# Contaminated Soils Management Plan: Human Health (CSMP(HH))

NZ TRANSPORT AGENCY
WAKA KOTAHI

1 MacKays to Peka Peka Expressway

## Contaminated Soils Management Plan (Human Health) (CSMP(HH))

### Revision History

| Revision N° | Prepared By | Description | Date |
|---|---|---|---|
| 1.0 | Genevieve Smith | Draft for internal review | 12 April 2013 |
| 1.1 | Genevieve Smith | Draft for KCDC review | 7 May 2013 |
| 2.0 | Genevieve Smith | Final for Certification | 17 May 2013 |
| 2.1 | Genevieve Smith | Reissue of Final for Certification | 25 June 2013 |

### Document Acceptance

| Action | Name | Signed | Date |
|---|---|---|---|
| Prepared by | Genevieve Smith (M2PP Alliance) | | 25 June 2013 |
| Reviewed by | Kerry Laing (Kerrich Environmental Ltd)<br>Anna Lewis and Kylie Eltham (M2PP Alliance) | | 25 June 2013 |
| Approved by | Alan Orange<br>Alliance Project Manager | | 26 June 2013 |
| on behalf of | M2PP Alliance | | |

### Certification

| Action | Name | Signed | Date |
|---|---|---|---|
| Regulatory Manager Approval | Andrew Guerin | | 26 August 2013 |
| on behalf of | Kapiti Coast District Council | | |

## Table of Contents



## Appendices

## Quick Reference Guide to Conditions

| Condition Number | Condition Requirement | Key Final CSMP(HH) Reference |
|---|---|---|
| NES.1 | Outcomes and standards that apply to the CSMP(HH) | Section 1.3 |
| NES.2 | Certification requirement and purpose of the CSMP(HH) | Section 1.1 |
| NES.3 | Should the further investigations required to be undertaken in accordance with condition G.33 record levels of contaminants that exceed the limits in the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, then these sites will be included in the CSMP (HH) as required by NES.2. | Section 2.2 and Appendix A |

# 1 Introduction

## 1.1 Purpose

The purpose of this Contaminated Soils Management Plan: Human Health (CSMP(HH)) is to fulfil the requirements of the MacKays to Peka Peka Expressway designation conditions NES.1 to NES.3. The purpose of the CSMP(HH) is to identify the following:

*NES.2 "(a) The approach to the remediation or ongoing management of the land at 55 Rata Road, Paraparaumu, including:*

*i) the remediation or management methods to address the risk posed by the contaminants to human health;*

*ii) the timing of the remediation;*

*iii) the standard of the remediation on completion;*

*iv) the mitigation methods to address the risk posed by the contaminants to human health;*

*v) the mitigation measures for the piece of land, including the frequency and location of monitoring of specified contaminants.*

*b) The adequacy of the site management plan or the site validation report or both, as applicable;*

*c) The transport, disposal, and tracking of soil and other materials taken away in the course of the activity;;;;"*

This management plan is submitted to the Manager (KCDC) in accordance with NES.2 for certification.

This Contaminated Soils Management Plan: Human Health (CSMP(HH)) forms part of a comprehensive suite of environmental management plans within the Construction Environmental Management Plan (CEMP) for the MacKays to Peka Peka Expressway ("the Project"). The CSMP(HH) addresses the potential human health effects resulting from contaminated soil at selected locations associated with the construction of the Project.

The principal purpose of this Plan is to provide a guide for the Alliance on how to manage the potential human health effects from soil containing levels of contaminants above background levels and, in particular, soil containing levels of contaminants which have been deemed to pose a risk to human health. This plan only covers activities and tasks that relate to human contact with contaminated soils. This Plan does not cover activities and tasks related to the wider construction works for the project, nor does it outline any environmental controls to be followed at contaminated sites. Environmental controls at contaminated sites are detailed in the Contaminated Soils and Groundwater Management Plan (CSGMP).

This Plan has been written to support Land Use Consent – Disturbance of soil containing contaminants NSP 12/01.002 for the site at 55 Rata Road in accordance with Regulation 10 of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES). This Plan is also written to support possible future land use consents for sites conservatively identified as requiring Controlled Activity consent under Regulation 9 of the NES.

The CSMP(HH) shall be updated, with the necessary approval, throughout the course of the Project to account for changes to construction techniques or the natural environment and consent conditions. A copy of any revisions of a material nature shall be submitted in writing to KCDC for certification at least 10 working days prior to any changes taking effect.

