Inaugural Sustainability Meeting

18th June 2007 Law Society, Chancery Lane, London





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INAUGURAL SUSTAINABILITY MEETING

AGENDA

18 June 2007

9:30 - 10:00 Refreshments

10:00 – 10:30 Introductions and welcome

Who is present, their objectives for the day, overview of the day by the Chair.

10:30 - 10:45 The context

How can remediation take its own account of climate impact - Jane Forshaw

10:45 - 11:30 Our success criteria

Small group work to agree two /three success criteria for judging sustainability in remediation with a plenary to share, compare and prioritise to agree four or five.

11:30 – 11:45 Refreshments

11:45 – 13:00 Presentations of examples of developing good practice

- Regulator Perspective Brian Bone, Environment Agency
- European Perspective Innovation, Policy and Costs for Remediation Hans Vanduijne, TNO
- Industry Perspective, National Grid's Sustainability Calculator Frank Evans, National Grid
- US Perspective, US SURF & Duponts sustainability estimation tool David Ellis, Dupont
- USEPA Pilot Trials Deborah Goldblum, USEPA
- R & D Sustainability Accounting Tool Philippa Scott, Shell & Stuart Arch, WorleyParsons Komex

13:00 - 13:45 Lunch

13:45 – 14:10 Risks and Opportunities 'walk'

14:10 - 15:00 How do we organise for success?

Further group work to explore what is required to achieve the success criteria – what needs to be done, who needs to do it and by when

15:00 - 15:15 Refreshments

15:15 – 16:00 Final plenary Whole group to consider overarching

16:00 - 16:30 Next steps and close



CONTAMINATED LAND: APPLICATIONS IN REAL ENVIRONMENTS



Sustainable remediation - a regulator's perspective

Brian Bone - Principal Scientist (Remediation)



Two words - first word

Sustainable
Context?
For/to whom?
How to measure - generic or specific?
Timescale?
Learning process - monitoring?



Second word

- Remediation
 - Technology
 - Generic indicators
 - Performance, carbon, energy, waste/resource
 - Strategy?
 - Indicators?
 - Carbon, energy, waste/resource
 - Timescale (durability)



Decision support

- Current/previous initiatives (knowledge & tools)
 - SUBR:IM
 - SNOWMAN
 - EURODEMO
 - Others
- Scale/detail required
 - Single small site
 - Major industrial complex
 - Urban river basin



My perception of needs

- Multi-level (tiered)
 - Data sheet to expert system
- Key indicators
 - One Planet Living
 - Directives (water & soil frameworks)
 - Waste/resource streams (incl. emissions)
 - Cost benefit
 - Timescale
 - People
- Feedback loop



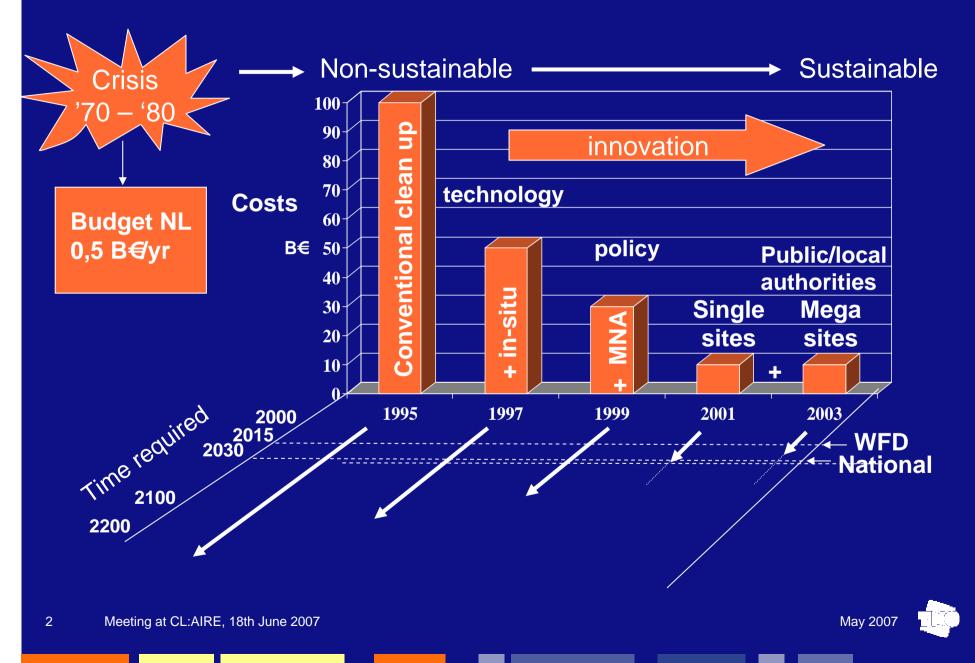
Innovation, policy and costs for soil remediation

