Department of Planning, Housing and Infrastructure

Our ref: SSD-88889679-PA-109

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AGL Macquarie Pty Limited
200 George Street
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18/08/2026

Liddell Battery and Bayswater Ancillary Works – Contamination Management Subplan

Dear Mr/Ms/Mx Surname

Thank you for submitting the Contamination Management Subplan in accordance with Condition C1, Schedule 2 of the consent for the Liddell Battery and Bayswater Ancillary Works (SSD-8889679). I also acknowledge your response to the Department's review comments and request for additional information.

I note the document was revised to align with operational stage of the project and to reflect the reduced environmental risks. The document contains the information required by the conditions of approval.

Accordingly, as nominee of the Planning Secretary, I approve the revised Contamination Management Subplan (Rev 7.1, July 2026).

You are reminded that if there are any inconsistencies between the Plan and the conditions of approval, the conditions prevail.

Please ensure you make the document publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Charissa Pillay on 02 99955944.

Yours sincerely

Stephen O'Donoghue
Director
Resource Assessments

As nominee of the Planning Secretary

Liddell Power Station Battery Energy Storage System Contamination Management Sub Plan

Environmental Management Strategy

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Document revision history

Date	Version	Author	Comments
24-Feb-2023	0	Neil Standen	Draft for client review
28-Mar-2023	1	Neil Standen	Second draft for client review
12-May-2023	2	Neil Standen	Final draft for DPE review
16-Jun-2023	3	Neil Standen	Final
05-Apr-2024	4	Neil Standen	Spoil stockpiling update
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05-May-2025	6	Neil Standen	MOD 2 – Transmission Line Easement
7 -May-2026	7	Lachy Taylor	Update for operational phase
17 July 2026	7.1	Lachy Taylor	Updated to address DPHI Comment

Glossary and terms

Term	Description
ACM	Asbestos-containing material
AEC	Areas of environmental concern
AECOM	AECOM Australia Pty Ltd
AGLM	AGL Macquarie Pty Ltd
BAW	Bayswater Ancillary Works
BESS	Battery Energy Storage System
BTEX	Benzene, toluene, ethylbenzene and xylene
CCTV	Closed-circuit television
CLM Act	*Contaminated Lands Management Act 1979* (NSW)
CMP	Contamination Management Plan
COPC	Contaminants of Potential Concern
DPE	Department of Planning and Environment (now DPHI)
DPHI	Department of Planning, Housing and Infrastructure (formerly DPE)
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	*Environmental Planning and Assessment Act 1979* (NSW)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GWh	Gigawatt hours
GVDA	Ground and Vegetation Disturbance Approval
ha	hectares
km	kilometre
kV	Kilovolt
LAA	Licenced Asbestos Assessor
LBBAWP	Liddell Battery and Bayswater Ancillary Works Project, consisting of a battery energy storage system at Liddell, decoupling works, and works associated with the ongoing operation of Bayswater
LDBS	Liddell Battery Energy Storage System
Liddell BESS	Liddell Battery Energy Storage System Stage 2 of the Liddell Battery and Bayswater Ancillary Works Project consisting of the construction of a BESS with the storage capacity to facilitate a maximum discharge of up to 500 MW for a four-hour period, or up to 2 GWh
MW	Megawatt
NEM	National Energy Market
OCP / OPP	Organochlorine pesticides / organophosphorus pesticides
PAH	Polycyclic Aromatic hydrocarbons
PCB	Polychlorinated biphenyls
POEO Act	*Protection of the Environment Operations Act 1997* (NSW)
RTS	Response to Submissions

Term	Description
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
TRH	Total recoverable hydrocarbons
V	Volt
WHS Act	*Work Health and Safety Act 2011* (NSW)
WHS Regulation	Work Health and Safety Regulation 2017 (NSW)

1. Introduction

AGL Macquarie Pty Limited (AGLM) has prepared this Contamination Management Plan (CMP) for a Battery Energy Storage System (BESS) which forms part of the Liddell Battery and Bayswater Ancillary Works Project (LBBAWP), NSW.

The LBBAWP is a State Significant Development (SSD) under the *State Environmental Planning Policy (State and Regional Development) 2011*[1], and is subject to Part 4, Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

An Environmental Impact Statement (EIS) was prepared in March 2021 in accordance with the Secretary's Environmental Assessment Requirements (SEARs). Development consent (SSD-8889679) was issued by the Department of Planning and Environment (DPE) (now Department of Planning, Housing and Infrastructure (DPHI)) on 8 March 2022.