## 1.2 Scope

The scope of this Plan is to:

- Summarise sites subject to control under the NES Regulations identified in Assessment of Environmental Effects Technical Report 23, Volume 3 and Addendum Technical Report 23a, Appendix B to the CSGMP; and
- Identify appropriate control measures to minimise potential human health risks from soil contamination associated with construction of the MacKays to Peka Peka Expressway.

## 1.3 Performance standards

The objective of this plan is that soil disturbance activities on sites identified in Table 1 below are managed such that human exposure to contaminated soils is minimised during and after construction of the Project. The following outcomes shall be achieved:

i) Contaminated dust or sediment discharged beyond the boundary is minimised;
ii) All excavated soils are appropriately handled and disposed of at facilities registered for taking contaminated material; and
iii) All soil that is to remain on a site will be suitable for the proposed future use of that site.

In achieving these outcomes the following standards and guidelines shall be referenced:

i) Contaminated Land Guidelines No.1 – Reporting on Contaminated Sites in New Zealand;
i) Contaminated Land Guidelines No. 5 – Site Investigation and Analysis of Soils.

# 2 Contamination summary

## 2.1 Site identification

The route has been divided into three zones, south, central and north. The zones are detailed in the CEMP.

## 2.2 Soil characterisation

A contamination assessment has been conducted at selected locations along the proposed route of the Project, the full findings of which are detailed in AEE Technical Report 23, Volume 3 and Addendum Report Technical Report 23a (this assessment report is required by condition G.33 and is appended to the CSGMP). In accordance with condition NES.3, where further investigations have been carried out and have recorded levels of contaminants that exceed the limits in the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, then these sites are included in the CSMP (HH) as required by NES.2.

Sites identified as triggering control under the NES Regulations are listed in Table 1 below.

**Table 1 – Sites subject to control under the NES along the Route of the Expressway**

| Sector | Site | Site Use | Activity | Contaminants Identified | Activity Status |
|---|---|---|---|---|---|
| **South** | 16 Leinster Avenue | Contractors Yard | Dumped waste and uncontrolled fill | PAH | Controlled Activity |
| **South** | 150 Raumati Road | Unoccupied land | Uncontrolled dumping | Heavy metals, PAH. Waste materials present. | Controlled Activity |
| **South** | 55 Rata Road | Contractors Yard | Historical storage of hydrocarbons, uncontrolled fill | TPH, PAH. Waste materials present. | Restricted Discretionary Activity |
| **South** | 61 Rata Road | Unoccupied land | Storage of waste materials/scrap | Contaminants similar to background levels. Waste materials present. | Controlled Activity |

| Sector | Site | Site Use | Activity | Contaminants Identified | Activity Status |
|---|---|---|---|---|---|
| **South** | 58 Kiwi Road | Horticulture | Market gardening | Heavy metals, OCP | Controlled Activity |
| **Central** | Kāpiti Road Intersection | Unoccupied land | Unknown dumping of waste | Heavy metals. Waste materials present. | Controlled Activity |
| **Central** | Otaihanga Project Yard | Landfill | Landfilling of waste materials | Assumed contamination present (soil testing not undertaken) | Permitted Activity |
| **North** | 124-154 Te Moana Road | Market gardens | Use of herbicides/ pesticides | Heavy metals | Controlled Activity |

Notes:
TPH – total petroleum hydrocarbons
PAH – polycyclic aromatic hydrocarbons.
OCP – organochlorine pesticides

The individual sampling locations at 55 Rata Road where elevated levels of contaminants are present are identified in the Contaminant Risk Register (**Appendix A**).

The following sections detail procedures to be followed for all sites listed in Table 1, and specific procedures to be followed for works at 55 Rata Road.

# 3 General procedures for all sites in Table 1

The following procedures have been prepared for the management of soil containing low levels of contaminants at all sites listed in Table 1.

## 3.1 Hazard minimisation procedures

Works at known contaminated sites have the potential to encounter contaminated soils and/or groundwater. Prior to work being undertaken, a Job Safety and Environment Analysis (JSEA) shall be carried out for each contaminated site that shall identify the appropriate personal protective equipment (PPE) and behaviours to reduce the exposure risk.

