



May 19, 2016

Mr. Brandon Hurley, Chairman  
Texas Low Level Radioactive Waste Disposal Compact Commission  
333 Guadalupe St. #3-240  
Austin, TX 78701

Re: Export Petition for Agilent Technologies, Cedar Creek, TX

Dear Mr. Hurley:

Enclosed is an export petition from Veolia ES Technical Solutions, L.L.C (Veolia) on behalf of Agilent Technologies in Cedar Creek, TX. The Class A wastes consist of aqueous liquids, liquid scintillation vials and dry active waste for proposed management at EnergySolutions in Oak Ridge, TN. Also included in this correspondence is an authorization letter from Agilent Technologies allowing Veolia to submit this petition on their behalf.

Please contact me at 973-691-7333 or [liza.krass@veolia.com](mailto:liza.krass@veolia.com) with any questions or concerns.

Sincerely,

Elizabeth Krass  
Director, Radioactive Services

**Veolia North America**  
1 Eden Lane  
Flanders, NJ 07836  
tel. +1 973 347 7111 fax +1 973 691 3978

[www.veolianorthamerica.com](http://www.veolianorthamerica.com)

**TLLRWDC §675.21—EXPORTATION FORM**

**TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION PETITION FOR EXPORTATION OF NON-PARTY LOW-LEVEL RADIOACTIVE WASTE. THIS PETITION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE, THE GENERATOR, OR A BROKER.**

**I. Petitioner Information:**

Entity Name: Veolia ES Technical Solutions, L.L.C.

Contact Person, Title: Liza Krass, Director, Radioactive Services

Phone: 973-691-7333

Email: liza.krass@veolia.com

Website: www.veolianorthamerica.com

Business Address: 1 Eden Lane

Flanders, NJ 07836

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Mailing Address: 1 Eden Lane

Flanders, NJ 07836

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Is applicant:

- Generator
- Broker
- Department of Defense

**II. Generator Specifications:**

A. Generator type:

- Industrial
- Academic/Research
- Medical
- Utility
- Government

Generator:

Agilent Technologies  
1834 Highway 71  
Cedar Creek, TX 78612

**III. Export Permit Period:**

Export petitions generally will be granted to expire on August 31 (that is, the end of the Compact's fiscal and operating year). If you are seeking a term that would extend over more than one fiscal year, please explain the unusual circumstances that would justify a deviation from this principle?

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**IV. Waste proposed for exportation:**

Waste Volume (Cubic Feet): 32 cuft

Waste Radioactivity (Curies): 0.008

Waste Classification:

- Class A,
- Class B, and/or
- Class C

If Class B and/or Class C is indicated, provide explanation for cause to export.

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Name and Location of Proposed Treatment and /or Disposal Facility:

EnergySolutions, Oak Ridge, TN

Approximate Date of Proposed Exportation (if known):

On or before August 31, 2016

Waste Description: (1) Aqueous waste containing 10% ethanol in solution with tritium

packaged for incineration, (2) liquid scintillation vials with tritium packaged for incineration,

and (3) dry active waste (DAW) with tritium packaged for compaction.

Justification for Exportation: (1) The aqueous waste contains 10% ethanol, exceeding WCS' VOC  
limit of 500 ppm, making this waste not viable for management via solidification at WCS.

(2) The scintillation vials and the dry active waste, while meeting the overall Table 1 Exempt

Concentration Limits for H-3, would require case specific surcharges. (3) WCS would increase

the volume for disposal of the scintillation vials upon solidification treatment. (4) The volume

of waste for export is very small. (5) Since the aqueous waste does not meet WCS's waste  
acceptance criteria, an alternate facility is already required and only one shipment is necessary  
if all wastes can be exported and shipped to one processing facility. (6) Use of the WCS facility  
for management would put an economical burden on the generator due to surcharges and  
the need for an additional shipment for the aqueous waste.

All of the wastes can be managed cost effectively and with volume reduction by EnergySolutions in Oak Ridge, TN in one shipment.

**V. Compliance**

Does Petitioner have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Commission?

- No.
- Yes. Please explain and attach applicable documents.

Does Petitioner have any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports associated with radioactive waste receipt, storage, handling, management, processing, or transportation pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the Texas Commission on Environmental Quality (TCEQ)?

- No.
- Yes. Please explain and attach applicable documents.

**VI. Certifications**

Petitioner hereby certifies\* the following:

- The information provided herein is complete, accurate, and correct.
- The low-level radioactive waste for which this Export Petition is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the proposed disposal facility.

If a Broker is submitting this petition on behalf of the Petitioner, the Broker hereby certifies\* the following:

- The Broker submitting this Export Petition is authorized by the Petitioner to act on behalf of the Petitioner related to this Permit for Exportation of In-Compact waste. A copy of written documentation containing such authorization is attached to this Export Petition.

\* If any box is left unchecked, the Commission will assume that requirement was not met.

**VII. Authorized Signatory:**

Elizabeth Krass

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*Print or type name*

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*Signature*

Director, Radioactive Services

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*Title*

May 20, 2016

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*Date*

**VIII. ATTACHMENTS:**

(Attachments should include all applicable licenses, authorizations, and other materials needed or useful to fully explain the Export Petition.)

May 18, 2016

Ms. Liza Krass  
Veolia ES Technical Solutions, L.L.C.  
1 Eden Lane  
Flanders, NJ 07836

RE: Export Petition Submittal to TLLRWDC

Dear Ms. Krass:

This letter authorizes Veolia ES Technical Solutions, L.L. C. (Veolia) to submit an export petition to the Texas Low Level Radioactive Waste Disposal Compact Commission (TLLRWDC) on behalf of Agilent Technologies. The petition is for a permit for the exportation of in-compact generated waste to a facility outside the Texas Compact for processing and subsequent disposal.

Sincerely,

Carlos Lopez

A handwritten signature in black ink, appearing to read 'Carlos Lopez', written in a cursive style.