 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.

11. 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.

12. The proponent will:

    i) 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

    ii) implement the strategy as approved in writing by the EPA.

Monitoring, Record Keeping & Reporting

13. 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*, 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.

14. 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.

15. 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.

16. 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*.

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

Performance Schedule

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

Part 3

Performance Schedule

1. Objectives of the proposal

The objective of the proposal is to implement measures to prevent, or reduce as far as possible, the exposure of offsite receptors to methane and carbon dioxide contained in LFG that migrates off site.

2. Principal features of the proposal

The principal features of the proposal include, but are not limited to:

a. Capital works

1) Detailed design, installation and commissioning of a gas mitigation system for a section of the north-east boundary of the site.

b. Investigation and/or Remediation

2) Assessment and, where required, repair or re-design of existing gas mitigation systems along the western boundary of the site and in the northern carpark.

3) Validation of new/improved gas mitigation systems in accordance with LFG Management Plan.

4) Investigate and, where possible, implement surface emissions capping for the tree area southwestern corner of the site where surface emissions are intermittently detected.

5) Liaise with service pit owners regarding access controls for activities within service pits and confined spaces.

6) Source analysis of gas collected at subsurface well PW-BH37 and service pit EX527.

7) Investigate feasible locations for installation of additional monitoring wells along the north-west, east-northeast and the south-west boundaries.

8) Develop a Long Term Environmental Management Plan following completion of mitigation works.

c. Monitoring

9) Develop and carry out a risk-based LFG monitoring program for:
    a) Subsurface wells
    b) Service pits
    c) Surface emissions
    d) On-site and off-site buildings.

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. Feasibility assessment and project mobilisation for a gas mitigation system across the north-eastern boundary of the site, adjacent to the Huntley Green Apartment Complex.	30 September 2025
T2. Design, installation, and commissioning of gas mitigation system in T1.	30 December 2026
T3. Validation and site audit review of new gas mitigation system in T2.	30 June 2027
T4. Assessment of existing gas mitigation systems along the western boundary of the site and in the northern carpark	30 September 2025
T5. Subject to assessment outcomes in T4, feasibility assessment and project inception for repair or re-design of existing gas mitigation systems.	30 September 2026
T6. Design, installation, and commissioning of repair or re-design existing gas mitigation systems in T5.	30 December 2027
T7. Validation and site audit review of repaired or re-designed gas mitigation system.	30 June 2028
T8. Investigate and, where possible, implement surface emissions capping for the tree area southwestern corner of the site where surface emissions are intermittently detected.	30 September 2025
T9. Liaise with service pit owners regarding access controls for activities within service pits and confined spaces.	30 September 2025
T10. Develop a risk-based, LFG monitoring program incorporating one-off source analysis of gas collected at subsurface well PW-BH37 and service pit EX527, and investigation of feasible locations for installation of additional monitoring wells	30 June 2025
T11. Prepare a Long Term Environmental Management Plan for the site.	31 October 2028

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. Site Auditor Interim Audit Advice letter for gas mitigation system design, per T1 and T2.	Within 4 weeks of receipt of the Interim Audit Advice.
R2. Validation Report and Site Audit Statement following the completion of validation of gas mitigation system, per T1 - T3.	Within 4 weeks of receipt of the final Validation Report.
R3. Site Auditor Interim Audit Advice letter for existing gas mitigation system assessment and modifications, per T4 – T6.	Within 4 weeks of receipt of the Interim Audit Advice.
R4. Validation Report and Site Audit Statement following the completion of repaired or re-designed gas mitigation systems, per T4 - T7.	Within 4 weeks of receipt of the final Validation Report.
R5. After each sampling event, submit a letter:	Within 4 weeks of receipt of final sampling reports.

• Summarising any sampling deviations to the monitoring program; • Providing data tables; • Noting any exceedances against relevant criteria; and • Detailing the sampling and outcomes of any investigation monitoring.	
R6. Site Auditor endorsement of the Long Term Environmental Management Plan, per T11.	Within 4 weeks of receipt of endorsement.

Signature of proponent

1

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	☐	the individual.
a company	☐ ☐ ☐ ☐	the common seal being affixed in accordance with the *Corporations Act 2001, 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	☐ ☐	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	☑ ☐	the general manager in accordance with s.377 of the *Local Government Act 1993* ('LG Act'), or the seal of the council being affixed in a manner authorised under the LG Act.

I (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	[redacted]
Name (printed)	Monica Barone
Position	Chief Executive Officer
Date	25/09/2024