

Victorian Desalination Project



D&C Plant and General Area Environmental Management Plan Attachment I7 – Soil Management Sub Plan

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D&C PGA EMP Attachment I7 – Soil Management Sub Plan

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Definitions and Acronyms

The following Definitions and Acronyms are used in this document:

ASS	Acid Sulfate Soils
CWMS	Construction Work Method Statements
D&C	Design and Construct Phase of the VDP
DEWHA	Department of the Environment, Water, Heritage and the Arts
DSE	Department of Sustainability and Environment
DPI	Department of Primary Industries
EES	Environmental Effects Statement
EIRP	Environmental Incident Response Plan
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Victorian Environment Protection Authority
EP Act	<i>Environment Protection Act 1970</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
JHA	Job Hazard Analysis
JSEA	Job Safety and Environmental Analysis
NEPM	National Environment Protection Measure
O&M	Operation and Maintenance Phase of the VDP
OHS	Occupational Health and Safety
PASS	Potential Acid Sulfate Soils
Performance Criteria	The Performance Criteria outline the overarching requirements based on the environmental objective for each Subject Area of Schedule A of Appendix S3 of the Project Scope and Project Requirements
Plant site	Victorian Desalination Project Wonthaggi Plant site
Pollution of Land as defined in s.45, <i>Environment Protection Act 1970</i>)	<p>A person shall not pollute land so that the condition of the land is so changed as to make or be reasonably expected to make the land or the produce of the land—</p> <ul style="list-style-type: none"> (a) noxious or poisonous; (b) harmful or potentially harmful to the health or welfare of human beings; (c) poisonous, harmful or potentially harmful to animals, birds or wildlife; (d) poisonous, harmful or potentially harmful to plants or vegetation;



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	(e) obnoxious or unduly offensive to the senses of human beings; or (f) detrimental to any beneficial use made of the land.
PR	Performance Requirements
Project Area	Refers to all areas designated for the project as defined in the Project Deed including both the plant area and the utilities corridor
PS&PR	Project Scope and Project Requirements
SEP	Site Environmental Plans
SEPP	State Environment Protection Policy
Spoil	Excavated material (soil or rock)
TBM	Tunnel Boring Machine
TDJV	Thiess Degremont Joint Venture
VENM	Virgin Excavated Natural Material
VDP	Victorian Desalination Project
WAP	Work Area Packages
WASS	Waste Acid Sulfate Soils
WP	Work Packs



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1 Purpose and scope

This Soil Management Sub Plan describes the existing soil conditions and the management measures required to mitigate the potential negative impacts and issues arising from contaminated soils and spoil generation from the design and construction (D&C) of the Victorian Desalination Project (VDP) Wonthaggi plant site.

This sub plan must be read in conjunction with the Environmental Management System (EMS) Manual, D&C Environmental Management Plan (D&C EMP) and the D&C Plant and General Area EMP. This sub plan forms an attachment to the D&C Plant and General Area EMP and addresses requirements listed in the Environmental Compliance Tracker (TDV-0-EV-RP-0001-01), including licence conditions, Performance Requirements (PRs), Performance Criteria (PC) and other obligations which may influence soil management.

Specific management measures from this and other environmental sub plans have been incorporated into Work Area Packages (WAP) and Work Packs (WP) which include Construction Work Method Statements (CWMS), Site Environmental Plans (SEP) and Job Safety and Environmental Analysis (JSEA's) where applicable.

While both contaminated and non-contaminated spoil management is addressed in this sub plan, the latter is also referenced in the Water Quality and Erosion Management Sub Plan (topsoil protection and erosion management) and the Site Rehabilitation and Reinstatement Sub Plan (topsoil segregation and reinstatement).

Acid Sulfate Soil (ASS) management is dealt with separately from Soil Management in the Acid Sulfate Soil Sub Plan.

2 Objectives and Targets

The objective of this sub plan is to ensure there are no health risks or loss of amenity due to exposure of contaminated soil or generation of spoil to the environment during construction and to ensure project objectives, targets and obligations, including PRs and associated criteria, are met.

