





Environmental Management Plan

88a-90 Wedge Street, Kyneton

ADTS as Trustee for the Jasper Family Trust

Document Control Information

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This report is solely for the use of the responsible person(s)/organisation(s) as defined under the Responsible Person(s) Section at the start of this Environmental Management Plan (EMP), their representatives, and the appointed Environmental Auditor (Contaminated Land) as appointed by ADTS as Trustee for the Jasper Family Trust. No responsibility or liability to any third party is accepted for any damages howsoever arising out of the use of this report by any third party.

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The EMP outlines the management controls to reduce risk to human health, however, these controls are not considered to represent all specific OH&S measures that still may be necessary for certain activities carried out by the site Owner or maintenance workers at the site. These potential risks should be controlled by other site specific OH&S plans.

The site Owner must understand that this EMP does not obviate their obligations to comply with relevant occupational health and safety legislation and environmental / EPA Guidelines (e.g., Occupational Health and Safety Act 2000, Environment Reference Standard (ERS), Industrial Waste Management Policies (IWMPs) and environmental regulations promulgated under the Environment Protection Act, 2017).

The information contained in this EMP is considered to be accurate on the date of issue in accordance with the current condition of the site. The conditions may vary with time as a result of natural or artificial factors, that may impact the site. These possibilities should be considered if the report is to be used after any significant period from the assessment date. If different conditions from those observed at the time of the site work are observed or appear to be present, Alpha Environmental should be advised promptly so that a review of these conditions can be conducted. It is the user's responsibility to ensure that this EMP remain valid.

The EMP has been based on previous assessment works, which necessarily involved the assessment of conditions at relatively few locations, and the interpretation and extrapolation of those conditions to elsewhere on the site, not so covered by the assessment works. All due care and skill was applied by Alpha Environmental Pty Ltd in carrying out and reporting on these works. Thus, the findings, conclusions and comments contained in this management plan represent professional estimates and opinions and are not to be read as facts unless the context makes it clear to the contrary. In general, statements of fact are confined to statements as to what was done and/or what was observed. Other statements have been based on professional judgment.

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1. Introduction

Alpha Environmental has previously undertaken environmental assessment works at 88a-90 Wedge Street, Kyneton (the Site). The purpose of the environmental assessment works was to assess the contamination status of the soils, water and groundwater onsite to aid in the completion of a Statutory Environmental Audit, being undertaken by Kristie Hanson of Senversa. The location of the site is presented in Figure 01, Appendix A.

A soil stockpile of unknown origin is present in Lot 25, located in the north-eastern portion of the site. It is understood that a portion of this stockpile has previously been used as backfill for a dam located in the southern portion of Lot 27 and Lot 28. Figures depicting the site, and the specific location of the soil stockpile and former dam are presented as Figures 03, 04 and 05, Appendix A.

The remaining soil stockpile is intended to be used as further backfill for the former dam located in the southern portion of Lot 27. It is noted that Lot 28 has recently been sold and is separate to the remaining audit site area, as such the portion of the dam that is present in Lot 28 is to be excluded from the current filling works described in this EMP.

The remaining stockpiled materials comprise intermixed building rubble and soils, and is intended to be used as backfill to infill the remaining portion of the former dam. Due to the presence of building rubble the remaining soil stockpile is currently considered to be contaminated regarding the protected beneficial use of aesthetics.

Minor occurrences of asbestos debris were identified immediately north of the existing stockpile, in the footprint of the materials already removed and used as backfill in the pond. Further soil assessment works undertaken in the remaining stockpiled soils has not identified further asbestos containing materials. Notwithstanding, consideration for the potential presence of asbestos debris has been made as part of this Environmental Management Plan.

2. Purpose

The purpose of this EMP is to outline the management measures to be employed during the movement of the stockpiled soils in Lot 25 to the former dam in the southern portion of Lot 27.

This EMP outlines:

- Identifying the party responsible for the implementation of the EMP.
- Processes to be followed during the movement of stockpiled soils to ensure protection of:
 - Relevant protected beneficial uses of land (i.e., aesthetics);
 - human health; and
 - the environment.

3. Responsibilities

3.1. Responsible Person/s

- The Responsible Person/s for the implementation of the EMP is defined as the Site **Owner/Principal Contractor**, whom is in control of the site;
- The **Environmental Consultant** is responsible for any updates and revisions of documentation (if required);
- The appointed **Environmental Auditor** is responsible for the review documentation developed by the **Environmental Consultant** and advise their opinion, in so far as it affects the final condition of the site for the purposes of the audit;
- review and provision of approval of documentation developed by the **Environmental Consultant** and any revisions thereof;
- Acknowledgement of EMP Procedures and Requirements (induction register provided in Appendix B) is required to be completed by all persons undertaking works onsite. It is the responsibility of the **Owner/Principal Contractor** to ensure that this is undertaken.

Contact names and details of relevant responsible person/s are presented in **Table 1 – Responsible Parties** below.

Table 1 is required to be updated every time control of the site is changed, for compliance with this EMP.

Table 1 – Responsible Parties

Position	Responsible Person/s	Contact Information
Site Owner	ADTS as Trustee for the Jasper Family Trust	Email: ghj@wedgewoods.net Phone: 0411 449 158
Principal Contractor	To be assigned during Excavation Works	TBC
Environmental Consultant / Occupational Hygienist	Alpha Environmental	<u>Alpha Environmental</u> Email: info@alphaenviro.com.au Phone: 03 9415 8002
Environmental Auditor	Kristi Hanson - Senversa	Phone: 0411 438 477 Email: kristi.hanson@senversa.com.au

3.1.1. Responsibilities of the Responsible Person/s

The following responsibilities are expected for compliance with this EMP:

- It is the responsibility of the **Owner/Principal Contractor** to ensure that a complete copy of this EMP is present and available on-site at all times during operation;
- It is the responsibility of the **Owner/Principal Contractor** to ensure that acknowledgement of EMP Procedures and Requirements (induction register provided in Appendix B) is completed by any individual/party involved with works discussed as part of this EMP;
- It is the responsibility of the **Owner/Principal Contractor** to ensure that a complete copy of this EMP required be in the possession of the site supervisor and/or the occupational health and safety officer as appropriate;
- It is the responsibility of the **Owner/Principal Contractor** to ensure that a complete copy of this EMP is presented during any and all site inductions, and that it is read and understood by all persons undertaking works on-site that have the potential to come into contact with contaminated soils;
- It is required that **all persons** who read this EMP, read it in its entirety and understand it. Understanding and acknowledgement of reading this EMP is to be recorded on a copy of the Acknowledgement form presented in Appendix B;
- It is the responsibility of the **Owner/Principal Contractor** to ensure that all persons undertaking intrusive works on-site adhere to the procedures outlined in this EMP;
- If unexpected contamination is identified at the site, then the **Owner/Principal Contractor** is to engage **Alpha Environmental** to undertake an assessment of its potential source, nature and extent (as detailed in **Section 5.4**);
- Record keeping and retention of relevant documentations (as detailed in **Section 5.9**) remains with the **Owner/Principal Contractor**;
- The **Owner/Principal Contractor** shall document and manage all potential complaints from occupants of the surrounding community, as detailed in **Section 6.5**);
- In the event that any one or more points contained within this EMP are not understood, advice shall be sought from **Alpha Environmental**;
- **Alpha Environmental** is responsible for any updates and revisions of the EMP where necessary;
- The appointed **Environmental Auditor** is responsible for review and advise their opinion on the EMP and any revisions thereof, in so far as it affects the final condition of the site for the purposes of the audit;
- It is the responsibility of the **Owner/Principal Contractor and Environmental Consultant** to ensure that activities are completed in a manner which does not pose a risk to human health or the environment in accordance with the relevant Occupational Health and Safety Regulations and EPA Guidelines.

This document or subsequent revisions will remain in effect for the duration of the works.

4. Identified Contaminants of Concern

The following have been identified as contaminants of concern within the soil stockpile. Please note that these contaminants of concern relate to the suitability of the stockpiled soils for re-use onsite and are not related to offsite disposal criteria:

- PFAS;
- Benzo(a)pyrene;
- Building and Rubble; and
- Potential Asbestos Containing Debris.

5. Soil Management

The following outlines the proposed works that are to occur, with consideration to identified contaminants of concern.

All contractors employed to undertake works involving the movement of soils from the stockpile in Lot 25 to the dam in the southern portion of Lot 27 are required to read, and understand the requirements set-out below. The requirements set-out below are in addition to relevant Occupational Health and Safety (OH&S) Regulations for construction sites.

