

VOLUNTARY MANAGEMENT PROPOSAL UNDER THE CONTAMINATED LAND MANAGEMENT ACT 1997

Part 1

Preliminary Details

1. Proponent's Details

(a) Name and contact details

If a registered company, company name: ACE Rosehill Pty Ltd

Trading as: ACE Rosehill Pty Ltd

ACN: 660 230 473

If not a registered company, your full name(s):

Trading as:

ABN:

Phone: 02 9644 5596

Fax: N/A

Email: dennis@acepdg.com.au

Postal address: 362 Park Rd, Regents Park NSW

Postcode: 2143

EPA licence number (if applicable): N/A

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

Name: Junaid Riaz

Employer/Company: ADE Consulting Group (ADE)

Position title: Associate Environmental Consultant

Type of business: Consultancy

Phone (business): 0450 602 475

Phone (after hours): 1300 796 922

Fax: N/A

Email: Junaid.riaz@ade.group

Proponent: Ace Rosehill Pty Ltd

Site: 12 Grand Avenue Rosehill NSW

Proposal Date: 7 March 2025

2. Site to which proposal applies

The site to which this Voluntary Management Proposal (VMP) applies is part of the property located at 12 Grand Avenue, Rosehill, NSW 2142.

Current Lot and Deposited Plan (DP): Lot 33 DP 1287670

Proposed Lot Subdivision: N/A

Description: South-eastern portion of the property (Lot 33 only) located at 12 Grand Avenue, Rosehill, NSW 2142.

Local Government Area: City of Parramatta

GPS Coordinates: Approximate: -33.82244, 151.04332

Two site figures are shown in **Appendix A: Figure 1** shows the site layout and **Figure 2** shows the locations of groundwater wells on site.

3. The contamination

On 8 August 2007, the NSW Environment Protection Agency (EPA) declared (Declaration Number 21104; Area Number 3236) that contamination at the site is 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) Dissolved Hexavalent Chromium (Cr(VI));
- b) Phase Separated Hydrocarbons, and
- c) Dissolved Phase Petroleum Hydrocarbons

4. The management proposal

The management proposal (“the proposal”) comprises:

- a) the information set out above;
- b) The actions, works and other components are set out in the following documents:
 - ADE (2025). *Environmental Management Plan – 12 Grand Avenue, Rosehill, NSW, 2142* (reference: A101024.0518.00 EMP.v2f, issue date: TBC)
- c) the undertakings set out in Part 2 of this document; and
- d) the performance schedule set out in Part 3 of this document.

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Part 2

Undertakings Included in Voluntary Management Proposal

THE PROPOSAL INCLUDES THE FOLLOWING UNDERTAKINGS:

1. General

- a) 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.
- b) 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.
- c) 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)

- d) 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.

- e) All the activities at the site will be carried out in a manner that prevents or minimises

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the emission of dust, odour and noise from the site.

- f) 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)

- g) 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>)

- h) 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.
- i) 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.
- j) 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.

2. Monitoring, Record Keeping & Reporting

- a) 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.
- b) The EPA will be informed in writing within 7 days of the proponent becoming aware of information or data indicating a material change:
- I. in conditions at the site, or

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II. in its surrounding environment,

which could adversely affect the prospects of successful management of the site or result in harm to the environment.

- c) 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.
- d) If the proponent becomes aware that they will not meet a key milestone or reporting requirement, they must notify the EPA in writing at least 21 days before the specified deadline. The notification must include:
 - I. detailed reasons for not meeting the milestone or requirement,
 - II. a revised time period within which the milestone or requirement will be met, and
 - III. a statement explaining why compliance action should not be taken.
- e) 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>)

3. Performance Schedule

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

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Part 3

Performance Schedule

PERFORMANCE SCHEDULE

1. Objectives of the proposal

The objectives of the works under this proposal are to achieve the following outcomes within the timeframes specified:

- O1. To assess the extent and impact of Cr(VI) contamination in fill and natural soils at the site.
- O2. To evaluate the potential for off-site migration of Cr(VI) contamination, particularly in shallow groundwater and surface water.
- O3. To assess the integrity of the compacted recycled asphalt layer across the site in relation to migration of Cr(VI) contamination.
- O4. To mitigate or minimise the potential for mobilisation of Cr(VI) contamination from the site to off-site receptors.
- O5. To rule out petroleum hydrocarbons as contaminants of potential concern.

The intended life of this agreement is 24 months from the date of acceptance.

2. Principal features of the proposal

The principal features of the proposal are as follows:

a) Characterisation

- P1 Undertake a soil characterisation assessment for the distribution of Cr(VI) in fill and natural materials. Where COPR is encountered during installation of new wells it will be logged and COPR sampled and analysed. Samples of soil containing COPR will be subjected to ASLP testing to assess the ability for any chromium ore processing residue to leach into groundwater. Any new groundwater wells installed as part of this program will be analysed for hexavalent chromium.
- P2 Identify the nature of any cap and pavements, including its condition and permeability in relation to preventing contaminant mobilisation where offsite migration is occurring at concentrations exceeding trigger values such as ANZECC/ARMCANZ (ANZG) or site specific criteria. Permeability to be determined using a double ring infiltrometer.

