

December 3, 2015

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

Re: Export Permits

Dear Mr. Hurley,

Please find Export permits for both the Texas A&M University Environmental Health and Safety Office and the Texas A&M University Nuclear Science Center. The one for the Health and Safety is a recent waste stream, while the Nuclear Science Center is for waste that was previously approved in 2015 but not shipped.

This waste will be sent for incineration at the licensed facility here in Oak Ridge, Tennessee with any ash shipped to the Clive, Utah burial site.

Feel to contact me with any questions regarding this amendment.

Sincerely,

John McCormick

TLLRWDCC §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: Bionomics, Inc.

Contact Person, Title: John McCormick, VP

Phone: 865-220-8501

Email: JMcCormick@Bionomics-Inc.com

Website: Bionomics-Inc.com

Business Address: PO Box 817

Kingston, TN 37763

Mailing Address: PO Box 817

Kingston, TN 37763

Generator: Texas A&M University Environmental Health and Safety

4472 TAMU

College Station, TX 77843-4472

Is applicant:

€ Generator

Broker

€ Department of Defense

II. Generator Specifications:

A. Generator type:

€ Industrial

¥ Academic/Research

€ Medical

- € Utility
- € Government

III. Export Permit Period:

Export petitions generally will be granted to expire on August 31 (that is, the end if 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?

IV. Waste proposed for exportation:

Waste Volume (Cubic Feet): 16 ft3

Waste Radioactivity (Curies): less than 5 mCi

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.

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

Energy Solutions Oak Ridge, TN for Incineration

Approximate Date of Proposed Exportation (if known): unknown

Waste Description: Dry Solid Waste and Waste with Liquid Vials, Used Oil/Water

Justification for Exportation: Sorting waste with radiological hazards and that may have sharp objects imposes additional health and safety risks on workers. Additionally, there is a great expense to shifting through all the material to ensure that the wastes meet the acceptance criteria of the burial site. Liquids are present and would be difficult to cause waste stream to come into compliance. Incineration of this waste stream would eliminate the need to sort through the waste and would also reduce the volume of waste sent for final disposal. Oils and Water require processing prior to disposal and small generators are not established to process this waste correctly. Burning the liquids is a method to eliminate the volume and cost.

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?



€ Yes. Please explain and attach applicable documents.

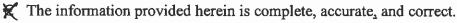
Does Petitioner have any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports associated with radioactive waste receipt, storage, handling, management, processing, or transportation pending with any other regulatory agency with jurisdiction to regulate radioactive material including,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



€ Yes. Please explain and attach applicable documents.

VI. Certifications

Petitioner hereby certifies* the following:





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
¥ 11.	Audiorzeu	DIVIDATORY.

John McCormick

Print or type name

Signature

VP Bionomics

Title

December 2, 2015

Date

VIII. ATTACHMENTS:

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

DIVISION OF FINANCE AND ADMINISTRATION ENVIRONMENTAL HEALTH & SAFETY



December 3, 2015

MEMORANDUM

To: Bionomics, Inc.

From: Latha Vasudevan, RSO Latha Vasud

Texas A&M University

Ref: Authorization for Exportation of In-Compact waste

This memorandum is to provide authorization for Bionomics, Inc to act on behalf of Texas A&M University to file an export petition for exportation of In-Compact waste. Bionomics, Inc is hereby authorized to pick up waste from Texas A&M University and export for incineration. Please contact us if you have any questions.

TLLRWDCC §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: Bionomics, Inc.

Contact Person, Title: John McCormick, VP

Phone: 865-220-8501

Email: JMcCormick@Bionomics-Inc.com

Website: Bionomics-Inc.com

Business Address: PO Box 817

Kingston, TN 37763

Mailing Address: PO Box 817

Kingston, TN 37763

Generator: Texas A&M University

Nuclear Science Center 1095 Nuclear Science Road College Station, TX 77843-3575

Is applicant:

Generator

M Broker

☐ Department of Defense

II. Generator Specifications:

A. Generator type:

□ Industrial

X Academic/Research

□ Utility

□ Government

III. Export Permit Period:

Export petitions generally will be granted to expire on August 31 (that is, the end if 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?

IV. Waste proposed for exportation:

Waste Volume (Cubic Feet): 138 ft3 approximately 1,400 pounds

Waste Radioactivity (Curies): less than 0.5 mCi

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.

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

Energy Solutions Oak Ridge, TN for Incineration

Approximate Date of Proposed Exportation (if known): unknown

Waste Description: Dry Solid Waste

This waste was packaged previous to the WCS burial site regulations and there would be great expense to shifting through all the material to ensure that the wastes meet the acceptance criteria of the burial site. Additionally, sorting waste with radiological hazards and that may have sharp objects imposes additional health and safety risks on workers. Incineration of this waste stream would eliminate the need to sort through the waste and would also reduce the volume of waste sent for final disposal.

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?

X 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.

/II.	Authorized	Signatory:	
John	McCormick	() h Ma	
Print	or type name	the head to	
Signa	ture		
VP Bi	ionomics		
Title			

December 2, 2015

Date

VIII. **ATTACHMENTS:**

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



December 2, 2015

MEMORANDUM

TO:

John McCormick, Bionomics

FROM:

Ashley Booth, Nuclear Science Center Authorization for Waste pickur

SUBJECT:

Authorization for Waste pickup

This memo is to establish authorization for Bionomics to pick up our pre-packed waste products for incineration. We had previously filed a permit but were unable to allow bionomics to conduct a pick up until now. We are allowing Bionomics to act on our behalf for exporting the waste. If you have any questions please let me know. Thank you.