TNO | Knowledge for business



Resarch centre on soil and water quality management Reserved to the solution of the solution

Innovation, policy and costs for remediation



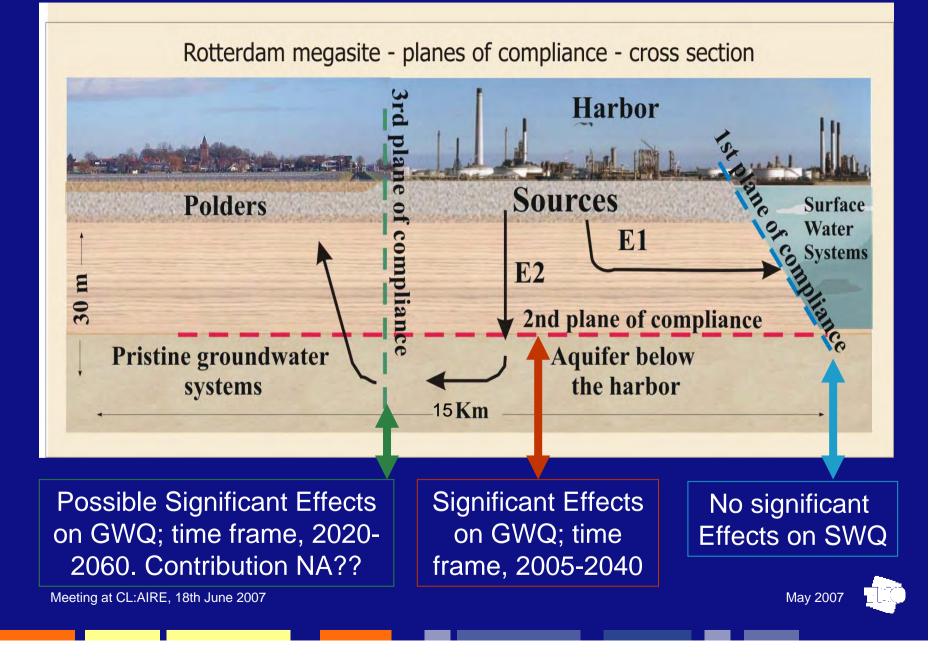
Innovation

- Technology
 - ➤Use "natural" cost-effective technologies:
 - MNA
 - in situ biotechnology
 - Split in source and plume management
 - Coherent remediation concept approach
- Policy
 - >1987: normative legislation
 - 2006: risk-based "system-oriented" legislation added (stable endsituation, groundwater plume management in line with GWD)
 - >Near future: integrated remediation and management programmes:
 - Megasites (Kempen, Rotterdam Harbour,)
 - Clusterized approaches (dry cleaning sector, metal industry, etc...)