1.1. Background

AGLM is progressing with plans to facilitate the efficient, safe and reliable continuation of electricity-generating works from the Bayswater and Liddell sites. The LBBAWP will be carried out in the following stages:

- Stage 1 - Decoupling Works: Alternative network connection arrangements for the Liddell 33 Kilovolt (kV) switching station that provides electricity to the infrastructure required for the ongoing operation of Bayswater power station, to associated ancillary infrastructure and to potential third-party industrial energy users
- Stage 2 - BESS: Replacement of a portion of Liddell's dispatchable electricity supply is required for the National Energy Market (NEM), including the construction, operation and decommissioning of a grid-connected utility-scale BESS with a capacity of up to 500 megawatts (MW) and 2 gigawatt hours (GWh)
- Stage 3 - Bayswater Ancillary Works (BAW): Works associated with Bayswater power station, which may include upgrades to ancillary infrastructure, such as pumps, pipelines, conveyor systems, roads and assets, to enable maintenance, repairs, replacement or expansion
- Consolidated consents: Surrender and consolidation of various existing development approvals required for the ongoing operation of AGLM assets.

This management plan has been developed for the operational phase of Stage 2 only (i.e. the BESS), which is hereinafter referred to as the Liddell BESS (LDBS).

1.2. Site details

The AGLM landholding is located approximately 15 kilometres (km) southeast of Muswellbrook, 25 km northwest of Singleton, and approximately 165 km west northwest of Sydney in NSW. The total area of the AGLM landholding is approximately 10,000 ha, including the Bayswater and Liddell power station operational areas, the Ravensworth rehabilitation area, Lake Liddell and surrounding buffer lands.

Surrounding the AGLM landholding is predominantly land uses heavily influenced by industrial activity. The local area is dominated by large-scale infrastructure associated with Bayswater and Liddell power stations and open-cut mining activities. Agricultural clearing for the purposes of grazing is also present within and surrounding the AGLM landholding.

[1] Now State Environmental Planning Policy (Planning Systems) 2021

Elevations within approximately 10 kilometres of the AGLM landholding range from around 100 to 500 metres above sea level.

The majority of the AGLM landholding has been previously disturbed during the construction and operation of Liddell and Bayswater power stations and historic agricultural activity. The BESS is located at the former solar array area shown in Figure 1. This location was selected as it is in close proximity to Liddell Power Station and is on previously disturbed operational lands no longer required for Liddell operations.

1.3. Project description

LDBS has the storage capacity to facilitate a maximum discharge of up to 500 MW for up to a four-hour period or up to 2 GWh. The BESS is connected to the existing TransGrid 330kV substation via a 330kV high-voltage power line (refer to Figure 1).

Key components for LDBS are as follows:

- 1,548 pre-assembled battery enclosures containing 24,768 battery modules.
- 172 inverters with 86 core transformers
- One control room, two switchgear room and a warehouse/ workshop
- 33kV reticulation system and collector switch rooms
- Overhead, underground, or a combination of both, 330 kV line to connect to TransGrid 330 kV substation
- Two 33 kV / 33kV / 330 kV three-winding transformers and 330 kV connection equipment
- Ancillary infrastructure, including water tanks for bushfire protection purposes, lightning protection, security fencing and closed-circuit television (CCTV).

The site layout of LDBS is shown in Figure 2.