Workers may be exposed to contaminants via the accidental ingestion of, or skin contact with soil and/or groundwater and/or surface water. To prevent this exposure, procedures shall be followed by workers who are likely to come in contact with contaminated soil and/or water, including the following:

- Cloth overalls or disposable overalls shall be worn.
- Gloves shall be worn.
- A P2 dust mask and eye protection shall be worn if conditions generate dust.
- Contact with contaminated water shall be avoided where possible.
- Where contact with water cannot be avoided, PPE shall be used to prevent contact with water such as waterproof gauntlets, gumboots, waders.
- Hand to mouth contact shall be minimised.
- Hands and face shall be washed prior to eating, drinking or smoking.
- Eating or drinking shall not occur within the excavation area.
- Any skin abrasions shall be washed immediately and treated to prevent infections.
- Any additional requirements in the Alliance Health and Safety Plan shall be followed.

In addition to the above, for excavation works in Otaihanga Project Yard the following measures will be required to mitigate the potential effects on human health from landfill materials:

- Non-disposable overalls shall be removed at the end of each day and shall be stored at the work site. The overalls shall not be left in vehicles or taken home (to prevent the tracking of contaminated materials into workers' homes).
- Non-disposable overalls shall be laundered by a commercial service and shall under no circumstances be taken home and washed.
- Disposable overalls shall be bagged at the end of each day and disposed of to an appropriate facility.
- All staff physically involved in works likely to result in hand contact with contaminated material shall wear chemical resistant disposable gloves which shall be regularly changed and disposed of appropriately.

## 3.2 Implementation and operation procedures

### 3.2.1 Pre-excavation procedure

Prior to any earthworks being undertaken at any site listed in Table 1, a pre-earthworks site meeting shall be held and attended by the Project staff including the Construction Manager, the Environmental Manager, the Contaminated Land Specialist (CLS) and personnel involved with the earthworks to discuss the risks and site procedures for handling contaminated soils and groundwater and/or potentially contaminated soils and groundwater located at that site. The Construction Manager shall prepare a JSEA for the earthworks which shall cover exposure to contaminated soil and dust, groundwater and surface water for construction workers and the general public.

### 3.2.2 Site establishment

The following controls shall be put in place by the Project team prior to works commencing:

- Barriers or fencing to prevent unauthorised entry and access by the general public. Warning signs (e.g. “Restricted entry”) shall be erected around the fenced site.
- Health and safety facilities such as first aid points, wash facilities and PPE locations shall be provided.
- All personnel working on sites listed in Table 1 during any intrusive ground works shall be required to undergo a specific health and safety induction in relation to contamination at that site. Toolbox meetings shall include aspects of health and safety in relation to contamination (soil, water and dust).
- The likelihood of encountering contaminated groundwater shall be assessed at known contaminated sites and relevant PPE obtained for workers

### 3.2.3 Dust controls

Dust suppression controls shall be rigorously implemented during earthworks at contaminated sites (in particular at 55 Rata Road) as detailed in the CEMP and Construction Air Quality Management Plan (CAQMP). This will minimise the generation of dust on site which could affect site workers and general public. Controls include but are not limited to:

- Reduction of vehicle speeds.
- Minimising drop heights from loaders.
- Considering timing of works including prevalent wind direction.
- Regular watering of haul roads.
- Revegetating/stabilising exposed surfaces as soon as possible.

### 3.2.4 Stormwater and sediment controls

Stormwater and sediment controls shall be installed prior to earthworks commencing in accordance with the ESCP (CEMP Appendix J) and section 3.1.4 of the CSGMP.

### 3.2.5 Asbestos controls

Risks arising from suspected asbestos occur at localised areas within 55 Rata Road and Kāpiti Road Intersection. Excavations at these locations shall follow procedures detailed in this section of the plan and Section 3.2 of the CSGMP.

Should Asbestos Containing Material (ACM) be observed or suspected during the excavation works, all work shall cease and Guidelines for the Management and Removal of Asbestos (revised 1999) for the Department of Labour, and the Health & Safety in Employment (Asbestos) Regulations (1998) shall be followed. Works can recommence once

all ACM has been removed safely. Any such asbestos works (assessment, delineation, removal and verification) shall be undertaken by a specialist asbestos contractor.