Result regional risk assessment Rotterdam Harbour



Lack of confidence in-situ remediation technologies

- Relatively small; site remediation is still too a large extend based on use of non-sustainable and too expensive technologies
- Local authorities and (small) company site owners <u>feel</u> uncertain about in situ and MNA technology
- Service providers do not always contribute to take these feelings away
- To break the chain, a new innovation programme is initiated: "On the job learn-and-experience programme for local authorities and site owners with respect to sustainable site remediation".
- Holland In-situ Program (HIP):
 - >24 pilots using In Situ Technologies and MNA
 - Support on working processes (interactions between site ownerconsultant-contractor-local authority-regulating authority)



Why Holland In-situ Program (HIP)?

Growing attention in (sub-)urban brownfields to:

- Provide building space in a densely populated area
- 600.000 contaminated sites, 90% in urban environment
- Ministry of Environment adjusted its policy for the soil remediation plan until 2030
 - Adopting risk based approach: only the "immediate risk" sites to be remediated

May 2007

- Risk driven clean-up plan:
 - 15.000 high priority risk sites, in 10 years
 - 60.000 risk carrying sites, in 30 years
- Shallow contamination needs to be remediated;
 - Targets made flexible (land use, costs and risks)
 - Industrial sector oriented programs
 - From 900 to 2000 sites/yr remediated

HIP setting

Bottlenecks applying in-situ techniques

- In-situ techniques not fully matured
- In-situ techniques insufficiently demonstrated in back yard
- No standardized approach to remediate common situations
- Mind set of competent authority/regulators lacks confidence in in-situ techniques:
 - "Outcome uncertain and risks difficult to manage"
 - Insufficient flexibility to deal with risks and uncertainties
 - Processes (authorisations etc.) with soil remediation too complex (many stakeholders, red tape)
 - Lack of knowledge and experience at daily practice level



What is HIP?

- Duration 3 years, 24 in-situ pilots, 5 pilots have started
- 10 contracting firms with financial contribution
- Biological-, physical-, and chemical technologies and combinations
- Development of standardized in-situ technologies for situations with a high occurence (a high repetition factor, low costs, good market position)



Towards standardized reliable and accepted in-situ technologies: the "Holland In Situ Demo" project (HIP).

	Occurrence (% of total)	
Contaminant type (C)	C.1 Chlorinated Hydrocarbons	45
	C.2 Aromatics/Oil/MTBE/Cyanide	45
	C.3 Other	10
Geo-hydrology (G)	G.1 Permeable (sandy)	45
	G.2 Layered, permeable and impermeable layers	45
	G.3 Other	10
Built Environment (B)	B.1 Urban	70
	B.2 Industrial	25
	B.3 Other	5



HIP Matrix

Pilot archetype Group 1	Pilot archetype Group 2
2500 sites	2500 sites
C.1 Chlorinated HydrocarbonsG.1 Permeable soilB.1 Built Environment (urban)	 C.1 Chlorinated Hydrocarbons G.2 Layered, permeable and impermeable layers B.1 Built Environment (urban)
Pilot archetype Group 3	Pilot archetype Group 4
5000 sites	3500 sites



"Combining bitter and sweet"

- Trends:
 - Increased land ownership by project developers in new urban areas
 - From a public-oriented planning system to a integrated stakeholder-oriented system
 - Public-Private Partnership
- Approach:
 - Transferring money from commercially viable sites to marginally viable sites
 - Combine "Greenfield" with "Brownfield" development in compensating twinning projects



Industry Perspective: Sustainability Calculator

Monday 18 June 2007 UK Sustainability Meeting

Frank Evans National Grid Property



National Grid Perspective - Landowner

- Manages environmental risks associated with its gasworks portfolio (both surplus and operational land) and electricity-related sites.
- Historical use of sites
- Remediation programme sustained for 10 years
- Sale of surplus property and significant contribution to UK Brownfield regeneration
- High % materials re-use in remediation programme
- Leading user of remediation technologies
- Member organisation of SAGTA



Surplus and Operational land: Differences

- Surplus land
 - Development potential
 - Effective transfer of liabilities
 - Closure with regulator prior to site sale
 - Concentrated and shorter remediation timescales
 - Land value is a factor
 - Developer confidence
 - Provision of warranties
 - Ex-situ remediation approaches
 - UK National Grid