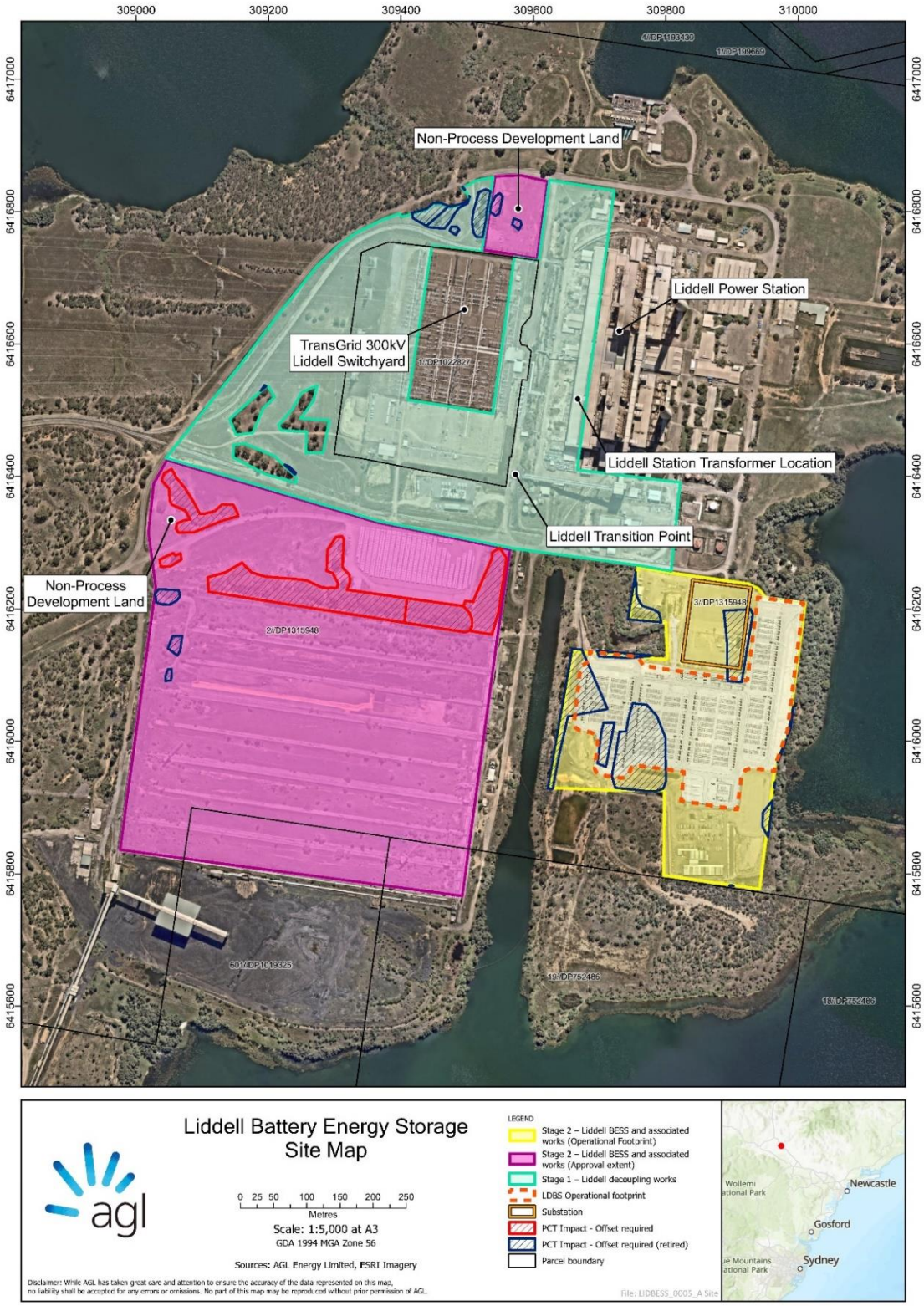

Figure 1 Site Map

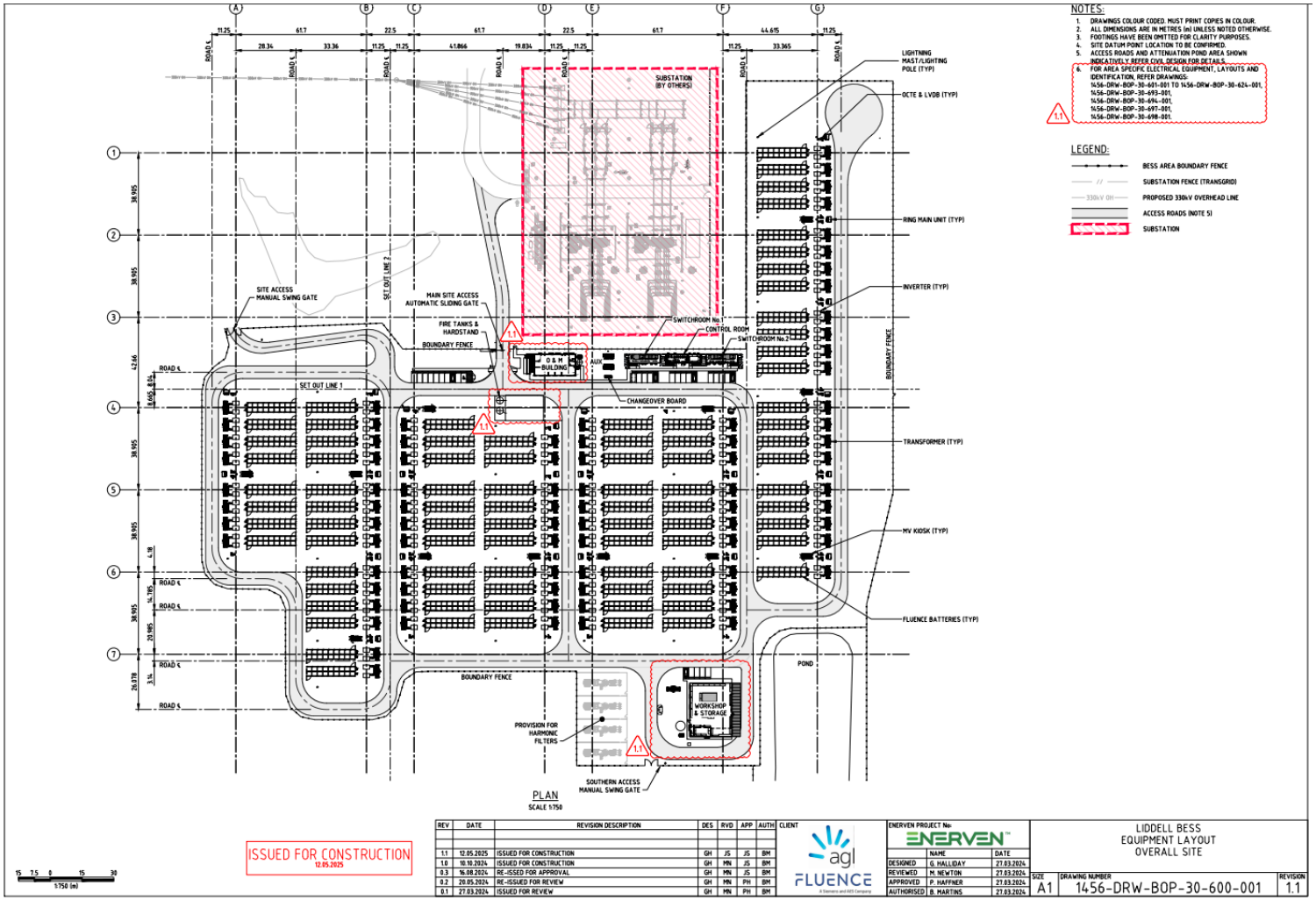

Figure 2 LDBS layout

1.4. Relevant approvals and conditions

1.4.1. Project approvals

Development consent (SSD-8889679) was granted for the AGL Macquarie Limited on 8 March 2022, which includes the voluntary surrender and consolidation of various existing development approvals into SSD-8889679. This approval includes the development of Liddell Battery and Bayswater Ancillary Works.

The site does not constitute a scheduled activity and is therefore not subject to obtaining a separate EPL. The site however does sit within the boundaries of EPL 2122, held by AGL Macquarie, and utilises licence discharge point 27 for discharge of water from site to Lake Liddell and therefore is subject to the provisions of the licence.

1.4.2. Development consent conditions

In accordance with SSD-8889679 development consent condition C1, an Environmental Management Strategy (EMS) has been prepared for the LDBS to provide a strategic framework for the environmental management of the development. A range of subplans has been developed to support the EMS and address development consent condition C1(e)(i).

This CMP has been developed to manage the potential environmental impacts arising from contamination as a result of the LDBS. The relevant conditions are outlined below in Table 1.

Table 1 Development consent conditions - contamination management

Condition	Requirement	Reference
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: e) include: (i) the following subplans: • soil, stormwater, water quality, flood and spoil management; • construction and decommissioning noise, including an out-of-hours works protocol; • air quality management; • **contamination, including an unexpected finds protocol;** • waste management; and • traffic.	This management plan
B4	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: a) The requirements of all relevant Australian Standards b) The NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Handbook* if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement shall prevail to the extent of the inconsistency.	Section 5 Management Measure L1

1.5. Scope, purpose and objectives

This CMP has been developed in accordance with SSD-8889679 development consent condition C1 and to address relevant requirements associated with:

- SSD-8889679 development consent conditions
- EIS management measures were amended in the Response to Submissions (RTS) (Jacobs 2021)
- AGL plans and procedures.

