



DOC19/1061459-3

Mr Tim Woodhouse
Project Manager – Safety, Environment and Site Services,
Roche Products Pty Ltd

Email: tim.woodhouse@roche.com

Dear Mr Woodhouse

**Approval of Voluntary Management Proposal
Roche Facility - 4-10 Inman Road, Dee Why,**

I am pleased to inform you that the EPA has approved the Voluntary Management Proposal you submitted for management of the contamination at the former pharmaceuticals site at 4-10 Inman Street, Dee Why. The ongoing work includes the second injections for In-Situ-Chemical Oxidation, the pilot trial of soil vapour extraction and further monitoring and assessment of the groundwater contamination onsite and off the site.

A signed Notice of Approval of Voluntary Management Proposal (Notice No. 20191730) made under the *Contaminated Land Management Act 1997* (CLM Act) is enclosed. The EPA has also withdrawn its approval of the previous VMP, as we are satisfied that the works have been completed and the future management is captured under this recently approved one. A copy of these Notices has been placed on our website, and a copy has also been provided to Council.

If you are unable to meet any deadline identified in the proposal, a written request for an extension must be provided. The request must be made 21 days before the deadline, and must outline the reasons for the delay, a revised time within which the action will be achieved and a statement explaining why enforcement action should not be taken.

Section 34 of the CLM Act allows the EPA to recover its costs in relation to assessing and settling the terms of a VMP, monitoring action under an approved VMP, seeking compliance with an approved VMP or matters associated with, or incidental to, any of these matters. A draft Cost Recovery Notice associated with the VMP approval is attached. Please provide any comments on the Draft Cost Recovery Notice within 14 days of this letter, at which time it will be finalised.

If you wish to discuss any matters raised above, please contact Olivia Patterson on (02) 9995 5798 or at Olivia.patterson@epa.nsw.gov.au

Yours sincerely

8 January 2020

ROB HOGAN
Manager Contaminated Land Regulation
Environment Protection Authority

Encl. VMP Completion Notice Ref. 201917-7-18
VMP Approval Notice Ref. 20191730
Draft Cost Recovery Notice

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

Fax 02 9995 5999
TTY 131 677
ABN 43 692 285 758

PO Box A290
SYDNEY SOUTH
NSW 1232

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SYDNEY NSW 2000
AUSTRALIA

info@epa.nsw.gov.au
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Environment Protection Authority

Notice of completion of approved voluntary management proposal

(Section 17(7) of the *Contaminated Land Management Act 1997*)

Notice Number 201917-7-18; Area Number 3399

Background

The Environment Protection Authority (EPA) approved (Approval No.20181706) a voluntary management proposal (VMP) from Roche Products Pty Ltd (the proponent) in relation to the land to which this notice applies. The proponent carried out the management actions under the approved VMP. The management has been completed and the results have been made available to the EPA.

Land to which this notice applies

Description	Address
Lot 1 in DP 1220196 (proposed subdivision Lot 100 in DP 611332)	4-10 Inman Road, Dee Why, NSW 2099

Completion of approved VMP

Pursuant to 17(7) of the CLM Act, VMP No. 20181706 approved on 19 September 2018, ceases to be an approved proposal as the EPA is satisfied that the terms have been carried out. The ongoing management of the contamination at the site is captured under VMP Approval No.20191730.

Signed:



ROB HOGAN
Manager Contaminated Land Regulation
Environment Protection Authority

Date: 8 January 2020

(by delegation)

NOTE:

Information recorded by the EPA

Section 58 of the CLM Act requires the EPA to maintain a public record. A copy of this notice will be included in the public record.

Information recorded by councils

Section 59 of the CLM Act requires the EPA to give a copy of this notice to the relevant local council. The council may then make appropriate consequential modifications to the planning certificate issued in relation to the land to which this notice applies pursuant to s10.7 of the *Environmental Planning and Assessment Act 1979*.

Relationship to other regulatory instrument

This repeal notice does not affect the provisions of any relevant environmental planning instruments which apply to the land or provisions of any other environmental protection legislation administered by the EPA.

Previous regulatory instrument

As of 1 July 2009, all current declarations of investigation area and declarations of remediation site are taken to be declarations of significantly contaminated land, all current investigation orders and remediation orders are taken to be management orders and all current agreed voluntary investigation proposals and agreed voluntary remediation proposals are taken to be approved voluntary management proposals.