- Operational land
 - Retained land-holding
 - Retention of associated liabilities
 - On-going regulator agreement
 - Longer remediation timescales
 - Land value less important
 - Plant and equipment remediation constraints
 - In-situ techniques
 - Both US & UK National Grid

Remediation Options Appraisal

- Remediation Design process require Remediation Options Appraisal
- ROA required to justify 'internal approval' to spend statutory provision. Remediation option agreed by programme mgr.
- Expectation of regulator and part of CLR 11
- National Grid Approach
 - Site Characterisation inputs
 - Assessment of Site-specific Factors
 - Constraints and Development of Remediation Objectives
 - Preliminary assessment of remediation options
 - Detailed assessment of remediation options

Example of Constraints Analysis

Project Timescales	e.g. Delivery by agreed sale date (note that this should be an iterative and 2-way consideration with the selection of remediation strategy influencing the agreement of a realistic sale date)
End-use	e.g. Residential across entire site Known zones for mixed residential/commercial Current use as operational compound
Operational issues	e.g. PRS overlies known tar tank sources Gas pipe crosses known tar tank sources (cost/benefit analysis of plant relocation may also require consideration)
Site factors	e.g. Area (vacant and operational), topography, access, vegetation, areas of hard-standing, Surrounding land-uses. Underlying strata type. Nature of contaminants
Relevant Stakeholders view	e.g. Client preference for source removal. Neighbouring properties in contact with SPH concerning cross-boundary issues. Regulator requirement for groundwater quality criteria. Planning restrictions on hours of operation
Cost	Minimise with reference to above factors
Sustainability	Maximise with reference to above factors

Conceptual Example of ROA Output

	Viability	Sustainability	Cost		
		C02	Waste	Local	
Landfill as	Yes	Road haulage to	20%	Least. Shorter	£1.4M
hazardous		Teesport from site CO2 emissions for job = 2X kg		site works	
Bioremediate	Yes	Local disposal.	20%	High-Medium.	£1.2M
to non-haz and		C02=Xkg		Long site works	
dispose					
Thermal desorption	Yes	CO2 emissions = 2X kg	90%	Highest/PR management. Long site works	£1.5M
Landfill tar tanks & S/S	No - Residential target prevent use	CO2 = 1.5X kg	80%	-	£1.2M
Bioremediate for re-use	No - Residential target prevent use	-	-	-	-
Soil washing	No -Soils too fine	-	-	-	-



Remediation Impact Assessment Tool

- How do we measure 'sustainability' elements of a project?
- Spreadsheet-based tool that consultants can use to assess sustainability of different remediation options
- Worley Parsons Komex have been commissioned to development tool to aid consultant with ROA process