### 3.2.6 Stockpiling controls

No stockpiling of excavated landfill materials from Otaihanga Project Yard. Stockpiling of contaminated material at all other sites should be avoided. If stockpiling of contaminated materials cannot be avoided, then the stockpile shall be covered at all times to prevent the generation of dust. The dust may potentially contain contaminants which can be dispersed across the site and beyond the site boundaries. Control of dust from stockpiles is also detailed in the CAQMP. Stockpiles shall be sited within an area away from the main working area to minimise potential contact by site workers.

### 3.2.7 General earthworks procedure

This procedure shall be followed for all sites except 55 Rata Road (see Section 4.2 for site specific procedures). Soil testing to date indicates that contaminant levels are above background levels at sites listed on Table 1, and therefore any working of soils requires management to minimise human exposure on and off site. The methodology for the working of soils containing contaminants and to minimise transport off site is as follows:

1 Materials requiring excavation for disposal to landfill shall be excavated and loaded directly into trucks where possible (limiting stockpiling).

2 No stockpiling of excavated landfill materials from Otaihanga Project Yard.

3 All trucks are to be covered before leaving site and any soils brushed off wheels to avoid tracking onto public roads. Should the site become wet and material adheres to wheels a wheel wash facility shall be installed and truck wheels washed before exiting the site.

4 The Project team shall maintain a register of landfill disposal activities and records such as location of excavation, disposal location, quantity of material and off site weighbridge documents. This information will be required for a Site Validation Report.

The landfill operator may require further testing before accepting materials, in accordance with the landfill's resource consent.

### 3.2.8 Post-excavation procedure

Upon completion of excavation works, all plant and equipment used on contaminated sites shall be cleaned and decontaminated prior to it leaving the site. Water from wheel washes shall be collected and disposed of to sewer in accordance with trade waste consent conditions from KCDC. Additional requirements are detailed in Section 4.2.3 for 55 Rata Road.

# 4 Specific procedures for 55 Rata Road

Soil testing has confirmed that contaminants at this site pose a potential risk to human health. The known locations of contaminated soil are illustrated on map number GIS-3320901-93 in **Appendix B**.

## 4.1 Hazard minimisation procedures

A specific Job Safety Environmental Analysis (JSEA) will be prepared for 55 Rata Road identifying the specific methodologies to be used to minimise impact on human health and the environment of the contaminants identified at this site.

In addition to the procedures in Section 3.1, the following procedures shall be followed for works at 55 Rata Road to minimise and mitigate the potential effects on human health from soil contamination:

- Non-disposable overalls shall be removed at the end of each day and shall be stored at the work site. The overalls shall not be left in vehicles or taken home (to prevent the tracking of contaminated materials into workers' homes).
- Non-disposable overalls shall be laundered by a commercial service and shall under no circumstances be taken home and washed.
- Disposable overalls shall be bagged at the end of each day and disposed of to an appropriate facility.
- All staff physically involved in works likely to result in hand contact with contaminated material shall wear chemical resistant disposable gloves which shall be regularly changed and disposed of appropriately.

## 4.2 Implementation and operation procedures

Procedures outlined in sections 3.2.1 to 3.2.6 shall be implemented for this site, in addition to the site specific procedures outlined below.

### 4.2.1 Earthworks procedure for 55 Rata Road

The excavation of contaminated materials shall be undertaken prior to the main works commencing at this site. The methodology for the works at this site is as follows:

1 Materials at locations TP209 and TP217 containing elevated levels of contaminants shall be excavated and disposed of to landfill authorised to receive contaminated materials.

2 Location TP217 shall be excavated to a minimum of 0.7m below ground level, or deeper if required for construction purposes. Soil validation samples shall be collected by the CLS (or personnel trained by the CLS) along the base and the sides of the excavation.

3 Location TP209 shall be excavated to a minimum of 0.9m below ground level, or deeper if required for construction purposes. Soil validation samples shall be collected

by the CLS (or personnel trained by the CLS) along the base and the sides of the excavation.

4 Materials excavated for construction purposes from other parts of this site shall also be disposed of to landfill authorised to receive contaminated material. Materials shall be excavated and loaded directly into trucks.

5 No materials shall be stockpiled.

6 All trucks taking contaminated material to landfill will be tracked with the driver ensuring a 'contaminated load' docket is completed, and leaving a copy with the disposal facility. The site engineer overseeing the works will be responsible for collating these dockets, ensuring they are tallied correctly and returned to the Environmental Manager for filing.

7 All trucks shall be covered before leaving site and any soils brushed off wheels to avoid tracking onto public roads. Should the site become wet and material adheres to wheels a wheel wash facility shall be installed and truck wheels washed before exiting the site.