The purpose of this CMP is to:

- Summarise potential impacts from contamination associated with the of LDBS as assessed in the EIS (Jacobs 2021)
- Identify environmental management measures to be implemented to manage contamination impacts.

The objective of this CMP is to manage potential contamination impacts as a result of the operation of the LDBS and to maintain compliance with SDD-8889679. Environment management measures are outlined in Section 5.0 of this plan.

1.6. Related reports and plans

There are environmental assessments, management plans and monitoring programs for existing and proposed operations within the AGLM landholdings. The Pollution Incident Response Management Plan (PIRMP) and Ground and Vegetation Disturbance Procedure for BESS Operations must be read in conjunction with this plan.

2. Legislation and guidelines

2.1. Legislation

This CMP has been prepared in accordance with the relevant legislation and regulatory requirements within the EMS. Key legislation relating to this CMP:

- POEO Act (NSW)
- *Contaminated Lands Management Act 1979* (NSW)
- *Work Health and Safety Act 2011* (NSW)
- Work Health and Safety Regulations 2017 (NSW)
- *National Environment Protection (Assessment of Site Contamination) Measure 1999* (Commonwealth).

2.1.1. POEO Act

The aim of the POEO Act is to achieve the protection, restoration and enhancement of the quality of the NSW environment and reduce potential risks to human health and the environment. The POEO Act is the primary piece of legislation for the regulation of potential pollution impacts associated with scheduled operations or activities in NSW. Scheduled activities are those defined in Schedule 1 of the Act.

The site does not constitute a scheduled activity and is therefore not subject to obtaining a separate EPL. The site however does sit within the boundaries of EPL 2122, held by AGL Macquarie, and utilises licence discharge point 27 for discharge of water from site to Lake Liddell and therefore is subject to the provisions of the licence.

2.1.2. Contaminated Lands Management Act 1979

The *Contaminated Lands Management Act 1979* (CLM Act) provides a framework for investigating and remediating land that is considered by the Environment Protection Authority (EPA) to be significantly contaminated. The framework provides for accountability, roles, audits and applications of ecologically sustainable development. Liddell Power Station has previously been notified to the EPA in accordance with the CLM Act.

2.1.3. Work Health and Safety Act 2011

The *Work Health and Safety Act 2011* (WHS Act) provides a national framework to secure the health and safety of workers.

2.1.4. Work Health and Safety Regulation 2017

The Work Health and Safety Regulation 2017 (WHS Regulation) prescribes matters which fall under the WHS Act.

2.2. Standards and guidelines

The main standards and guidelines relevant to this CMP include:

- *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* (Australian Government Institute 2018)
- *Code of Practice: How to safely remove asbestos* (Safe Work Australia 2022)
- *Contaminated Land Guidelines* (Environment Protection Authority 2022).

2.2.1. Australian and New Zealand Guidelines for Fresh and Marine Water Quality

The *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* (ANZG 2018) provide a framework for managing water quality in rivers, lakes, estuaries and marine waters in Australia and New Zealand.

Water quality and discharge from the site are managed under criteria established by EPL 2122.

2.2.2. Code of Practice: How to safety remove asbestos

The *Code of Practice: How to safely remove asbestos* provides practical guidance on how to manage the risks of asbestos removal and achieve the standards of work health and safety required under the WHS Act and WHS Regulation.

2.2.3. Contaminated Land Guidelines

The Contaminated Land Guidelines provide for identifying and mitigating risks to human health and the environment through the design of appropriate sampling and analysis plans at contaminated sites. The guidelines are in two parts; part 1 describes the application of sampling design, and part 2 provides guidance on interpreting the results.

2.3. Environmental impact assessment

A Contamination Assessment was prepared by Kleinfelder (2021) in accordance with the SEARs issued for the LBBAWP and to support the EIS. The key purpose of the Contamination Assessment was to identify potential contamination issues associated with the LBBAWP and assess any human health and environmental risks associated with the potential contamination impacts identified.

The Contamination Assessment also recommended suitable mitigation and management measures which have been included in this CMP in Section 5, where relevant to the operation of the LDBS.

