Contaminated site management: the French status

upds
Union des professionnels de la dépollution des sites

Summer school on Contaminated Soils – June 18-22, 2012

Introducing UPDS

1. Principles : the French policy of contaminated sites management
2. Regulatory framework
3. The remediation « methodology »
4. Norms and certification
5. The French remediation market

Introducing UPDS

The UPDS is the French professional union of site remediation companies.

➢ *41 members, organised in two colleges*

ENGINEERING COLLEGE
23 members
70% of the engineering market of site remediation

SITE REMEDIATION WORKS COLLEGE
18 members
55% of the remediation works market

➢ *An estimated >2000 workers and 344 M€ turnover in 2011*

More information on www.upds.org

UPDS's main actions/goals

www.upds.org

Promoting contaminated sites remediation profession gathering the professionals, taking part in – and during –communication events (like the Pollutec fair, trade symposiums…)

Proposing updates to the methodological and regulatory frameworks by contributing to the working groups on the new norms, legal texts, methodologies, and by bringing in our field experience.

Help the expertise progress
by defining the rule of the art :
within the NFX31-620 norm
and the new certification.
Through numerous working
Groups associating, Ministry
of Ecology, industrial facilities,
environmental engineering practices

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1. The French policy of contaminated site management

A. For “historical” contamination, site remediation is based on future use

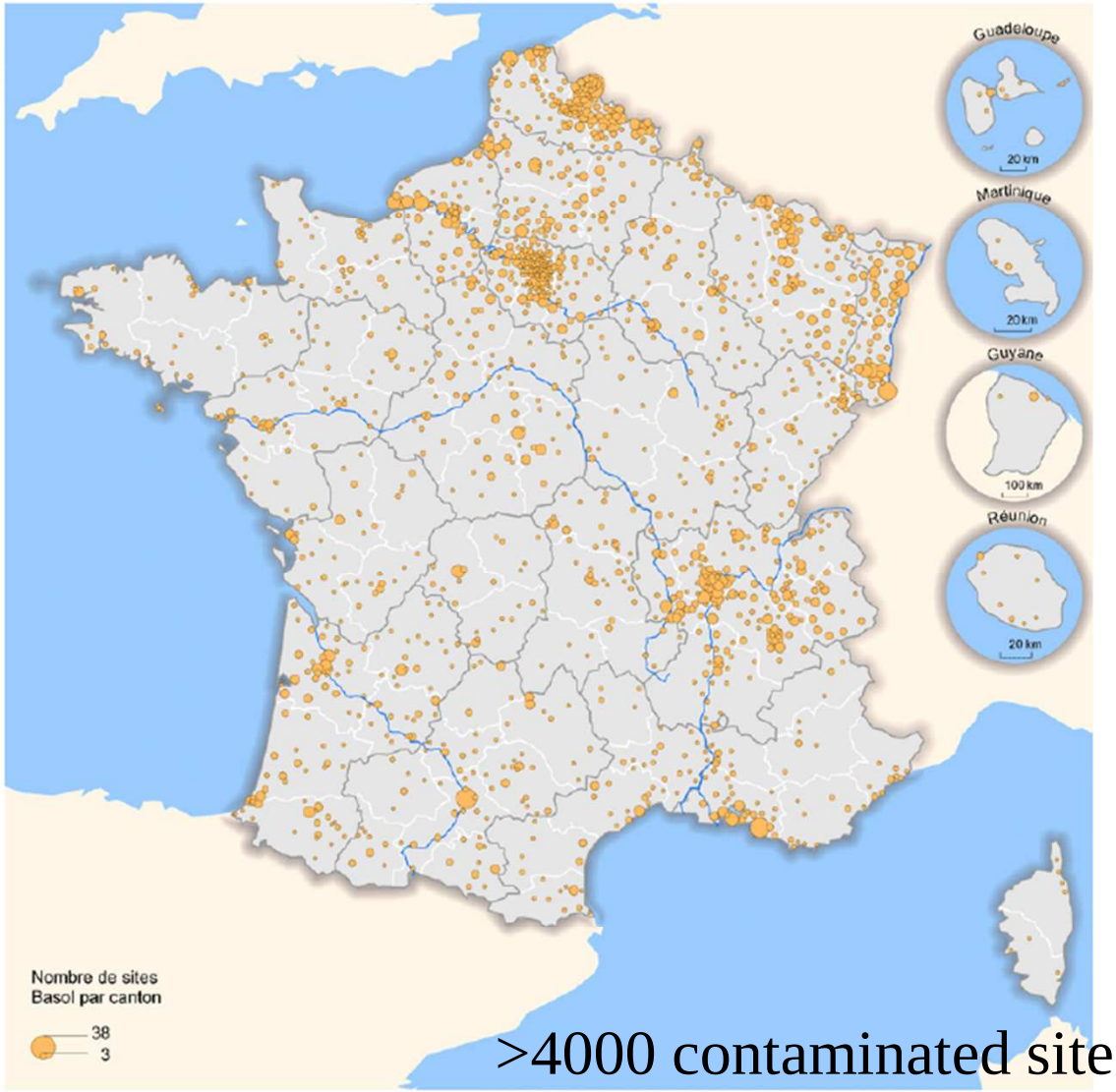
Since beginning of year 2000 “Risk based approach”

>> protection of the health and safety of users/workers

Milestones for contaminated site management in France

- 1992 1st contaminated sites listing?
- 1993 Roadmap
- 1996 Methodological tools (Priorizing-ESR)
- 1999 Health risks targets set
- 2000 Health risk assesment guide
- 2007(8Feb) revamping of methodology….

Les sites et sols pollués en 2009
(sites sur lesquels l'état a entrepris des actions au 9 juillet 2009)



>4000 contaminated sites

Source : Meeddm, DGPR (Basol), 2009.