Table 1 outlines the relevant soil management objectives and targets nominated to be achieved during the D&C phase of the VDP. Numbered entries are applicable performance requirements taken from Schedule A of Appendix S3 of the Project Deed. Non-numbered entries in Table 1 have been identified through earlier rounds of agency consultation.

Table 1: Environmental objectives, targets and performance requirements

Issue	Objective/Performance Criteria	Target/Performance Requirement
Contaminated Land	<p>Protect beneficial uses of land</p> <p>Manage and remediate contaminated soils (PR#18118) D, C.</p> <p>Comply with the State Environment Protection Policy (Prevention and Management of Contamination of Land) (PR#18118) D, C.</p> <p>Protect human health and ecosystems from exposure (PR#18118) D, C.</p>	<p>Assess any contamination in accordance with the National Environment Protection (Assessment of Site Contamination) Measure, NEPC 1999 and other relevant guidelines (PR#18120) C.</p> <p>Identify any contaminated land within the plant site area and assess the potential for long term impacts (PR#18121) D, C.</p> <p>Detail the methodology for any soil removal, assessment, reuse and management (PR#18122) C.</p> <p>Manage decontamination of any buildings being demolished or areas within the plant site in which pre-existing land, water or ground contamination is identified or exposed (PR#18123) C.</p> <p>Identify procedures to manage contaminated soil and buildings during the construction works, including during building demolishing (PR#18124) C.</p> <p>Develop and implement methods and management systems that seek to protect human health and the environment (PR#18125) C.</p>
Spoil Management	<p>Minimise materials excavated and maximise reuse- C.</p>	<p>Remove only soil required as per construction requirements- C.</p> <p>Reuse spoil onsite or offsite where possible- C.</p>

D = Design phase requirement; C= Construct phase requirement

All PRs from Project Deed Schedule A of Appendix S3 are contained within the D&C EMP Attachment G – Environmental Obligations Register. The Environmental Compliance Tracker tracks conformance with these PRs and is updated regularly by the TDJV Environmental Coordinator and Area Environmental Managers.

3 Legal, Regulatory, License, Permits and Approvals Requirements

This sub plan has been developed in accordance with the following legislation:

- ~ *Environment Protection Act 1970*
 - o Environmental Protection (Industrial Waste Resources) Regulation 2009
 - o SEPP (Prevention and Management of Contaminated Land)
- ~ *Plant Health and Plant Products Act 1995 and the Plant Health and Plant Products Regulations 2006*
- ~ *National Environment Protection (Assessment of Site Contamination) Measure, 1999*



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The legislative and contractual requirements for the D & C Plant and General Area works are summarised in:

- ~ D&C Plant and General Area EMP – Attachment E – Environmental Legislation Register
- ~ D&C Plant and General Area EMP – Attachment F – Environmental Licence, Permit and Approval Register
- ~ D&C Plant and General Area EMP – Attachment G – Environmental Obligations Register.

The applicable PRs from Project Deed Schedule A of Appendix S3 are provided in Table 1.

Under the Project Deed the D&C EMP, all sub plans and any changes to these must be endorsed by the State, who may refer aspects to relevant agencies.

EPA and any other relevant agencies and stakeholders will be consulted with regard to any specific approval requirements in relation to this sub plan. The requirements of any permits, licence and approvals obtained will be placed in the Environmental Licence, Permit and Approval Register on receipt and updated in the Environmental Compliance Tracker.

4 Existing conditions and issues

4.1 Investigation and Assessment of Contaminated land

The plant site is located in a predominately agricultural area. The area contained the State Coal Mine which operated until 1964. The majority of workings were well underground and there is minimal opportunity for potential contamination to be released as a result of construction activities (EES, Volume 3, Chapter 5).

