

Effects of Management Philosophy on Remediation (according to Bubba & Bullie)

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Environmental Management Philosophies

- Nonactive (Sleeping Dog) (Forced Remediation)
- Reactive (Anxiety Remediation)
- Proactive (Managed Remediation)

Sleeping Dog Remediation

- Bubba, “Bullie, this is Bubba. I stumbled onto a situation here at Bossier City that might be an issue.”
- Bullie, “Do you know if anyone at the plant is aware of it?”

Sleeping Dog Remediation (continued)

- Bubba, “No, I don’t think so, and if they are they ain’t talking.”
- Bullie, “Well, I don’t want to know any details either. Let’s just ignore it and deal with it if anyone ever discovers it.”

Sleeping Dog Remediation (continued – 6 months later)

- Company CEO, “Bullie, this is John. We need to get a Phase 1 Environmental Assessment on the Bossier City property immediately. We have a chance to sell the property if we can show the buyer there are no environmental issues.”

Sleeping Dog Remediation (continued 3 months later)

- Company CEO, “I know I told you guys I didn’t want to be no tree hugger, but I sure didn’t mean I wanted you to just ignore issues like this. The fact we didn’t clean this mess up when we found it in the first place has cost us over \$10,000,000 from the sale of the facility, not to mention the yet to be determined cost to clean the mess up, and the hassles we are going to have in dealing with the State. We will discuss your jobs latter after I find a good environmental attorney.”

Remediation Anxiety

- Bubba, “Bullie, this is Bubba. You ain’t gonna believe what these idiots at Bossier have done. Apparently they have been letting hydraulic fluid leak out of a pipe to a storm drain for who knows how long. It has created a real mess in the woods behind the plant.”

Remediation Anxiety (Continued)

- Bullie, “We ain’t got any choice except to report it. You got any idea who we should call at the LDEQ? It’s times like this that I wish we had spent a little time getting to know them better.”
- Bubba, “I ain’t got a clue.”

Remediation Anxiety (Continued)

- Bullie, “Do you know any consultants in the area that we might call that would know anyone at LDEQ?”
- Bubba, “No. Procurement told me we didn’t need to be worrying about contracting with anyone until we had an issue.”

Remediation Anxiety (Continued)

- Bullie, “All I know for you to do is call LDEQ and hope we get someone who is reasonable. Let me know what you find out. With the price of corn being so high right now and nobody wanting to spend any money, I think I will hold off on calling our boss or any other senior managers.”

Remediation Anxiety (Continued)

- Bubba, “Bullie, I called LDEQ and talked to someone named LaVerne. She took our site information and said since this was an unauthorized discharge they would have to send a field person out to inspect. She let me know they didn’t take unauthorized discharges lightly and it was very possible there would be some type of enforcement action for this type of thing.”

Remediation Anxiety (Continued 2 hrs later)

- Bubba Nomercy, “Bubba, this is Bubba Nomercy from LDEQ. I understand you guys have a mess up there in Bossier City. Meet me there at 10 am in the morning so we can inspect the situation.”

Remediation Anxiety (Continued next day)

- Bubba Nomercy, “Looks like you guys bought a pig-in-a-poke. This could be a major problem. You are going to have to develop a detailed remediation plan and install up gradient and down gradient monitoring wells to make sure the contamination has not migrated. It is also likely you will be hearing from the enforcement folks after I report back to them.”

Remediation Anxiety (Continued)

A little later...

- Bubba, “Bullie, Mr. Nomercy just left and I don’t think he had mercy on his mind. He seemed to be really ticked off that we didn’t do a better job of preparing for this type of situation before hand so we could respond quicker. I got the idea if we’d had someone lined up and ready to move immediately it would not have been such a big deal. I sure wish I had returned that guy’s call from Cajun Bengal Tiger Remediators.

