

Supervision and Enforcement on Enterprises in Operation – Self-monitoring and Plans of action

10 April 2019 Elisabeth Omsäter, County Administrative Board of Östergötland

Supervision and enforcement on enterprises in operation

A presentation in three parts

- The project. Self-monitoring and plans of action
Elisabeth Omsäter, County Administrative Board of Östergötland
- Supervision on Enterprises, Case study Trinseo Sverige AB
Michael Werthén, County Administrative Board of Östergötland
- INSURE Strategic management methods for contaminated sites
Frida Nilson, Trinseo Sverige AB

Background

Supervision and enforcement on contaminated sites

PPP - Polluter Pays Principle

The Swedish Environment Code

Self-monitoring



Try out new methods

Structured ways of working with contaminated sites

Conflict between:

Fast actions connected with development and continuous work, long-term planning of action

Prioritise!

Help operators finding tools to handle contaminated sites.

- Self-monitoring
- Take control



Try out new methods

Structured ways of working with contaminated sites

Plans of action

- awareness raising
- make priorities that are satisfactory to enterprises as well as supervisory authorities
- enhance sustainable remediation



Plans of action

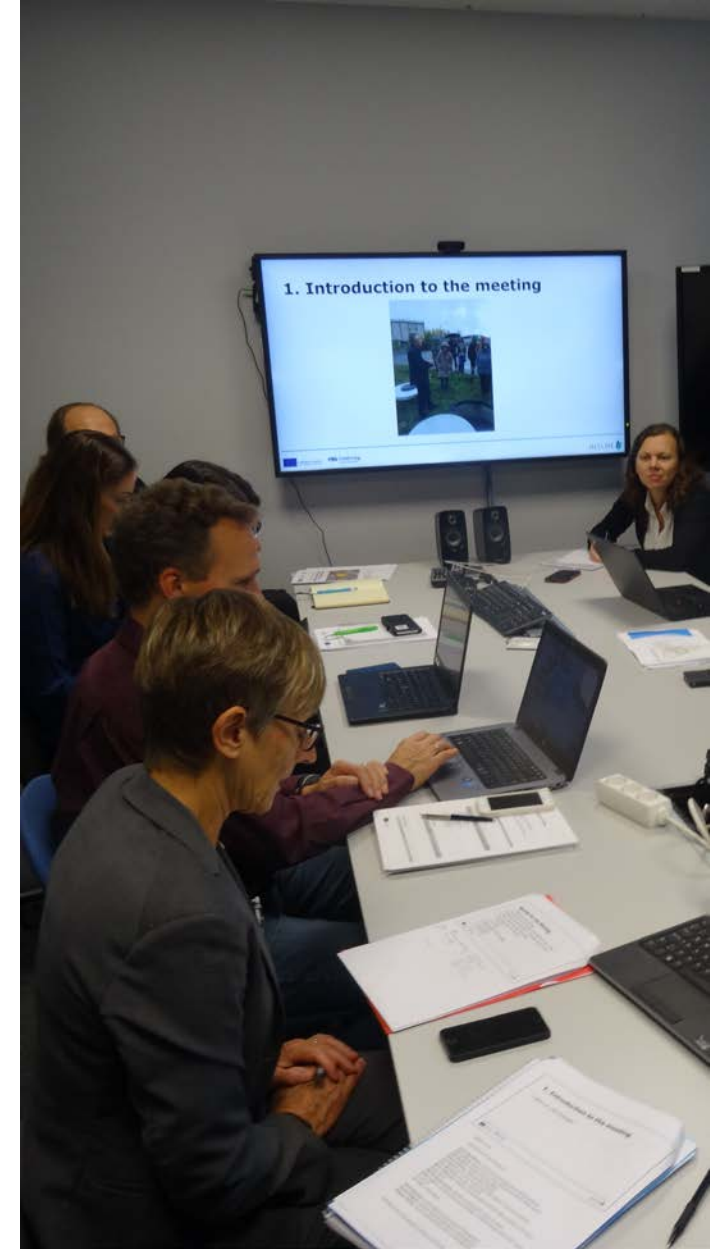
How to make a plan and handle it (according to the INSURE project)

- ❖ Breakfast meeting with operators and supervisory authorities. Information about plans of action.
- ❖ Start-up meeting with each operator and staff from the supervisory authority. Information about plans of action.
- ❖ The operator makes a draft plan of action and sends it to the supervisory authority
- ❖ The supervisory authority goes through the draft to find out if important parts are missing
- ❖ The supervisory authority asks for complementary information, if necessary
- ❖ The operator elaborates a new version of the plan that includes the complementary information
- ❖ The supervisory authority goes through the new version of the plan
- ❖ If the plan is satisfactory for the time being the supervisory authority confirms this in a letter to the operator

Plans of action

How to make a plan and handle it – the short version:

- o Dialogue



Plans of action

How to make a plan and handle it (according to the INSURE project)

- ❖ Both parts – operator and supervisory authority – are satisfied with the result, at present
- ❖ **The plan should be updated continuously when necessary**
- ❖ All changes should be reported annually in the environmental report. Results from the activities.



Plans of action

Contents, a selection of items (1)

- A list with activities that are planned to be carried out during the coming 10 years
- Clearly defined area/areas (land)
- The operator's own view about the most important issues concerning contaminated sites on the plant – statement
- Anticipated future changes within the enterprise



Plans of action

Contents, a selection of items (2)

- Description of the company organization including decisions about financing. Responsibility distribution.
- Description of the connection between the operator's self-monitoring programme and the plan of action
- General information about the site like maps, history, contamination, investigations, earlier remedial actions, geology, geohydrology etc.



Plans of action

A list with activities that are planned to be carried out during the coming 10 years

Activities could be, for example: studies, investigations, remedial actions, material for a liability study, new procedures

- ✓ Information about when each activity will be carried out
- ✓ Justification for why the activities are planned in that order and at that time
- ✓ Costs for each activity
- ✓ Investigations – should be adapted to sustainable remediation
- ✓ Remedial actions – sustainable methods should be chosen