The EIS was placed on public exhibition for a period of 28 days, between 15 April 2021 to 12 May 2021. Following this, an RTS report (Jacobs 2021) was prepared to consider and respond to any submissions received during the exhibition period, which resulted in changes to some of the management measures from the EIS. Therefore, the management measures in the RTS report supersede those in the EIS, where changes have been made.

3. Roles and responsibilities

Section 4.3 of the EMS outlines key roles and responsibilities for all staff working at LDBS.

4. Environmental setting and potential impacts

4.1. Previous contamination assessments

Detailed contamination assessments have been conducted in 2013, 2014, 2018 and 2019 across all areas of environmental concern (AEC) at the Bayswater and Liddell power stations, which have been identified as having the potential to be affected by contamination arising from the existing uses since Bayswater and Liddell were initially constructed.

The Contamination Assessment (Kleinfelder 2021) carried out for the LBBAWP considered the results presented in the previous contamination investigation reports in relation to the LBBAWP site.

4.2. Previous land use

Construction of Liddell commenced in the late 1960s, with the power station being commissioned in 1971. In 2009, the layout of the power station remained unchanged, with the exception of the installation of a series of solar panels to the south of the electricity generating units (the former solar array area).

The LDBS is located south of the main power-generating infrastructure. The former coal yard is located to the west of the LDBS. To the south of the BESS site, there is an historic asbestos landfill and another small landfill area. There is also potential for other areas of historical fill material in this area from ground disturbance activities (shown in aerial photographs). Lake Liddell lies to the east of the LDBS.

4.3. Potential sources of contamination

The following Contaminants of Potential Concern (COPCs) have previously been assessed within the LDBS:

- Total recoverable hydrocarbons (TRH)
- Benzene, toluene, ethylbenzene and xylene (BTEX)
- Polycyclic Aromatic hydrocarbons (PAH)
- Organochloride pesticides / Organophosphorus Pesticides
- Heavy metals
- Asbestos.

Concentrations of COPCs have not been identified above the commercial/industrial health investigation levels, which provide conservative screening criteria (commercial/industrial screening criteria).

Fill was not identified in the assessments undertaken for the EIS. During construction, fill has been laid across most of the site during construction with depths ranging from 0 to 2.5m.

4.4. Release and transport mechanisms

Potential release and transport mechanisms identified for the LDBS include:

- Potential leaks and spills from plant and machinery operating in this area to soils and water
- Volatilisation of contaminants from soil/fill
- Leaching/runoff/airborne transport.

4.5. Human health receptors and exposure pathways

The assessment considered the following human receptors for the LDBS:

- Soil disturbance associated with earthworks and remediation, noting that during operations it is unlikely that soil disturbance of this nature will occur.
- On-Site future intrusive maintenance workers who may complete maintenance to above ground and underground infrastructure (e.g. services). It is considered that shallow intrusive works will be conducted to a maximum depth of two metres below ground level
- On-Site future commercial/industrial workers (e.g. operators for the BESS).

The following potential human exposure pathways were also considered for the LDBS:

- Dermal contact with and incidental ingestion of soils
- Inhalation of soil-derived dust in indoor and/or outdoor air
- Inhalation of soil-derived vapour in indoor and outdoor air
- Inhalation of soil-derived vapour in a trench
- Inhalation of groundwater-derived vapour in indoor and outdoor air
- Inhalation of groundwater-derived vapour in a trench.

Groundwater, surface water and offsite receptors and fauna and flora ecology were not considered for the following reasons:

- Groundwater was considered unlikely to be encountered during operations. Should groundwater be encountered, it is considered this would be managed as part of the EMS and a Dewatering Management Plan to be prepared by AGLM if required.
- There are currently no abstraction bores for domestic potable or non-potable uses in the surrounding area. Therefore, potential groundwater issues are not considered to represent a significant risk to human health or the environment.
- Based on the current EPLs that are in place, it is considered that:
  - surface water is being adequately controlled and monitored. Surface water issues that may arise should be dealt with as part of the EMS
  - offsite receptors would be managed as part of the ongoing operation of the site.
- There would be minimal impact on on-site ecology as the area is already significantly developed. Where there may be interaction with surface water bodies, specific environmental controls will be implemented as part of the EMS.