Managed Remediation

- Bubba, “Bullie, this is Bubba. While completing the initial annual stormwater inspection today at the Bossier City Plant we purchased last year I have discovered an issue that needs immediate attention. Specifically, there is a secondary stormwater outfall at the southwest corner of the property that has apparently had an unknown drain pipe from a hydraulic room flowing to it for an unknown period of time. The outfall discharges into a small drainage way in a wooded area. From the initial look of things there is a considerable amount of hydrocarbon residue for an unknown depth into the soil around the outfall and downstream in the drainage way.”

Managed Remediation (continued)

- Bullie, “Follow the established protocol. Tell the Facility Manager what you have discovered and advise him you are going to contact the LDEQ immediately. Call our contact at LDEQ, and tell him what you have discovered and advise him that we are going to call our remediation consultant/contractor and get them on site immediately. Call Mike at Cajun Bengal Tiger Remediators and have him come out and meet you at the site today if at all possible. After Mike has made his initial assessment develop a strategy with him, followed by a joint call from you and Mike to LDEQ to advise them of the plan of action to be taken. Report back to me as soon as possible. In the meantime, I will advise our boss of the situation so he can set things in motion to let Senior Management know what is going on.”

Three hours later...

Managed Remediation (continued)

- Bubba, “Bullie, this is Bubba. Mike and I have scoped out the situation and it appears we have relatively low level hydrocarbon penetration to a depth of about 3 feet over an area of approximately 400 square feet. We have located a covered concrete pad on the property relatively close to the area. We have advised LDEQ that we plan to excavate the area of obvious impact and move the material to the covered concrete pad for future testing and disposal. Additionally, we advised LDEQ that we plan to take samples of the in-situ soils after the excavation to test for petroleum hydrocarbons to determine if adequate material has been removed to remediate the risk of future problems. LDEQ agrees with our approach and asked that we call him after the excavation is completed and the in-situ soils testing is completed. He indicated he was confident we were committed to a proper cleanup of the area and that he new that Cajun Bengal Tiger Remediators knew what they were doing and would do a good job. He said he saw no reason to visit the site at this time.”

Managed Remediation (continued)

48 Hours later...

- Bubba (to LDEQ), “This is Bubba and Mike reporting back to you on the Bossier City remediation project. We have completed the excavation and tested the in-situ soils. In-situ soils petroleum hydrocarbon levels are well below the guidelines and we are confident we have excavated sufficient soil to eliminate the risk of any future issues related to the discharge. The excavated soils are protected and covered and will be treated and eventually hauled to an authorized landfill when hydrocarbon levels reach acceptable levels. Additionally, the pipe flowing from the hydraulic room has been removed and a sump has been installed to allow pumping of any residual flows or spills from the room to the onsite wastewater pretreatment system that discharges to the local municipal system.”

Managed Remediation (continued)

- LDEQ, “Thank you for the follow-up report. Please send me a brief summary in writing and we will consider this one successfully handled.”
- Bubba, “Will do, and thanks for your confidence in working with us in handling this situation. We don’t like to come across these types of issues but are pleased that our system of knowing the regulators and having our consultants/contractors lined up before hand has worked. Hopefully we won’t have any more of these types of issues, but if we do we will be prepared.”

Remediation Management

- Strong, positive regulatory agency relationships
- Risk assessment to optimize cost effective remedies
- Remediation Strategy Teams

Strong and Positive Regulatory Agency Relationships

- The key to successful management of any environmental project is regulatory interface
- Develop and maintain strong regulatory relationships - building these relationships smoothes and accelerates the remediation process.

Risk Assessment

- A detailed risk assessment provides management with the ability to set environmental priorities based on relative risk

Remediation Strategy Teams

- In-house Partners
- Experienced Local Consultants/Contractors
- Experienced State Consultants/Contractors
- Experienced Environmental Attorneys

Forward to the Future...

- Anticipate likely response needs
- Identify agency representatives to respond to
- Build response oriented relationships
- Assemble professional responders
- Formulate sound responses
- Respond quickly and professionally

Planning for your next
remediation project starts...

NOW