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Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR | JAMES ZEHRINGER, DIRECTOR

Division of Oil & Gas Resource Management
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August 1, 2014

Kristin Vratkovich
Howland Company, LLC
7378 Southern Boulevard, Suite 200
Youngstown, Ohio 44512

RE: Belmont Solids Control, LLC
Application to Operate a Facility

Ms. Vratkovich:

Please find enclosed the application, including supporting documents, submitted on July 7, 2014. The application and documents are being returned to BSC for modifications as discussed during a phone conversation on August 1, 2014. Please resubmit the application after consideration has been given to the items discussed and the appropriate revisions and/or additions to the documents have made.

Below, please find the comments discussed after review of the submitted application for an order to operate a facility:

- The site is located in a watershed that drains into Crabapple Creek. Please provide details on the controls to be constructed to prevent storm water that may come into contact with contaminants from being discharged off-site and into this watershed. mud site
- Drawings do not show sufficient details to determine the construction of the facility. Please provide more complete construction drawings. At a minimum include typical details for floor drains, collection sumps, concrete slab, storm water controls, and cross-sections for concrete containment and solidification pits. DOGRM recommends installation of a collection sump for the solidification pits. They are double lined, but if the metal liner leaks, how would the liquids be collected?
- As per ORC Section 1509.074, TENORM materials, (muds, sludges, semi-solids) are required to be tested by the owner prior to leaving the well pad site, unless the owner authorizes the testing to be performed by a person with an order or permit to operate a facility. In the detailed description of the facility operations, it states that BSC is testing for RA226 and RA228 prior to disposal. This would be required since BSC has technologically enhanced the materials, but there also needs to be documentation of what is coming into the site. Attached with this correspondence is the section of the Ohio Revised Code, Chapter 1509.074 that address TENORM testing and disposal options, for you information.
- A Radiation Protection Plan for the protection of the environment and of the workers is highly recommended. The plan should contain measures investigating and addressing exposure pathways (shielding and distance) and time of exposure. DOGRM would recommend a Radiation Safety Officer or some other qualified person develop this plan.
- The application states that the facility would be taking muds from pipeline installations. These materials are not under the sole and exclusive authority of the division and would need to be managed separately. This means separate entrance and handling from the point of the public right of way to final disposal. Oil & gas wastes may not be co-mingled with other waste materials regulated under other agencies' jurisdiction.

- Please provide the agents to be used for stabilization of the solids prior to final disposal. Free liquids materials that are not going to a Class II injection well need to be chemically bound, not bulked, with a stabilizing agent such as Portland cement or quick-lime (CaO). See attached letter dated May 1, 2014.
- Please define what is meant by the "off-site permitted disposal facility".
- Please define what is meant by the "off-site licensed landfills permitted to receive said materials". For example, is this in-state, out-of-state?

Administrative rules regulating construction and operation of facilities that treat, recycle, store, and/or process oil and gas waste substances are currently being drafted. To better align this facility for compliance with the future rules, the division would highly recommend consideration of the following items that address location, construction and operation of a facility:

- Design elements necessary for construction in or in close proximity to surface waters, drinking water sources, flood plains, environmentally sensitive areas, and residential or public gathering areas.
- Full construction documents developed and sealed by an Ohio registered professional engineer, to include existing and proposed infrastructure, buildings, equipment, utilities, loading areas, containments systems, security and other stationary items to be operated under the facility permit.
- Spill and secondary containment for all vessels.
- Geotechnical investigation as necessary to ensure the site is stable and suitable for the intended operation.
- Environmental site assessment to determine baseline soil & water conditions and potential migration pathways. In the event of closure and reclamation of the facility this information will set desired clean-up levels equal to the pre-operating conditions.
- Storm water hydraulic evaluation and design for the site, including an emergency containment plan in the event of a release of waste constituents from the site.
- Erosion & sediment control plan for the site during and after construction.
- Operation and Maintenance plan, to include safety and emergency measures.
- Radiation Protection Plan for the facility and the workers as discussed above.
- Closure and Reclamation Plan for the facility in the event the facility ceases operations.

If you have any questions, please contact me at 614/265-6905 or by email at beth.pratt@dnr.state.oh.us.

Sincerely,

Beth A. Pratt

Beth A. Pratt, P.E.
DOGRM Engineer

enclosures
C: Ron Trivisonno, P.E., DOGRM Engineer
Blake Arthur, P.E., DOGRM Engineer