

**ANNEX A**

**TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL  
COMPACT COMMISSION**

**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	<u>Environmental Mgmt. &amp; Controls, Inc.</u>
Contact Person	<u>Steven May, ARSO</u>
Phone	<u>714-997-8090</u>
Email	<u>smay@tgainc.com</u>
Website address	<u>www.tgainc.com</u>
Business Address	<u>3106 S. Faith Home Road</u>
	<u>Turlock, CA 95380</u>
Mailing Address	<u>1205 W. Barkley Ave.</u>
	<u>Orange, CA 92868</u>

**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.

☒ 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: approval date through 8/31/16

3. Waste proposed for importation.

Waste Volume (Cubic Feet)	1,175.00
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Waste Radioactivity in Curies

25.0

Place of origination (State) of waste: AL, AZ, AR, CA, CO, CT, DE, FL, GA, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, PA, RI, SC, SD, TN, VA, WV,

Waste description:	WI, DC
Sealed sources stabilized in concrete, depleted uranium, LLRW waste.	

Waste classification (Class A, Class B, or Class C): Class A, B, & CWaste form: ☒ stable ☒ unstable

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

<input checked="" type="checkbox"/> C-14	30.0	millicuries (mCi)
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☒ Tc-99                  1.0                  microcuries (uCi)

☒ I-129 5.0E05 nanocuries (nCi)

☒ Depleted Uranium 15.0E6 microcuries (uCi)

☐ Concentration (provide units)

Source of generation

Research, industry.

4. Is the proposed waste a sealed source?

☐ No.

☒ Yes. Please explain: All sealed sources will be shipped as

stable waste encapsulated with concrete in 7A containers.

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:**

Steven May

*Print or type name*

*Signature*

ARSO

*Title*

5/29/15

*Date*

**ATTACHMENTS:**

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

- 1. Figure: 31 TAC §675.23(f)(2) - Annex B
- 2. EMC CA RML #3546-50
- 3. Generator Certification Approval Letter (CAEMC1EMC)

## ANNEX B

### TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION

#### Agreement for Importation of Nonparty Compact Waste

This Agreement for Importation of Nonparty Compact Waste (hereinafter referred to as "Agreement") is dated \_\_\_\_\_, 2015, by and between Thomas Gray & Associates, Inc./Environmental Management & Controls, Inc. (hereinafter collectively referred to as "Generator") and the Texas Low-Level Radioactive Waste Disposal Compact Commission ("Commission") (collectively the "Parties").

#### I. RECITALS

WHEREAS Texas is the host state for the Texas Low-Level Radioactive Waste Disposal Compact ("Compact"), which requires the state to develop a facility for the disposal of low-level radioactive waste generated within the Compact's party states; and

WHEREAS in compliance with the Compact and with state law, the Texas Commission on Environmental Quality ("TCEQ") issued a license to Waste Control Specialists LLC ("Compact Facility Operator") to construct and operate a Compact Waste Disposal Facility in Andrews, TX for the disposal of low-level radioactive waste for the Compact; and

WHEREAS the Texas legislature has authorized the Compact Facility Operator to accept for disposal at the Compact Facility low-level radioactive waste from waste generators located outside of the Compact party states; and

WHEREAS Chapter 403, §3.05(6) of the Texas Health and Safety Code authorized the Commission to enter into an agreement with any person, state, regional body, or group of states for the importation of low-level radioactive waste into the Compact for management or disposal, provided that the agreement receives the majority vote of the Commission; and

WHEREAS the Texas Legislature has established additional terms and conditions in Chapter 401 of the Texas Health and Safety Code that if satisfied ensure that the importation of low-level radioactive waste will be in the State's public interest; and

WHEREAS Generator has filed an Application for Importation of Nonparty Low-Level Radioactive Waste ("Application") with the Commission; and

WHEREAS the Commission has processed and considered Generators' Application in accordance with applicable requirements, and a majority of the members of the Commission approved the Application and voted to enter into this Agreement; and

WHEREAS in voting to approve Generator's Application and to enter into this Agreement, the Commission considered all relevant statutory and regulatory considerations, including, but not limited to: (a) the volume, type, physical form, and total activity (radionuclide-specific activity, if needed) of the waste proposed for importation as identified in the Application; (b) the poly and purpose of the

Compact; (c) the existence of the unresolved violations pending against Generator with any other regulatory agency with jurisdiction to regulate radioactive material, and any comments by the regulatory agency with which Generator has unresolved violations; (d) any unresolved violation, complaint, unpaid fee, or past due report that the Generator has with the Commission; (e) whether, by acceptance of this waste for disposal, the Compact Facility will remain below the applicable annual and total volume and curie capacity disposal limits set forth in §401.207(e), (e-1) (if applicable) and (f)(1) of the Texas Health and Safety Code; and (f) other factors that the Commission has deemed relevant to carry out the policy and purpose of the Compact and Chapters 401 and 403 of the Texas Health and Safety Code.