1. The French policy of contaminated site management

B. Other principles and tools

>> ensuring the security of the sites

>> monitor and management of impacts

>> memory (Basol-Basias)

>> participation - concertation

2. Regulatory framework

A. Overview of the management system : the role of the State

B. « classified activity » sites

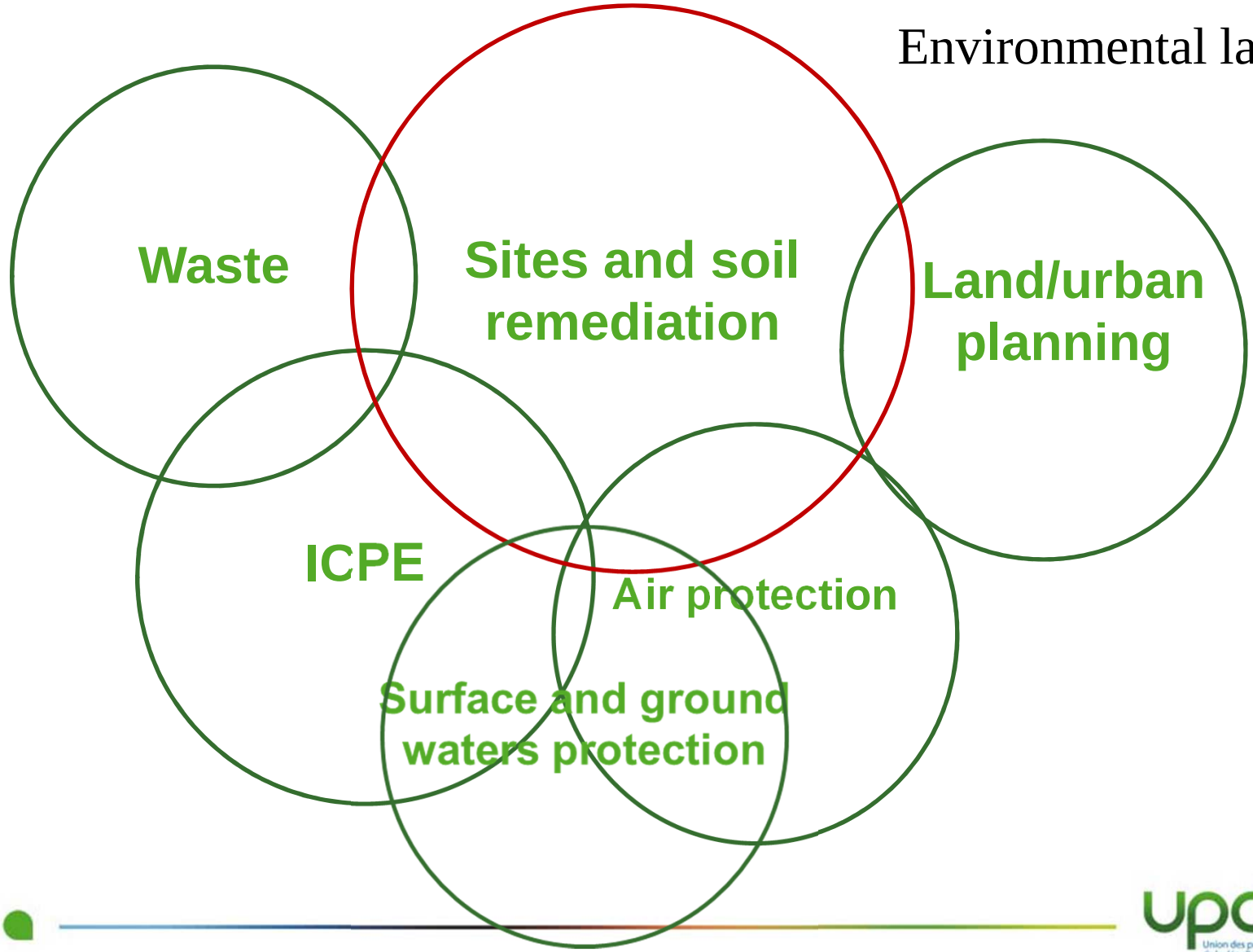
C. Waste regulation

D. Information obligations

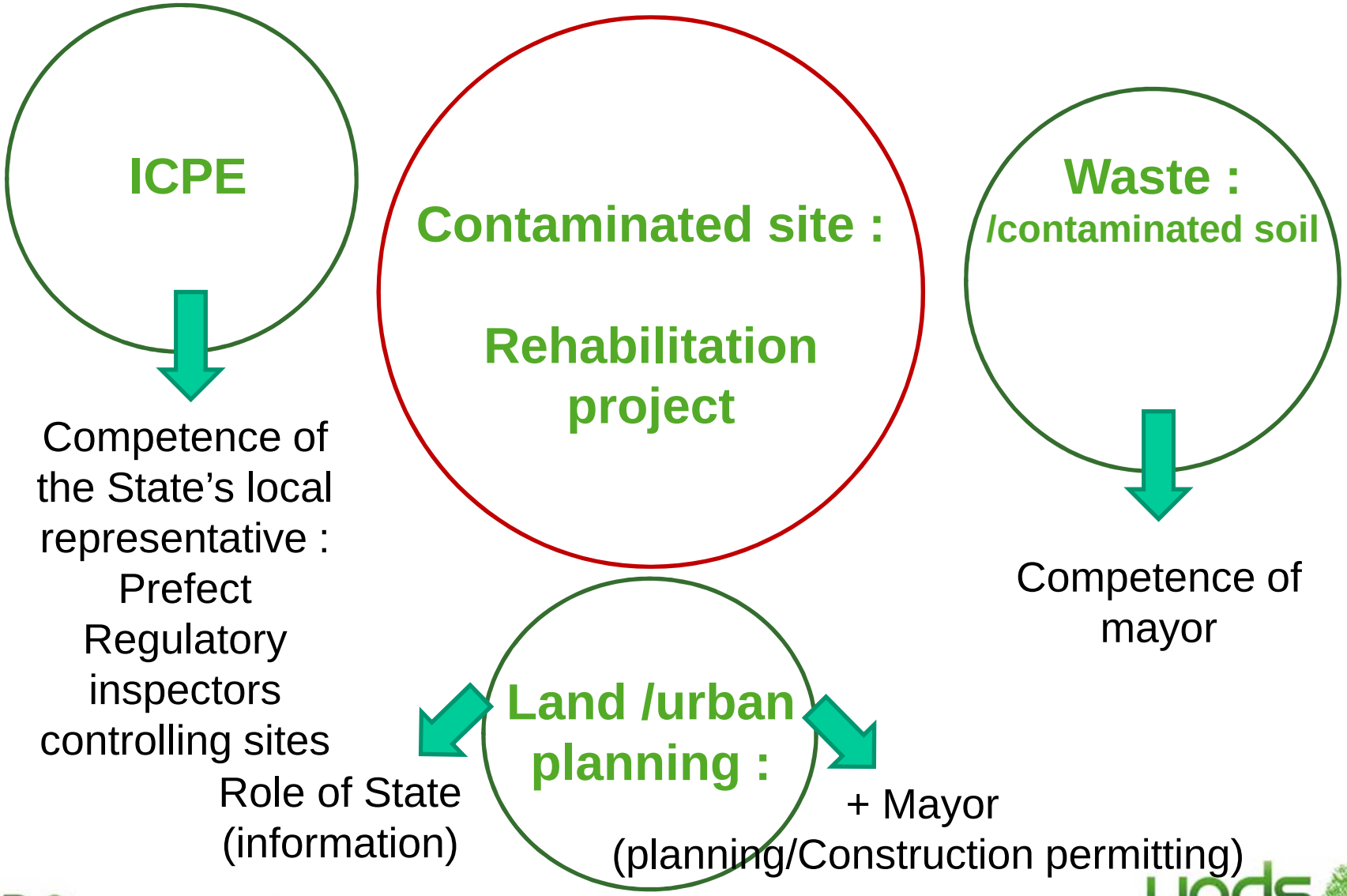
E. Liability and responsibilty for a contaminated site

2. Regulatory framework

Environmental law Code



2. Regulatory framework



2. Regulatory framework

B. « classified activity »contaminated sites management (A/E/D)

a. before the opening of the plant

>> initial status of contamination. “Base line report
Reinforced through IED directive (IPPC sites)

b. Throughout the exploitation

>> monitoring of emissions
prevent accidents/reporting/immediate measures

>> Compatibility with the industrial use must be maintained

c. At the end of exploitation

>> Definition of future use.
Remediation as necessary depending on the ICPE status

… BUT APPLIES ONLY TO 20% OF SITES !!

