



October 4, 2017

Dear Ms. Ing,

Qal-Tek Associates, LLC would also like to submit the generator information under a Business Confidential classification to prevent the customer information from reaching public access. This request is intended to abide by Homeland Security interests in protecting or preventing radioactive materials from falling into the wrong hands (eg. many of our industrial clients have sources in remote locations with limited security) and to protect our client list for competitive reasons and potential harassment from our competitors.

Best regards,

A handwritten signature in black ink that reads 'Michael Albanese'. The signature is written in a cursive, flowing style.

Michael Albanese  
QTA Corporate RSO



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

Oct. 5, 2017

TLLRWDC  
Mrs. Leigh Ing  
333 Guadalupe Street #3-240  
Austin, Texas 78701

Subject: Application for Importation of Non-Party Low-Level Radioactive Waste

Dear Ms. Ing:

Please find enclosed an application from Qal-Tek Associates, LLC to import Class C domestic normal and special form LLRW for disposal at Waste Control Specialists, LLC facility in Andrews, Texas. Qal-Tek Associates respectfully requests that this BROKER application be considered by the Texas LLRW Compact Commission at its next meeting. Qal-Tek Associates understands that the application requires export permits from the Southwest compact and written authorization from the generator authorizing Qal-Tek Associates to act on their behalf for disposal of their radioactive material. Copies of the approved petitions and copies of the letter from the generator (Qal-Tek relinquishment of ownership (RoO) and/or authorization to dispose -GRAA) will be submitted as evidence to satisfy the Commission prior to each shipment over the next year of this authorization. This import disposal request represents a continuation of reducing our legacy inventory using previously approved documentation (RoO) and for newer materials with conforming documentation as requested in the application.

Attachments:

- Company authority of signatory
- Generator Certification Approval Letter
- Letter of Authority from TX DSHS
- Annex B Term Sheet

Thank you for your consideration,

A handwritten signature in black ink that reads "Michael Albanese". The signature is written in a cursive, flowing style.

Michael Albanese  
Qal-Tek Corporate RSO

Figure: 31 TAC §675.23(e)(1)

**ANNEX A**

**TLLRWDC §675.23—IMPORTATION FORM**

**TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION APPLICATION FOR IMPORTATION OF NON-PARTY LOW-LEVEL RADIOACTIVE WASTE (NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS PETITION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL QUANTITY GENERATOR AS DEFINED IN 31 TAC §675.20(19), IN WHICH CASE THE PETITION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER) (Article III, Sec. 3.05(7) of the Compact)**

**I. Applicant Information:**

Entity Name: Qal-Tek Associates

Contact Person, Title: Michael Albanese, RSO

Phone: 208-523-5557 ext. 34

Email: malbanese@qaltek.com

Website: www.qaltek.com

Business Address: 3998 Commerce Cir  
Idaho Falls, ID 83401

Mailing Address: 3998 Commerce Cir  
Idaho Falls, ID 83401

Is applicant:

- Generator
- Broker
  - Licensed Waste Processor
  - Licensed Waste Collector
- Department of Defense

**II. Generator Specifications:**

A. Generator type:

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

B. Is waste from a "small quantity generator"?

- Yes
- No

**III. Agreement Period:**

Import applications generally will be granted only in single fiscal-year increments. If you are seeking a term that would extend beyond the end of a current fiscal year, please explain the unusual circumstances that would justify a deviation from this general rule?

**Agreement period through August 31, 2018**

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**IV. Waste proposed for importation:**

Waste Volume (Cubic Feet): 46

Waste Radioactivity (Curies): 82

Waste Classification:

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

Waste Form

- Stable
- Unstable

Does the proposed waste consist solely of sealed sources?

- No.
- Yes.

Compact and/or unaffiliated state, territory, possession, or district of the United States where the waste was generated (please list):

Northwest, Rocky Mountain, Southwest, Midwest, Central,  
Southeast, Central Midwest, Appalachian, Atlantic, Unaffiliated,

(Nebraska, Michigan, New York, New Hampshire, Maine, Massachusetts, Rhode Island, North Carolina, Washington D.C.)

Waste Description: Sealed Sources (special and normal form)

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**V. Compliance**

Does Applicant 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 Applicant 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**

Applicant hereby certifies\* the following:

- The information provided herein is complete, accurate, and correct.
- The waste proposed for importation is not waste of international origin.
- The low-level radioactive waste for which this Import 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.
- The person submitting this Import Application is authorized by the Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Non-Party Compact Waste. A copy of a written document containing such authorization must be attached to this Import Application.
- Applicant has delivered to the specified disposal facility and TCEQ a copy of this Application for Importation of Compact Waste (along with any supplement or amendment thereto).

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

**VII. Authorized Signatory:**

Michael Albanese

*Print or type name*

*Michael Albanese*

*Signature*

Radiation Safety Officer

*Title*

Oct. 2, 2017

*Date*

**VIII. ATTACHMENTS:**

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

In April of 2017 a source shipment was offered to the transporter without a positive closure on the inner shield resulting in the release of 3 sources. As a result, the radiation fields on the outside of the package exceeded 49CFR limits and triggered an NRC reporting requirement. The NRC investigated the self-reporting incident and is expected to issue Notice of Violations per the exit interview in the near future. Immediately following the incident and reporting Qal-Tek Associates president and CEO ceased all source shipments and performed an audit of shipping practices and an investigation into the root-cause. The audit and investigation lead to several corrective actions that were promptly addressed to prevent reoccurrence. The NRC was satisfied with our response and corrective action plan and execution thereof. Qal-Tek Associates Radiation Safety Committee removed the source shipping ban as QTA shippers were trained on the new procedures.