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- P3 Conduct groundwater monitoring and gauging events at the identified monitoring well locations, to demonstrate suitability for the assessment of offsite migration of contaminants (refer to **Figure 2** in **Appendix A – Figures**). Monitoring should include historical shallow wells MW1001, MW1002, CW203 and CW202 or wells immediately downgradient. Downgradient wells could include MW13A, MW13B, MW14B, MW15A, MW17 and CW204.
- a. Identify and assess condition of existing groundwater monitoring wells onsite against proposal objectives. ADE assumes that 3 deep and 3 shallow wells are accessible and are viable, or can be rehabilitated for use. If required, non-functional groundwater monitoring wells will be replaced. Additionally, up to 3 new shallow groundwater wells will be installed at locations down hydraulic gradient of the site..
 - b. Conduct monitoring events as per **Table 1** below.

Table 1. Summary of groundwater *and* stormwater monitoring requirements

Task	Wells/sample locations	Analysis
Baseline (Round 1)	Groundwater: 9 locations on site (3 deep and 6 shallow)	TRHs, BTEX, PAHs, heavy metals including Cr(VI), anions and nutrients
	Stormwater: 2 locations on site (storm water drains)	TRHs, BTEX, PAHs, heavy metals including Cr(VI)
	River: 1 location off site (Paramatta River)	TRHs, BTEX, PAHs, heavy metals including Cr(VI),
Rounds 2,3 and 4	6 shallow groundwater wells on site	Cr(VI)

- P4 Conduct a surface water assessment for Cr(VI).
- P5 Prepare a summary report on completion of all works (including 4 Groundwater monitoring rounds, stormwater flow and stormwater quality assessments)
- P6 Update the conceptual site model.

b) Management

- P7 Continued implementation of the EMP prepared for Lot 33 (See Part 1, Section 4b of the EMP). Key elements of the EMP include:
- c. Manage Cr (VI) contamination and prohibit groundwater use.
 - d. Control contamination during excavation with PPE, dust suppression, and tracking.

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- e. Minimize, contain, cover, and track contaminated stockpiles.
- f. Classify, dispose, and document waste per regulations.
- g. Verify and test imported fill for VENM/ENM compliance.
- h. Track and document all material movements.
- i. Assess risks, use controls, and reinstate capping during maintenance.
- j. Stop work, isolate, assess, and validate unexpected contamination.
- k. Monitor groundwater, manage exposure, and install wells as required.

P8 Remedial Action Planning

- I. Where offsite migration of groundwater exceeding trigger values such as ANZECC/ARMCANZ (ANZG) or site specific criteria are exceeded, a remedial action plan will be developed. This plan will identify the most appropriate remedial objectives and methods, in synergy with the proposed future use of the site.
- II. Where capping is the preferred remedial method, capping specifications will be outlined in the remedial action plan.

3. Key milestones for investigation, remediation and other actions

Key milestones for the investigation, remediation and other actions are specified in **Table 2** below, followed by further details on each task.

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Table 2. Summary of key milestones for the investigation, remediation and other actions

Task Description	Deadline
T1.1 Assessment and rehabilitation of current/historical groundwater network.	30 June 2025
T1.2 Undertake well installation, if required based on T1.1	30 June 2025
T1.3 Complete a soil characterisation assessment (CrVI)	31 July 2025
T1.4 Targeted groundwater monitoring events (P2), for a total of 4 rounds (including shallow and deep monitoring wells, surface water and storm water drains)	Baseline (Round 1) – 30 July 2025 Round 2 – 31 October 2025 Round 3 – 31 January 2026 Round 4 – 30 April 2026
T1.5 Complete a stormwater flow assessment	1 December 2025
T1.6 Complete a stormwater quality assessment	1 December 2025
T1.7 Complete nature of cap and permeability testing	1 December 2025
T1.8 Prepare a summary report	25 June 2026

4. Reporting requirements and timeframe for submission of reports

The EPA must be provided with the following reports, related to **Stage 3** of the works, by the deadlines specified below:

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Table 3. Summary of deliverables

Report number	Description	Deadline
R1	Groundwater Monitoring Event – Baseline event	4 weeks after receiving all groundwater monitoring results (nominally 30 July, 31 Oct 2025, 31 Jan 2025, 30 Apr 2026),
R2	Groundwater Monitoring Event – 2 nd event	
R3	Groundwater Monitoring Event – 3 rd event	
R4	Groundwater Monitoring Event – 4 th event	
R5	Stormwater flow assessment	4 weeks after receiving all stormwater monitoring results (nominally 1 Dec 2025)
R6	Stormwater quality assessment	4 weeks after receiving all stormwater monitoring results (nominally 1 Dec 2025)
R7	Nature of cap and permeability testing	4 weeks after conducting permeability testing (nominally 1 Dec 2025)
R8	Limited soil assessment for characterisation and distribution of hexavalent chromium in fill	4 weeks after receiving all soil analytical results (nominally 31 July 2025)
R9	Summary report – including groundwater monitoring events 1-4, stormwater flow assessment, stormwater quality assessment, limited soil assessment	3 weeks after issue of groundwater monitoring event round 4 (nominally 25 Jun 2026)

Where off-site migration is occurring, preparation of a remedial action plan (RAP) to identify the most appropriate remedial method (synergistic with the proposed use of the site) is recommended, in accordance with the National Remediation Framework (CRC CARE, August2019).