Environment Protection Authority (EPA)

**NOTICE OF APPROVAL OF VOLUNTARY
MANAGEMENT PROPOSAL**

(Section 17 of the *Contaminated Land Management Act 1997*)

Approval No.: 20191730

Approval Date: 8 January 2020

Area No.: 3399

The approved proposal consists of this approval document and the attached proposal, which comprises three Parts: Part 1 – Preliminary Details; Part 2 – Undertakings; and Part 3 – Performance Schedule.

Proponent: Roche Products Pty Ltd

Site: Part of Lot 1 in DP 1220196 (proposed subdivision Lot 100 in DP 611332)

Proposal Date: 4 November 2019

BACKGROUND

The EPA is satisfied that the terms of the proposal, as modified by the conditions of this approval, are appropriate.

For the purposes of section 17(4) of the *Contaminated Land Management Act 1997* (CLM Act), the EPA is satisfied that the proponent has taken all reasonable steps to identify and find every owner and notional owner of the land and every person responsible for significant contamination of the land and given those parties identified an opportunity to participate in the formulation and carrying out of the proposal on reasonable terms.

The contents of Part 1, Part 2 and Part 3 of the attached proposal form part of the terms of the approved proposal.

For the purposes of section 9(1) of the CLM Act, the EPA has had regard to the principles of ecologically sustainable development in assessing and approving this Voluntary Management Proposal (VMP) and has also sought the implementation of those principles in the management of the site under this approved proposal.

APPROVAL AND CONDITIONS

The EPA approves the proposal subject to the following conditions. These conditions form part of the terms of the approved proposal.

1. Each feature and milestone of the proposal is to be completed by the date specified in the proposal. Failure to satisfactorily complete any component by the due date for that feature or milestone may be taken as a failure to carry out the terms of the proposal for the purposes of section 17(6) of the CLM Act.
2. The proponent cannot recover contributions under Part 3 Division 6 of the CLM Act.

3. Make available for inspection by any person, free of charge, and provide a copy to any person for a reasonable fee, any document required to be prepared and submitted to the EPA under this voluntary management proposal. It is not necessary to disclose:
 - (i) any information contained in those documents that relates to any manufacturing or other industrial or commercial secrets or working processes; or
 - (ii) any personal information, within the meaning of the *Privacy and Personal Information Protection Act 1998* contained in those documents.
4. Where this proposal requires the proponent or any other person to give a document to the EPA, that document may be given to the EPA:
 - (i) By posting the document to Director of Contaminated Land Management
PO Box A290, Sydney South, NSW 1232
 - (ii) By emailing the document to contaminated.sites@epa.nsw.gov.au
5. Any report submitted to the EPA to comply with this Notice must be prepared, or reviewed and approved, by a practitioner certified by an EPA-recognised scheme. Further information, and a list of contaminated land consultant certification schemes recognised by the EPA is available on the EPA's website at: <http://www.epa.nsw.gov.au/your-environment/contaminated-land/managing-contaminated-land/engaging-consultant>.

ADDITIONAL INFORMATION

6. The EPA may still exercise any powers it has under the CLM Act, or any other legislation, in relation to the site.
7. The EPA may require the proponent to pay all or any costs incurred by the EPA in connection with any one or more of the following:
 - a. Assessing and settling the terms of the approved voluntary management proposal;
 - b. Monitoring action under the approved voluntary management proposal;
 - c. Seeking the compliance of the proponent with the approved voluntary management proposal;
 - d. Any other matter associated with, or incidental to, the matters set out in paragraphs a. to c. above.

Signed:



ROB HOGAN
Manager Contaminated Land Regulation
Environment Protection Authority

(by delegation)

VOLUNTARY MANAGEMENT PROPOSAL UNDER THE CONTAMINATED LAND MANAGEMENT ACT 1997

Part 1

Preliminary Details

1. Proponent's Details

(a) Name and contact details

Roche Products Pty Ltd

ABN: 70 000 132 865

Postal address: Level 8, 30-34 Hickson Road
Sydney NSW

Postcode: 2000

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

Name: Mr Tim Woodhouse

Employer/Company: Roche Products Pty Ltd

Position title: Project Manager - Safety, Environment and Site Services

Phone (business): 02 9454 9110

Email: tim.woodhouse@roche.com

2. Site to which Proposal Applies

The site to which the proposal applies (“the Site”) is a portion (the ‘Regulated Area’, as marked in attached survey plan) of the property located at 4-10 Inman Road, Dee Why NSW (part Lot 100 in DP 611332 within the local government area of Northern Beaches Council).