It is a requirement that operators of the site (i.e., the **Owner / Principal Contractor**) or contractors employed to undertake works on the site, engage Alpha Environmental to answer and explain any issues that may be of concern with regards to the contamination status or management of the soils being moved as part of these works.

5.1. Excavation and Emplacement Activities

5.1.1. Scope of Works

All works are to be undertaken under the supervision of a suitably experienced environmental consultant.

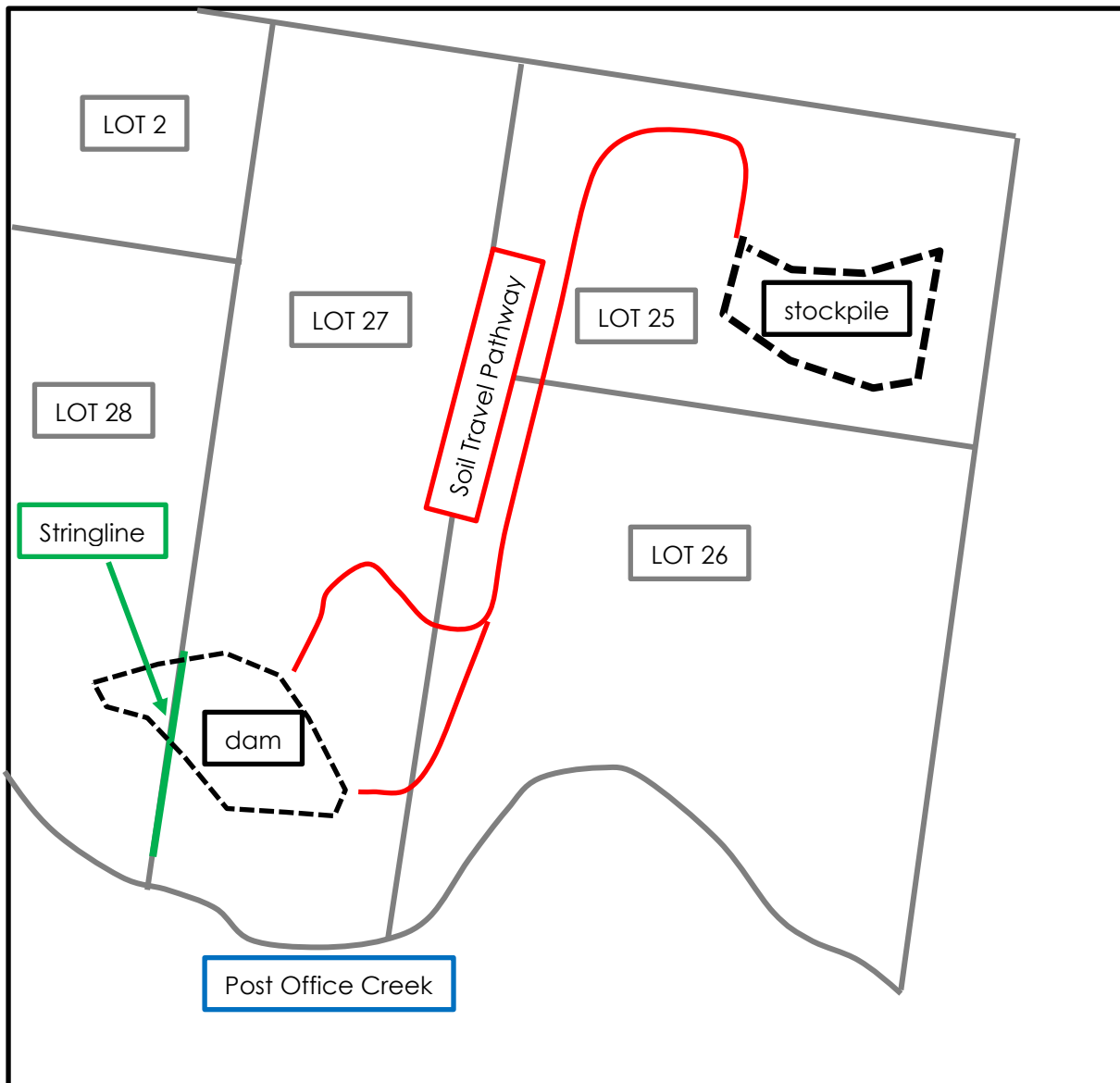
The works that are to occur comprise the following:

- Excavation and sieving of stockpiled soils through the use of a bucket sieve attached to the excavator to remove building waste / rubble;
- During the excavation and sieving process, the environmental consultant shall inspect both soils being excavated and building materials that have been sieved for potential asbestos containing debris and any other unanticipated contaminants;
- The sieved soils will be loaded into a truck and delivered to the former dam located in Lot 27.

Transportation of soils from the stockpile in Lot 25 to the dam in the southern portion of Lot 27 shall not include travel across gazetted roadways, or other properties / public land. Plate 1 depicts the proposed soil transport pathway.

Soils excavated from the stockpile in Lot 25 are to be placed in the portion of the dam that is located in Lot 27. This is further discussed in **Section 5.1.2**.

Plate 1 - Soil Movement Pathway



5.1.2. Pre-Excavation Works

The **Principal Contractor / Owner** shall ensure that prior to the commencement of any works that require, or may potentially require, the disturbance of shallow soils at the site, the following procedures must be followed:

- All personnel undertaking works that may expose them to potentially contaminated soil beneath the site must review this EMP;
- All operators / contractors must have appropriate licenses for equipment and machinery that they will be operating;

- All plant and equipment being used as part of these works are required to be in good service with appropriate service records / pre-start checks in place, prior to their use onsite; and
- All persons undertaking works onsite have completed task specific Safe Work Method Statements / Risk Assessments for the works being undertaken.

Prior to the commencement of excavation and filling works, the following shall be undertaken by the **Principal Contractor / Owner**:

- Place a stringline from the southern edged of the fence separating Lots 27 and 28, south to the survey pin marking the boundary of Lots 27 and 28 near the creek;
- In the event that the survey pin cannot be found, a suitably qualified surveyor shall be engaged to place a pin on the southern boundary of the dam (or further south) at the intersection of Lots 27 and 28 to allow for a stringline to be placed.

The purpose of the stringline is to clearly mark the maximum extent of dam filling from materials sourced from the stockpile located in Lot 25. No soils sourced from Lot 25 are to be placed within the boundaries of Lot 28.

5.1.3. Sieving of Stockpiled Soils

The **Principal Contractor / Owner** under the supervision of **Alpha Environmental** shall ensure that stockpiled soils are sieved prior to being used as backfill in the dam. The sieving process shall comprise the following:

- The sieving works shall be supervised by Alpha Environmental to:
 - ensure no debris suspected of containing asbestos are present within the sieved soils;
 - ensure sieving works conform to the requirements specified in the following sections of this EMP;
 - ensure that the residual foreign material or debris/rubble within the sieved soils are sufficiently small that these soils are not detrimental to the aesthetics environmental value of land;
 - document the sieving works undertaken and the condition of the sieved soils with respect to aesthetics environmental values of land and any other environmental values that may be applicable based on the findings of the works;
- Soils shall be sieved using a skeleton bucket with a nominal 70mm by 70mm sieve aperture;
 - 70mm x 70mm is considered to be an appropriate screening size, based on the intended use of the sieved soils (as backfill in the dam at Lot 27). This has been considered due to the following:
 - The proposed future use of the land at Lot 27 (in the area of the dam) is recreational / open space;
 - The backfill soils sourced from the onsite stockpile at Lot 25 may be dressed with soils classified as Fill Material, to allow for seeding, as such, potential residual inert

materials which may remain in these soils will not impact the environmental value of aesthetics;

- The removal of all inert waste exceeding 70mm x 70mm will allow for appropriate compaction and minimal subsidence of the backfill within the dam at Lot 27.
- Inert debris that do not pass through the skeleton bucket shall be temporarily stockpiled to the north of the existing stockpile within the former stockpile footprint;
- Inert debris which are longer than 70mm but pass through the skeleton bucket shall be removed by hand, by a labourer employed by the principal contractor;

5.1.4. Excavation Works

It is the responsibility of the **Principal Contactor / Owner** to ensure that during any works in areas where disturbance to soils is likely, the following procedures are required to be adhered to:

