To: stillots@nd.gov[stillots@nd.gov]; Peronard, Paul[Peronard.Paul@epa.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]; sradig@nd.gov[sradig@nd.gov]; Roberts, Kris D. (kroberts@nd.gov)[kroberts@nd.gov]
From: Scott Kluska
Sent: Fri 8/29/2014 1:12:51 PM
Subject: RE: Red River Supply - Soil Stockpile

Steve,

Thanks for your consideration and approval in this matter. This helps Red River Supply in their efforts to mitigate the incident in a safe, efficient, expeditious and cost effective manner.

Once I have the results back from the characterization sampling, I will forward them to you with all applicable information for your final review and approval to dispose of the soil at the oilfield special waste landfills.

Thanks again for your time.

Scott Kluska

Sr. Consultant

Center for Toxicology and Environmental Health, LLC (CTEH)

5120 North Shore Drive

North Little Rock, AR 72118

Office: 501-801-8500

Cell: 908-399-8875

1-866-869-2834 [24–HOUR ER Help Desk]

www.cteh.com

From: Tillotson, Steve J. [mailto:stillots@nd.gov]
Sent: Friday, August 29, 2014 9:05 AM
To: Scott Kluska; Peronard.Paul@EPA.Gov
Cc: cmckissack@garner-es.com; Casey Anderson (canderson@garner-es.com); MikeC@redriversupply.us; Radig, Scott A.
Subject: RE: Red River Supply - Soil Stockpile

Scott,

Per our phone conversation yesterday, based on the information supplied to date on the Red River Supply site as well as the knowledge of Red River Supply and CTEH of the site, the nature of the waste materials, and the cleanup issues, the Department will consider disposal of the contaminated soils from The Red River Supply cleanup as industrial waste at various oilfield special waste and industrial waste landfills regulated by the Department if the waste soil is sampled and analyzed as follows:

Analyses:

1. Total Petroleum Hydrocarbons – Gasoline Range Organics, Diesel Range Organics, and Oil Range Organics by USEPA Method 8015

2. Ignitability

3. TCLP RCRA Metals.

Frequency:

1 Composite Sample per 1,000 cyds of soil. Each Composite Sample to be comprised of 15 grab samples from various locations from the soil stockpile.

As to how much of this waste may be approved for disposal at specific solid waste facilities, that discussion would hinge on the analytical results, the amount of waste, the amount of extraneous materials (metals, jagged chunks, etc) in the waste etc. as well as the status and operating

conditions at a specific facility. Waste acceptance issues will be between a specific solid waste facility owner/operator and the Department with coordination with Red River Supply's cleanup staff.

Sincerely,

Steve Tillotson

Assistant Director

Solid Waste Program Manager

Division of Waste Management

North Dakota Department of Health

918 E Divide Ave - 3rd Floor

Bismarck ND 58501-1947

P: 701.328.5163

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Email: stillots@nd.gov

Website: http://www.ndhealth.gov/wm/

Please Keep North Dakota Clean

From: Scott Kluska [mailto:skluska@cteh.com]
Sent: Thursday, August 28, 2014 4:08 PM
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
Subject: Red River Supply - Soil Stockpile
Importance: High

Steve,

Per our phone conversation a few minutes ago, I am writing to you to confirm our conversation regarding the analytical requirements to characterize the soil being excavated and stockpiled at the Red River Supply fire site. You indicated that the following parameters will be acceptable to properly characterize the soil to be able to go to one or more of the local E&P landfills (i.e., Dishon's, Gibsons, R360, etc.):

Analyses:

4. Total Petroleum Hydrocarbons – Gasoline Range Organics, Diesel Range Organics, and Oil Range Organics by USEPA Method 8015

5. Ignitability

6. TCLP RCRA Metals.

Frequency:

1 Composite Sample per 1,000 cyds of soil. Each Composite Sample to be comprised of 15 grab samples from various locations from the soil stockpile.

Volume:

You had mentioned that given that we are at the end of the current month (August) that the NDDH would be amenable to allow the E&P landfills to accept more than the 3,000 tons per month limit for this project.

Please reply to confirm this meets your requirements and is acceptable to the NDDH for use by

the E&P landfills for proper characterization of the soil to be disposed of.

Thanks again for your quick review and consideration.

Scott Kluska

Sr. Consultant

Center for Toxicology and Environmental Health, LLC (CTEH)

5120 North Shore Drive

North Little Rock, AR 72118

Office: 501-801-8500

Cell: 908-399-8875

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