The Phase 1 Environment Site Assessment indicates that based on historic land use activities; the potential for contaminants to be encountered at the plant site is low. There have been no known, significant historic uses at the site that would give rise to significant contamination. Contamination is not anticipated at the site. Soils will be tested for the presence of contaminants if evidence of contamination is identified or hazardous materials come into contact with the environment as a result of construction works. Those stockpiles identified as potentially contaminated will be sampled and classified prior to treatment, reuse or disposal as required and will follow EPA’s ‘Soil Hazard Categorisation and Management’ from EPA’s Industrial Waste Resource Guidelines, 2009.

The potential sources of contaminated land and potential pollutants associated with the use of this land are detailed below (Table 2). A review of the potential for contamination associated with these uses was considered low. However site personnel will be made aware of the potential contamination sources.

Table 2: Plant site – potential contamination sources

Issue	Potential contamination sources
Pastoral land and grazing	Dip sites (pesticides)
	Holding pen and milking areas (nutrients, pathogens)
	Fertiliser application (metals and nutrients)
State Coal Mine	Disused mine
Landfill Waste Disposal	Landfill and waste disposal site (Heavy metals, petroleum hydrocarbon products, solvents, degreasers, nutrients, salinity)

5 Environmental risk

An environmental risk assessment has been carried out for the D & C Plant and General Area works. This assessment is contained in the Environmental Risk Register, Attachment C of the D&C Plant and General Area EMP. Table 3 summarises the potential hazards from project activities, potential impacts of these hazards and the risk of occurrence as rated by the environmental risk assessment.

Table 3: Summary of plant and general area risk assessment for Soil Management

Activity posing hazard	Risk/ Potential Impact	Inherent Risk (before controls)	Control Measure Reference (Att I07.1)
Unexpected discovery of suspected contaminated land or groundwater.	Localised harm to soil and local water quality	High	#5, 8
Unexpected discovery of acid sulfate soil or rock during construction	Localised harm to soil and local water quality	High	Refer to ASS Sub Plan
Inappropriate fill materials used in trenching and excavation activities	Localised harm to soil and local water quality	Moderate	#19

Attachment C of the D&C Plant and General Area EMP should be consulted for a comprehensive assessment of these risks.

The following risks from project activities have been identified elsewhere in the risk assessment as potentially impacting on soil management. They are addressed directly in other sub plans as follows:

- ~ Chemical spills resulting in contamination of soil or waterways (see Hazardous Materials Sub Plan)
- ~ Legal risks of inappropriate transportation or disposal of contaminated soil (see Resource Efficiency Sub Plan)
- ~ Project personnel health as a result of disturbance of and exposure to contaminated soil including asbestos (see Resource Efficiency Sub Plan)
- ~ Spread of agricultural or horticultural pests or through disturbance of and exposure to contaminated soil (see Flora and Fauna Sub Plan)

Spoil management was not deemed as significant in the environmental risk assessment, but is included below for completeness.

The sections below provide further information on the major environmental risks relating to soil management.

5.1 Contaminated Land

Based on land use activities, the potential for contaminants to be encountered at the plant site is low. There have been no known, significant historic uses at the site that would give rise to significant contamination.



5.2 Spoil generation

Spoil generated by the construction of the plant and general area will originate from general earthworks, trenching and tunnel boring operations. It is not anticipated that there will be any excess soil requiring disposal from the construction works. Any excess soil will be redistributed within the plant site area.

5.3 Acid Sulfate Soils

The management of Acid Sulfate Soils, including the identification, handling, treatment and disposal is the subject of the Acid Sulfate Soil Sub Plan.

6 Control, Management and Mitigation Measures

Attachment I7.1 describes a range of mitigation and control measures to be used to minimise and manage contaminated soil and spoil. Control measures implemented on site in response to potential and actual impacts to soil management will be recorded in the Weekly Environmental Inspection Checklist (FM-TDV-EN-0-X-000-0006) and records retained on site.

The measures in Attachment I7.1 are designed to address potential impacts from the risks outlined in Section 5 as well as deliver on the objectives, targets and in particular the PRs listed in Section 2. They include requirements and responsibilities for design, construction, evaluating performance and reporting.

Attachment I7.1 also references Design Packages (DPs) in design-related control measures. PRs that relate to design are addressed in accordance with the Design Management Plan (PL-TDV-PM-0-X-000-0011-0-00).