Environmental Aspects

ISO 14001 requires identification of aspects

Local

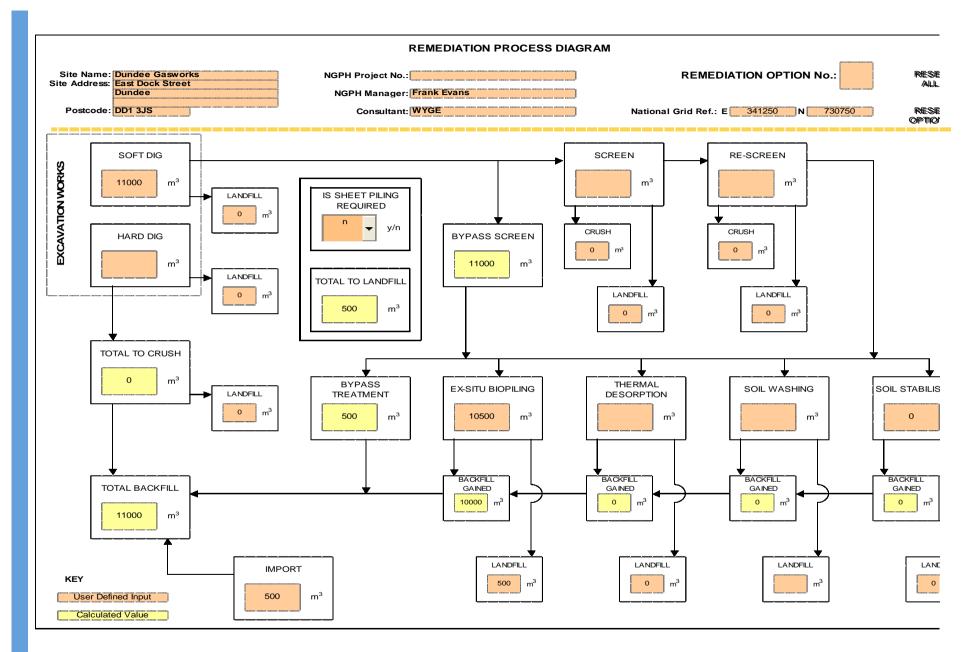
- Noise
- Dust
- Vibration
- Odour
- Regional
 - CO2 emissions (kg)
 - Waste re-use (%)



Remediation Techniques

- Landfilling,
- Screening/sorting
- Soil washing,
- Ex-situ bioremediation,
- Direct-fired thermal desorption,
- Solidification/soil stabilisation.
- Why? because they represent most projects in programme and contribute to current targets. More in future





										1	
SITE DATA											
Dundee Gasworks		NGPH Project No.:					I			DEM	DIATION O
East Dock Street									REMEDIA		
Dundee			NG	PH Manager:	Frank Evans						
DD1 3JS				Consultant:	WYGE				National Grid Ref.:		
					Landfill	Options					Import
KEY					Volume	Landfill/	Distance				Volume
					(m ³)	Quarry ID	from Site (km)				(m ³)
USER DEFINABLE INPUT			Dis	sposal Site 1:	500	Teesport	350		Inert import Site 1:		500
			Dis	sposal Site 2:					Inert import Site 2:		
VALUE DERIVED FROM PROCESS DI	AGRAM		Dis	sposal Site 3:					Inert import Site 3:		
						W	ORKS TOTA	JS			
Area Type - residential, commercial or industrial?	Residential	•	Total Excavation Volume	11000	m ³	Total Volume To Landfill		m ³	Reuse & Recycle	95	%
PROCESS ASSESSMENT DATA											
	C	GROUNDWORK	S				MENT	1		DISPOSAL	
	Soft Dig	Hard Dig	Piling	Screen	Crush	Ex-situ Biopiling	Thermal Desorption	Soil Washing	Soil Stabilisation	Load to Landfill	Disposal Haulage
Is process required? (y/n)	у	n	n	n	n	у	n	n	n	У	у
Estimated Duration of Process (weeks)	6					24				1	1
Treatment Volume(m ³)	11000					10500				500	500
Material Odour Ranking	<mark>3 - mod -</mark>			_		3 - mod 🔫	_	_	•	3 - mod	n/a

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	n/a n/a n/a	emissions (Kg) emissions (Kg)	n/a n/a	n/a n/a	n/a n/a	n/a n/a		60948.1 4126.4	9730.3 658.8	n/a
	n/a n/a n/a n/a	emissions (Kg) emissions (Kg) emissions (Kg)	n/a n/a	n/a n/a n/a	n/a n/a	n/a n/a n/a	n/a n/a	4126.4	658.8	n/a
	n/a n/a n/a n/a	emissions (Kg) emissions (Kg) emissions (Kg) iculate emissions (Kg) issions Totals consumption (L of dieset)	n/a n/a	n/a n/a n/a	n/a n/a	n/a n/a n/a	n/a			
	n/a n/a n/a n/a 79342 246754	emissions (Kg) emissions (Kg) emissions (Kg) iculate emissions (Kg) Issions Totals	n/a n/a n/a 79342 246754	n/a n/a n/a 15868 49351	n/a n/a 32171 100052	n/a n/a n/a 3217 10005	n/a n/a 10646 33109	4126.4 2697429 7430614	658.8 445553 1232663	n/a
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How do you use output?