- Soils being excavated shall include in-situ soils to a depth of approximately 50-100mm below the surrounding ground level, to ensure that all stockpiled soils are removed from the stockpile print as part of these works;
- Temporary building material stockpiles generated during the sieving works should be contained within the footprint of the stockpiled soils in Lot 25 (this includes the area where soils have previously been removed, immediately north of the current stockpile extents);
- During works that involve the excavation, sieving loading and unloading of soils, the soils shall be handled carefully to avoid dust generation;
- If excessive visible dust is generated during excavation/stockpiling/any handling work, soils shall be sprayed with a fine mist of water in order to effectively minimise the generation of dust;
- The **Principal Contractor** is responsible for ensuring that appropriate controls are in place to prevent:
 - Migration of soils offsite, through equipment tracking from site and onto surrounding streets;
 - Migration of soils offsite, as dust, generated during the screening / excavation and/or emplacement works;
 - Sediment and soils from being washed into the stormwater system or off-site
- The controls to be employed by the **Principal Contractor** will be dependent on-site conditions at the time of the works may include, but not limited to the following:
 - Provision of appropriate wash-down facilities to clean tracks, buckets and tires prior to equipment leaving site. This washdown facility would ideally be located in the immediate vicinity of the Lot 25 Stockpile footprint;
 - Provision of dust suppression equipment (hose / spray) and personnel as required;
 - Installation of sediment barriers along the southern boundary of the Dam in Lot 27 and potentially along the boundary between Lots 27 and 28 within the Dam. As there are no stormwater drains in the vicinity of the works, the only identified potential receptor for surficial run-off is Post Office Creek on the southern boundary of the site.

5.1.5. **Emplacement Works**

Screened soils from the stockpile located in Lot 25 shall be emplaced within the Lot 27 boundaries of the dam. The emplaced soils shall conform to the following under the supervision of **Alpha Environmental** and/or the **Principal Contractor / Owner**:

- Sieved soils shall not be placed any closer to the boundary between Lot 27 and Lot 28 than 300mm;
- Emplaced soils shall be spread into layers no thicker than 300mm and track rolled;
- Emplaced soils on the western side of the filling works (boundary of Lots 27 and 28) shall have a gradient no steeper than 60° from horizontal;
- Sieved soils used as backfill shall not be emplace any higher than 200mm below the final site level as proposed by the **Principal Contractor / Owner**;
- Upon completion of the emplacement of sieved soils, the surface shall be stabilised or dressed with soils that are suitable for planting / seeding of grasses and conform with the requirements specified in **Section 5.8**, to aid in erosion and sediment management;
- The final surface shall be shaped with a gentle gradient to minimise erosion and pooling of water during rain events; and
- The surface shall be either seeded, planted and/or hydromulched to promote vegetation of this area.

It is the responsibility of **Alpha Environmental** to record the material, volume and extents of the soils used to backfill the dam, including observations on processes employed during the works (i.e., compaction, sediment controls, etc.). These records shall conform with the requirements specified in **Section 5.9**.

5.1.6. **Post Excavation Works**

Following the cessation of excavation or soil disturbance, the **Principal Contractor / Owner** shall ensure that:

- Any stockpiled soils or materials not utilised as part of the backfill of the dam in the southern portion of Lot 27 shall be encapsulated / made safe to prevent spread of these soils through sediment erosion or wind. It is understood that the stockpiling of these materials will be temporary / short-term, as such encapsulation comprise:
 - black builders' plastic, weighted down;
 - 'clean' fill material (Refer to **Section 5.8**; and/or
 - Other method, provided it is reviewed and approved by **Alpha Environmental**.
- All materials to be disposed of from site shall be undertaken in accordance with EPA Victoria Industrial Waste Resource Guidelines.

It is noted that the current intention of these works is the complete removal of the stockpile located at Lot 27 to either the dam as backfill or to landfill (for sieved inert wastes). This section

has been included as a provision for temporary management of remaining materials following sieving.

5.2. Occupational Health & Safety Requirements

5.2.1. General Health and Safety Requirements

The controls and procedures in this document do not supersede or preclude the requirements specified in the Victorian Occupational Health and Safety Regulations 2017. As such, in addition to the controls to be implemented as part of this EMP to protect the health of persons and the environment from soil contamination, additional activity specific Occupational Health, Safety and Environment (OHSE) plans are required for all works being undertaken.

It is the responsibility of **All Workers / Contractors** onsite, that in addition to routine OHSE requirements, the following shall be adhered to:

- Minimise dust generation when handling soils;
- Where possible persons on-site should avoid or attempt to minimise contact with soil, dust and surface water on-site, within reasonable limitations based on the tasks that they are undertaking;
- Personnel undertaking works that involve or may potentially involve exposure to the contaminated shallow soils should wear rubberised cut proof gloves (or similar) to minimise dermal contact and avoid abrasions and lacerations, long sleeved shirts and trousers;
- It is required that high standards of personal hygiene are maintained when working on site. This includes thoroughly washing of hands upon the completion of works and prior to the consumption of food, liquids, chewing substances and/or cigarettes;
- The **Principal Contractor / Owner** is responsible for providing workers with access to a clean area for eating and drinking, and soiled clothing or footwear should be removed before entering designated clean areas. The clean-area should be located outside of the immediate vicinity of the stockpile in Lot 25 and dam in Lot 27;
- Hand and boot wash facilities should be provided in the immediate vicinity of the works area in Lot 25 and Lot 27, to minimise potential spread of impacted soils from these area to other areas of the site; and
- Respiratory protective equipment is not considered to be necessary based on the reported Contaminants of Concern within the soils.

5.3. Asbestos Health and Safety Requirements

Whilst not anticipated, asbestos is considered to be a potential contaminant of concern, and as such, consideration to its potential presence is required.

It is the responsibility of the **Principal Contractor** to ensure that, In the event asbestos or substances suspected of being asbestos containing are identified within the soils on-site, the following procedures must be adhered to:

- The person identifying the suspect material is to immediately stop work;
- If the person who identifies the suspect material is an excavator operator, he shall remain inside the excavator cab following cessation of all soil disturbance for a minimum of three minutes prior to exiting;
- The site manager shall be informed of the presence of suspect material and its location given immediately following the identification;
- All works that potentially or do involve the disturbance of soils in the immediate vicinity of the suspect material shall cease;
- The site manager is to engage an Occupational Hygienist such as Alpha Environmental to identify the suspect material. This may require the collection of a sample and laboratory analysis;
- The Occupational Hygienist shall then make appropriate recommendations based on their observations and findings during the inspection;
- Possible recommendations may include but are not limited to the following:
- In the event that asbestos debris are required to be removed from the site or significant quantities of asbestos constituting greater than minor works are identified, the site manager shall engage an A-Class Licensed Asbestos Removalist (LAR) to undertake the removal of asbestos fragments from the site, in accordance with current Occupational Health and Safety Regulations (2017) and WorkSafe Victoria Compliance Code – Removing asbestos in workplaces. Further Management plans may be required if this is the case;
- The removal works may include the removal of asbestos debris by hand prior to removing soils from site if this is deemed appropriate. Where friable lagging asbestos is identified no abatement shall be undertaken and soils shall be removed as asbestos containing;
- At the completion of the removal works, the appointed Occupational Hygienist shall provide a visual clearance;
- All works undertaken on-site that have the potential to disturb soils shall require the development of a SWMS that includes the procedures for encountering asbestos debris within the soils;
- AT NO TIME ARE PERSONS WHO ARE NOT TRAINED IN THE HANDLING OF ASBESTOS and ARE NOT WEARING ASBESTOS SPECIFIC PPE, ARE TO HANDLE SUSPECT OR IDENTIFIED ASBESTOS CONTAINING MATERIALS;
- During any asbestos removal or cessation of works due to suspect materials being identified, the work area shall be barricaded / taped and an exclusion barrier shall be erected around the area at a distance of 10m, with appropriate signage;
- Following the removal of ACM or ACM contaminated soils, a clearance shall be issued for that area; and
- Personnel not involved in the removal or clearance will not be allowed to enter this exclusion zone until removal works have been completed and a visual clearance issued, unless they are equipped in appropriate PPE and escorted by either the Occupational Hygienist or Licenced Asbestos Removalist.

5.4. Other Unexpected Finds

If unexpected contamination is identified at the site, then the **Owner/Principal Contractor** is to cease all works which involve disturbance of soils in the area of the find, and engage **Alpha Environmental** to undertake an assessment of its potential source, nature and extent.

Examples of unexpected contamination may include, but are not limited to:

- Underground Infrastructure such as USTs or Triple Interceptor Traps;
- Odorous Soils; and / or
- Asbestos Debris / Pipes.