A decision framework for soil contamination investigation and remediation procedure is also detailed in Contingency Measures, section 9.1.1.

7 Site environmental plans

A single Site Environmental Plan (SEP) has been developed for the whole plant site that details environmental management measures such as permanent controls, No Go zones, property boundaries and significant flora and fauna species. These measures are implemented to minimise potential impacts of construction activity on the environment and community.

The information contained in the SEP is presented in pictorial and tabular drawing format. This is to make them easy to use by all site personnel, consultants and subcontractors. SEPs are updated to reflect operating practices on a regular basis.

The soil management controls set out in the SEP are drawn from this sub plan. Additional practical management measures are picked up and covered by the Weekly Environmental Checklist.

SEPs are held by Area Environment Managers.

8 Evaluating performance and reporting

Environmental audits and site environmental inspections (SEIs) are scheduled to detect where PRs are not being met with appropriate corrective actions developed to address these issues as they arise. Schedules, responsibilities and reporting procedures for soil management are set out in the Monitoring, inspection, audit and reporting schedule - Attachment L of the D&C Plant and General Area EMP.



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Monitoring will be undertaken by appropriately qualified personnel, in accordance with the appropriate standards and guidelines specified in Attachment L of the D&C Plant and General Area EMP.

9 Contingency measures

Contingency measures have been developed and are summarised below. The control measures table (Attachment I7.1) focuses on preventative measures.

All environmental incidents will be responded to in accordance with the plant site Environmental Incident Response Plan (EIRP). The EIRP provides project specific details for the identification of and response to potential environmental related incidents at the plant site during the D&C phase of the VDP. It provides assistance in managing potential and actual incidents, as well as follow-up and reporting requirements.

Contingencies for contaminated soil and spoil management are discussed below.

9.1 Contaminated Soil

The environmental risk assessment has identified the following circumstances which could occur outside normal operating conditions:

- ~ Unexpected discovery of suspected contaminated soil, liquid or waste during construction
- ~ Unexpected discovery of suspected contaminated groundwater.
- ~ Contamination may be identified by discoloured or odorous soils, underground fuel storage tanks, pipelines, drums or filling with foreign matter.

Figure 1 summarises the procedure for the assessment of potential or known contaminated soils.

All contaminated material must be classified in accordance with EPA guidelines prior to disposal. Figure 2 summarises the procedure to classify contaminated material prior to disposal.

Prescribed wastes must be transported under the EPA waste transport certificate system. It is the responsibility of the waste producer, transporter and receiver to ensure that a waste transport certificate is completed for each consignment of prescribed industrial waste.