- Company Objectives include:
 - Maximise materials re-use
 - Minimise impact on Climate
 - Maximise land value
 - Minimise costs
 - Safety performance is high priority
- Challenges for project and programme managers in balancing all of the above



The easy project to select!

	Option A1	Option A2	Option A3
Materials Re-use	\odot	\odot	$\overline{\mathbf{S}}$
Climate impact	\odot	$\overline{\mathbf{S}}$	
Local Impact			\odot
Land Value	\odot	\odot	\odot
Cost of project	\odot		

The harder decision to be made!

	Option B1	Option B2	Option B3
Materials Re-use	:	\odot	$\overline{\boldsymbol{\bigotimes}}$
Climate impact	\odot	\bigotimes	
Local Impact			\odot
Land Value	(\mathbf{i})	\odot	\odot
Cost of project			

Safety Performance

- Unreliable to use predictive tool
- Road traffic statistics give a reliable indicator of risks associated with road travel
- Construction statistics do not take into account remediation technology selection or Company H&S cultures
- Need a reliable dataset to use effectively otherwise unrealistic predictions
- Communications challenge in selecting projects that are predicted to have 'higher' safety risk irrespective of environmental gains and cost savings

Next Stages

- Roll out model to supply chain for their consideration in remediation design process
- Refine and validate model based on measured site data (e.g. fuel consumption, local complaints)
- Consider adding further aspects and remediation techniques in later versions
- Evaluate internal decision making as a consequence
 - Wider view: Environment-Economic-Society balance
 - Environmental view only



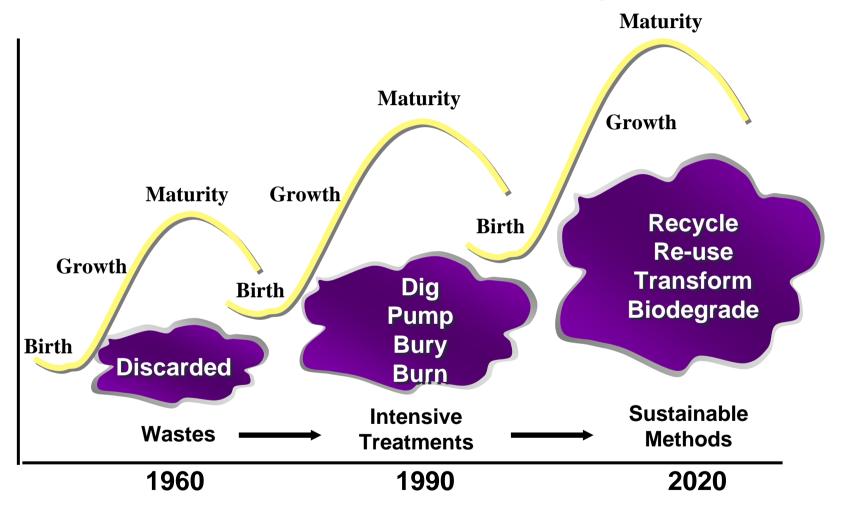
Sustainability in Remediation:

SURF and DuPont

David Ellis DuPont Engineering

CL:AIRE June 18, 2007

How Can We Transform Our Thought Process?





Sustainable Remediation Principles

Our working concepts:

DuPont, in fulfilling its obligation to remediate sites to be protective of human health and the environment will embrace sustainable approaches to remediation that provide a net benefit to the environment.