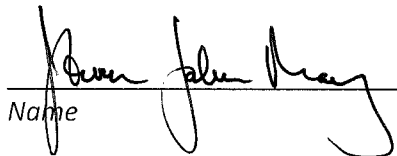
## II. REPRESENTATIONS AND ACKNOWLEDGEMENTS

WHEREAS we, the Generator, represent, acknowledge, and propose the following:

- A. Generator proposes this Agreement shall remain in effect from 8/1/2015 through 8/31/2016 unless amended by agreement of the Parties, or revoked by the Commission prior to importation.
- B. Generator agrees to comply with all applicable federal and state laws and rules including, without limitation, Texas Health and Safety Code (THSC), Chapter 403, §8.03
- C. Generator shall be liable for its own acts, omissions, conduct, and relationships in accordance with applicable law.
- D. Generator acknowledges that the Commission under any circumstances may amend or revoke the agreement with prior notice and that under emergency circumstances the Commission may suspend authorization to import with such notice as it is able to give under the circumstances.
- E. Generator agrees that this Agreement shall not be assignable or transferable to any other person.
- F. Generator acknowledges that this Agreement is subject to receipt by the Compact Facility Operator and the Commission of written certification from the Texas Commission on Environmental Quality (TCEQ) prior to the acceptance of Generator's Nonparty Compact Waste that the waste to be imported is authorized for disposal under the Compact Facility license.
- G. Generator describes the waste as follows:
  - a. Waste Volume (ft<sup>3</sup>): ≤ 1175.00
  - b. Waste Type: Type A
  - c. Physical Form/Waste Class: Stable sealed sources (Class A, B, & C) in concrete, depleted uranium (Class A), and unstable LLRW (Class A).
  - d. Total Radioactivity (Ci): ≤ 25.00
  - e. Radionuclide-specific activities:
    - i. C14: 30 mCi
    - ii. Tc99: 1.0 µCi
    - iii. I129: 5.0E05 nCi
    - iv. Depleted Uranium: 15.0E6 µCi
- H. Generator has disclosed in its Application:

- a. the existence of unresolved violations pending against the applicant with any other regulatory agency with jurisdiction to regulate radioactive material; and
  - b. the existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s), that the applicant has with the Commission; and
  - c. the existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s), that the applicant has with any other regulatory body, including, without limitation, the TCEQ.
- I. Generator acknowledges that a misrepresentation with respect to an item listed in A, B, or C, may result in the cancellation of the agreement.
  - J. Generator acknowledges the obligation to report immediately to the Commission any allegation of the violation of any law, rule or regulation related to the storage, shipment or treatment of any form of radioactive material.
  - K. Generator acknowledges the right of the Commission to audit or cause to be audited compliance with the agreement.
  - L. Generator agrees to comply to the extent applicable with the rules related to commingling adopted by the TCEQ in coordination with the Commission pursuant to THSC, §401.207(k).
  - M. Generator affirms that no waste of international origin shall ever be included in the materials imported to the Compact Facility.
  - N. Generator agrees to comply with any other matter required by 31 TAC §675.23 to be included in the agreement.

GENERATOR:

  
Name

  
Title

**RADIOACTIVE MATERIAL LICENSE**

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health, now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee	Environmental Management and Controls, Inc.	3. License Number	3546-50	Amendment Number : 80
2. Address	3106 South Faith Home Road Turlock, CA 95380	4. Expiration date	August 10, 2019	(2)
Attention:	Thomas A. Gray President	5. Inspection agency	Radiologic Health Branch North	