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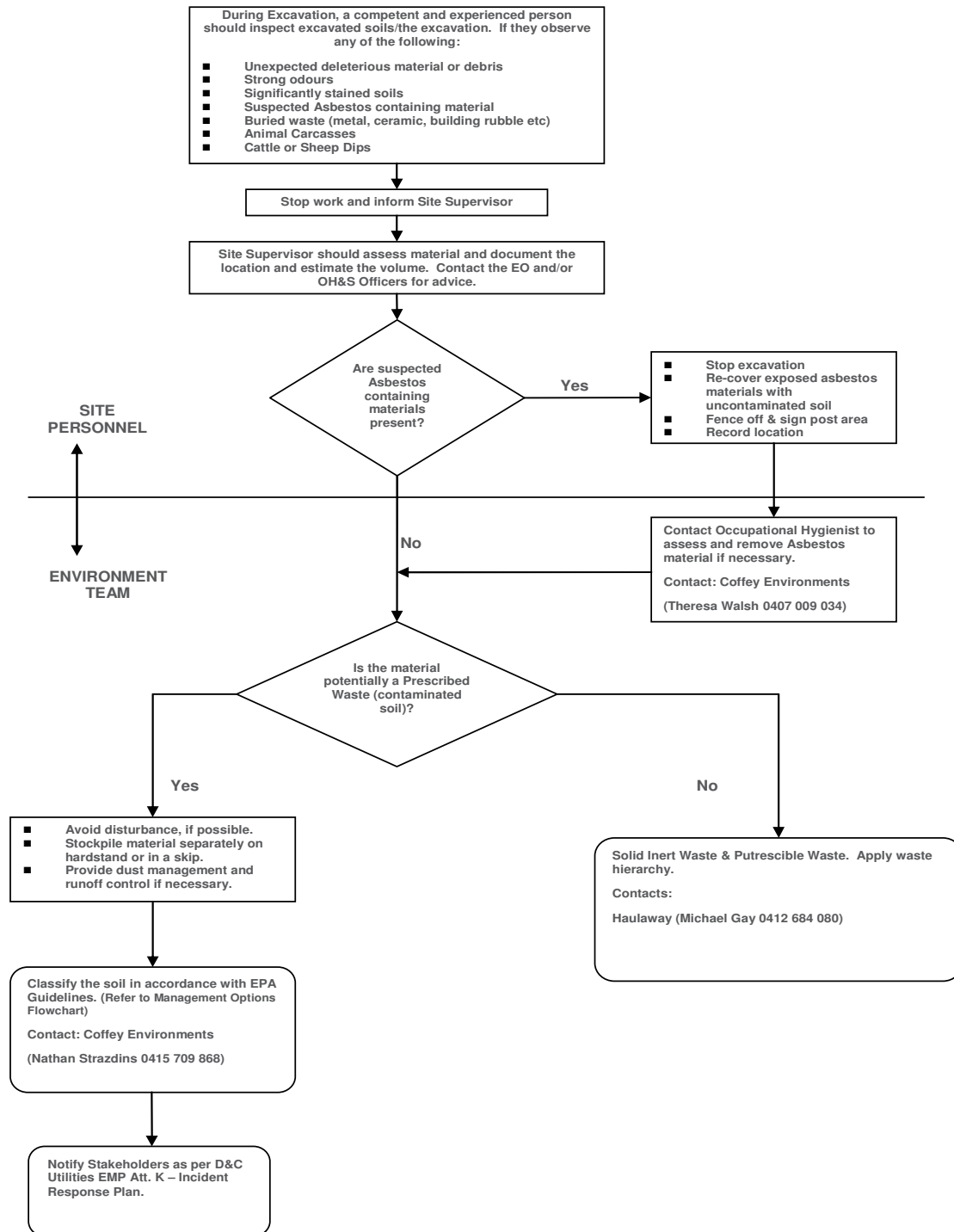