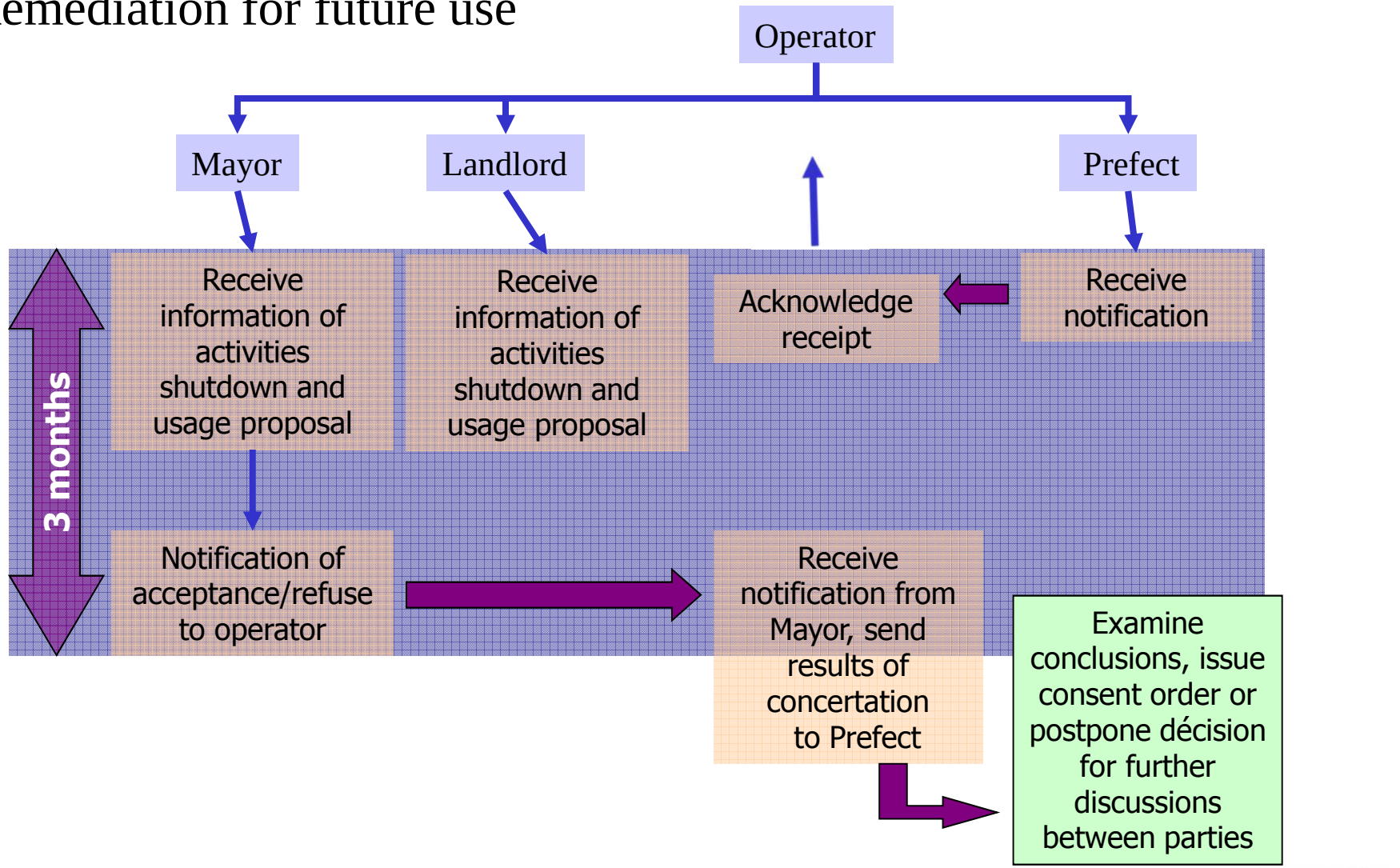
A. Classified installations closing < 1st October 2005

D. Classified installations closing

Remediation for industrial use only

A/E Classified installations closing > 1st October 2005

Remediation for future use



2. Regulatory framework

C. Rules from the Waste regulation

… to manage/dispose off site excavated soils (when they leave the site or imported from another site)

D. Information on the status of the site

a. information published by the state
b. Information of the buyer by the seller ICPE -A

E. Liability and responsibility

a. who bears the remediation costs?
b. What if the operator cannot be identified?
c. Is the owner searched for in terms of responsibility?

3. « New » remediation methodology » 2007

A. Apply to all contaminated sites

- ... and not only ICPE.
- But less binding legally.

B. Two solutions for different situations

a. Management plan

When the status of the site can be worked on.
Definition of the steps necessary for
a change of use

b. Interpretation of the status of the environment

When the site is in use and no intervention is possible
Check compatibility between current use and Regulatory values