In the event that unexpected contamination is identified the **Alpha Environmental** are considered suitable consultants for matters relating to both occupational hygiene and contamination of land.

Alpha Environmental shall provide the **Owner/Principal Contractor** formal advice for the appropriate management and remediation, in line with Victorian EPA and Occupational Health and Safety Regulations as appropriate, based on the nature of the Unexpected Contamination identified.

The **Owner/Principal Contractor** is to ensure that all recommendations made by **Alpha Environmental** are to be undertaken to ensure compliance with this EMP and that the health and safety of site occupants is protected. All recommendations are to be reviewed and accepted by the **Environmental Auditor** prior to implementation.

5.5. Dust Control

Generation of dust at the site can pose a risk to the health of on-site workers and to people off-site. Dust emissions can also affect the visual amenity at the site and surrounding areas. Measures that can be undertaken to assist in the minimisation of dust generation include:

- Minimising movement of vehicles on the site;
- Minimising excavation and movement of soils;
- Using a water spray to dampen vehicle tracks, if excess dust is generated;
- Using a water spray to dampen soil prior to and during excavation;
- Avoiding soil excavation during gusty or windy weather;
- Minimising the extent and duration of stockpiling of soil; and
- Encapsulation of soils with plastic, in the event that uncontrolled dust generation occurs (i.e., during strong winds).

It is the responsibility of the **Principal Contractor** to ensure that appropriate controls and personnel are provided and enacted to mitigate potential dust issues onsite generated throughout the course of the excavation, transport and emplacement works onsite.

It is the responsibility of both the **Principal Contractor and Environmental Consultant** to monitor dust being generated by the works, and ensure appropriate controls are employed.

Specific indicators and Triggers relating to dust control are further discussed in **Section 6.4**.

5.6. Stormwater Management and Sediment Control

Soil eroded during land disturbance can wash away and contaminate stormwater. If sediment laden stormwater enters a drainage line, stormwater drainage system or as surficial run-off, it may eventually discharge into an adjacent waterway and pollute it.

Specific indicators and Triggers relating to stormwater management and sediment control are further discussed in **Section 6.4**.

With regards to the works areas:

- The location of the stockpiled soil in Lot 25, being well within the site boundaries and there being little potential for stormwater run-off, specific implementation of measures is not required in this area.
- The proximity of the dam at Lot 27 to the nearest surface water receptor (Post Office Creek), immediately south of this area, controls to prevent sediment migration from the dam into the creek are required to be installed.

It is the responsibility of the **Principal Contractor / Owner** to ensure that stormwater / sediment run-off measures are in place prior to the commencement of excavation and emplacement works. These measures are required to remain in place until such time as the emplaced soils in Lot 27 have been dressed and/or stabilised to prevent erosion and sediment loading of stormwater run-off (i.e., revegetation of the surface has commenced).

Measures to minimise the potential for stormwater sedimentation may include the following as appropriate:

- Placement of a silt fence along the southern boundary of the dam;
- In the event of pooled water, that requires removal, collect on-site and allow suspended solids to settle before disposal in accordance with EPA and/or local Water Authority requirements;
- Ensure vehicles are free from excess soil when leaving the site, to avoid tracking soil off-site;
- Establish a vehicle wash down area, if necessary;
- Avoid extended stockpiling of soil;
- Cover soil stockpiles during heavy rain, if necessary (refer **Section 5.1.6**);
- Avoid conducting vehicle or machinery maintenance on-site;
- Ensure any fuel, oil or other chemicals are stored safely and securely and are prevented from leaking;
- Repair or remove any leaking containers or machinery from the site;
- Clean up any spilt fuel, oil or other chemicals;

- Check sediment control measures regularly (at least daily) and clean and maintain as necessary; and
- Inspect sediment control measures more frequently during rain periods, to check they are adequate.

5.7. Off-Site Disposal Classification

Where soils are excavated the **Owner / Principal Contractor** is offered the opportunity to remediate or dispose of contaminated soils from site. The high cost of soil disposal to EPA-licensed facilities should be appreciated by the owner and contractors and responsible measures should be taken to minimise the need for such disposal. In accordance with the stated EPA waste hierarchy, any soils excavated should be re-instated and re-used on-site. The wastes hierarchy is one of eleven principles of environment protection contained in the Environment Protection Act 2017 (the Act). If soil must be removed from site as part of the development, it is a requirement that the soils be classified by a current registered member of the ACLCA in accordance with current EPA Victoria Industrial Waste Resource Guidelines (Publications 1828.2 and IWRG702) or subsequent documents that replace it.

If soils are deemed to be contaminated for disposal purposes, they shall be disposed of off-site by EPA licensed transporters to EPA approved landfill or treatment facility sites.

All Waste Transport Certificates and weighbridge dockets shall be held and maintained by the **Owner / Principal Contractor** for a period of not less than 8 years.

Waste soil to be removed from the site for disposal or potential re-use must be sampled as specified in Environment Protection Authority Victoria (EPA) 1828.2 and IWRG 702 or subsequent documents that replace it.

Where possible, the soil should be classified prior to excavation, so it can be loaded directly into licensed transport. The waste soil should be transported in accordance with EPA transport regulations including the Instructions for Completion of Waste Transport Certificates (IWRG821.3) or subsequent documents that replace it.

Any wastewater (groundwater or storm water accumulation) should be collected, stored and tested, and if required treated, by an appropriately licensed waste contractor for key potential contaminants.

5.8. Importation of Clean Fill to Site

Any imported soils to be used onsite are to be classified as 'Fill Material' in accordance with EPA Victoria publications 1968.1 and 1828.2 or subsequent documents that replace them.

The guidelines to be applied to the material imported to site for the purposes of fill material are the guidelines for Fill Material as specified in the current EPA Industrial Waste Resource Guidelines 1828.2 or any subsequent superseding documents. Concentrations of contaminants within imported fill material shall also not exceed the current NEPM Ecological

Investigation Levels. Imported fill material with elevated concentrations of contaminants will be accepted providing that they are proved to be naturally occurring and do not represent an ecological or health risk to the site.

All imported fill material shall be tested at a density of not less than 3 samples and at a rate of 1 sample for every 25 cubic metres of imported material as specified in the current EPA Industrial Waste Resource Guidelines IWRG702 Soil Sampling or any subsequent superseding documents. It is a requirement that the Owner / Principal Contractor maintain records of all imported fill material sources, amounts and laboratory analytical information for a period of not less than 8 years.

Should soil be imported to site during the Audit process, then details including the source site, the analytical results, volume and description must be provided to **Alpha Environmental** for submission to the **Environmental Auditor** for review prior to importation. All imported soils should be aesthetically suitable for the proposed use onsite.

5.9. Documentation and Record Keeping

The originals of all inductions, records and actions taken under this EMP shall be kept in one place at a location nominated by the **Owner/Principal Contractor** so that the information can be easily reviewed.

All documentation associated with the disposal of wastes off-site (e.g., Waste Transport Certificates and weigh bridge docket) and importation of soil to site must be retained to be reviewed when necessary and to allow verification of appropriate soil movement by **Alpha Environmental** and **Environmental Auditor**.

6. Environmental Monitoring

This section outlines environmental monitoring requirements and trigger levels to assess and manage (minimise) unacceptable environmental risk that may occur when performing intrusive works at the site.

6.1. Environmental Monitoring

Potential environmental and human health exposure issues include the presence of dust, generated waste, accumulated/pooled water on site caused by storm water in excavated or stockpiled areas, or any other unusual site event/activity that may be perceived to have a potential to result in site contamination or have an environmental (including aesthetics) or health impact. Monitoring is therefore considered necessary in order to assess and manage potential environmental and human health exposure. Observation of any of the above environmental issues, or assessment that may occur due to the natures of the proposed site activities or works, must be assessed in general accordance with the control measures outlined in the EMP and the trigger levels / indicators presented in the section below.

It is the responsibility of the **Owner / Principal Contractor** to appoint an appropriately trained person to undertake monitoring of the work areas (**Alpha Environmental**).

6.2. Odour Monitoring

The impacts and detection of odours are somewhat subjective, as everyone has a different sensitivity to odours and specific chemicals. There are no specific criteria for the assessment of odours, however, as a general guide. If an odour is considered to be unpleasant to the senses, it is required that action be undertaken to mitigate those odours.

Based on the assessment works to date, odours are not anticipated to be an issue during the excavation and sieving works.

Alpha Environmental shall assess for odours and the **Principal Contractor** is responsible to enacting the mitigation measures as directed by **Alpha Environmental**.