To whom it may concern,

The Qal-Tek recognized Radiation Safety Officer, Michael Albanese, is the authorized individual for signature of all disposal permitting and applications for WCS as well as all other company approved disposal facilities.

This authorization is offered as of June 1, 2015 and is effective until any other such notice or change of position.

A handwritten signature in black ink that reads "Travis Snowder".

Travis Snowder  
President/CEO  
Qal-Tek Associates



## *Generator Certification Approval Letter*

**January 6, 2016**

Mr. Michael Albanese  
Radiation Safety Officer  
Qal-Tek Associates, LLC  
3998 Commerce Circle  
Idaho Falls, Idaho 83401

**RE:** Qal-Tek Associate, LLC's Generator Certification Identification Number – **IDQLTAQTA**

Generator Certification Valid **January 6, 2016** through **January 31, 2017**

**Dear Mr. Michael Albanese,**

On January 6, 2016, Waste Control Specialists LLC completed a review of the submitted Generator Certification Packet and found Qal-Tek Associate, LLC to have an acceptable waste management program and is authorized to ship waste materials to the Waste Control Specialists LLC Compact Waste Disposal Facility (CWF).

Be reminded, any change to Qal-Tek Associate, LLC's waste management program which reduces administrative control requires notification to Waste Control Specialists LLC. This Certification is valid until the last day of the month, 12 months from the date of issue.

The generator certification identification number is required on all documentation or correspondence with Waste Control Specialists LLC regarding waste disposal.

Waste Control Specialists LLC is pleased to have the opportunity to provide you with the quality waste management services that you need. If you have any questions or need further assistance, please feel free to contact me at (432) 525-8674 or at (432) 269-5963.

Sincerely,  
WASTE CONTROL SPECIALISTS LLC

*Thomas Huck*

Thomas Huck  
QA - Generator Certification Manager

*Corporate*  
5430 UBI Freeway, Ste. 1700  
Three Lincoln Centre  
Dallas, TX 75240  
Ph. 972.715.9800  
Ex. 972.448.1419

*Facility*  
P.O. Box 1129  
Andrews, TX 79714  
Ph. 888.789.2783  
Ex. 432.525.8902

**TEXAS DEPARTMENT OF STATE HEALTH SERVICES**

DAVID L. LAKEY, M.D.  
COMMISSIONER

P.O. Box 149347  
Austin, Texas 78714-9347  
1-888-963-7111  
TTY: 1-800-735-2989  
[www.dshs.state.tx.us](http://www.dshs.state.tx.us)

July 12, 2012

QAL-TEK ASSOCIATES LLC  
ATTN ANTHONY BORLAND  
3998 COMMERCE CIRCLE  
IDAHO FALLS ID 83401

Registration No.: W0020  
Authorized Use: Shipper

Mr. Borland:

Qal-Tek Associates, LLC is hereby registered to ship Low Level Radioactive Waste (LLRW) to the Texas LLRW Disposal Facility pursuant to Title 25 Texas Administrative Code (TAC) §289.257. This registration will expire on the date listed above.

In addition to the requirements and restrictions of Title 25 TAC §289.257, the following conditions are imposed on your activities as a general licensee while shipping or transporting LLRW in the state of Texas:

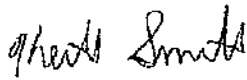
1. The registrant shall have the following in their possession at all times when shipping LLRW in Texas to the Texas LLRW disposal facility, and make them available for Texas Department of State Health Services (DSHS) review upon request:
  - a) a copy of this registration letter,
  - b) a copy of the registrant's Emergency Plan,
  - c) a uniform LLRW manifest, and
2. The registrant shall submit a copy of the LLRW manifest including shipping, container and waste information to DSHS at least five (5) days prior to the waste shipping date. This can be faxed to: Manager, Radioactive Material Licensing Branch at (512) 834-6690 or a scanned copy emailed to the Program Coordinator, Industrial Licensing Program: [ray.fleming@dshs.state.tx.us](mailto:ray.fleming@dshs.state.tx.us).
3. If at any time during the registration period the Emergency Plan, Proof of Financial Responsibility, Packaging Information (COC) is amended, the registrant shall provide DSHS with copies of amended documentation at least five (5) days prior to the next LLRW shipment to the Texas LLRW Disposal Facility.

Qal-Tek Associates, LLC  
Page 2 of 2  
July 12, 2012

4. After this registration has expired Qal-Tek Associates, LLC shall apply for renewal of their registration per the requirements outlined in DSHS Regulatory Guide 2.19. The registrant shall provide DSHS with the required documentation at least fourteen (14) days prior to their next LLRW shipment to the Texas LLRW Disposal Facility.

If I may be of assistance, please contact me at (512) 834-6688 extension 2215; or by electronic mail at [keith.smith@dshs.state.tx.us](mailto:keith.smith@dshs.state.tx.us).

Sincerely,



Keith Smith, License Reviewer  
Industrial Licensing Program  
Radiation Safety Licensing Branch

Enclosures: Emergency Telephone Notice