8 The Project team shall maintain a register of landfill disposal activities and records such as location of excavation, disposal location, quantity of material and off site weighbridge documents. This information will be required for a Site Validation Report.

9 Suspected asbestos containing material (ACM) at locations TP203 and TP204 will be disposed of by an authorised contractor specialising in ACM disposal in accordance with Guidelines for the Management and Removal of Asbestos (revised 1999) for the Department of Labour, and the Health & Safety in Employment (Asbestos) Regulations (1998).

The landfill operator may require further testing before accepting materials, in accordance with the landfill's resource consent.

### 4.2.2 Soil Validation

Once final required excavation depth is reached at each location (minimum 0.7m and 0.9m for TP217 and TP209 respectively), soil validation samples shall be collected by the CLS (or personnel trained by the CLS) along the base and sides of the excavations at locations TP209 and TP217. Samples shall be sent for chemical laboratory analysis. Samples from location TP209 shall be analysed for polycyclic aromatic hydrocarbons (PAH) and total petroleum hydrocarbons (TPH). Samples from location TP217 shall be analysed for heavy metals (arsenic, cadmium, chromium, copper, lead, nickel and zinc).

The results of the validation sampling shall be assessed against the NES Soil Contaminant Standards for commercial/industrial outdoor worker (unpaved) land use.

The CLS shall determine whether any further excavation is needed, depending on the results of the validation sampling and whether the human exposure pathway to any

remaining deep soil contamination will be incomplete during and after construction of the Project.

Validation results shall be recorded in the Site Validation Report.

### 4.2.3 Post-excavation procedure

Upon completion of excavation works, particular care shall be taken to clean and decontaminate all plant and equipment used at 55 Rata Road prior to it leaving site. Water from wheel washes shall be collected and disposed of to sewer in accordance with trade waste consent conditions from KCDC. Loose soil on equipment shall be brushed off onto a tarpaulin and the soils transferred to a truck containing contaminated soils being transported to landfill.

## 5 Roles and responsibilities

Section 3.1 of the CEMP details the roles and responsibilities associated with managing the Project. Specifically the Environmental Manager and Construction Manager shall take responsibility for the implementation of the CSMP(HH) including training personnel in the required procedures, the coordination of monitoring work by contaminated sites specialists and decision making in the event of discovery of unexpected potentially contaminated material. The Environmental Manager is responsible for liaison with KCDC.

A CLS shall be engaged by the Project team to monitor, supervise and report on all works that may disturb contaminated land. Tasks include the following:

- Coordinate contaminated land assessments and testing;
- Advise on classification of excavated material for reuse and disposal;
- Coordinate contaminated groundwater management and disposal; and
- Train staff in contaminated land identification and control procedures.

## 6 CSMP(HH) review

This section describes how the CSMP(HH) shall be reviewed, including looking at the controls and procedures to make sure that they are still applicable to the activities being carried out

The CSMP(HH) shall be updated, with the necessary approval, throughout the course of the Project to reflect material changes associated with changes to construction techniques or the natural environment.

The review shall take into consideration:

- Any significant changes to construction activities or methods.
- Key changes to roles and responsibilities within the Project.
- Changes in industry best practice standards or recommended health and safety controls.
- Changes in legal or other requirements (social and environmental legal requirements, NZTA objectives and relevant policies, plans, standards, specifications and guidelines).
- Results of: inspection and maintenance programmes, environmental incidents, corrective actions, and internal or external assessments.

The reasons for making changes to the CSMP(HH) shall be documented. A copy of the original CSMP(HH) document and subsequent versions shall be kept for the Project records, and marked as obsolete. Each new/updated version of the CSMP(HH) documentation shall be issued with a version number and date to prevent obsolete CSMP(HH) documentation being used.

# 7 References

Kirkby, C. Construction Air Quality Management Plan: CEMP Appendix G, Volume 4 of the MacKays to Peka Peka Expressway Project AEE.

Ridley, G. Erosion and Sediment Control Plan: CEMP Appendix H, Volume 4 of the MacKays to Peka Peka Expressway Project AEE.

Smith, G. Assessment of Land and Groundwater Contamination Effects: Technical Report 23, Volume 3 of the MacKays to Peka Peka Expressway Project AEE.

Smith, G. Contaminated Soil and Groundwater Management Plan, Appendix K CEMP of the MacKays to Peka Peka Expressway Project AEE.