6.3. Noise Monitoring

Noise generated throughout the construction works should be managed by the **Principal Contractor** such that their potential impacts on the surrounding area/community are minimised. Works that are anticipated to generate excessive noise should be undertaken during normal working hours only.

- Additional noise controls should also be considered throughout construction;
- Deliveries should be received during normal working hours;
- No noisy equipment should be taken off the site;
- If works are to be undertaken outside of normal working hours, then additional management measures should be implemented such that associated risks and hazards are assessed in order to reduce the potential impact on the surrounding area/community.

6.4. Trigger Levels / Indicators

Table 2 outlines trigger levels/indicators for potential environmental and human health exposure issues and recommended action measures when they are observed. **Alpha Environmental** is responsible for assessing the trigger levels presented in **Table 2**, and the **Principal Contractor / Owner** is responsible for implementation of the Actions presented under Levels 1 and 2 as directed by **Alpha Environmental**.

Table 2 – Trigger Levels/Indicators

Issue	Level 1		Level 2	
	Primary Trigger Action	Action	Trigger Level(s)	Action
Vapour/Odour Exposure	Aesthetically displeasing odours / elevated vapour concentrations	<p>PPE and advice from the Environmental Consultant.</p> <p>monitoring of volatile organic compounds in ambient air to allay potential public health concerns. It is proposed that monitoring (using a PID) be undertaken along the site boundaries, closest to potential sensitive receptors.</p>	As set out in Safe Work Australia 'Workplace Exposure Standards for Airborne Contaminants' (December 219) and the provision of controls for these airborne hazards in Australian workplaces.	<p>Stop work immediately Cover exposed soil to minimize vapour generation and exposure.</p> <p>Passive Review and implement other recommended control measures, including the potential application of odour suppressant (e.g. BioSolve® or equivalent).</p>
Dust Exposure	Observable dust	<p>Provide dust suppression measures.</p> <p>Provide appropriate PPE (respirator with a class P1 or P2 particulate filters).</p> <p>If dust cannot be controlled, stop work, review alternative control measures, and provide active personnel and boundary monitoring.</p>	As set out in Safe Work Australia 'Workplace Exposure Standards for Airborne Contaminants' (December 219) and the provision of controls for these airborne hazards in Australian workplaces.	<p>Stop work immediately. Cover exposed soil to prevent dust generation.</p> <p>Review and implement other control measures or complete works when wind subsides.</p>

Issue	Level 1		Level 2	
	Primary Trigger Action	Action	Trigger Level(s)	Action
Contaminated runoff to storm water or creek	<p>Pooled water / leakage</p> <p>Surficial Run-off from stockpile or dam area towards the creek</p>	<p>Manage water intrusion into open excavations with the use of pumps or other appropriate methods</p> <p>Control surface water run-off in an appropriate manner to prevent discharge of sediments to creek (e.g. cover stockpiles, provide bunding around work area to minimise water ingress, provide sediment controls).</p> <p>Where inclement weather is predicted, suspend works if there is concern about the potential for detrimental environmental impact to the site or surrounds.</p>	Breach of control measures and discharge into stormwater.	<p>Stop work immediately and contain discharge, where possible.</p> <p>Engage qualified environmental consultant to investigate risk and notify authority (where deemed necessary).</p>
Generation of Waste	<p>Building Debris / Soil stockpiles / unexpected waste</p>	<p>Manage waste in line with control measures.</p> <p>Where waste type is unknown (e.g. buried drum, asbestos) then isolate area and seek advice from a suitably qualified practitioner (e.g. occupational hygienist).</p> <p>Provide appropriate PPE. Manage excess spoil onsite, where possible.</p>	As set out in Industrial Waste Resource Guidelines (1968.1 and 1828.2).	<p>Retain EPA waste transport certificates and waste categorization testing reports.</p> <p>Review and implement other recommended control measures.</p>

The table provided above outlines action measures that should be considered where trigger levels / indicators are observed. Where there is any doubt or uncertainty about potential or perceived environmental or human health impacts, it is recommended that **Alpha Environmental** be consulted to further assess the potential risk.

6.5. Environmental Emergency Response and Incident Reporting

In the event of an environmental incident, the first priority should be the safety of site personnel and the community that may be potentially affected. All steps should then be taken to minimise the risk of environmental damage. Typical first response to an emergency may include:

- Ensure site personnel can be removed safely from the emergency location;
- Containment of any pollution using booms, silt fences, absorbents, bunding or interceptor traps;
- Temporary repair or isolate failed source (e.g., plant, vessel); and
- Sampling the impacted material (e.g., soil or surface water).

Corrective action should include the development of a work plan to remediate the impacted area. This plan would detail testing requirements to define the nature and extent of impacts; methods for recovery; general handling, storage and treatment of impacted materials; disposal and reuse options; and personnel protective equipment.

Any incidents, accidents, hazardous situations, unusual event and unsafe exposures must be reported to the **Owner/Principal Contractor**, which in turn can alert the proper emergency services- or authorities.

Emergency procedures and contact telephone numbers should be displayed in a prominent area during site works. Relevant (but not limited to) emergency services/authority contacts details are presented in **Table 3 – Emergency Contact Details** below.

Table 3 – Emergency Contact Details

Service	Telephone Number
Emergency Services	000
WorkSafe	13 23 60
EPA Victoria	1300 372 842

An example of an Incident and Complaints Register is presented in Appendix C.

6.5.1. Complaints Management

Proposed remedial- and construction works may cause complaints by occupants of the surrounding community.

The **Owner/Principal Contractor** shall undertake efforts to minimise complaints from the works by, but not limited to:

- Appropriate notification (typically 7 days in writing) to occupants of the site and the surrounding community which may be impacted by the works;

- Ensure that a responsible person is appointed to handle complaints and enquiries and their details are included in any notification to occupants of the site or the surrounding community which may be impacted by the works;
- Ensure that the work area(s) are sufficiently delineated / isolated from users of the site and the surrounding community with fencing or other suitable barricading;
- Ensure that appropriate controls are in place to mitigate potential odour and dust generation;
- Ensure that appropriate controls to mitigate / manage noise and vibration are in place;
- Ensure that appropriate management of soils and water is undertaken; and
- Ensure that appropriate controls for asbestos (if applicable) are in place.

If any complaints with regards to the works are raised, the person nominated by the **Owner/Principal Contractor** shall record the following information:

- The time and date of the enquiry / complaint;
- Nature of the enquiry / complaint;
- Contact details of the person making the enquiry / complaint;
- Corrective actions implemented to address the complaint; and
- Date of response to the complaint.

Records of all complaints shall be managed and kept in accordance with **Section 5.9**.

It may be necessary to undertake monitoring or seek advice from professionals to aid in mitigating dust, waste, noise and vibrations. Where necessary and applicable, **Alpha Environmental** shall be engaged by the **Owner/Principal Contractor** to assist in implementing responses to complaints.

An example of an Incident and Complaints Register is presented in Appendix C.

6.6. Changes & Termination of the EMP

This EMP is applicable for all works at the site that have the potential to disturb soils, or until such time it is proven that the contaminated soil has been remediated, removed or no longer poses a potential risk to human health and the environment.