Figure 1. Flow chart for the discovery and removal of contaminated land

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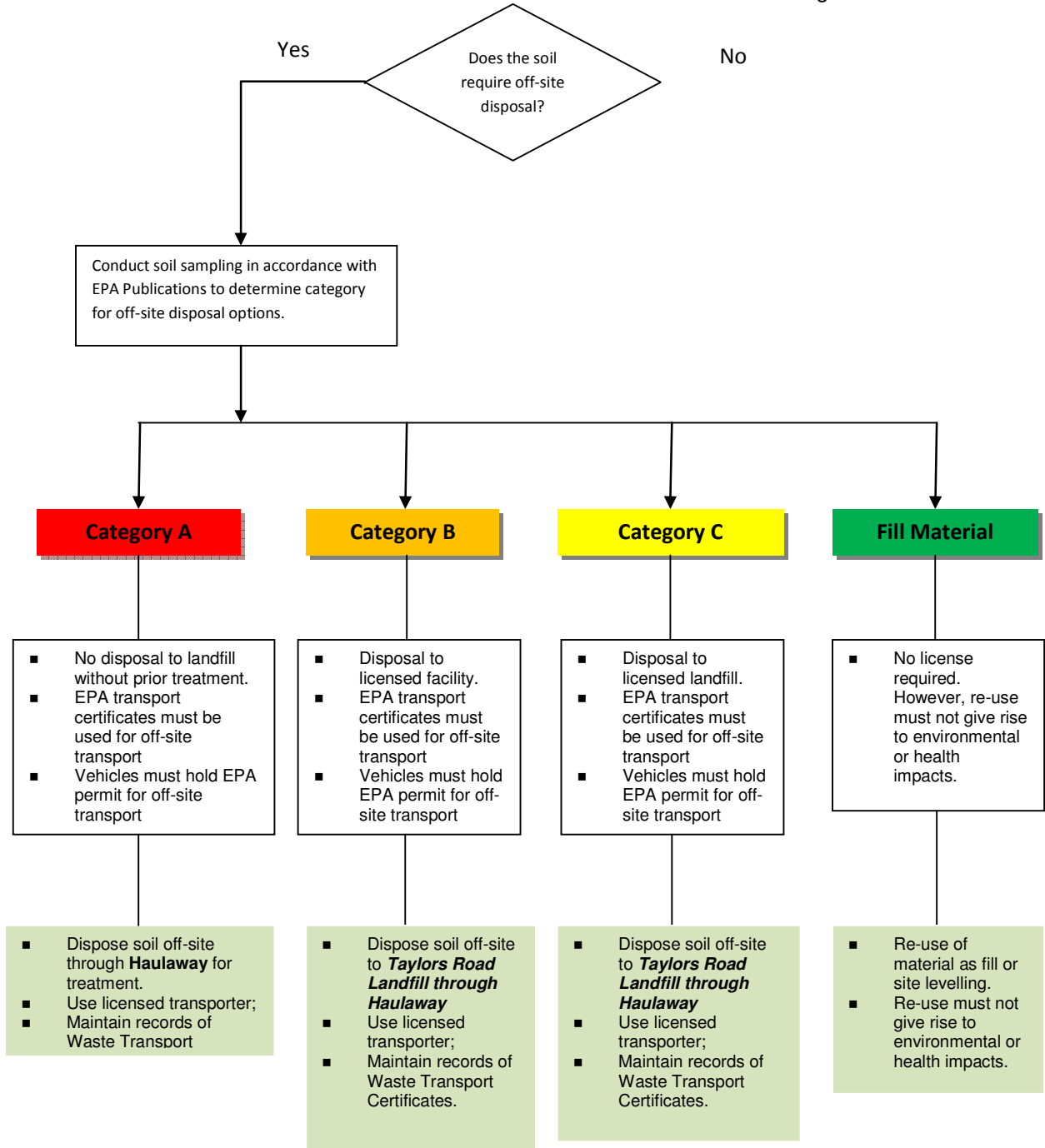


Figure 2. Management Options for Contaminated Land



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9.1.1 Spill Response

In the result of a hydrocarbon spill the following procedure will be followed:

- Stop work
- Contain the spill and prevent any further environmental contamination/spillage/pollution (if safe to do so) using the materials available within the spill kits.
- Notify your Supervisor and/or Environmental Officer of the spill.

For minor spills (small leaks of 5000mL or less), contaminated materials will be dug up and placed in the spill bags provided in spill kit. The contaminated soil will then be placed in the contaminated soil bin, for later classification testing and the bag in the contaminated waste bin.

For a major spill, contaminated material will be dug up, stockpiled on plastic, covered with plastic and stored on site for later classification testing in accordance with the contaminated land procedure outlined in section 4.



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9.2 Spoil management

The environmental risk assessment has identified the following circumstances in relation to spoil management that could occur outside normal operating conditions:

Contamination of existing waterways resulting from a storm event greater than the one in two year storm event (see Water Quality and Erosion Management Sub Plan, Section 9 Contingency Measures)

Design of temporary sediment controls is insufficient for the maximum exposed area (see Water Quality and Erosion Management Sub Plan, Section 9 Contingency Measures)

Unforeseen water and soil contamination due to fuel or oil spill (see Hazardous Materials Sub Plan, Section 9 Contingency Measures).