3. The Contamination

The Site was notified to the NSW EPA under section 60 of the CLM Act (1997) in November 2015. The notification was made based on the presence of Trichloroethene (TCE) and petroleum hydrocarbons in groundwater. The EPA determined that the contamination identified at the Site is significant and warrants regulation under the CLM Act. Since the initial declaration the EPA has approved three separate Voluntary Management Plans (VMP’s) which have provided a framework for the management of the contamination at the Site to date. The staged approach to the VMPs has been required given the complexities of the issues at the Site and the related uncertainties around the progression of the remedial activities. A key commitment in the VMPs to date has been the final deliverable being a proposal for a VMP to cover the next phase of Site management. All tasks required by the most recent VMP (Remediation VMP #1, dated 4/7/18) has now been completed to the satisfaction of the Site Auditor and all deliverables have been submitted to the NSW EPA.

The Site has been used for the manufacture and / or storage of pharmaceutical products for approximately 40 years. A wire cable manufacturing facility also operated in a building onsite (Building 18) prior to acquisition by Roche Products. Various historical operations on the Site included the use of petroleum hydrocarbon products industrial solvents, including chlorinated volatile organic compounds (CVOCs). Investigations completed to date have determined that both CVOC and petroleum hydrocarbon impact is present in groundwater at the Site.

The identified CVOC impact to groundwater appears to be related to the historical wire cable manufacturing within Building 18. As noted above, Building 18 was previously owned and occupied by a company called Fibrecell Products Pty Ltd (Fibrecell) which manufactured wire cables. Roche's investigations indicate that Fibrecell was deregistered as a company in 1977. On this basis, it is noted that reasonable steps have been taken to identify persons previously responsible for contamination and it is also noted that Roche does not intend to seek to recover remediation costs from any other person.

The identified CVOC plume has been found to be present within three primary zones in the unconfined shallow aquifer at depths of up to 33 metres. Impact has been confirmed not to extend to the underlying sandstone bedrock. Investigations completed to date indicate that the plumes may extend as far as Dee Why Creek to the south of the Site at low concentrations, however concentrations do not extend beyond Dee Why Creek. Low level TCE concentrations at two orders of magnitude below the most conservatively applied screening criteria have been detected in surface water in Dee Why Creek.

Proponent: Roche Products Pty Ltd
Site: Part 4-10 Inman Road, Dee Why
Proposal Date: November 2019

The source of the identified petroleum hydrocarbon impact to groundwater is considered likely to be an unnamed former fuel UST located to the south of Building 7. The petroleum hydrocarbon plume extends beyond the southern Site boundary to Cromer Park, however it is fully delineated offsite.

In 2017, ERM completed a Human and Ecological Risk Assessment (HERA) conducted for the Site concluded that TCE concentrations in groundwater beneath the Site posed a potential vapour intrusion risk to onsite workers. However, the HERA noted that onsite indoor air sampling has confirmed that concentrations of CVOC's in indoor air are not above Tier 1 and therefore there is currently no risk present. The HERA did not identify any current offsite risk for human or ecological receptors.

Based on the conclusions of the HERA, a Remedial Action Plan (RAP) was produced which provides the goals for future Site remediation and recommended remedial options for the Site, which if implemented appropriately, are expected to achieve the remediation goals. The recommended remediation technology was ISCO for on-site areas, with institutional controls to be implemented within impacted off-site areas.

In order to assess the feasibility of ISCO as a remedial approach for the Site, an ISCO Pilot Trial was conducted during 2017. The Pilot Trial included the injection of sodium permanganate at a limited number of injection locations and subsequent groundwater monitoring over a three month period. The outcomes of the Pilot Trial indicated that the ISCO approach described in the RAP was feasible and likely to be effective in achieving the remedial objectives if appropriately implemented on a full scale basis.

A Full Scale ISCO Injection Program was subsequently implemented which targeted both the CVOC and petroleum hydrocarbon plumes. A total of 89 remedial injection locations were included in the overall system design, with 77 targeting the CVOC plume and 12 targeting the petroleum hydrocarbon plume. An extensive monitoring program was implemented for 12 months following the ISCO injections. Results indicated that both CVOC and petroleum hydrocarbon concentrations had been significantly reduced. However, further injections were required in the shallow and deep zones of the CVOC plume to further reduce concentrations and manage concentration rebound. Soil vapour concentrations were found to not reduce significantly as expected following the ISCO injections, which was attributed to lower than expected standing groundwater levels. On this basis, it has been recommended that contingency measures be considered to manage concentrations of CVOCs in soil vapour.