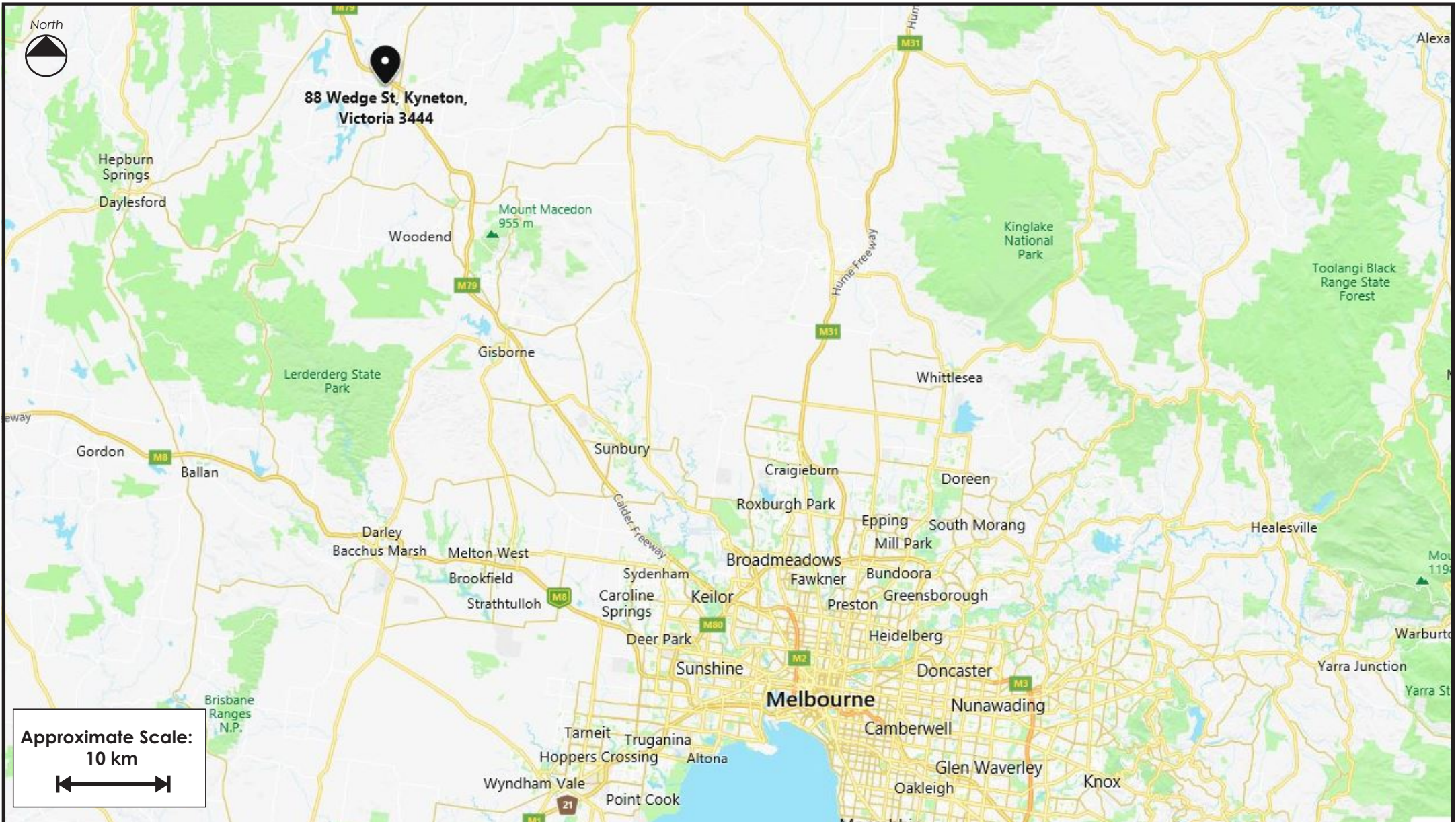
Any alteration or variation to site conditions and/or the proposed development will require amendment to the EMP and review and acceptance by the **Environmental Auditor**.

7. References

- EPA Victoria Best Practice Environmental Management (1996). Environmental Guidelines for Major Construction Sites. February 1996;
- EPA Victoria (2021 a). 1828.2, Waste disposal categories – characteristics and thresholds. 01 July 2021;
- EPA Victoria (2021b). 1968.1, Guide to classifying industrial waste. 12 August 2021;

- EPA Victoria Industrial Waste Resource Guidelines 2009. IWRG702, Soil sampling. 30 June 2009;
- EPA Victoria Industrial Waste Resource Guidelines 2016. IWRG822.3, Waste codes. 29 November 2016;
- EPA Victoria Industrial Waste Resource Guidelines 2017. IWRG611.2, Asbestos transport and disposal. 26 June 2017;
- SafeWork Australia (2019) Workplace Exposure Standards for Airborne Contaminants. 16 December 2019;
- State Government of Victoria. Occupational Health and Safety Act 2004. No. 107 of 2004, Authorised Version incorporating amendments as at 26 October 2017;
- State Government of Victoria. Occupational Health and Safety Regulations 2017. S.R. No. 22/2017, Authorised Version as 18 June 2017; and
- WorkSafe Victoria Compliance Code – Removing asbestos in workplaces. December 2019.

Appendix A **Figures**



Approximate Scale:
10 km

Alpha Environmental

ABN 85 088 652 671

Suite 205, 134 Cambridge Street
Collingwood, Victoria 3066
p: (03) 9415 8002
f: (03) 9415 8052
email: info@alphaenviro.com.au

ADTS as Trustee for the Jasper Family Trust
88a-90 Wedge Street, Kyneton

Site Location

Scale: As Shown

Job No: AE1808063

Date: 18/08/2020

Drawn: KVR




Approved: KVR

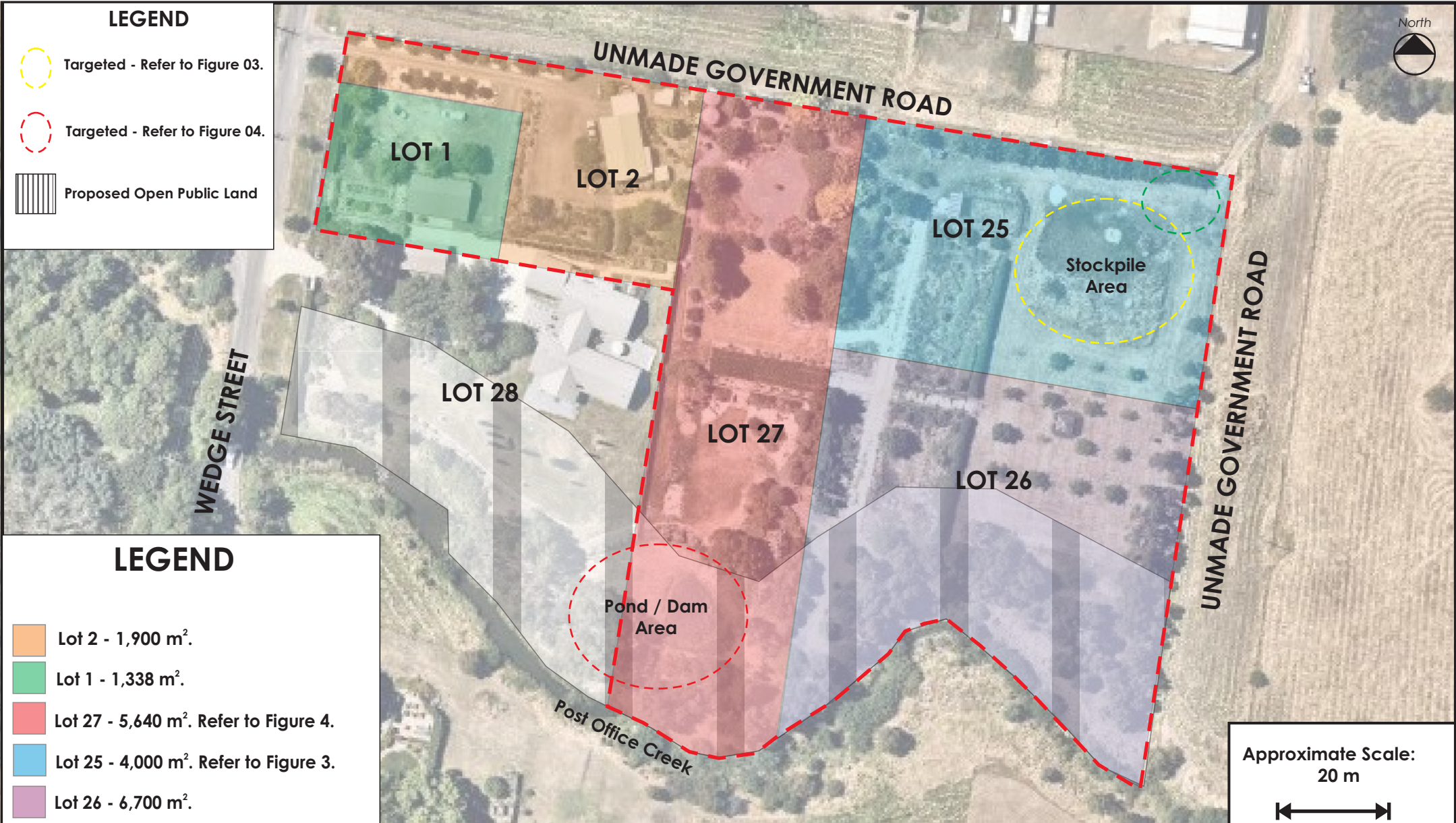
FIGURE 01

Sheet Size: A4








LEGEND


-  Targeted - Refer to Figure 03.
-  Targeted - Refer to Figure 04.
-  Proposed Open Public Land



LEGEND

-  Lot 2 - 1,900 m².
-  Lot 1 - 1,338 m².
-  Lot 27 - 5,640 m². Refer to Figure 4.
-  Lot 25 - 4,000 m². Refer to Figure 3.
-  Lot 26 - 6,700 m².