License Number 3546-50 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Hydrogen-3	A. Packaged waste	A. Not to exceed 9,000 curies.
B. Any radioactive material except: (1) special nuclear material, (2) source material, (3) any other alpha emitters	B. Packaged waste	B. Not to exceed 150 curies.
C. Alpha emitters except: (1) special nuclear material, (2) source material	C. Packaged waste	C. Not to exceed 1000 millicuries.
D. Special nuclear material	D. Packaged waste	D. See Condition 27
E. Source material	E. Packaged waste (non-dispersible)	E. Not to exceed 30,000 pounds.
F. Source material	F. Packaged waste	F. Not to exceed 2,500 pounds
G. Radium-226	G. Radioactive waste (Sealed sources)	G. Sources not to exceed 100 millicuries each. Total not to exceed 2.7 curies.
H. Any nuclide with atomic number 3-104	H. Radioactive waste (Sealed calibration check sources)	H. Not to exceed 99 microcuries. Not to include TRU > 100 nanocuries/g.
I. Any nuclide with atomic number 3-104	I. Contaminated wipe samples	I. Not to exceed 10 millicuries total.
J. Any nuclide with atomic number 3-104	J. Calibration sources	J. Not to exceed 1.0 millicurie total.
K. Radium-226	K. Sealed source	K. 1 source not to exceed 100 microcuries
L. Americium-241	L. Sealed source	L. 1 source not to exceed 12 microcuries

9. Authorized Use

- A.-I. To be used incidental to performing services including pickup and packaging of radioactive waste in DOT approved containers at temporary job sites. Receipt and storage of radioactive waste packaged in DOT approved containers. Defacing <100 microcuries sealed calibration check sources to be disposed of as DAW, not to include TRU>100 nanocuries per gram. Transportation of radioactive waste within the State of California when each transport conforms to the California Radiation Control Regulations including Section 30373. Up to ten (10) percent (or one (1) percent if in liquid form) of the radioactive waste as described in Subitems A.-I. of this license may also be processed and repackaged in accordance with the procedures and limitations specified in this license.

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J. To be used as check sources for in house detectors.

K.-L. To be used as check calibration sources for effluent monitoring.

**LICENSE CONDITIONS**

10. Radioactive material shall be used only at the following locations:
  - (a) 3106 South Faith Home Road, Turlock, CA.
  - (b) Temporary job sites of the licensee in areas not under exclusive federal jurisdiction throughout the state of California (See Condition 32). (Except for Decay in Storage)
11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Items 6, 7, 8 and 9 of this license. The annual fee for this license is required by and computed in accordance with Title 17, California Code of Regulations, Sections 30230-30232 and is also subject to an annual cost-of-living adjustment pursuant to Section 100425 of the California Health and Safety Code.
12. Radioactive material shall be used by, or under the supervision of, the following individuals:

(a) Joseph P. Skovron	(d) Jason A. Hoffman
(b) Harold Sims	(e) Steven J. May
(c) Thomas Essig	(f) Mark Sims
13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with the statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
  - (a) The renewal application dated July 03, 2007, letters with attachments, dated July 3, 2007, and July 23, 2007, all signed by Gaye Nelson, Manager, Radiation Safety Officer, EMC, regarding the addition/appointment of an Alternate Radiation Safety Officer, the addition of the sealed source disposal service, the services performed at temporary job sites, and the letters dated January 19, 2009, and January 21, 2009, both signed by Gaye Nelson and E-Mails dated January 20, 2009, sent by Gaye Nelson, regarding a revision to license condition numbers 15(c), and 23.
  - (b) The letters dated January 11, 2010, and July 21, 2010, both signed by Gaye Nelson, Manager and RSO, requesting to provide additional services for Decay in Storage prior to disposal, committing to perform requirements for Decay in Storage of Co-57 sealed sources, and the letter dated August 9, 2010, signed by Gaye Nelson, correcting the renewal application, dated July 3, 2007, for temporary job sites.
  - (c) The letter dated April 1, 2014, with attachments, signed by Richard Gallego, President, regarding updated emergency contact list.
  - (d) The letter dated May 16, 2014, with attachments, signed by Thomas Essig, CHP, Alternate Radiation Safety Officer, regarding an updated training program.
  - (e) The letter with attachments dated February 2, 2015, signed by Richard Gallego, President, including the updated Emergency Contact List.