10 References

10.1 VDP documents

- Victorian Desalination Project, Environmental Effects Statement, Volume 4, Chapter 5 – Geology, Geomorphology and Soils
- Victorian Desalination Project, Environmental Effects Statement, Volume 4, Chapter 5 – Geology, Geomorphology and Soils, Technical Appendix 61 – Rosengren and Boyd 2008

10.2 Technical/ Legislative Documents

National Environment Protection (Assessment of Site Contamination) Measure, 1999



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ATTACHMENT 17.1 – SOIL MANAGMENT – CONTROL MEASURES TABLE

ATTACHMENT I7.1 SOIL MANAGEMENT – CONTROL MEASURES TABLE AND DECISION FRAMEWORK

#	Issue	PR # addressed	Control Measure	Responsibility *	Project Phase	Evidence	Audit Check
1	Dewatering	18124, 18125	<p>Before dewatering at locations where contaminated soil has been found, visually inspect water for indicators of contamination such as:</p> <ul style="list-style-type: none"> – Oil/grease and/or hydrocarbon sheen – Fluids/liquids other than groundwater – Odorous groundwater. 	Area Environment Manager	Construct	Inspection Records	
2	Contaminated groundwater	18124, 18125	<p>If contamination indicators are identified:</p> <ul style="list-style-type: none"> – Ensure potentially contaminated groundwater is segregated by discharging to a tank/separate pond – Conduct water testing for contamination by an appropriately qualified professional – Identify whether water can be treated on site or if water quality is poor, ensure water is classified in accordance with the <i>Victorian EPA State Environmental Protection Policy (Waters of Victoria)</i> and disposed of off-site by an appropriately licensed waste transporter – Only allow discharge of groundwater once groundwater quality established (the same or better than perched groundwater quality at the site) and EPA approval has been obtained. – Representative soil from the area will be sampled in accordance with guidelines and Australian Standards (see Monitoring, inspection, audit and reporting schedule - Attachment F of the D&C Plant and General Area EMP) – Sampling and analytical regime will be fed into construction schedule and Site Environment Plans as required to plan works 	Environment Manager and Site Manager	Construct	Daily logs	

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#	Issue	PR # addressed	Control Measure	Responsibility *	Project Phase	Evidence	Audit Check
3	Contaminated Spoil	18124, 18125	<p>In all areas regularly inspect and monitor spoil generated by excavation activities for indicators of possible contamination. Typical indicators of contamination include:</p> <ul style="list-style-type: none"> – Odorous and/or discoloured/stained material – Asbestos containing materials – Oil/Grease and/or hydrocarbon sheen – Drums/containers of any sort – Fluids/liquids other than groundwater – Putrescible wastes, general rubbish – Unknown wastes and objects – Unexpected fill materials. <p>If any of the above items are identified, follow procedures detailed in the Soil Management Sub Plan, section 9.1 Contingency Measures</p> <p>Ensure control measures including sediment fencing and diversion banks are installed around segregated materials to prevent their release into surrounding work areas, conservation area, shallow groundwater or off site.</p>	Area Environment Manager	Construct	Inspection Records	
4	Spoil Classification	18118, 18123	<p>Ensure any spoil removed from the site is appropriately classified through completion of a sampling programme involving methodologies and procedures set out in the relevant sections of Schedule B(2) of the Assessment of Site Contamination NEPM, 'Soil Hazard Categorisation and Management', EPA publication IWRG621 and State Environmental Protection Policy (Prevention and Management of Contaminated Land).</p>	Area Environment Manager	Construct	Spoil and Waste Management records	
5	Contamination found	18118, 18120, 18121, 18125	<p>If any other contamination is found on site, which has not been previously identified, all work must stop in the affected area and the contamination reported immediately to the Area Environment Manager.</p> <p>Work can only continue, once the material has been assessed and removed, or stabilised. If material is to be retained on site ensure this is undertaken in accordance with the Contamination Investigation and Remediation Procedure (Figure 1) below.</p>	Site Manager	Construct	Daily log	