Approximate Scale:
20 m



Alpha Environmental
ABN 85 088 652 671

Suite 205, 134 Cambridge Street
Collingwood, Victoria 3066
p: (03) 9415 8002
f: (03) 9415 8052
email: info@alphaenviro.com.au

ADTS as Trustee for the Jasper Family Trust
88a-90 Wedge Street, Kyneton

Master Site Map

Scale:	As Shown
Job No:	AE1808063
Date:	16/11/2021
Drawn:	BJT
Approved:	BJT

FIGURE 02	

North



LEGEND



Lot Boundary.

Approximate Scale:

5 m



Alpha Environmental

ABN 85 088 652 671

Suite 205, 134 Cambridge Street
Collingwood, Victoria 3066
p: (03) 9415 8002
f: (03) 9415 8052
email: info@alphaenviro.com.au

ADTS as Trustee for the Jasper Family Trust
88a-90 Wedge Street, Kyneton

Site Map - Lot 25

Scale: As Shown

Job No: AE1808063

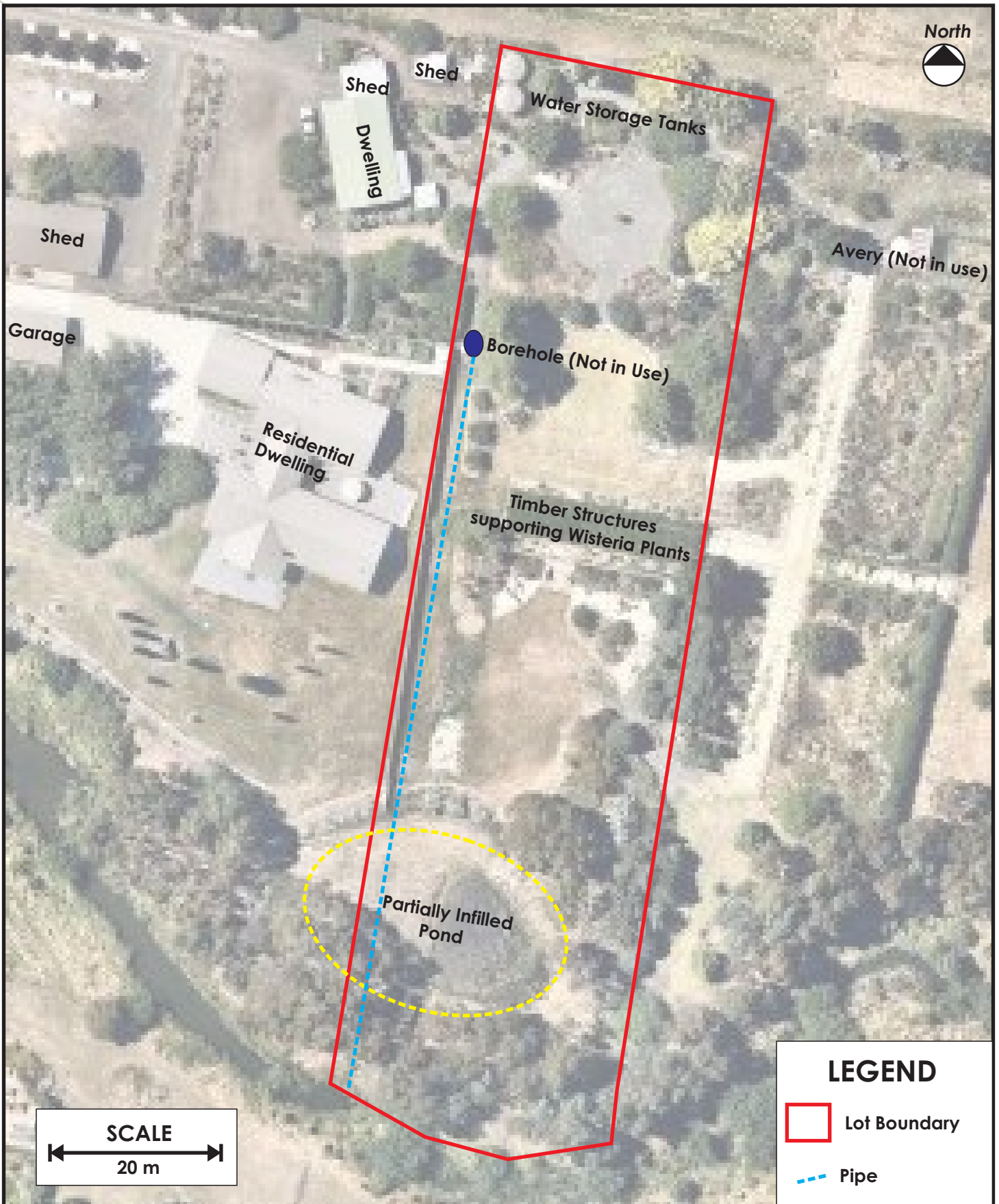
Date: 17/11/2021

Drawn: BJT

Approved: BJT

FIGURE 03

Sheet Size: A4



LEGEND

- Lot Boundary
- Pipe

SCALE

← 20 m →

ADTS as Trustee for the Jasper Family Trust 88a-90 Wedge Street, Kyneton	Site Map - Lot 27
--	-------------------

<p>Alpha Environmental <small>ABN 85 088 652 671</small></p> <p>Suite 205, 134 Cambridge Street Collingwood, Victoria 3066 p: (03) 9415 8002 f: (03) 9415 8052 email: info@alphaenviro.com.au</p>	Scale: As shown	<h1 style="margin: 0;">FIGURE 04</h1>
	Job No: AE1808063	
	Date: 16/11/2021	
	Drawn: BJT	
	Approved: BJT	
Sheet Size: A4		



Appendix B Acknowledgment of EMP

Acknowledgement of EMP Procedures and Requirements

This document provides a record of having read, understanding and agreement to follow the procedures presented in the EMP for 88a-90 Wedge Street, Kyneton (AE1808063-R03).

I acknowledge that:

- I have read the EMP;
- I understand the EMP; and
- I agree to the procedures presented within the EMP.

Name (Print Clearly)	Company	Signature	Date

Description of works being undertaken:



Appendix C Incident and Complaints Register

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Incident/Complaint Register

Date	
Name/Details of Reportee	
Incident/Complaint Details	
Action Recommended	
Date Resolved	

24 November 2021

Graham Jasper
Armstrong Design and Technical Services Pty Ltd
as Trustee for the Jasper Family Trust
PO Box 284
Kyneton VIC 3444

cc: Ben Taylor, Alpha Environmental (ben.taylor@alphaenviro.com.au)

Dear Graham,

Re: Auditor Review Comments – Environmental Management Plan Movement of Stockpiled Material at 88a-90 Wedge Street, Kyneton

I have been provided with a copy of the following document:

- *Environmental Management Plan, 88-90 Wedge Street, Kyneton (Alpha Environmental reference AE1808063, DRAFT A), 17 November 2021, Alpha Environmental Pty Ltd.*
- Comments on the Environmental Management Plan (EMP) are provided in the table below.



