

April 30, 2018

delivered via email

Mr. David Stradinger
North Dakota Department of Health, 2nd Floor
918 East Divide Avenue
Bismarck, ND 58501

RE: Radioactive Materials License Application – 13-Mile Landfill

Dear Dave:

Please find enclosed documentation to support the submission of our application to obtain an additional radioactive materials license for Secure Energy Services USA, LLC (Secure Energy), specifically associated with our permit modification request to accept TENORM-impacted waste at our 13-Mile Landfill north of Williston, ND.

In this submittal we have included our revised Radiation Protection Program as well as our Application for Radioactive Material License (Form SFN 8418) with the supporting detailed documentation attached.

Secure Energy Services USA, LLC understands that all statements and representations made in this application are binding upon the entity. Secure Energy Services USA, LLC and I, Kurt Rhea, certify that this application is prepared in conformity with Section 23-20.1-01 through Section 23-20.1-11 of Chapter 23-20.1 of the North Dakota Century Code and Articles 33-10-23 and 33-20 of the North Dakota Administrative Code and that all information contained herein is true and correct to the best of my knowledge and belief.

Please don't hesitate to contact me with any questions. Thank you for your consideration and prompt review of this application.

Sincerely,

A handwritten signature in blue ink that reads "Kurt Rhea".

Kurt Rhea
General Manager, NORM Services
Secure Energy Services USA, LLC

attachments




APPLICATION FOR RADIOACTIVE MATERIAL LICENSE
NORTH DAKOTA DEPARTMENT OF HEALTH
RADIATION CONTROL PROGRAM
 SFN 8418 (10/12)

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE (NUREG-1556 SERIES) FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. EMAIL A COPY OF THE ENTIRE COMPLETED APPLICATION TO RAM@ND.GOV

1. <input checked="" type="checkbox"/> A. New License <input type="checkbox"/> B. Amendment to License Number _____ <input type="checkbox"/> C. Renewal of License Number _____ <input type="checkbox"/> D. Current NRC or Agreement State License No. _____	2. Name and Mailing Address of Applicant (include Zip Code) Secure Energy Services USA, LLC 5807 Front Street West Williston, ND 58801								
3. Address where Licensed Material will be Used or Possessed Secure Energy Services USA, LLC 13-Mile Landfill 13809 66th Street NW Williston, ND 58801	4. Name of Person to be Contacted about this Application Kurt Rhea <table border="1"> <tr> <td>Business Telephone Number</td> <td>Business Cell Phone Number</td> </tr> <tr> <td>(303) 968-1933</td> <td>(303) 945-5381</td> </tr> <tr> <td colspan="2">Business Email Address</td> </tr> <tr> <td colspan="2">krhea@secure-energy.com</td> </tr> </table>	Business Telephone Number	Business Cell Phone Number	(303) 968-1933	(303) 945-5381	Business Email Address		krhea@secure-energy.com	
Business Telephone Number	Business Cell Phone Number								
(303) 968-1933	(303) 945-5381								
Business Email Address									
krhea@secure-energy.com									

SUBMIT DOCUMENTATION FOR ITEMS 5 THROUGH 11 AND AN ELECTRONIC COPY OF YOUR CURRENT OPERATING AND EMERGENCY PROCEDURES MANUAL. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE APPROPRIATE LICENSE APPLICATION GUIDE (NUREG-1556 SERIES).

5. Radioactive Material a. Element and mass number; b. Chemical and/or physical form; and c. Maximum amount which will be possessed at any one time 6. Purpose(s) for which Licensed Material will be Used. 7. Individual(s) Responsible for Radiation Safety Program and their Training Experience. 8. Training for Individuals Working in or Frequenting Restricted Areas. 9. Facilities and Equipment 10. Radiation Safety Program 11. Waste Management		
12. License Fee (See North Dakota Radiological Health Rule 33-10-11)		
License Type Landfill Waste Disposal	Amount Enclosed \$ 134,720.00	
13. Obtain a "Certificate of Authority" from the North Dakota Secretary of State to operate in North Dakota. Call (800) 352-0867 ext. 4284 for more information.		
14. Certification (must be completed by applicant). The applicant understands that all statements and representations made in this application are binding upon the applicant. The applicant and any official executing this certification on behalf of the applicant, named in Item 2, certify that this application is prepared in conformity with Radiation Health Chapters 33-10-3.1, -4.2, -5.1, -7.2, -10.1, -11, -12.1, -13.1, -16, -17, -20, -21 and that all information contained herein is true and correct to the best of their knowledge and belief.		
Certifying Officer – Typed/Printed Name and Title Kurt Rhea, General Manager	Signature 	Date 4/30/18

