Message

From: Evan Wortman [e.wortman@erllc.com]
Sent: 10/29/2018 4:38:14 PM
To: Moore, Gary [Moore.Gary@epa.gov]
Subject: RE: Final Analytical Set

Yeah, we discussed the building wipes after the site walk. At the site walk we talked about how the waste rarely gets accepted as Class II and I mentioned they may require dioxin analysis which is a long 21 day turn around. That's the only other parameter I think they could possibly ask for because we came across that with another site, but again may not be required. That analytes we ran were TCLP TX 11 Metals, VOCs, SVOCs and TPH. This is what the Republic representative (David) told me we need to run to get approval for Class II.

From: Moore, Gary <Moore.Gary@epa.gov>
Sent: Monday, October 29, 2018 10:32 AM
To: Evan Wortman <e.wortman@erllc.com>
Subject: RE: Final Analytical Set

Evan:

We talked about that relative to the building but the historical wipe sampling did not show dioxins. We never discussed this as part of the TCLP soil analysis. What additional analytes would we have to sample for should we need to do this?

Thanks
Gary Moore

From: Evan Wortman [mailto:e.wortman@erllc.com]
Sent: Monday, October 29, 2018 11:14 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Cc: Delgado, Paige <Delgado.Paige@epa.gov>; Don Edgington <d.edgington@erllc.com>
Subject: RE: Final Analytical Set

I'm not saying it's necessary at this point, we'll see if the approvals department requires it. I thought we discussed the dioxin analysis at the site walk and verbally agreed we didn't have time to run that analysis due to the turn around time.

From: Moore, Gary <Moore.Gary@epa.gov>
Sent: Monday, October 29, 2018 9:59 AM
To: Evan Wortman <e.wortman@erllc.com>
Cc: Delgado, Paige <Delgado.Paige@epa.gov>; Don Edgington <d.edgington@erllc.com>
Subject: RE: Final Analytical Set

Evan:

So what you are saying is that we may need run additional analysis to make this determination (Class 1 vs. Class 2). There is at least a $10/ton difference in disposal plus the hauling is more expensive to Mt. Pleasant vs Campbell. We should have run this previously but we certainly need to probably take an additional representative sample of our non-TSCA waste stream and run it for whatever is necessary to make the Class 1 vs. Class 2 determination because of the significant cost savings it could produce.

If this is necessary, we need to do this immediately upon mobilization and have quick turnaround on the data.

Thanks
Gary Moore

From: Evan Wortman [mailto:e.wortman@erllc.com]
Sent: Monday, October 29, 2018 10:20 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Subject: RE: Final Analytical Set

OK, I'm hoping we don't have the same issues either. David Thornburg initially told me he thought it would be Class II but I don't have a lot of confidence in the sales representatives. Page 40 (document page 35) of the attached TCEQ Classification Guidelines lists dioxin analysis as part of the Class II determination. We briefly discussed at the site walk that we wouldn't have this data due to the turn around time. Since that's not a constituent of concern they may not require it however, we'll see.

From: Moore, Gary <Moore.Gary@epa.gov>
Sent: Monday, October 29, 2018 9:09 AM
To: Evan Wortman <e.wortman@erllc.com>
Subject: RE: Final Analytical Set

Evan:

That's fine but I need you to be able to discuss this with Republic so that they are not pushing us to the Class 1 landfill when the waste maybe a Class Ii. It is our waste so we need to know as well to be able to discuss this with them.

I am hoping that we are not going to have the same issues we had in Henryetta.

Thanks
Gary Moore

From: Evan Wortman [mailto:e.wortman@erllc.com]
Sent: Monday, October 29, 2018 9:58 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Cc: Don Edgington <d.edgington@erllc.com>
Subject: RE: Final Analytical Set

Morning Gary, if it's alright with you I'd like to put this responsibility on the landfill (Republic). Ultimately, it is up to their approvals department to accept the waste as Class II. So rather than duplicate the effort and charge you time to sort the data we can have Republic do it for us.

Evan

From: Moore, Gary <Moore.Gary@epa.gov>
Sent: Friday, October 26, 2018 4:03 PM
To: Evan Wortman <e.wortman@erllc.com>
Subject: RE: Final Analytical Set

Evan:

Did we ever get the final TCLP lab data package for FJ Doyle?

Also, I reviewed the data and it looks like TPH and Barium were the only detections and it appeared that they did not exceed the TCEQ Criteria and therefore it looks like the Non-TSCA material could be classified as Class 2 NH Waste and go to the Maloy Landfill. As mentioned In the previous email, I need someone to go through this data and make sure that it meets the TCEQ requirements to be a Class 2 NH Waste.

Obviously, the TSCA soils will be a Class 1 NH but they have to go to the TSCA Landfill. I need someone to navigate the checklist in the TCEQ Waste Classification document and send it to me.

Thanks
Gary Moore

From: Moore, Gary
Sent: Friday, October 26, 2018 4:26 PM
To: Evan Wortman <e.wortman@erllc.com>
Subject: FW: Final Analytical Set

Evan:

Can you put this data in a table and compare it to the Federal TCLP criteria and the TCEQ Class 1 Criteria to show me if our material is Federal Hazardous, TCEQ NH Class 1, or TCEQ Class 2 NH. I know that for all grids that we designate as TSCA grids that they will be a NH Class 1. I am more concerned with the Non-TSCA grids to see if they are a NH Class 1 or Class 2. This is where the T&D guys earn their money.

Thank
Gary Moore

From: Don Edgington [mailto:d.edgington@erllc.com]
Sent: Friday, October 19, 2018 4:11 PM
To: dthornburg@republicservices.com; caldrete@republicservices.com
Cc: Evan Wortman <e.wortman@erllc.com>; Moore, Gary <Moore.Gary@epa.gov>; Delgado, Paige <Delgado.Paige@epa.gov>; Janice Rick <j.rick@erllc.com>; Angela Harbin <a.harbin@erllc.com>
Subject: Final Analytical Set

Good afternoon.

Attached please find the third and final analysis, in draft form, relating to the TSCA and non-regulated soils to be excavated at the F.J. Doyle removal in Leonard, Texas.

Sample No. FJD-WP1 is a composite sample associated with those grids that had elevated (>50 ppm) PCBs in the original Weston assessment sample. Sample No(s) FJD-WP2 and WP3 are also composites and are associated with those grids that had PCB levels below 50 ppm.

Due to the late delivery of this set of analysis, the bid due date has been extended until 10:00 AM on Wednesday, 10/24/18.

Thanks,

Don

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