Smith, G. Assessment of Land and Groundwater Contamination Effects: Addendum Technical Report 23a.

Appendix A

# Contaminant Risk Register

## Risk Evaluation:

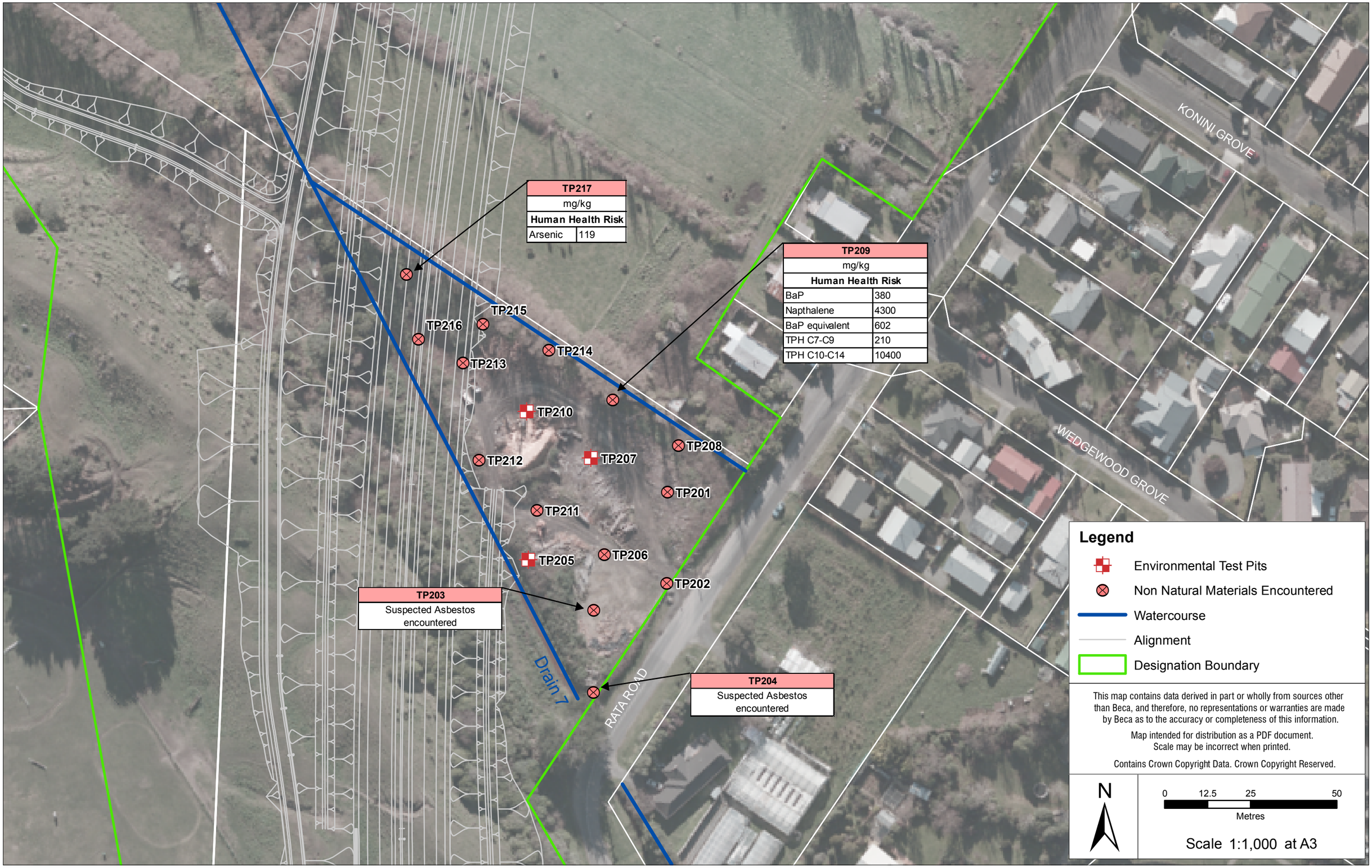
| | |
|---|---|
| **Likelihood of finding the contamination** | Likely or Unlikely |
| **Consequence** | Minor: Low harm to human health |
| | Moderate: Some harm to human health |
| | Major: Severe harm to human health |
| **Risk** | Low, Medium, High |

