To: Scott Kluska[skluska@cteh.com]; Roberts, Kris D.[kroberts@nd.gov]; Peronard, Paul[Peronard.Paul@epa.gov]; Rockeman, Karl H.[krockema@nd.gov]
Cc: cmckissack@garner-es.com[cmckissack@garner-es.com]; Casey Anderson (canderson@garner-es.com)[canderson@garner-es.com]; MikeC@redriversupply.us[MikeC@redriversupply.us]; BrandonL@JMACResources.com[BrandonL@JMACResources.com]; dglatt@nd.gov[dglatt@nd.gov]; sradig@nd.gov[sradig@nd.gov]
From: Tillotson, Steve J.
Sent: Fri 8/29/2014 5:04:45 PM
Subject: RE: Red River Supply - Concrete Recycling
Red River Supply Concrete Analysis Summary 20140828.pdf

Scott,

As we discussed in a conference call this morning between you and Brandon Lerbakken of JMAC (a local concrete and aggregate supplier), on reviewing the analysis of the concrete sampled at Red River Supply Fire site, the sample results submitted to the Department averaged 357 ppm DRO, 323 ppm Motor Oil and 22 ppm for GRO. All other parameters measured were adequately low. A copy of the spread sheet I used in this review is attached.

Brandon Lerbakken of JMAC proposed they would crush this concrete to a 1 inch minus gravel type material for use as a sub-base on roads, parking lots and similar sites. The material would, in all likelihood be mixed with other concrete aggregate which is typically applied to a depth of four to six inches as a base for roads and parking lots in normal construction practices. Typical placement would be in a controlled manner, above any water table and would typically be covered with asphalt, concrete or other pavement surfaces. The Department believes the amount of oil remaining after such processing, mixing and application would be de-minimus. The Department supports appropriate recycling of such materials as it saves valuable fuel, reduces road traffic and reduces impact to land resources from mining virgin materials. Concrete aggregate is a widely used construction material with obvious advantages in constructing roads and vehicle traffic areas.

The levels of DRO, MRO AND GRO are low and we have no objection to processing and recycling this stockpile from cleanup and demolition of the Red River Supply site in Williston.

We would ask that you provide us a summary of how much concrete and metal material was finally removed, processed and recycled as well as a discussion of any issues that arose. Any concrete that is not processed for re-use may be disposed as previously discussed. Placement of concrete chunks in flood plains or environmentally sensitive areas is not approved.

If you have any questions, give me a call or email.

Sincerely,

Steve Tillotson

Assistant Director

Solid Waste Program Manager

Division of Waste Management

North Dakota Department of Health

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Please Keep North Dakota Clean

From: Scott Kluska [mailto:skluska@cteh.com]
Sent: Friday, August 29, 2014 11:31 AM
To: Tillotson, Steve J.; Roberts, Kris D.; Peronard.Paul@EPA.Gov
Cc: cmckissack@garner-es.com; Casey Anderson (canderson@garner-es.com); MikeC@redriversupply.us; BrandonL@JMACResources.com
Subject: Red River Supply - Concrete Recycling
Importance: High

Steve,

Per our phone discussion just now with Brandon Lerbakken (JMAC/Indian Hills Disposal) RE: the disposition of the rest of the concrete from the Red River Supply site. You indicated that you are now approving all of the concrete to go to JMAC Resources' concrete crushing/recycling operation at the Indian Hills Disposal landfill in Williston, ND. While on the phone it was explained by Brandon that the concrete is crushed down to approximately a 1"minus size and then is typically used for sub base material in areas such as roads, parking lots, driveways, etc.

Please reply to this email that you are in agreement with this.

Thanks again for working with us to a common goal.

Scott Kluska

Sr. Consultant

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