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Signature of proponent

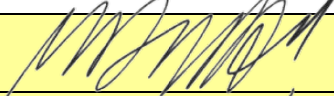
This application for approval of this voluntary management proposal may only be signed by a person(s) with the legal authority to sign it. The various ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.

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 checked="" 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)	Sami Allam	Name (printed)	
Position	Sole Director and Secretary	Position	
Date	11/4/2025	Date	

Seal (if signing under seal):

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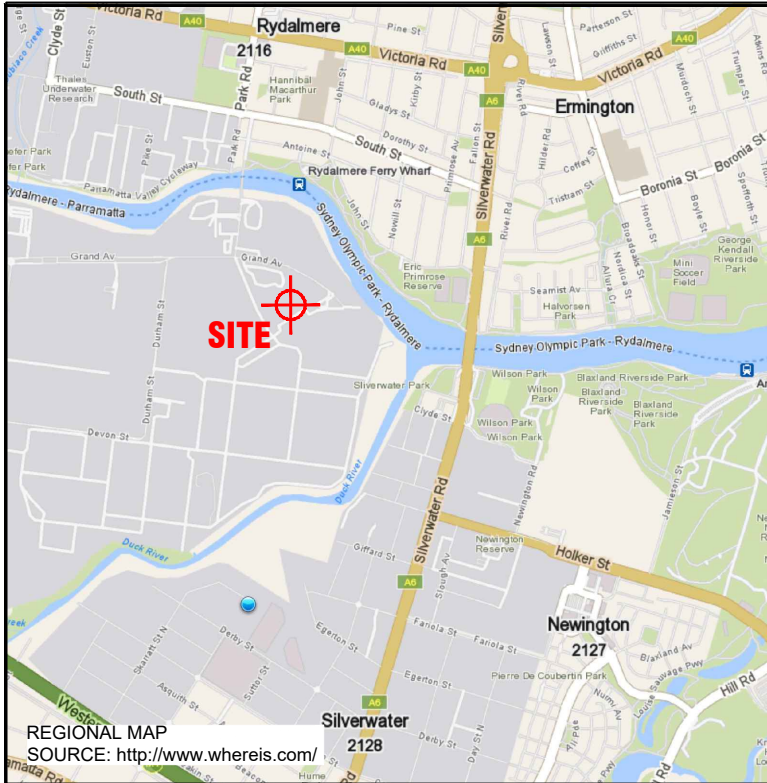
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Appendix A: Figures

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LEGEND

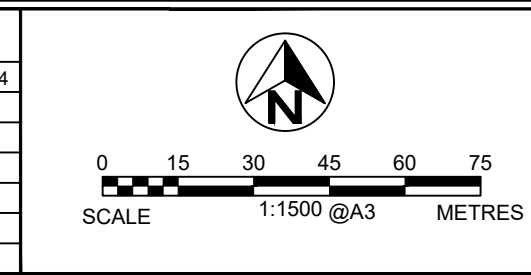
SITE BOUNDARY

NOTE:

ALL LOCATIONS ARE APPROXIMATE
DIMENSIONS IN METRES.

AERIAL IMAGE SOURCE: MAPS.AU.NEARMAP.COM, 30 OCT 2024.

revision	no.	description	drawn	approved	date
	A	FIRST ISSUE	MC	LL	22/07/24



drawn	MC	client:	ACE ROSEHILL PTY LTD		
approved	JR	project:	VOLUNTARY MANAGEMENT PLAN LOT33, DP1287670 12A GRAND AVENUE, ROSEHILL, NSW		
date	16/01/2025	title:	SITE LAYOUT PLAN		
scale	AS SHOWN	project no:	A101024.0518.00	figure no:	FIGURE 1
original size	A3	rev:	A		

ADE
CONSULTING
GROUP

Sydney Office

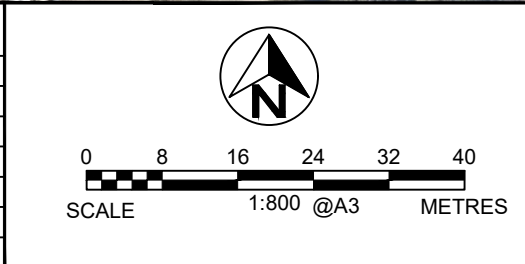
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revision	no.	description	drawn	approved	date
	A	FIRST ISSUE	MC	SR	16/01/25



drawn	MC	client:	ACE ROSEHILL PTY LTD		
approved	SR	project:	VOLUNTARY MANAGEMENT PLAN LOT33, DP1287670 12A GRAND AVENUE, ROSEHILL, NSW		
date	16/01/2025	title:	WELL INSPECTION LOCATION PLAN		
scale	AS SHOWN	project no:	A101024.0518.00	figure no:	FIGURE 2
original size	A3			rev:	A



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