| Sample Location | Soils<br>Exceeds Background | Exceeds Human Health Risk Concentrations | Non-natural Materials | Likelihood of Finding the Contamination | Consequence | Risk | Mitigation Controls Required |
|---|---|---|---|---|---|---|---|
| South – (RAU-IHA) – 55 Rata Road | | | | | | | |
| **TP203** | As, Cd, Cr, Cu, Pb, Ni, Zn | No | Yes, suspected Asbestos Containing Materials (ACM) | Likely | Minor | Low | Hazard minimisation procedures (Section 3) and site control procedures (Section 4). If ACM suspected, follow procedure in Section 3.2 of CSGMP. |
| **TP204** | As, Cd, Cu, Pb, Ni | No | Yes, suspected Asbestos Containing Materials | Likely | Minor | Low | Hazard minimisation procedures (Section 3) and site control procedures (Section 4). If ACM suspected, follow procedure in Section 3.2 of CSGMP. |
| **TP209** | Cd, Cr, Cu, Pb, Ni, PAH, TPH | PAH, TPH | Yes | Likely | Moderate | Medium | Strict compliance with hazard minimisation procedures (Section 3) and site control procedures (Section 4). Strict environmental controls to prevent contamination dispersion (see CSGMP). |
| **TP217** | As, Cd, Cr, Cu, Ni, Zn, PAH, TPH | Arsenic | Yes | Likely | Moderate | Medium | Strict compliance with hazard minimisation procedures (Section 3) and site control procedures (Section 4). Strict environmental controls to prevent contamination dispersion (see CSGMP). |

| Central Zone (MAZ-OT) – Otaihanga Project Yard | | | | | | | |
|---|---|---|---|---|---|---|---|
| **All locations within Project Yard** | Assumed range of contaminants | Potential for health risk | Yes | Likely | Moderate | Medium | Excavated materials **shall** be disposed of to landfill. |

Appendix B

# Map of Contaminants Exceeding Guideline Values – 55 Rata Road

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Notes:

| Revision. | Amendment. | Verified | Date |
|---|---|---|---|
| A | CONTAMINANTS MAPPED | AYF | 03/05/13 |

NZ TRANSPORT AGENCY
WAKA KOTAHI

Project:
**MACKAYS TO PEKA PEKA EXPRESSWAY**

Title
Contaminants Exceeding Guideline Values
Sector 2: 55 Rata Road

Status:
Document ID:
Rev.
Drawing No:
GIS-3320901-93
A

Appendix C

# KCDC Review Comments

**KCDC REVIEW OF Contaminated Soils Mangement Plan: Human Health [CSMP(HH)]**
**Reviewed by: Rita O'Brien**
**Date of Review: 13 May 2013**
**Signature of Reviewer:**

| *Condition Reference* | *Condition Summary* | *KCDC Reviewer's comment* | *Page/paragraph/section reference within Management Plan* | *Management Plan Author's response* |
|---|---|---|---|---|
| | | What is the trigger for applying for regulation 9 consent(s)? | 1.1 Purpose, pg 1, paragraph 6 ... *'written to support Land Use Consent - Disturbance of soil containing contaminants NSP 12/01.002 for 55 Rata Road … also written to support possible future land use consents for sites conservatively indentified as requiring Controlled Activity consent under Reg 9 of NES'.* | The trigger is volumes of disturbance in each case. Controlled Activity consents are required for the 6 sites listed in Table 1. These consents are being applied for by NZTA. Should there be any other as yet unidentified contaminated sites along the route, then these will be assessed under the NES and consents applied for where triggered under this legislation. |
| DC.9 | certification of requests for amendment | DC.9 requires the request for amendment be submitted in writting to Manager for certification at least 10 working days prior to any changes taking effect - should be certification not comment. | 1.1 Purpose, pg 2, paragraph 1 …*'A copy of the revisions of a material nature shall be passed to Kapiti Coast District Council (KCDC) for comment.* | Amendments to wording made. |
| NES.2 | management of risk posed by contaminants to human health | add *'eye protection'* to list of procedures | 3.1 Hazard minimisation procedures, pg 4, paragraph 1 | Amendments to list made |
| NES.2 | management of risk posed by contaminants to human health | content limited to soils only - discussion of the management of contaminated ground or surface water is defered to ESCP (CEMP Appendix J) and section 3.1.4 of CSGMP. The ESCP is silent on the subject of contaminated water/sediment and yet to see CSGMP. While I understand why the CSGMP and CSMP(HH) are presented as two separate documents, I suggest that the CSMP(HH) could be included within the CSGMP as one document. | 3.2.4 Stormwater and sediment controls, pg 5, paragraph 1 | ESCP provides general overview of ESCP measures. CSGMP section 3.1.4 has specific details regarding specific erosion and sediment control measures for contaminated land parcels. CSMP(HH) deals with soils only to limit the overlap with CSGMP. KCDC have been provided with the CSGMP for comment in relation to this particular matter (Brydon Hughes). The decision to prepare separate management plans was discussed and decided a while ago, and the intention is for them to remain separate. |
| NES.2 | management of risk posed by contaminants to human health | suggest it may be helpful to list relevant clauses in guidelines as Appendix to Management Plan. | 3.2.5 Asbestos Control, pg 5, paragraph 2 … '*in accordance with Guidelines for the Management and Removal of Asbestos (revised 1999) for the Department of Labour, and the Health & Safety in Employment (Asbestos) Regulations (1998)* ' | Rather than appending copies of legislation to this management plan, it is preferred that when the need arises then the most recent version of legislation is sourced directly. This avoids out-of-date legislation being used. |