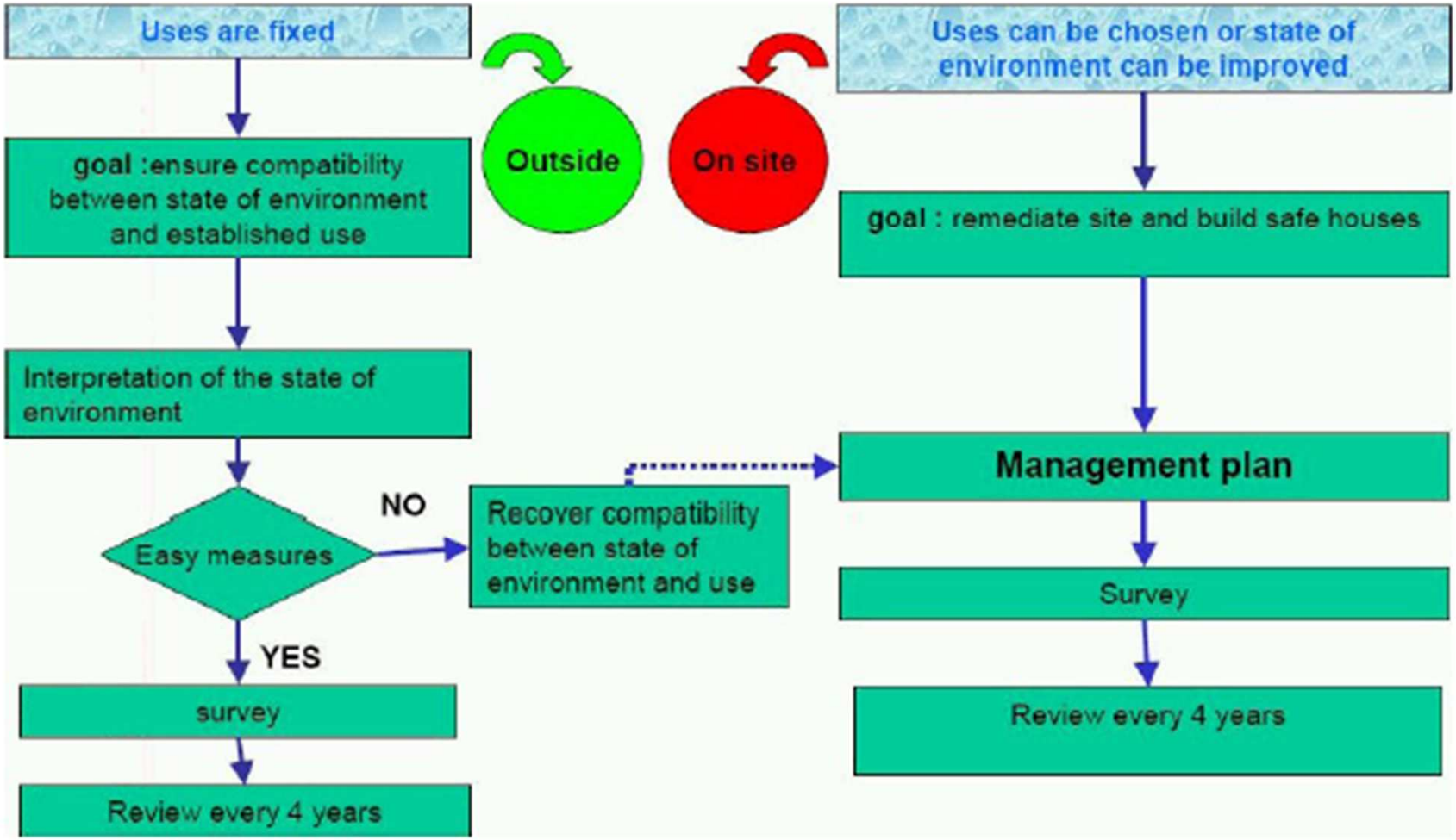
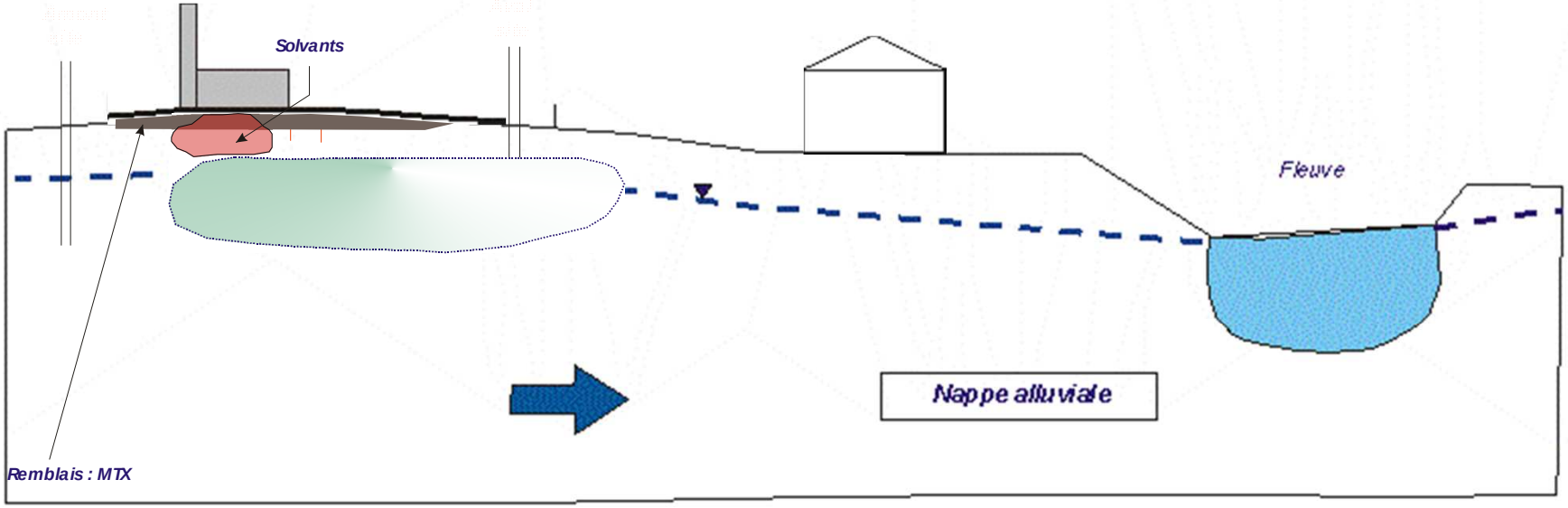
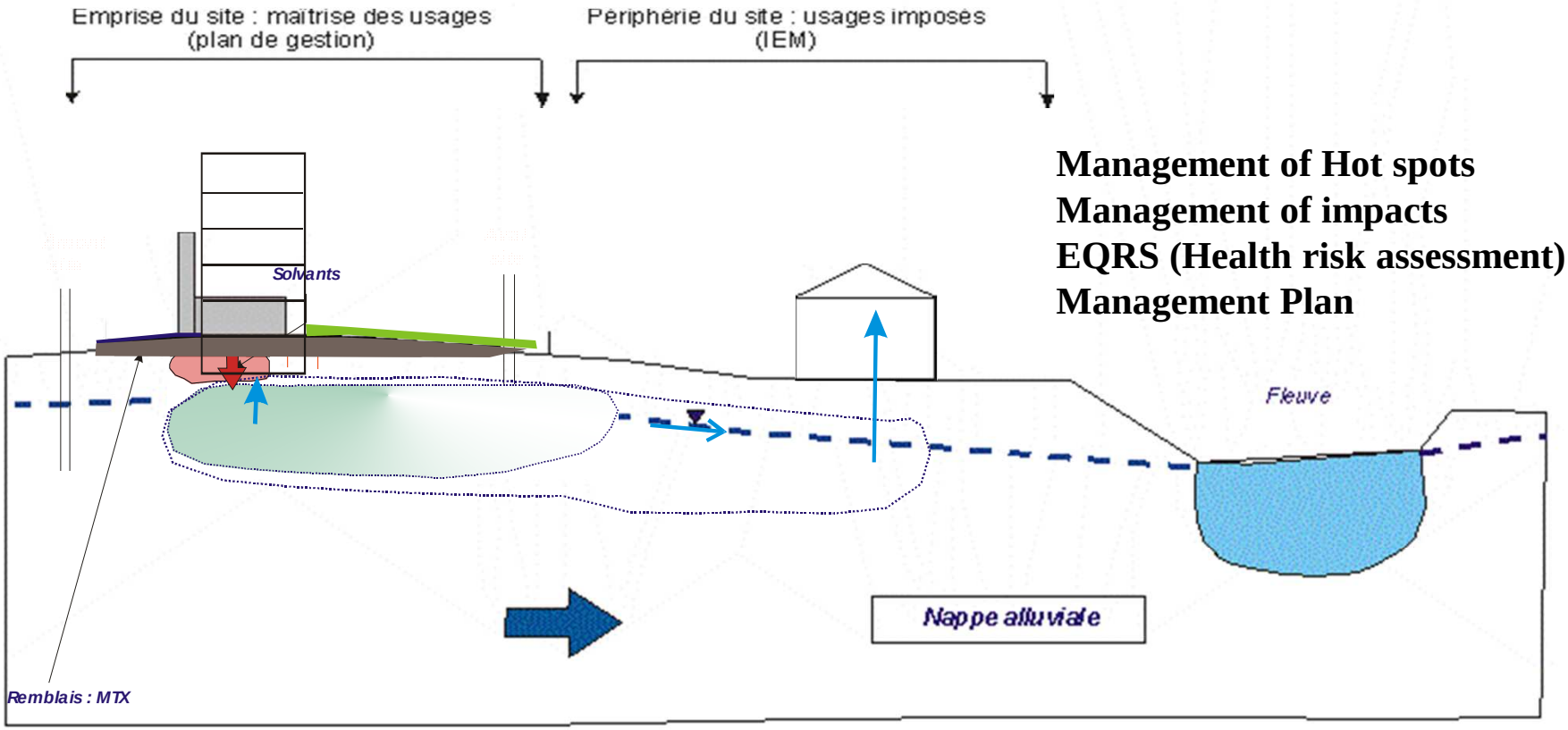


