



COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

July 20, 2017

RE: Rescission of May 12, 2017 Notice to Landfills - Potential TENORM
Characteristics of Oil and Gas Exploration and Production Wastes

Dear Solid Waste Landfill Owner or Operator:

After further consideration, the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), is hereby rescinding our May 12, 2017 letter regarding potential technically enhanced naturally occurring radioactive material (TENORM) wastes generated by the exploration and production of oil and gas.

The Division will replace the May 12, 2017 letter with additional information at some point in the next 90 days. In the interim, we strongly recommend that landfill owners and operators continue to work with oil and gas exploration and production (E&P) operators to adequately characterize their wastes for appropriate management. It is particularly important to begin and/or continue characterizing E&P waste streams with the potential for high concentrations of TENORM. This would include, but not be limited to, wastes such as tank bottoms, filter socks, filter press sludge, waste pipe and flow line sections, and residual materials dislodged during cleaning and maintenance activities on pipelines, flow lines, connector pipes, tanks and vessels.

The Division reiterates that the Colorado Solid Waste Act prohibits disposal of materials contaminated by radioactive substances at landfills unless a landfill is specifically designated for that purpose (Section 30-20-110(1)(c), C.R.S.). In addition, the Colorado Radiation Control Act prohibits the possession, ownership, and use of radioactive materials without having been granted a license from the department, as well as the transfer or disposal of radioactive material without prior approval by the department (Section 25-11-107(1), C.R.S.).



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If you have any questions regarding the solid waste aspects of this letter, please contact Jerry Henderson of the Solid Waste Permitting Unit at 303-692-3455 or jerry.henderson@state.co.us. If you have any questions regarding TENORM, please contact Jim Grice of the Radioactive Materials Unit at 303-692-3371.

Sincerely,



Joe Schieffelin, Manager
Solid Waste and Materials Management Program
Hazardous Materials and Waste Management Division