To: Roberts, Kris D.[kroberts@nd.gov]; Peronard, Paul[Peronard.Paul@epa.gov]; dcawthon@cteh.com[dcawthon@cteh.com]
Cc: Otto, Justin L.[jotto@nd.gov]; Kangas, Jane K.[jkangas@nd.gov]; Patrick, Dale P.[dpatrick@nd.gov]
From: Washek, Sandra K.
Sent: Wed 7/30/2014 1:57:51 PM
Subject: FW: asbestos Notification form issue for Williston Bldg - Sandi Washek
removed.txt

Paul:

The ND Notification of Demolition & Renovation form is not a permit, it is a notification to the Department that a demolition is taking place. It is information required by the Department to ensure any facility that is demolished or damaged by fire/ natural disaster is tested for asbestos, all regulated asbestos is removed (if possible), and if the asbestos is not able to be removed due to unsafe conditions, than the demolition debris is disposed of in a ND permitted landfill as asbestos-containing.

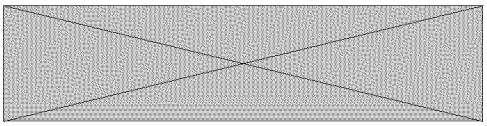
Not all ND landfills will accept or are permitted to accept asbestos containing building debris. Most landfills in the State do not have the equipment or personnel trained to handle asbestos-containing materials.

When the Demolition form is sent to the Department and it is completely filled out and correct, the person who signs the form receives a response letter from the Department, acknowledging that we have received the Notification. The Notification is then entered into a Department database. If a Notification of Demolition is not received by the Department, then the Department would have no record of that demolition ever taking place. This Notification form is required by the ND Air Pollution Control Rules. In this case the Department would waive the 10-day waiting period.

Also, the majority of the landfills in the state that are permitted to accept asbestos will not accept asbestos-containing waste without a copy of the Department acknowledgement letter of the Notification. Some of these landfills have a separate area for disposing of asbestos-containing waste, and the waste must be handled in accordance with the ND Air Pollution Control Rules.

If you have any additional Question on this issue please contact Justin Otto or Jane Kangas at 701-328-5188.

Sandi Washek



Sandi Washek
North Dakota Department of Health
918 E. Divide Avenue
Bismarck, ND 58501-1947
Phone: 701.328.5188
Fax: 701.328.5185
Email: swashek@nd.gov

Confidentiality Notice:

This email message, including any attachment, is for the sole use of the intended recipient and may contain confidential information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email and destroy all copies of the original message.

From: Roberts, Kris D.
Sent: Tuesday, July 29, 2014 9:57 AM
To: Washek, Sandra K.; Otto, Justin L.; O'Clair, Terry L.
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Just passing this on. Questions should be bounced off Paul.

Kris Roberts

Response Lead

Div. of Water Quality

701-328-5236 (o)

701-391-0982 (c)

kroberts@nd.gov

From: Peronard, Paul [mailto:Peronard.Paul@epa.gov]
Sent: Monday, July 28, 2014 5:52 PM
To: Roberts, Kris D.
Subject: Re: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

300.400(e)...no permits required...

From: Roberts, Kris D. <kroberts@nd.gov>
Sent: Monday, July 28, 2014 4:36:50 PM
To: Peronard, Paul
Subject: RE: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Paul:

Bounce that question off Sandi Washek. I think she likes your method better than ours, but still has some hoops Garner is going to have to jump through, including a demolition permit. Looks pretty well demolished already to me though .

(:>)

From: Peronard, Paul [mailto:Peronard.Paul@epa.gov]
Sent: Monday, July 28, 2014 2:56 PM
To: Roberts, Kris D.; jpavlicek@garner-es.com; dcawthon@cteh.com

Subject: Re: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Hey All,

Before we jump too far down the road of NESHAP regulations let's get some samples and see if there is any ACM. If not the handling of the debris will get much easier. If there is ACM it might be worth our while to isolate it with further sampling to minimize where the NESHAP rules apply. I'm not directly familiar with ND regs, but most States have some alternative standards for fire damaged or otherwise structurally unsound buildings.

Paul

From: Roberts, Kris D. <kroberts@nd.gov>
Sent: Monday, July 28, 2014 1:26:27 PM
To: jpavlicek@garner-es.com; dcawthon@cteh.com
Cc: Peronard, Paul
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

John and Dave:

After shoving the question up the line to my office and Paul Peronard, I got back two thing.

1) From Paul Peronard – USEPA OSC – The START contractors, David and Ellie will be tasked with Asbestos inspection. They can probably use some help, as the whole building under NESHAP must be inspected/sampled(?), as it is commercial. So, David, if you can get the your classes and certificate information together quickly, our folks have been told to fast track a ND certificate for you.

2) The email from Sandi Washek, below, goes into the other details that will be applicable to this cleanup of the building materials. I suggest that you direct any questions about that email directly to Sandi.

Kris Roberts

Environmental Response Team Leader

ND Department of Health

Division of Water Quality

918 E. Divide Ave, 4th Floor

Bismarck, ND 58501-1947

701-328-5236 (off.)

701-391-0982 (cell)

kroberts@nd.gov

From: Washek, Sandra K.
Sent: Monday, July 28, 2014 2:09 PM
To: Roberts, Kris D.; O'Clair, Terry L.
Cc: Kangas, Jane K.; Otto, Justin L.; Patrick, Dale P.
Subject: RE: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Kris:

This is the regulations or options the company have when the START Team leave the site. If the START team stay and maintain the site the Asbestos Program still needs a Notification of Demolition for the site for its records.