To the extent possible, these approaches will:

- Minimize or eliminate energy consumption or the consumption of other natural resources;
- Reduce or eliminate releases to the environment, especially to the air
- Harness or mimic a natural process;
- Result in the reuse or recycling of land or otherwise undesirable materials.
- Encourage the use of remedial technologies that permanently destroy contaminants



Sustainable Remediation Forum (SURF)

Mission Statement:

To establish a framework that incorporates sustainable concepts throughout the remedial action process, that provides long-term protection of human health and the environment, and that achieves public and regulatory acceptance

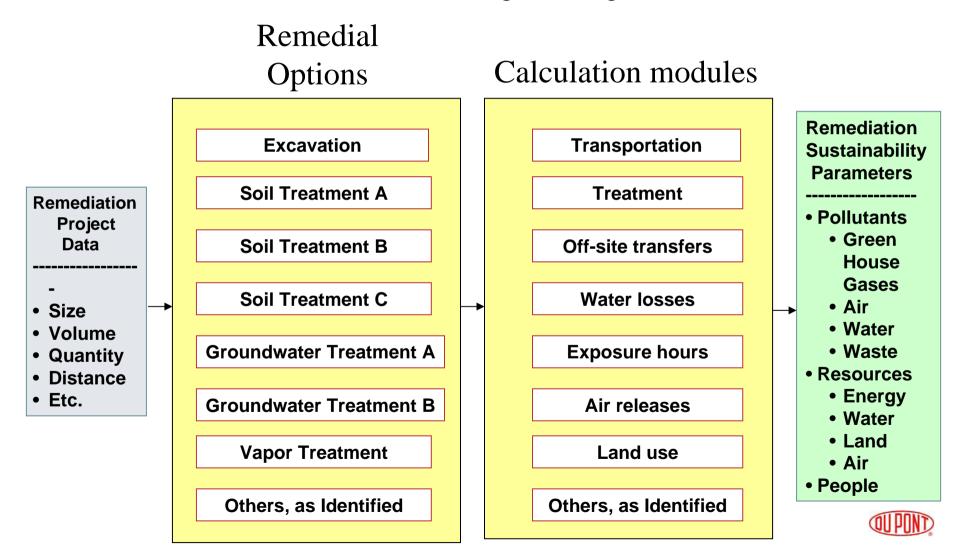


Sustainable Remediation Forum (SURF)

- •A discussion group facilitated and hosted by DuPont
- A core group of highly motivated participants has evolved
- SURF shares perspectives, experiences, site-specific examples
- DuPont, British Petroleum, Canadian National, Dow, ERM, Roux, Dept of Energy, GeoSyntec, Honeywell, National Grid, Shell, Terra Systems, URS, NJIT, USEPA, SERDP, CA EPA, DNREC, UK Environment Agency, British Geological Survey, CL:AIRE, Univ. of Edinburgh. Anyone is welcome
- Met November 13, February 8, May 10. SURF-4 will be August 22 & 23 at NJIT, SURF-5 November 28 & 29 at California EPA
- Meeting records publicly available



DuPont's Conceptual Framework for Sustainability Analysis



Sustainability Analysis Modules Available

- Constructed Wetlands
- Excavation & Landfill
- In-situ Aerobic Stimulation
- In-situ Reductive Dechlorination / Bioaugmentation
- Ex-situ Stablilization
- Off-site GW Disposal
- On-site GW Disposal
- Geomembrane Cap
- Bioventing
- Landfill Bioreactor
- Stabilization

- Off-site Haz Waste Disposal
- Off-site Waste Disposal
- On-site Haz Waste Landfill
- Slurry Wall
- Soil Cover / Cap
- Spray Irrigation
- ZVI / Clay
- SVE
- Catalytic Oxidation
- Surfactant Flushing
- Pump and Treat



Future Sustainability Analysis Modules

- Permeable Reactive Barrier
- Sediment Removal
- Sediment Capping
- Sediment Covers
- Soil Washing
- Chemical Oxidation
- Electro-osmosis
- Air Sparging w SVE
- In-well stripping
- MNA

- In-Situ 6-Phase heating
- In-Situ Steam Heating
- Horizontal Wells
- Phytoremediation
- Dual-phase Extraction
- Others.....