4. The Voluntary Management Proposal

This 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

Explanatory Note:

Before the EPA can approve a voluntary management proposal under section 17 of the Contaminated Land Management Act 1997, it has a statutory obligation to satisfy itself that the terms of the proposal (as modified by any conditions to be imposed by the EPA) submitted to it under section 17 are appropriate. In addition to including an appropriate investigation plan, remedial action plan or other plan of management, to be acceptable to the EPA a proposal would usually include the undertakings set out below. These undertakings are important and will form part of the terms of the proposal. If the proposal is approved, they must be complied with in order for the EPA to be satisfied that the terms of the proposal have been carried out.

THE PROPOSAL INCLUDES THE FOLLOWING UNDERTAKINGS:

General

1. 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 55 – Remediation of Land* and any requirements imposed under it in relation to the activities.
2. Matters listed as relevant to a remedial 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.
3. Activities will be carried out consistently with guidelines made or approved under section 105 of the CLM Act. (See <http://www.epa.nsw.gov.au/clm/guidelines.htm>)
4. The activities will be carried out in compliance with applicable NSW environmental legislation, and in particular:
 - i) 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) 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.
5. Activities at the site will be carried out in a manner that prevents or minimises

where practical 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 NSW EPA *Waste Classification Guidelines Part 1: Classifying Waste*.

(See <http://www.epa.nsw.gov.au/resources/wasteregulation/140796-classify-waste.pdf>)

7. Waste transported from the site that is required by the *Protection of the Environment (Waste) Regulation 2014* to be tracked must be tracked using NSW EPA's on-line tracking system or an alternative tracking system approved in writing by NSW EPA.

(See <http://www.epa.nsw.gov.au/wasteregulation/tracking-waste-mla.htm>)

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 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:

- 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

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*, 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 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 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. The EPA will be informed 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

15. The performance schedule outlined in Part 3 of this document will be adhered to.

Part 3

Performance Schedule

1. Objectives of the Proposal

This proposal is intended to set out a course of actions which will facilitate the implementation and performance monitoring related to the second full scale ISCO injection in accordance with the RAP and the ISCO Injection 2 Technical Specification. Furthermore, options for supplemental remediation methods will be investigated for the reduction of CVOCs in soil vapour as per the contingency section of the RAP.

The overarching goal of the proposal is to set out a course of actions and appropriate timeline that will help achieve the following objectives:

- Investigate the feasibility of implementing Soil Vapour Extraction (SVE) as a remediation technology to potentially supplement the ISCO remediation works at the Site;
- Expand the existing ISCO Injection network to increase well density in the shallow CVOC zone;
- Implement a second ISCO injection program in accordance with the RAP and ISCO Injection 2 Technical Specification;
- Provide advice on the effectiveness of the ongoing ISCO remediation in reducing concentrations of chlorinated hydrocarbons and petroleum hydrocarbons; and
- Provide advice on whether remedial goals stated in the RAP have been achieved or if subsequent remediation works are required.

Specific activities addressed under this proposal are as follows:

1. Continue maintaining relations and communication with regulatory and other relevant stakeholders;
2. Undertake an SVE Pilot Trial;
3. Install additional injection wells targeting the shallow CVOC plume;
4. Continue to implement the full scale ISCO injection program at the Site in accordance with the ISCO Injection Technical Specification;
5. Undertake post injection monitoring; and
6. Continue to monitor both the onsite and offsite portions of the plumes as part of an ongoing assessment of offsite risk and plume stability.

2. Principal Features of this Proposal

The key activities that make up the principal features of this proposal include, but are not limited to, the following:

P1. Stakeholder Engagement and Consultation

Engagement with key project stakeholders (i.e., Site owner (EG Developments), relevant community members, Site Auditor, Northern Beaches Council, the NSW EPA, Water NSW, Site employees, owners and occupiers of down gradient sites) will continue during the future management of the Site. The regulatory authorities will be consulted regularly for input in the decision making process, and necessary regulatory permits and approvals will be obtained prior to undertaking site works.

P2. Shallow Injection Well Network Expansion

ERMs Remediation Progress Report #1 recommended that additional injection points should be installed targeting the shallow CVOC plume in order to increase the injection network density. This work was completed during April 2019. The increased density had a number of benefits, including increasing the distribution of oxidant through the plume following injection and also potentially enabling additional contaminated material to be treated. The additional wells were installed prior to the implementation of the second ISCO injection so that they could be utilised during the event.