| | | | | |
|---|---|---|---|---|
| | | more detail required - include procedure for disposal of contaminated wash water - settlement, filtration of sediment and how it will enter sewer (pump station / lateral / manhole) - talk to Travis Wood (Asset Manager water/wastewater) - an alternative could be to divert to sediment retention pond servicing site but may need to think about separating grease/oil. | 3.2.8 Post-excavation procedure, pg 6, paragraph 1 and 4.2.3 Post-excavation procedure, pg 7, paragraph 1 , … collection and disposal of contaminated wash water to sewer with consent from KCDC. | Understand a trade waste consent may be applied for for the works which should specify the requirements prior to sewer disposal, in agreement with KCDC. We would prefer that this detail (currently unknown volumes, contaminant levels) is managed via consent rather than pre-empting requirements in this management plan. Clarification added to these sections to make this clear. |
| NES.2 | management of risk posed by contaminants to human health | suggest added to end of clause ix … '*in accordance with Guidelines for the Management and Removal of Asbestos (revised 1999) for the Department of Labour, and the Health & Safety in Employment (Asbestos) Regulations (1998)* ' | 4.2.1 Earthworks procedure for 55 Rata Road, pg 7, clause ix | Suggested changes made. |
| NES.1 | NES.1 expected standard of remediation | what criteria are we validating to - suggest this is provided as appendix to Management Plan for all potentially contaminated sites - would also be helpful if all initial test results could be reproduced in appendix | 4.2.2 Soil Validation, pg 7, paragraph 2 ...'*The CLS shall determine whether any further excavation is needed …* ' | Soil validation sampling is only likely to be required for 55 Rata Rd given the human health risk. All other sites investigated only pose a low risk to human health and therefore are unlikely to require soil validation testing. The investigation data is available in the Technical Report appendix if required. Wording inserted into section 4.2.2 identifying NES commercial/industrial land use soil contaminant standards will be used to assess validation samples. At 55 Rata Road, should contamination levels remain probematic once the final construction excavation depth is reached, an assessment will be made by the CLS as to whether further digging is required, or whether the human exposure route will be eliminated as the soils will be buried beneath the expressway. |
| NES.2 | NES.2 (iii) standard of remediation on completion | what criteria are we validating to - suggest this is provided as appendix to Management Plan | 4.2.1 Earthworks procedure for 55 Rata Road, pg 6, paragraph and 4.2.2 Soil Validation. pg 7, paragraph 1/2 | Wording inserted into section 4.2.2 identifying NES commercial/industrial land use soil contaminant standards will be used to assess validation samples. |
| NES.3 | | management plan silent on condition G.33 trigger? | | Additional sites listed in G.33 have been investigated, with the technical report appended to the CSGMP. Where those investigations have triggered control under the NES, then these sites are listed in Table 1 of the CSMP(HH). |

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| | | management plan silent on Otaihanga landfill and construction yard? | | The works being undertaken to form the Otaihanga Project Yard on Otaihanga Landfill have been assessed in the technical report appended to the CSGMP. The works are a Permitted Activity under the NES and do not require consent. H&S controls will be in place during the works, and these will be outlined in the Construction Health and Safety Plan. |