Proposed Sustainability Credits and Debits

Media or Impact	Credit (+)	Debit ¹ (-)
Greenhouse Gas (CO ₂ equivalents)	 Sequestration in-situ Sequestration by plants Destroying GWP equivalents 	 Generated by fuel consumed during activity Generated by manufacture of consumables Vegetation removed Ex-situ contaminant destruction
Resource Use		1
Soil	 Reused-recycled soil or soil- substitute Improved soil usability 	 All soil required Off-site disposal Sterilized sterilized
Land	 Unrestricted reuse Restricted reuse – i.e. renewable energy or brownfield Wetlands created or upgraded 	 Permanently deed restricted Permanent access restriction
Water	 Restored aquifer or surface water Reused-recycled 	 All water used or captured for treatment Water for dust control Used for ongoing O&M (i.e. grass)
Air	Odor control	 Contaminant emissions PM10 and PM 2.5 & acid rain compounds
Energy Use	 Renewable energy used for remedial action Renewable energy production 	 Required by remediation activity Required for manufacture of consumables
Occupational Risk	Controls or measures to reduce hazardous exposure	 Exposure hours on-site Exposure hours for travel or delivery of consumables

Brief Real World Examples



Source Area Quantities

Areas	Acreage	Depth, ft	Volume, CY
Landfill-A	28.2	42	1,910,832
Landfill-B	20.0	20	645,333
DNAPL Area	6.2	40	400,107
Northern Basin Area	26.7	10 - 15	567,087
Western Fill Area	30.1	20	971,227
Southern Fill Area	14.5	20	467,867
Total	125.7		4,962,452
Unimpacted Area	11.3	-	
Total	137.0	-	4,962,452



Measures of Sustainability and Reduction

	Excavation	Stabilization	Bioventing
Destruction In-situ Mobility Toxicity Volume	No No	No Yes	Yes Yes
Tons CO ₂	2,700,000*	920,000	190,000*
Exposure Hours Highway Miles	4,900,000 56,000,000	540,000 8,000,000	82,000 1,000
Odor Light PM10, tons	High High 50,500	Moderate Moderate 7,200	None None 24

Martinsville- DNAPL Remediation

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60 days Duration 5,300 Man hours **Zero Valent Iron** 225 ton 340 ton Kaolinite 445 ton **Kiln Dust** Asphalt and Sub-base 886 ton Water 240,000 gal Gallons of fuel 9,900 gal 0.5 acre, 20 ton CT \$900,000 \$500,000 if optimized

Martinsville- DNAPL Remediation

A Policy Question: Can destruction of global warming or ozone depleting chemicals become an incentive for source treatment?

Example data:

CCI ₄ Destroyed:	20 tons
CO ₂ Emissions:	664 tons
GWP of CCI ₄ :	2,540
GWP of destroyed CCI ₄ :	50,800 tons
Net CO ₂ including GWP destruction:	-50,136 tons
Actual cost:	\$ 900,000
Net CO ₂ credit at \$4/ton:	\$ 200,544
Net CO_2 credit at \$25/ton:	\$1,253,400



Some Process Observations

- Only remedies that are fully protective of human health and the environment should be considered
- Considering sustainability changes thinking
- Engineers work together more closely, improved quality
- Some unexpected and very creative remedies have been proposed
- Some remedies are less costly, others about the same
- Processing remedies and sustainability with agencies leads to a faster consensus on which remedies to seriously consider



What Sustainable Remediation Is – and What It's Not

It is:

- A thought process with luck it is inclusive and creative
- A method to evaluate local, regional, and global impacts
- A way to express your organization's values and select cleanup methods that are fully consistent with them

It is not:

- A cost containment tool
- A fully developed method
- A regulatory guidance or regulation
- Voodoo





Discussion