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#	Issue	PR # addressed	Control Measure	Responsibility *	Project Phase	Evidence	Audit Check
6	Contamination procedures	18124, 18125	<p>Prior to disturbance of land or demolition of any buildings appropriate CWMS and JSEAs will be developed detailing measures to manage identified hazards and risks specific to the site Management of contamination risk will include:</p> <ul style="list-style-type: none"> – Identification of potential hazards and risks – Development of appropriate mitigation measures through the implementation of the design framework, refer to Figure 1. 	Area Environment Manager	Construct	CWMS and JSEA	
7	Contaminated soil management	18118, 18121	<p>Contaminated soil management procedures (including identification and assessment of potential contaminated soil) incorporated into following design packages:</p> <ul style="list-style-type: none"> – DP 2-0156 Feature Landscape works [formerly Hard Landscaping - Internal to Construction Area] – DP 2-0177 Hard Park Landscape Works - External to Security Fence – DP 3-0514 - Pressure Reducing Station Detail & Pit - DP1 	Design Package Manager	Design	Validated Design	
8	Potential contaminated soil	18152	Confirm potential for contaminated spoil prior to construction to prevent inappropriate management of such spoil types	Area Environment Manager	Construct	Site Environmental Inspection	
9	Spoil beneficial reuse	18122	Confirm if all/any spoil generated (with the exception of acid sulfate soil or contaminated soils) can be beneficially reused on site in preference to importing fill, or disposal to landfill. If all spoil cannot be reused, identify off-site locations for beneficial reuse, recycling or disposal of excess spoil including reuse on the Desalination Plant area	Area Environment Manager	Construct	Spoil Management Plan	
10	Contaminated soil reuse	18122	Reuse of contaminated soil must be in accordance with SEPP (Prevention and Management of Contaminated Land), in particular the NEPM HIL criteria set for the proposed land use	Area Environment Manager	Construct	CWMS and JSEA	

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#	Issue	PR # addressed	Control Measure	Responsibility *	Project Phase	Evidence	Audit Check
11	Stockpiles	18122	Ensure all soil stockpile areas are: <ul style="list-style-type: none"> – Located at least 10m from any water bodies – Preventing loss of sediment due to runoff – Located away from existing vegetation, concentrated water flow paths and drains/gutters; – Accessible for the purpose of dust suppression (e.g. application of water sprays, covers, binding agents etc). 	Area Environment Manager and Site Manager	Construct	Site Environmental Plan	
12	Separate spoil	18118	Separate all spoil and segregate into: <ul style="list-style-type: none"> – Topsoil – Virgin Excavated Natural Material (VENM) – Hazardous and non-hazardous wastes (i.e. contaminated/non-contaminated soil, etc.) – Various waste states (e.g. liquids/solids). 	Area Environment Manager / Site Engineer	Construct	Inspection records	
13	Records	18125	Maintain spoil and waste management records, including: <ul style="list-style-type: none"> – Haulage docketts – Daily output records – Daily haulage log sheet per work site – Inspection records – Weighbridge (site based or off-site facility) records – Monthly summary sheets. 	Site Manager	Construct	Records maintained	
14	Waste transport	18125	If any spoil material is removed from the site ensure it is assessed for contamination (against <i>EPA Publication 448.3 – Classification of Wastes</i>). If it is a prescribed waste (most likely low level contaminated soil), ensure it is tracked in accordance with EPA's Waste Transport Certificate	Area Environment Manager	Construct	Waste transport records	

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#	Issue	PR # addressed	Control Measure	Responsibility *	Project Phase	Evidence	Audit Check
15	Waste transport	18125	Use appropriately licensed (EPA) waste transporters for the transportation of contaminated spoil to off-site locations (see #14 above).	Site Manager	Construct	Waste transport records	
16	Waste transport	18125	Cover all trucks transporting spoil to off-site locations and check tailgates are secured before leaving the site.	Site Manager	Construct	Inspection records	
17	Induction	-	All personnel are appropriately inducted and are aware of any hazards associated with the management of soil (both contaminated and non-contaminated).	Site Manager	Construct	Training records	

* The *Responsibilities* column refers in many cases to senior positions within the project organisation, due to the changing nature of project teams. In practice some responsibilities may be delegated by the person nominated.