4.6. Potential impacts

Based on the analytical dataset and knowledge of the historical development of the LDBS (reviewed as part of the Contamination Assessment (Kleinfelder 2021)), widespread contamination is considered unlikely to be present,. Excavations into natural ground are unlikely during operations. If excavations are required, the Ground and Vegetation Disturbance Procedure will be followed to identify potential environmental impacts and controls.

LDBS will involve the storage and use in small qualities of hydrocarbons, chemicals and wastes which have the potential to spill during operation. The final layout of the BESS comprises large areas of sealed road or

crushed blue metal base that will minimise the potential for any direct contact with subsurface soil for on-site workers.

5. Environmental management measures

The management measures provided in Table 2 and will be implemented to minimise potential contamination impacts from the operation of LDBS. For completeness, measures relevant to decommissioning have been included, however where they are not applicable to the operational phase they have been marked in grey. Measures identified for pre-construction and detail design have been excluded as that phase has been completed.

Table 2 Environmental management measures - contamination (EIS / RTS / development consent)

Reference	Measure	Responsibility	Timing
L1	The internal bunding and environmental controls for the storage and management of all chemicals, fuels and oils used on-site (including any dangerous goods and hazardous materials) will be in accordance with applicable guidelines, including Australian Standards and the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Handbook.*	AGLM	Operation
L2	Potential contamination-related impacts associated with LDBS will be managed by the implementation of a Decommissioning Environment Management Plan that includes (but not limited to): • An unexpected finds protocol for the appropriate assessment and management of encountered contamination to address impacts, if required • Procedures to ensure that all material excavated during the construction of the development is appropriately assessed and classified before being disposed of in accordance with environmental laws, if required • Specific control measures to mitigate impacts to soil, water, air, noise, traffic, structures and clear protocols for measurement of affected media and validation of results during construction of the development.	AGLM Decommissioning contractor	Decommissioning
L3	The Asbestos Management Procedure (AGLM-HSE-PRO-007.10.01) should be referred to, to provide appropriate control measures during the construction phase (as well as the operational phase (if maintenance activities are required) to mitigate any risks of worker exposure to airborne asbestos fibres during work activities.	AGLM Decommissioning contractor (Decommissioning only)	Operation Decommissioning

Reference	Measure	Responsibility	Timing
	The Decommissioning Contractor may adopt their own unexpected finds procedure provided that this is in alignment with AGLs procedure.		
L5	Ongoing monitoring will be required following decommissioning of the BESS to ensure the footprint has been suitably reinstated and are safe, stable and non-polluting	AGLM	Decommissioning
HR4	Storage and management of dangerous goods and hazardous materials (if required) will occur in a safe, secure location consistent with the requirements of applicable Australian Standards.	AGLM	Operation Decommissioning
HR4	The need to store or handle additional dangerous goods or hazardous substances will be subject to additional risk consideration prior to being undertaken.	AGLM	Operation Decommissioning
HR5	Refuelling will take place in a designated area within the works area, away from ignition sources and trees or vegetation and with appropriate controls to prevent any spills coming into contact with the ground	AGLM	Operation Decommissioning
HR6	Appropriately stocked emergency spill kits will be available at all work areas at all times. All staff will be made aware of the location of the spill kit and trained in its use.	AGLM	Operation Decommissioning
HR7	Temporary construction compounds will be maintained in a tidy and orderly manner to minimise potential fuel loads in the event that any construction compounds are affected by fire.	Decommissioning contractor	Decommissioning
HR8	Decommissioning activities involving flammable materials and ignition sources (for example, welding) will be proactively managed to ensure that the potential for fire is effectively minimised. High risk construction activities, such as welding and metal work, would be subject to a risk assessment on total fire ban days and restricted or ceased as appropriate. Construction personnel will be inducted into the requirement to safely dispose of cigarette butts.	Decommissioning contractor	Decommissioning

Table 3 Environmental management measures - contamination (other)

Reference	Measure	Responsibility	Timing
L6	Project induction and targeted toolbox talks will include discussion of areas of environmental concern, relevant controls and the procedure to follow if contamination is suspected.	AGLM Decommissioning contractor	Decommissioning
L7	Silt socks will be placed around the perimeter of established work areas to prevent potentially contaminated runoff from entering stormwater drains, waterways or other sensitive areas.	AGLM Decommissioning contractor	Decommissioning