A hard copy of this form shall be signed, dated and submitted to the Department along with the appropriate license fee. Payment shall be in the form of a check or money order payable to the North Dakota Department of Health. Send to:

North Dakota Department of Health
 Division of Air Quality, 2nd Floor
 918 East Divide Avenue
 Bismarck, ND 58501-1947

FOR DEPARTMENT USE ONLY				
TYPE OF FEE	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
		\$	DATE	

Addendum to Applications for Radioactive Materials License (SFN 8418)

April 30, 2018

The following information is provided in support of our Application for Radioactive Materials License and is part of our total submission including our cover letter dated April 30, 2018. See our detailed responses below to the corresponding line numbers on Form SFN 8418.

Item #5a

As permitted under the new rules, the elements to be managed at the landfill will include Radium-226, Radium-228, Pb-210, and their progeny.

Item #5b

The TENORM material to be managed and disposed of at the landfill will be limited to solid waste streams that meet all other landfill acceptance criteria as established in Permit #0371 potentially including: filter cake from Secure Energy's full-service processing terminals, filter socks from saltwater disposals, impacted/contaminated soils, frack sand, tank bottoms, fly ash and other solidification materials, and surface-contaminated objects such as pipe, tanks, and other miscellaneous debris. The waste will also comply with other waste acceptance criteria as outlined in the Solid Waste landfill permit and in conformance with the new TENORM rules.

Item #5c

Each load of material will be placed in an open cell of the landfill along with other exempt E & P waste such as drill cuttings and hydrocarbon- and production water-impacted soils. Per the new rules and regulations, the waste will be covered with a foot of non-radioactive waste or other suitable cover material on a daily basis. The maximum tonnage of TENORM-impacted waste will not exceed the 25,000 per annum as established by the TENORM rules.

Item #6

TENORM-impacted waste accepted at the landfill will not be used or reused for any purpose.

Item #7

As our Corporate RSO, Kurt Rhea, will assume primary responsibility for oversight of the Radiation Protection Program (attached). Assisting Mr. Rhea will be two full-time, North Dakota employees: Gretchen Anderson and Eugene Davis. Both Ms. Anderson and Mr. Davis hold 40-hour RSO certificates from qualified, independent training organizations.

Item #8

All landfill employees will be certified as TENORM Surveyors through our internal training program, which the Department of Health has reviewed and approved. TENORM refresher training will be conducted on a regular basis per our Radiation Protection Program.

Item #9

Our 13-Mile Landfill is located approximately 14-miles north of Williston at 13809 66th Street NW, Williston, ND 58801. The facility is a RCRA Subtitle D landfill with a well-engineered liner and leachate collection system that is compliant in its design with the TENORM rules and regulations. Secure Energy Services USA, LLC has applied for a major permit modification from the Solid Waste Division to accept TENORM-impacted waste in addition to the stipulations and conditions found in its current certificate of designation. The landfill currently has 10 working acres on a 160-acre parcel. We also utilize our own scales, loader, bulldozer, and radioactive measurement/survey devices from well-known manufacturers such as Ludlum, Tracerco, and W.B. Johnson.

Item #10

Our revised Radiation Protection Program v. 5.1 is included for your review and approval.

Item #11

All waste will be managed at the landfill or rejected per Solid Waste guidance. Waste acceptance related to TENORM will conform to ND requirements, rules, and regulations.

Item #12

Our initial licensing fee has been previously submitted.