Figure1. The new site management procedures

Methodology/process



Management Plan/I.E.M



Management of Hot spots
Management of impacts
EQRS (Health risk assessment)
Management Plan

3. The remediation « methodology »

C. How it is conducted : tools

- The “conceptual schema”
- Health Risk assessment
- “Cost-benefit” balance
- Analysis of residual risks (ARR)

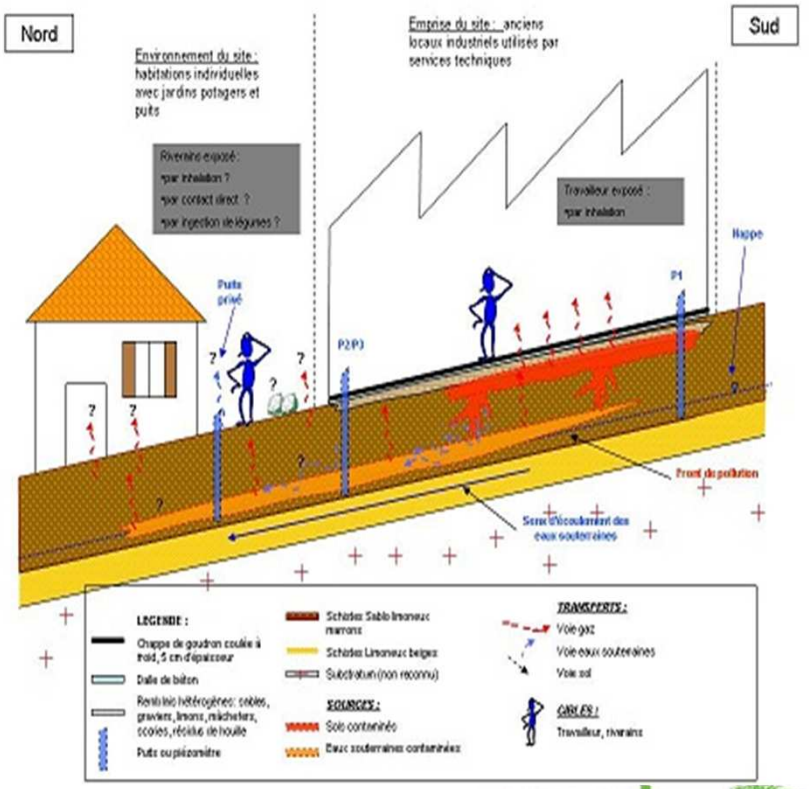
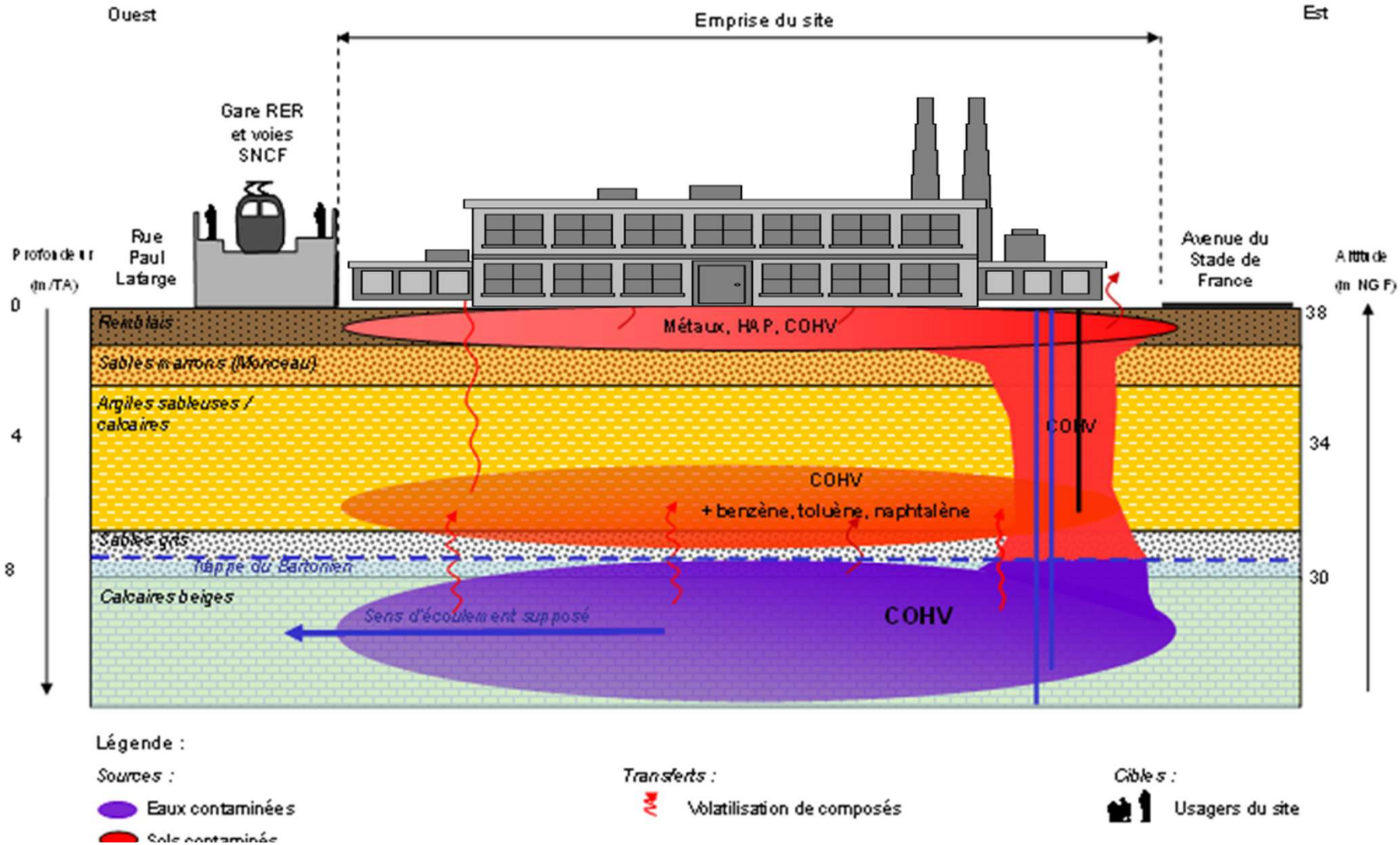
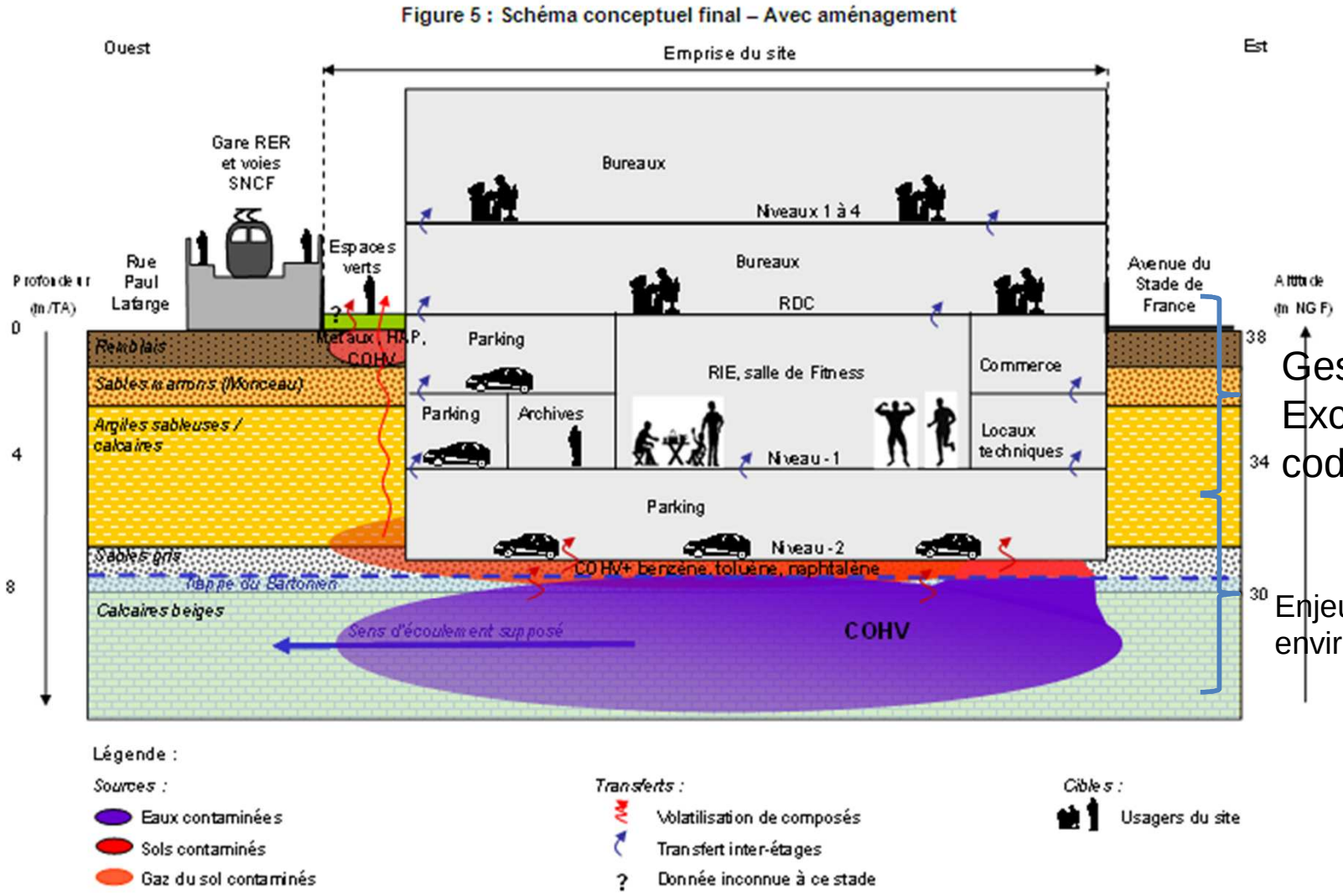


Schéma conceptuel – Etat actuel

Figure 4 : Schéma conceptuel final – Etat actuel



Conceptual Scheme – With Project



Gestion Terres Excavées + code du travail

Enjeux sanitaires et environnementaux

SITE REMEDIATION STAKES

ON Site :

Risk Base Approach

•On site/in situ soil/G.W treatment to reach health risks compatible with future use

Few constraints for on site treatment

•Géographical unity (ZAC, PC contiguous,..)

Soil reuse (not considered wastes) for backfilling, subroad fill/parkings, landscape use,....