The well network expansion included installation of 10 new shallow injection wells and two new shallow monitoring wells.

P3. Second Full Scale ISCO Injection Program

The RAP specified that groundwater remediation (for CVOCs particularly) may require up to three separate ISCO injections. Based on the monitoring results following the First Full Scale ISCO Injection, further injection was considered to be required for the shallow and deep zones of the CVOC plume. It was identified that the intermediate zone of the CVOC plume and the petroleum hydrocarbon plume do not require further remediation at this stage, however ongoing monitoring will be undertaken at locations targeting these plumes.

A Technical Specification was produced (ISCO Injection 2 Technical Specification) which provides overarching guidance on the procedures and risk mitigations to be used throughout the program, as well as specific guidance on the volumes of oxidant (sodium permanganate) required for the second ISCO injection event.

The second ISCO injection event was completed during June and July 2019. The injection event targeted a total of 71 injection wells which targeted the shallow and deep zones of the CVOC plume. As per the previous ISCO injections at the Site sodium permanganate was the selected oxidant injected. The sodium permanganate was injected as a 5% solution into the shallow zone, with a 15% solution used for the deep zone. The methodologies used to deliver the oxidant to the subsurface were

generally similar to previous events, where low pressure was used to deliver the oxidant to the subsurface via individual injection wells under controlled flow rates.

During the injection program a comprehensive monitoring program was undertaken. The objective of the monitoring during the program was to monitor for groundwater mounding and potential "daylighting" of injectate either as a result of unforeseen short circuiting or overflow of down gradient monitoring or injection wells.

The program is currently in a phase of remediation performance monitoring. It is expected that the sodium permanganate will remain active in the subsurface for up to 18-24 months. Additional applications will not be undertaken until the sodium permanganate in the subsurface from the previous injection is oxidised.

P4. Post Injection Remediation Monitoring

Monitoring activities for the Second ISCO Injection will be as per the schedule specified in the ISCO Injection 2 Technical Specification.

In the four weeks following the completion of injections, weekly inspections will be undertaken to continue to assess whether any oxidant is surfacing at any location. Additional inspections will be undertaken at six weeks, eight and twelve weeks following injections. For these events a general inspection of the remediation area will be undertaken. Events at four and twelve weeks following injections will be shallow zone observation event, during which monitoring wells screened in the shallow zone will be gauged and sampled. Where sodium permanganate is observed (as indicated by colour) a field method will be used to estimate the concentration of sodium permanganate in groundwater.

Full post injection monitoring events will be undertaken at six months, twelve months, 18 months and 24 months following the completion of the injection program. The full monitoring events will include soil vapour and groundwater sampling across a comprehensive selection of monitoring locations. The purpose of these events will be to assess changes in groundwater and soil vapour conditions across the onsite plumes. The data will be used to assess the effect of the injection event in terms of CoPC concentration reductions and oxidant distribution.

The full post injection events will include offsite groundwater monitoring wells. The offsite data will be used as part of the ongoing assessment of offsite risk and plume stability.

P5. SVE Pilot Trial

At the time of preparation of this VMP, groundwater levels at the Site were currently approximately 1 m below the levels upon which the ISCO approach was designed and a portion of the previously saturated CVOC impacts in the vadose zone have been exposed above the water table. Soil vapour data collected following the first ISCO injection indicated that CVOC impacted material in the vadose zone may be a contributing factor to the ongoing presence of significant CVOC concentrations in soil vapours at the source area of the CVOC groundwater plume. Based on the

Proponent: Roche Products Pty Ltd
Site: Part 4-10 Inman Road, Dee Why
Proposal Date: November 2019

potentially incomplete treatment of CVOCs, the contingency measures detailed in the RAP were considered. Based on this review, it was identified that an alternative approach to managing unsaturated impacts should be considered in the event that groundwater levels do not return to levels conducive to ISCO treatment. SVE was selected as an appropriate technology and therefore a Pilot Trial was scheduled.

The SVE Pilot Trial will be conducted in accordance with a SVE Pilot Trial Technical Specification, which will be produced prior to the works. The Pilot Trial period will involve active SVE at a single SVE well which was previously installed in the source area of the plume in 2017 as a potential contingency. The Pilot Trial will run for a period of three months, during which data will be collected from both the SVE system and surrounding monitoring locations. The data collected during the Pilot Trial will be used to assess the suitability and feasibility of the technology to effectively reduce soil vapour concentrations in a locally impacted portion of the Site, particularly within the source area.