Item Ref	Section / Topic	Auditor Comment / Query
1.	General	Amend wording throughout the entire document to ensure clear, accountable directions and/or requirements. Refer to <i>Environmental Management Plan Guidelines, Commonwealth of Australia, 2014</i> for specific guidance on including commitments in management plans (Section 2.2). For example, sentences like “ <i>Acknowledgment of EMP Procedures and Requirements... should be completed...</i> ” need to be reworded to clearly state the required actions).
2.	Figure 02	The pond/dam area to be infilled with stockpiled material sits across the boundary of Lot 27 (which forms part of the property known as 88A-90 Wedge Street) into former Lot 28 (property known as 88 Wedge Street). Since former Lot 28 has recently been sold and is separate to the remaining audit site area, the stockpiled material cannot be transported onto this area, as this would trigger additional regulatory requirements associated with off-site re-use of waste. Please refer to previous correspondence issued regarding this (Ref: <i>M18243_LET_008Rev0_AC_Review of DSI Draft Report</i> , 19 March 2021, Item 19). On this basis, any movement of on-site materials will need to be within the site area of 88a-90 Wedge Street (i.e. not extend beyond Lot 27 for the infilled dam). Please confirm if the area to be infilled has been surveyed in relation to the Lot boundaries shown in Figure 02 of the EMP, so that any movement of soil can be appropriately tracked in relation to the Lot boundaries. A revised figure will be required detailing the extent of infilling in the pond/dam area.
3.	S. 3.1 Responsible Person/s	Please amend the reference error.
4.	Table 1 – Responsible Parties	Please add contact details for the site owner are required. Please update/correct the environmental auditor name and details.
5.	S. 3.1.1	It is not the auditor’s role to ‘approve’ the EMP. While the environmental auditor will review and advise their opinion on the EMP in so far as it affects the final condition of the site for the purposes of the audit, it is the responsibility of the Contractor and Consultant to ensure that activities are completed in a manner which does not pose a risk to human health or the environment and accordance with relevant legislation and guidelines.
6.	S 4. Identified Contaminants of Concern	PFAS and benzo(a)pyrene are also identified contaminants of potential concern (CoPC), based on the stockpile sampling results. Please amend accordingly.
7.	S. 5.1 General Excavation, Piling, Maintenance and Construction Activities	It is assumed that the inclusion of ‘piling’ in this section heading is a typographical error, since it is not anticipated that piling works will occur at the site as part of the stockpile movement works. Please clarify. While it is clearly stated that transportation of soils will not occur on gazetted roadways, it also needs to be made clear that the material will remain on the same site, i.e. will remain on 88A-90 Wedge Street, Kyneton. It cannot be moved onto or via other properties or public land. Please specify the planned transport path from the stockpiled area to the infilled dam area. Ideally, this would be provided as an in-text figure.



Item Ref	Section / Topic	Auditor Comment / Query
8.	S 5.1.1 Sieving process	As previously advised (email from auditor dated 25 October 2021), a workplan / further detail is needed regarding the sieving process that will be used (e.g. what meshes in what order). This should also include acceptance criteria for the sieving process, and triggers/contingencies for the acceptance criteria not being met. What criteria will be used to establish whether all waste material has been removed from the soils?
9.	S. 5.1.1 Placement in dam	How will the material be placed in the dam, and to what level? Will a capping of topsoil layer be applied? Will the material be compacted? Covered in hydromulch to promote vegetation? Some indication of the target final condition should be provided.
10.	S 5.1.2 Pre-Excavation Works	Please state who is responsible for ensuring that appropriate service records are provided for mechanical equipment (to be updated in S. 3).
11.	S 5.1.3 Excavation Works	<p>The procedures outlined in S 5.1.3 are vague and do not hold any one party accountable. Sentences including phrases such as “All efforts shall be made...” need to be re-worded to assign a responsible party to a specific action. For example, this wording needs to be replaced with phrases such as “The site contractor/ environmental consultant / site owner (as applicable) is responsible for...”.</p> <p>Further to this, the actions provided also need to be more specific (e.g. “Mechanisms should be in place...”).</p> <p>For example:</p> <ul style="list-style-type: none"> • In terms of minimising dust generation, what equipment will be used to spray soils? Who is responsible for this? (e.g. Is there a hose on site that will be used? Will the contractor provide water spray and associated equipment?). • Do cattle grids exist at the site? Is this an effective way to prevent material being removed from site? • If a street sweeper is required, this means that soils have been tracked off-site, which needs to be prevented in the first place. However, if this cannot be prevented and material is tracked onto roadways, who will organise a street sweeper (if required)? • Who will provide silt traps or geo-fabric socks and how will they be used? <p>A more effective method of ensuring materials are not removed from site is to assign a washdown area (marked on a plan) with appropriate (clearly specified) run-off controls and request the contractor to provide suitable equipment for washing the wheels and undercarriage of any trucks / machines prior to departure from the site.</p>
12.	S 5.1.4 Post Excavation Works	Please clarify how the remaining stockpiled material on Lot 27 will be “...encapsulated / made safe to prevent spread... through sediment erosion or wind.”.



Item Ref	Section / Topic	Auditor Comment / Query
13.	S 5.2.1 General Health and Safety Requirements	<p>It should be made clear here and elsewhere in the document that the health and safety requirements referenced in this EMP relate specifically to potential hazards and risks due to contaminated soil, and do not negate or replace the need for broader health, safety and environmental management requirements that would exist even in the absence of contamination. The contractor and other parties may therefore still need to develop separate site and activity specific OHSE plans which consider and address potential risks that apply more generally to all construction / earth moving activities.</p> <p>Please remove reference to 'trenches' (unless this is relevant for the proposed works). The EMP should be as specific as possible to the site and scope of works.</p> <p>Specific information is required regarding the location/availability of handwashing and eating areas. These designated locations, situated away from the work areas, need to be included on a figure for reference.</p>
14.	S 5.4 Other Unexpected Finds	<p>In the event of an 'unexpected find', clearly state that works are to stop immediately until any risks are appropriately investigated (using the methods listed).</p>
15.	S 5.5 Dust Control	<p>Dust control measures are necessary to negate any potential airborne migration of contamination (including asbestos fibres and PFAS), in addition to visibility and aesthetic issues. Rather than stating measures that 'can' be undertaken, clearly state the responsible person(s) and the action required (as per Item 1) to mitigate any environmental risks associated with dust generation.</p> <p>The Level 2 Action levels detailed in Table 2 (S 6.4) for dust exposure specifies that exposed soil must be covered to prevent dust generation, however this management measure is not specified in S 5.5. Please ensure that the actions detailed throughout the EMP are consistent. If exposed soils are to be covered as a management measure, what will be used to cover the soils and who is responsible for bringing this onto site?</p>
16.	S 5.6 Stormwater Management and Sediment Control	<p>The auditor disagrees with the statement "<i>Due to the locations of the works being well within the site boundaries and there being little potential for stormwater run-off, specific implementation of measures is not required.</i>" The location of infilling is adjacent to a surface water receptor (Post Office Creek) and therefore prevention of runoff into this receptor is necessary. While the risk associated with chemical contaminant leaching or migration to the creek has been assessed as low, runoff of sediments into the creek during soil transport activities needs to be minimised, as this has the potential to affect aquatic habitats, alter water flow and the nutrient balance.</p> <p>This section should therefore make it clear that stormwater and sediment need to be controlled during movement, until such time as the soil is placed and stabilised in the infilled pond area. Therefore, please re-word the stormwater management requirements to assign responsible parties and actions (as detailed in Item 1), providing clear, specific actions with supporting diagrams and/or figures as necessary.</p> <p>As per comment 9 above, the workplan / EMP also needs to describe how the material will be placed and stabilised within the receiving area, to prevent erosion / sediment runoff. Please clarify.</p>
17.	Infilled Pond / Dam	<p>Please maintain records of the origin of stockpiled material and the volume of soil transported to the infilled dam area. Details regarding compaction of soils also needs to be included (how will this be done and to what extent).</p>



Item Ref	Section / Topic	Auditor Comment / Query
18.	S 5.7 Off-Site Disposal Classification	Presumably, the environmental consultant (Alpha) is responsible for soil and wastewater testing and disposal. This needs to be clarified. Please also update references to reflect current legislation and guidance (the Environment Protection Act 1970 and Industrial Waste Resource Guidelines are no longer in force). Is it anticipated that groundwater or stormwater has the potential to accumulate in trenches? Please clarify.
19.	S 5.8 Importation of Clean Fill to Site	Please clarify if Alpha intends to import clean fill to the site. If not, this section needs to be removed from the EMP. If clean fill is intended to be imported, then, as stated, the auditor requires detailed information regarding the source of the clean fill, including analytical results, and the location that it is to be imported to.
20.	S 6 Environmental Monitoring	A typographical error was noted ('instructive'). Please amend.
21.		Please maintain records of all on-site soil movement and photographic records of work (before, during and after completion).

If you have any comments or questions, please do not hesitate to contact the undersigned at Jantina.lalor@senversa.com.au (0402 256 339) or kristi.hanson@senversa.com.au (0411 438 477).

Yours sincerely,

Jantina Lalor
Associate Environmental Scientist

Kristi Hanson
Environmental Auditor
(appointed pursuant to the *Environment Protection Act 2017*)

JL/KH

Technical Limitations and Uncertainty – Please note these auditor review comments are based on a limited scope review to assist in the planning of further assessment works. This document should not be considered prescriptive of future works proposed and should not be reproduced in assessment reports.

Reliance – This document has been prepared solely for the use of Armstrong Design and Technical Services Pty Ltd as Trustee for the Jasper Family Trust. No responsibility or liability to any other party is accepted for any damages arising out of the use of this document. Only a completed Audit report should be considered to represent an auditor's opinion on the condition of any site in accordance with EPA Guidelines.

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