



ECOLOGY SERVICES, INC.

9135 Guilford Road, Suite 200
Columbia, Maryland 21046
(301) 362-6700
Fax (301) 490.0172

May 3, 2012

Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753
MC-233

Re: Application for Importation of Nonparty LLRW - revised

Dear Sir or Madam,

Enclosed please find referenced revised application for Ecology Services, Inc. (ESI) including a letter from Agilent Technologies, Inc. authorizing ESI to perform waste brokerage services. A copy of this application is also being sent to Waste Control Specialists and is being submitted via e-mail to:

administration@tllrwdcc.org
RADMAT@tceq.texas.gov

The revised application is focused on a single ESI client, namely Agilent Technologies, Inc.

Please let me know if you require any additional information and thank you for your attention to this application.

Sincerely,

A handwritten signature in black ink, reading "Paul Marshall". The signature is written in a cursive, flowing style with a large initial "P" and "M".

Paul Marshall, CHMM
Vice President

APPLICATION FOR IMPORTATION OF NONPARTY LOW-LEVEL RADIOACTIVE WASTE

(NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS APPLICATION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL GENERATOR AS DEFINED IN 31 TAC §675.23(o), IN WHICH CASE THE APPLICATION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER)

1. Applicant Information:

Entity Name	Ecology Services, Inc.
Contact Person	Paul Marshall
Phone	(301) 362-6700
Email	pmarshall@ecologyservices.com
Website address	www.ecologyservices.com
Business Address	9135 Guilford Road, Suite 200 Columbia, MD 21046
Mailing Address	same as Business Address

Is Applicant:

- Generator
- A Broker who is a: Licensed Waste Processor
 Licensed Waste Collector
- Department of Defense

Notes:

(1) An appropriately licensed Broker may act on behalf of a Small Generator only if each such generator is identified and written authorization from each such generator is provided as an attachment hereto.

(2) While Department of Defense Regulation 4715.6-R designates the Department of the Army as Executive Agent for disposal of low-level radioactive waste, the Commission will require that any agreement that it enters into in this regard be signed by both the Department of the Army as Executive Agent and the branch of the military that has generated the waste.

- Generator Type:** Industrial
 Academic/Research

- Medical
- Utility
- Government

Is Applicant the entity responsible for the waste shipment? yes no

If no, please include the name and contact information for the entity responsible for the waste shipment.

Is Waste from a "Small Generator"? yes no

2. Term/Duration from Date of Approval: 12 Months

3. Waste proposed for importation.

Waste Volume (Cubic Feet) 22.5

Waste Radioactivity in Curies 44

Place of origination (State) of waste: Delaware

Waste description:

Approximately 2700 Electron Capture Devices.

Each ECD contains a 15 mCi ⁶³Ni foil sealed source.

Waste classification (Class A, Class B, or Class C): Class B

Waste form: stable unstable

Does waste contain any of the following radionuclides, check box(es) and complete blank(s):

C-14 _____ millicuries (mCi)

Tc-99 _____ microcuries (uCi)

I-129 _____ nanocuries (nCi)

Depleted Uranium _____ microcuries (uCi)

Concentration _____ (provide units)

Source of generation

When the ECD in the GC reaches end of life, no longer works,
or doesn't function to the customer expectations the ECD is
sent back to Agilent by the customer for disposal.

4. Is the proposed waste a sealed source?

No. Yes. Please explain: _____

The waste is a collection of sealed sources packaged into a 55 gallon
drum per the WCS-TCEQ WAC requirements for burial of sealed sources.
Each ECD contains a Ni-63 foil in a sealed capsule. There will be
approximately 900 ECD's placed into a 55 gallon drum.

5. Does Broker and/or Generator(s) 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: _____

6. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) 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: _____

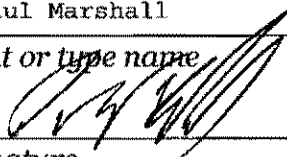
7. **Certifications.** Applicant hereby certifies the following.

- a. The information provided herein is complete, accurate and correct.
- b. The low-level radioactive waste for which this Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.
- c. The person submitting this Application is authorized by Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Nonparty Compact Waste. A copy of a written document containing such authorization must be attached to this Application.
- d. Applicant has delivered to the Compact Facility operator and TCEQ a copy of this Application and the Agreement for Importation of Nonparty Compact Waste (along with any supplements or amendment thereto).

8. **Authorized Signatory:**

Paul Marshall

Print or type name



Signature

Vice President

Title

May 2, 2012

Date

ATTACHMENTS:

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



Agilent Technologies

2850 Centerville Road
Wilmington, DE 19808

Agilent Technologies, Inc. Letter of Authorization to Ecology Services, Inc.

Agilent Technologies, Inc. (Agilent) is a small generator of Low Level Radioactive Waste (LLRW). Since December 2007, Agilent has accumulated approximately 2700 individual Electron Capture Detectors (ECD's). Each ECD contains a Nickel-63 foil in a sealed capsule. This volume will fit into approximately three (3) 55 gallon drums when these drums are prepared for burial in accordance with the WCS-TCEQ WAC. This equates to 22.5 cubic feet of total volume accumulated over the past 4.5 years.

Agilent will utilize the Low Level Radioactive Waste Brokerage Services of Ecology Services, Inc. of Columbia, MD to package, label, manifest, and transport this material to the WCS-TCEQ facility. This letter serves as official authorization to allow Ecology Services, Inc. to perform these services on behalf of Agilent per the requirements specified in the "Application for Importation of Nonparty Low-Level Radioactive Waste" to which this will be attached.

Sincerely,

David Hoppy, CHMM

EHS Manager – Agilent Technologies, Inc. – Eastern Region