This information addresses the cleanup of the fire damaged Red River Supply Company Warehouse building located in Williston, North Dakota. Without an inspection by a ND Certified Asbestos Inspector, regulated asbestos-containing materials cannot be ruled out of certain areas of burnt debris because of the physical condition of the debris. Therefore, fire damaged materials must be handled as regulated asbestos-containing materials.

The following conditions must be met while conducting the cleanup operations of the debris that has been identified as suspect asbestos containing:

1. Have at least one North Dakota Certified Asbestos Abatement Supervisor

present at all times during further handling and disposal activities.

2. Plan for work during periods of little or no wind to minimize the likelihood of

wind-borne asbestos fiber spread.

3. Adequately wet the waste material, if above 32 degrees Fahrenheit, and

maintain wet, during any further handling, transportation and disposal.

4. Release no visible emissions off the work site from asbestos-

   containing materials.

5. The materials must be hauled to an approved landfill as assumed

regulated asbestos-containing material and must be accompanied by a waste manifest form (enclosed). The materials must be covered during transportation.

Items like concrete, concrete blocks, steel, glass, and clean wood do not have to be treated as asbestos waste. Those items should be washed off and may be handled by individuals who are not certified as asbestos workers, and deposited at an inert landfill or recycled.

In addition, a Notification of Demolition and Renovation form should be completed and submitted to the Department as soon as possible. The ten-day waiting period will not be necessary for this cleanup project.

For school buildings built after October 12, 1988, a letter from the building architect or contractor stated there was "no asbestos building products" were used in the construction of the building can be substituted for the asbestos inspection. This exemption only pertains to K – 12 school buildings and not any type of commercial/ or public buildings. Commercial and public buildings are regulated under NESHAP and the ND Air Pollution Control Rules.

Thank you for your cooperation and feel free to call Justin Otto or Jane Kangas of the Air Quality Division at 701-328-5188 if you have any questions.

Sandi Washek

Sandi Washek
North Dakota Department of Health
918 E. Divide Avenue
Bismarck, ND 58501-1947
Phone: 701.328.5188
Fax: 701.328.5185
Email: swashek@nd.gov

Confidentiality Notice:

This email message, including any attachment, is for the sole use of the intended recipient and may contain confidential information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email and destroy all copies of the original message.

From: O'Clair, Terry L.
Sent: Monday, July 28, 2014 11:58 AM
To: Washek, Sandra K.
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Sandi,

See message to Jane below. What are your thoughts?

Terry

From: O'Clair, Terry L.
Sent: Monday, July 28, 2014 9:41 AM
To: Kangas, Jane K.
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Jane,

See the underlined paragraph in Kris's email. If one of the START contractors is CO certified would we be ok with allowing them to move forward? Our rules typically are for things that must be done for demolition purposes; however, they are not clear on addressing clean up from a burn site. Your thoughts?

Terry

From: Roberts, Kris D.

Sent: Sunday, July 27, 2014 6:02 PM
To: Glatt, Dave D.; Rockeman, Karl H.; Radig, Scott A.; O'Clair, Terry L.; Peronard, Paul
Subject: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Lime Piles could not be covered due to debris around them.

SO2 readings around south and east perimeter berm running 2-3 ppm. PEL is 5 ppm. Doesn't appear that there is a STEL anymore, but they are planning on anyone in the work zone being in respiratory protection at levels above 0.2 ppm.

Some equipment adjusters are coming tomorrow (Monday) morning, and RR Supply doesn't want to move a lot of things around until they are done. Best estimate now is both fire marshal and adjusters will release around noon.

An issue has come up relating to Asbestos. One part of the burned building (the NW corner) is older than the other parts. They are thinking that there might be an issue there. They are definitely willing to take samples and get them to a lab, but neither Garner or CTEH has a ND certified tech on site. So here is the possible solution, it works for us. Ellie (one of the START contractors) is Colorado asbestos certified, and David (the other START guy) has many years of asbestos esperience, but has let his certification drop. One of the CTEH guys is in the same boat, experience, but certification expired.

So, can these 3 do the sampling on this emergency cleanup site under ND regs? Waiver, exception, what have you, to get the answers they need? Please get back to me with an answer on that.

Plan is to clean that little sliver of the Schlumberger property in the morning, and bring the perimeter fence/berm in to the RR property line.

They have been filling sand supersacks this afternoon, but crane place says no until Monday morning. So Narrows plug will be upgraded then.

There was another flare up about 14:40 today that slowed everyone down until the fire crew cooled it down.

Of the circulation pumps that Paul wanted in the "Little Muddy Relief Channel", 3 are in and operating, only deployment instructions weren't conveyed to the "doers". One pump I saw was pumping away merrily, with the intake and the discharge within about 5 feet of each other. Brought that to Garner's attention after the 16:00 meeting, and the heads just got shaken with a bit of a lopsided smile. Immediate call went out for a whole lot more 2" hose so we can get intake and discharge closer to 100 feet apart. Tried to think it through, and it was finally decided to put the intake about 100 feet away from the bubbler and the discharge at the bubbler. If that is the wrong way around, let me know.

One of the best pieces of news today was that RR Supply send one of the warehouse workers over and he was able to "place" most of the inventory within the burn photo. There were a lot of happy faces when that was done. I will get a photo of that in the morning. For future incidents, we definitely want to make that effort.

There was a quite a bit of discussion of how to best go about getting the steel and such away from the chemical areas, and how to go about separating the now empty containers from those that still have chem. in them. A lot of thinking on that is going to go on tonight and tomorrow morning.

Kris Roberts

Environmental Response Team Leader

ND Department of Health

Division of Water Quality

918 E. Divide Ave, 4th Floor

Bismarck, ND 58501-1947

701-328-5236 (off.)

701-391-0982 (cell)

kroberts@nd.gov