L8	Excavated materials will be placed so that they do not impact the flow path of or further contaminate surface runoff	AGLM Decommissioning contractor	Decommissioning
L10	Occupational hygiene controls will be implemented as a precaution to mitigate potential worker exposure (e.g. handwashing facilities and a separate clean area).	AGLM Decommissioning contractor	Decommissioning
L11	If contamination is encountered, all vehicles, machinery and footwear will be cleaned. Washdown stations will be established on accessible flat areas located away from surface water and waterways.	AGLM Decommissioning contractor	Decommissioning

5.1. Ground and Vegetation Disturbance Approval Procedure

All ground and vegetation disturbance at the site is regulated by the Ground and Vegetation Disturbance Approval (GVDA) procedure for BESS Operations. The GVDA procedure ensures that Environment Team and other key stakeholders are notified of work which will involve:

- Land disturbance (includes excavations, scrub or grass clearing, weed management)
- Tree trimming or removal
- Work within 40m of a waterway or waterbody (installation, development or disturbance works)
- Changes to infrastructure (buildings, utilities etc.).

Records of approved and completed GVDA's are managed by the Environment Team.

5.2. Unexpected finds protocol

This Unexpected Finds Protocol is to be enacted immediately when suspected contamination is discovered.

5.2.1. Immediate response actions

If unknown or unexpected contaminated sites or materials are found during the operation of the LDBS, the following steps must be taken:

- Cease work immediately in the vicinity of the material
- Notify the site supervisor immediately, who will then notify the Environment Manager.
- Demarcate the area with appropriate fencing and warning signage (i.e. DANGER CONTAMINATED AREA).

5.2.2. Identification of potential contamination

Key identifiers of potential contamination or the presence of contaminated materials include:

- Sudden unexplained change in texture or colour
- Odorous materials or changes in odour
- Inclusion of construction/building materials in fill.

5.2.3. Sampling and assessment

Following the immediate response action, the Environment Manager is to arrange an assessment of the potentially contaminated material by an appropriately qualified person. A sample of the contaminated

material must undergo laboratory analysis at a NATA-accredited testing laboratory to confirm the contamination status.

Excavated material from the immediate vicinity will be separated from other materials and stockpiled for assessment, with sampling undertaken in accordance *with EPA Contaminated Land Guidelines: Sampling design part 1 – application.*

Works in the immediate vicinity are not to recommence until appropriate advice and approval has been obtained from an appropriately qualified person (depending on the contamination type). The approval to recommence will be granted by the Environment Manager.

For suspected asbestos-containing material (ACM), a Licenced Asbestos Assessor (LAA) will be required to confirm the presence of ACM. Should the presence of ACM be confirmed, the LAA must advise appropriate steps to be taken to manage the unexpected find and must supervise any excavation works beyond the known ACM impact area to ensure there is no further ACM risk.

5.2.4. Reporting requirements

If an incident relating to contamination occurs at LDBS it will be managed in accordance with the HSE Event Classification and Reporting Procedure (AGL-HSE-PRO-011.1.3).

In response to identifying suspected contamination or positive identification through lab testing, AGLM staff are to update the myHSE Investigation and enter all Improvement Actions. Any unexpected finds must be documented, including details such as the:

- The exact location of the find
- The volume of material removed
- The classification of the material
- The licenced facility the material was disposed at, if required
- Receipt documentation.

If ACM or suspected ACM material is discovered, refer to Section 6.4 in the Liddell Power Station Battery Energy Storage System Waste Management Sub Plan (Appendix F of the EMS) for further guidance.

6. Compliance and reporting

6.1. Monitoring and reporting

There will be no monitoring associated with the operation of the LDBS. Where potentially contaminated material is discovered, the unexpected finds procedure in Section 5.1 will be applied.

6.2. Incidents and complaints

Incident management will be managed in accordance with the process outlined in Section 4.5 of the EMS and Schedule 2 Condition C4 of SSD-8889679.

Complaints and enquiries will be managed in accordance with the process outlined in Section 5.3 of the EMS.

6.3. Documentation review and update

As part of the EMS requirements and Schedule 2 Condition C3 of SSD 8889679, all associated plans, studies and strategies are to be reviewed and updated within three months of the following events:

- The submission of an Environmental Immediate Notification Report
- The submission of an audit report
- The approval of any modification to the conditions of the development consent
- A direction of the Secretary.

This document will also be reviewed and updated prior to the commencement of decommissioning.