Usages Restrictions

OFF-Site :

Waste Regulation

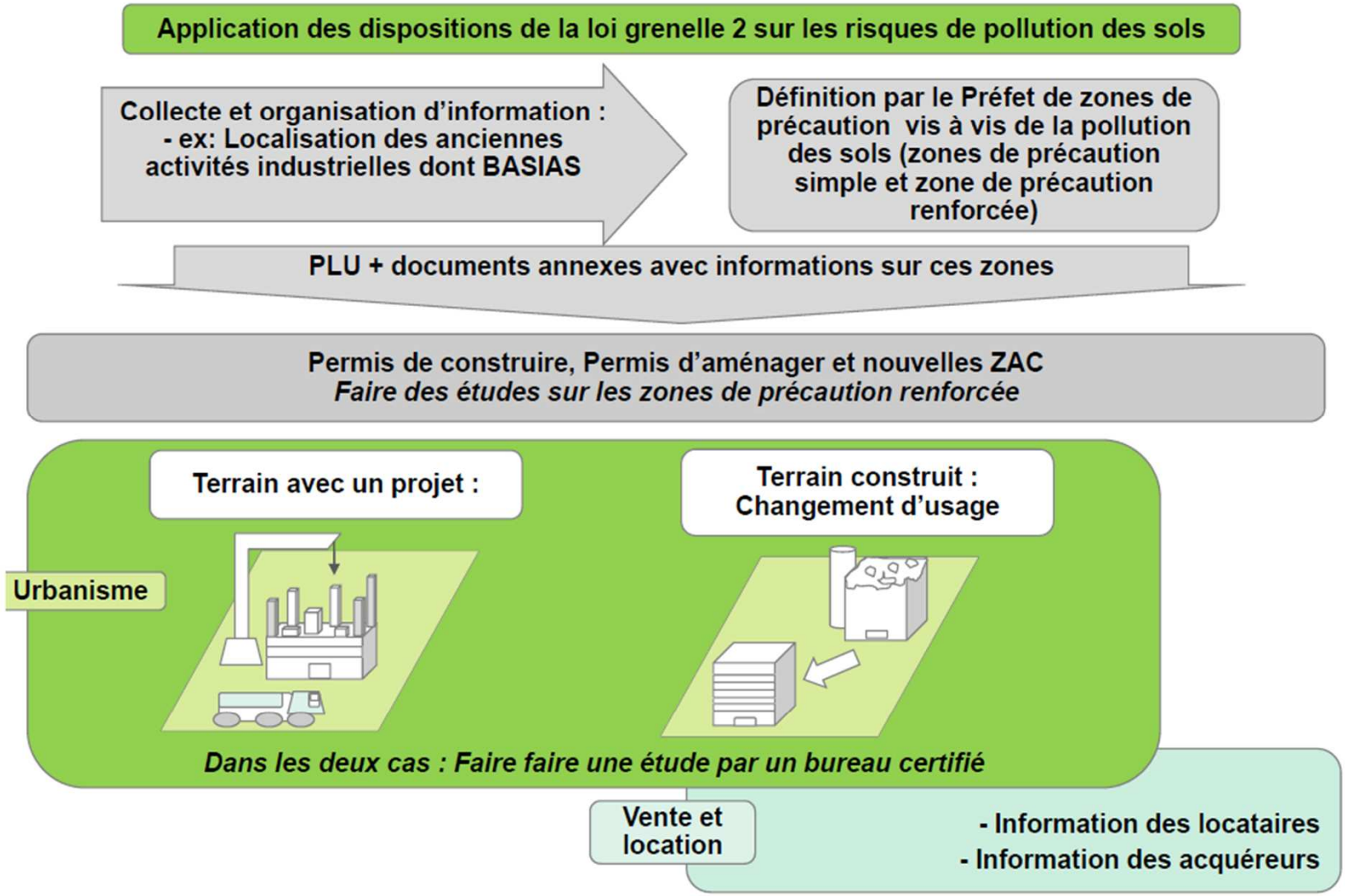
• Off site disposal according to acceptance values

• a) Polluted soils directed to off site regulated treatment plants

• b) non significantly impacted soil (ex: fills, natural soils,..) follow Waste regulation

Excavated soils outcome

Following Grenelle law: Application for land permitting



4. Norms and certification

A. A 4-tier norm

With a general part, and 3 parts differentiated for the activities :

- Studies, assistance and control
- Engineering
- Remediation works

The norms describe the objectives and content of each service, and every deliverable to be handed out to the client.

4. Norms and certification

B. Guaranteeing a high quality of service : the certification

The referential is based on the norm, to guarantee a service that

- meets the clients' needs, taking into account the characteristics of the site and project ;

- while complying with the the profession best practices

Like the norm, it describes in detail the different services that may be delivered.

4. Norms and certification

C. The Certification referential

a. 3 certificates : for the 3 main activities

b. 16 Commitments

Regarding

- The client-service provider relationship :

Attention to client's needs, offer, counsel and information, deliverables, follow-up

- the actual services

An identified contact person, deadlines, staff, equipment, HSE rules, env'l impact