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- (f) The letters dated November 21, 2014, February 25, 2015, March 20, 2015, and March 24, 2015, all with attachments, and all signed by Thomas Essig, Alternate Radiation Safety Officer, regarding updating the effluent monitoring procedure.
14. (a) The Radiation Safety Officer in this program shall be Harold Sims.
- (b) The Alternate Radiation Safety Officers in this program shall be Thomas Essig, Steven J. May, and Jason A. Hoffman.
15. The Radioactive Shipment Record, from each customer, shall be on file describing:
- (a) Total activity in millicuries, or in the case of source or special nuclear material, the total weight.
- (b) The principal radioisotopes.
- (c) The maximum radiation level at the surface of the container, and the reading at one meter from the source, only for Yellow II and Yellow III Containers.
- (d) The name and address of the licensee from whom the waste was received.
- (e) The date of receipt of the package.
- (f) Form of the radioactive material, specifically whether absorbed liquid, dry solid, animal carcasses or scintillation vials.
- (g) Cataloging system (numbering or lettering) to be used for the accountability, and tracing of the radioactive material through documentation pertaining to the specifics of each container and generator.
16. The maximum period the licensee is authorized to store radioactive waste material is as follows:
- (a) For solid material in noncombustible containers, 24 months.
- (b) For solid material in combustible containers, 6 months.
- (c) For absorbed liquid material and non-overpacked animal carcasses in hermetically sealed, watertight liner inside a 7A-type drum, 90 days.
- (d) For over-packed animal carcasses, 12 months.
17. The licensee shall, with respect to all radioactive waste collected for disposal at licensed land burial sites, establish and maintain a training program, written operating and radiation safety procedures, and quality assurance inspection and testing procedures which assure that:
- (a) All waste is properly segregated and identified with respect to those classes of waste being accepted for burial at the intended burial sites.
- (b) Waste is properly packaged to conform to DOT regulations, according to specific packaging instructions for the class of waste being packed and for the intended burial site.
- (c) All containers are properly closed, meet DOT specifications, and are acceptable at the burial site for the class of waste contained.
- (d) All containers are free of surface contamination per DOT regulations.

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- (e) Radiation levels conform to DOT limits.
  - (f) All containers are properly labeled per DOT regulations.
  - (g) All records, shipping papers, and certificates are complete and accurate.
18. The licensee shall not store more than 8,000 cubic feet of uncompacted radioactive waste at any one time or a total of 8,500 cubic feet of radioactive waste including both uncompacted, compacted, and solidified radioactive waste at any one time.
19. All radioactive waste shall be loaded and transported in accordance with all applicable U.S. Department of Transportation Regulations, U.S. Nuclear Regulatory Commission Regulations, state regulations, and the requirements of this license. Nothing in this license shall in any way relieve the licensee from full compliance with all applicable local, state, and federal laws and regulations.
20. Sealed sources possessed under this license shall be tested for leakage and/or contamination as required by Title 17, California Radiation Control Regulations, Section 30275 (c).
21. Records of leak test results shall be kept in units of microcuries and maintained for inspection. Records may be disposed of following Department inspection. Any leak test revealing the presence of 0.005 microcuries or more of removable radioactive material shall be reported to the California Department of Public Health, Radiologic Health Branch, MS 7610, P.O. Box 997414, Sacramento, CA 95814-5006, within five days of the test. This report shall include a description of the defective source or device, the results of the test, and the corrective action taken.
22. The licensee is authorized to perform tests for leakage and/or contamination of sealed sources. The following tests may be performed for sources possessed under this license and as a customer service:
- (a) Collection of wipe test samples from sealed sources and devices containing sealed sources.
  - (b) Furnishing leak test kits Model TGA-76 for sealed sources and devices containing sealed sources to customers authorized to use such leak test kits.
  - (c) Analysis of materials collected by the licensee as stated in (a) above and material returned by customers from leak test kits listed in (b) above for amount of radioactivity. Reports to customers of analysis shall be in microcuries.
23. The licensee is authorized to use a radioactive waste compactor for compacting radioactive waste under the following limitations:
- (a) Compacting of radioactive waste is prohibited if the radioactive waste contains:
    - (1) Unsealed radioactive material other than contaminated articles,
    - (2) Radioactive material in liquid form.
  - (b) The licensee shall test areas near the compactor (excluding the compactor chamber and inside the surfaces of the sorting tunnel or the starting belts) considered most likely to be contaminated for removable contamination at intervals not less frequently than monthly, or if used less frequently than monthly, after each use. Results of such tests shall be maintained available for Department inspection. If removable contamination exceeds 2,000 disintegrations per minute per 100 square centimeters, the licensee shall immediately decontaminate the area.
  - (c) The licensee shall test areas inside the compaction chamber for contamination at intervals not less frequently than monthly or if used less frequently than monthly, after each use. Results of such tests shall be maintained

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available for inspection. If removable contamination exceeds 10,000 disintegrations per minute per 100 square centimeters, the licensee shall immediately decontaminate the area. If direct surface contamination surveys with a portable survey meter exceed 5,000 disintegrations per minute, the licensee shall immediately decontaminate the area.