P6. Reporting

The reporting requirements and timeframes for submission to EPA are presented in *Table 1* below.

3. Reporting Requirements and Timeframe for Submission of Reports

The NSW EPA will be provided with the following reports specified below in Tables 1 and 2. Prior to submission to the NSW EPA, these documents will undergo an independent review process by a NSW EPA accredited Site Auditor.

Table 1: Reporting Requirements and Expected Timing for Submission of Draft Document to the Site Auditor

Report	Expected Timing (submission to Site Auditor)
R1. ISCO Injection #2 Technical Specification	Completed
R2. SVE Pilot Trial Technical Specification	Completed
R3. SVE Pilot Trial Report	29 May 2020
R4. Remedial Progress Report #2	28 January 2022
R5. Updated VMP	29 April 2022

Table 2: Reporting Requirements and Expected Timing for Submission of Final Document to the NSW EPA

Report	Expected Timing (submission to NSW EPA)
R1. ISCO Injection #2 Technical Specification	1 week following VMP Approval
R2. SVE Pilot Trial Technical Specification	1 week following VMP Approval
R3. SVE Pilot Trial Report	31 July 2020
R4. Remedial Progress Report #2	31 March 2022
R5. Updated VMP	30 June 2022

Signature of Proponent

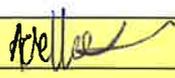
This application for approval of this voluntary management proposal may only be signed by a person(s) with the legal authority to sign it. The various ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.

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"/> the common seal being affixed in accordance with the <i>Corporations Act 2001</i> , or <input type="checkbox"/> two directors, or <input checked="" type="checkbox"/> a director and a company secretary, or <input type="checkbox"/> 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"/> the chief executive officer of the public authority, or <input type="checkbox"/> 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"/> the general manager in accordance with s.377 of the <i>Local Government Act 1993</i> ('LG Act'), or <input type="checkbox"/> 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)	STEFAN PLATTNER	Name (printed)	ADRI DE VLEESCHAUWER
Position	DIRECTOR	Position	COMPANY SECRETARY
Date	04.11.19	Date	04.11.19

Seal (if signing under seal):

Proponent: Roche Products Pty Ltd
 Site: Part 4-10 Inman Road, Dee Why
 Proposal Date: November 2019



Our reference: DOC19/1061459-6

The Proper Officer
c/o Roche Products Pty Ltd

Attn: Tim Woodhouse

Service: *By email* - tim.woodhouse@roche.com

Cost Recovery Notice
Recovery of the EPA's Costs associated with approved Voluntary Management Proposals
(VMP) numbers 20181706 and 20191730

Roche Products Pty Ltd, 4-10 Inman Street, DEE WHY NSW
NOVEMBER 2019 to DECEMBER 2019

In accordance with section 34 of the *Contaminated Land Management Act 1997* (CLM Act) the Environment Protection Authority (EPA), by this notice, requires Roche Products Pty Ltd (Roche), ACN: 000 132 865 to pay the costs incurred by the EPA in connection with Notice of approved voluntary management proposal (VMP) number 20181706 and VMP number 20191730.

The costs for the activities described in section 34(a)/(b)/(c), are charged at the rate of \$80 per hour prescribed under cl 4(2) of the *Contaminated Land Management Regulation 2013*, which is adjusted on 1 September each year (cl 10) with movements in the Public Sector Wage Price Index. Details of the activities, costs and rates relevant to your site are provided in the table below.

The costs incurred by the EPA in connection with the VMPs are summarised as follows:

Section	Activity	Time Period	Rate/hour	Hours	Costs
s 34(a)	Assessing and settling the terms of the VMP	1 Sept 2019 to 31 Aug 2020	\$96	8.75	\$840.00
s 34(b)	Monitoring action taken under order/approved VMP	1 Sept 2019 to 31 Aug 2020	\$96	3	\$288.00
Total			\$	11.75	\$1,128.00

An invoice is attached to this notice. Please note the payment terms are 30 days from the date of issue of the invoice.

If you have any questions regarding this matter please contact Olivia Patterson on (02) 9995 5798.

Yours sincerely

BEN LIVISSIANIS
Unit Head Regulation - Contaminated Land Management
Environment Protection Authority

Enclosed: invoice

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

Fax 02 9995 5999
TTY 131 677
ABN 43 692 285 758

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NSW 1232

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