- the service provider's internal organisation

Insurance, subcontracting, confidentiality, conflicts of interest, quality

NFX 31-620

1 norme en
4 parties

1 référentiel
de certification

Remediation
Works

Studies

SERVICE CERTIFIÉ LNE
SITES ET SOLS POLLUÉS
NF X 31-620-2
ÉTUDES, ASSISTANCE
ET CONTRÔLE

SERVICE CERTIFIÉ LNE
SITES ET SOLS POLLUÉS
NF X 31-620-3
INGÉNIERIE DES TRAVAUX
DE RÉHABILITATION

SERVICE CERTIFIÉ LNE
SITES ET SOLS POLLUÉS
NF X 31-620-4
EXÉCUTION DES TRAVAUX
DE RÉHABILITATION

Engineering

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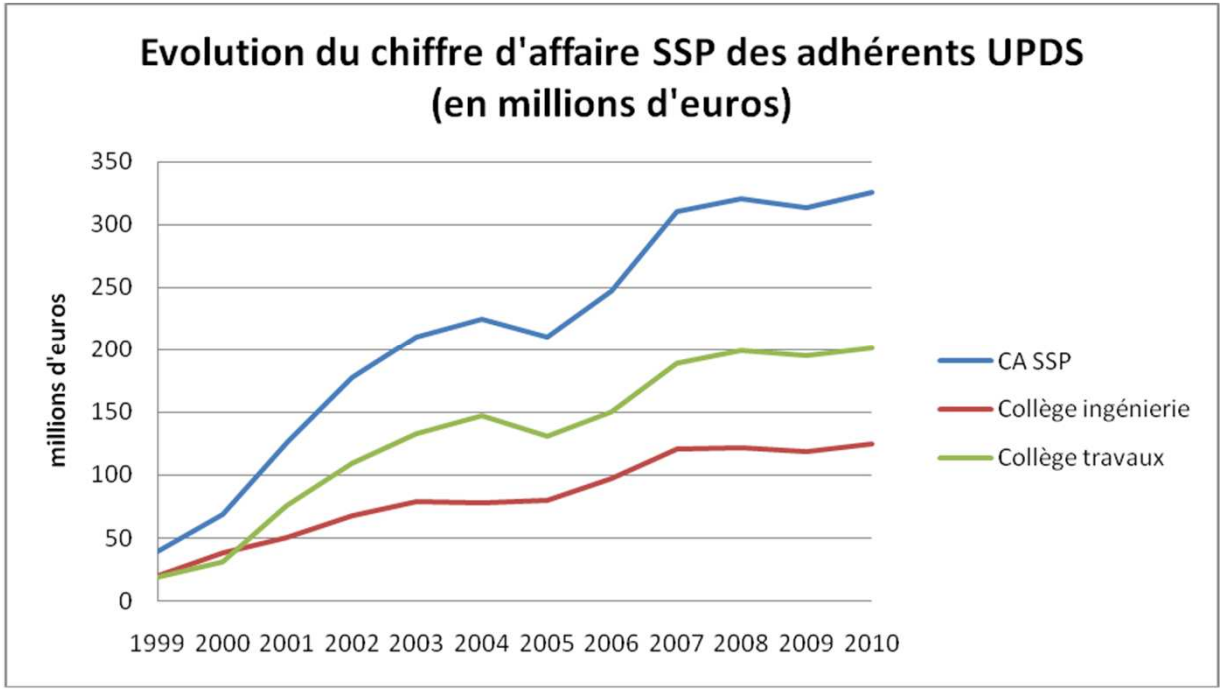
5. The French remediation market

A. Figures – turnover evolution and distribution



5. The French remediation market

A. Figures – turnover evolution and distribution

Fig 2 : distribution of members between the two colleges – 2011

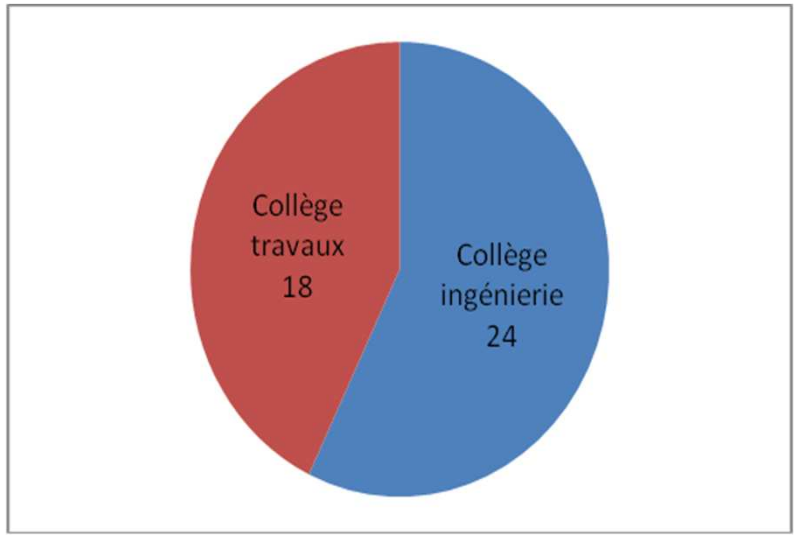
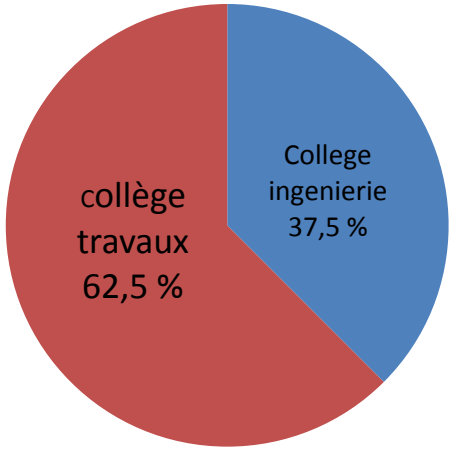


Fig 3 : distribution of turnover between the two colleges – 2011



5. The French remediation market

B. An expertise essential to the preservation of environment in industrial contexts

a. From the opening of a new activity to its end – and even long after

b. A necessity in rehabilitation projects

5. The French remediation market

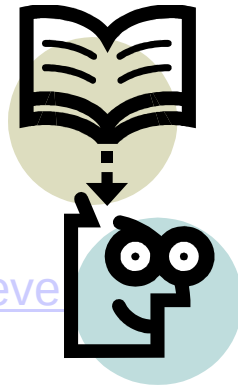
B. An expertise essential to the preservation of environment in industrial contexts

c. The « sensitive sites » campaign

launched by the State in 2010 :
to identify the buildings kindergarden /elementary schools used by more sensitive parts of the population, Built on former industrial sites.

d. An action plan to accelerate the treatment of orphan sites and the rehabilitation of former gas stations (ADEME)

Bibliography



⇒ UPDS : www.upds.org

⇒ Remediation Portal Site (Ministry of Environment) : http://www.developpement-durable.gouv.fr/-Sites-et-sols-pollues-.html

⇒ Guide « aménageurs » : http://www.developpement-durable.gouv.fr/amenagement-et-sites-pollues/accueil.html

⇒ Norme NFX 31-620, parts 1 - 4

⇒ Information on the certification of the site rehabilitation trade (referentials and auditor's guide) on the LNE website : https://www.lne.fr/fr/certification/en_savoir_plus/popup_savoir_plus_sites_sols_pollues.shtml . More info on Qualipol on the UPDS website.

⇒ www.ademe.fr

Guide for impacted soils off-site (One year trial)

BRGM/RP-60013-FR
Février 2012 - (PDF - 1 700 Ko)
Ministère du Développement durable, BRGM, INERIS

Ce guide expose les règles de l'art et les modalités sous lesquelles certaines terres peuvent être réutilisées dans une optique de développement durable, de protection des populations et de l'environnement. Ce guide est issu des échanges du groupe de travail mis en place sur la thématique de la réutilisation des terres excavées, initiés 2009 et ceci en cohérence avec la politique française sur les déchets qui s'appuie sur une démarche durable de la valorisation des déchets.

Le présent guide est mis en application à titre provisoire pour une durée d'un an.

La valorisation des terres excavées est inscrite aux actions nationales 2012 de l'inspection des installations classées qui pourra être mobilisée pour des actions d'information et d'inspection.

Les modalités de la démarche décrite dans le guide pourront être revues à l'issue de cette période probatoire en fonction du retour d'expérience reçu.

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FRANCE PAGES

Thank you for yr attention…