24. The licensee shall conduct a physical inventory every six months to account for all sealed sources and/or devices received and possessed under the license. Records of the inventories shall be maintained for inspection, and may be disposed of following Department inspection.
25. The licensee is authorized to solidify waste under the following limitations:
  - (a) The solidification process shall be limited to Class A wastes as defined by 10 CFR 61.
  - (b) The licensee shall test for surface contamination in the puck loading area, where it is considered most likely to be contaminated, prior to moving any waste containers to outside storage. Results of such tests shall be maintained available for inspection.
  - (c) The licensee shall test by air sampling or shall use engineering controls to ensure airborne environmental releases do not occur via unmonitored release points. Results of such tests or the use of engineering controls shall be documented and maintained for inspection.
26. Notwithstanding the limitations specified by Condition 16 of this license, the licensee is authorized to store all forms of packaged waste for up to five (5) years from the date of receipt while an authorized waste site is not available to receive the waste. If an authorized waste site becomes available during the five-year limit specified by this condition, the licensee must meet the requirements of Condition 16 within 90 days of availability of the waste site.
27. The total mass of special nuclear material possessed under this license at any one time or at any one authorized location of use shall not exceed that stated in the following formula: The number of grams of Uranium-235 divided by 350, plus the number of grams of Uranium-233 divided by 200, plus the number of grams of Plutonium (all isotopes) divided by 200, shall not exceed one (i.e., unity).
28. In accordance with the California Code of Regulations Title 17, Section 30195.1, the licensee shall maintain an acceptable financial instrument in the amount of \$320,810.00 that satisfies the requirements outlined in the decommissioning funding plan dated August 12, 2010 if:
  - (a) The possession limit of unsealed licensed material specified in this license, has a half life greater than 120 days, and each isotope is greater than  $10^5$  times the applicable quantities listed in the Code of Federal Regulations, Title 10, Part 30, Appendix B; or
  - (b) The possession limit of unsealed licensed material specified in this license, has a half life greater than 120 days, and for a combination of isotopes,  $R$  (sum of the ratios) divided by  $10^5$  is greater 1.
29. The licensee is authorized to hold radioactive materials with a physical half-life of less than 65 days including Co-57 for decay in storage before disposal in ordinary trash provided:
  - (a) Radioactive waste to be disposed of in this manner shall be held for decay in storage for at least 10 half-lives. Cobalt-57 shall be held for decay for at least 15 half-lives.
  - (b) Before disposal as normal waste, radioactive waste shall be surveyed to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

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- (c) Records shall be maintained of the disposal of licensed materials made by decay in storage. These records shall be sufficient to demonstrate compliance with this license condition and shall be retained for 3 years after the record is made.
  - (d) Radioactive waste to be held for decay shall be segregated from all other radioactive waste forms to ensure decay to background levels prior to disposal.
30. The licensee shall comply with the requirements described in the RHB document entitled "Increased Controls (IC) for Licensees that Possess Sources Containing Radioactive Material Quantities of Concern". The IC requirements shall be implemented before taking possession of any IC quantities. Upon completion of implementation, the licensee shall notify the Radiologic Health Branch (RHB) of the California Department of Public Health (CDPH) by telephone and in writing. Written notification is to be sent to:

**CDPH**

Radiologic Health Branch  
Radioactive Material Licensing  
ATT: Increased Controls Program  
MS 7610  
PO Box 997414  
Sacramento, CA 95899-7414

Telephone notification shall be made to the local RHB Inspection Office. Local RHB Inspection Office telephone numbers are:

Northern California:	(510) 620-3416 or (510) 620-3419
Southern California:	(714) 524-1409 or (714) 524-1203
Los Angeles County:	(213) 351-7897 or (213) 351-7387
San Diego County:	(858) 694-3621 or (858) 694-3616

31. The licensee shall comply with the requirements described in the Department of Public Health, Radiologic Health Branch letter, with enclosure entitled, "Specific Requirements Pertaining to Fingerprinting and Criminal History Records Checks," dated June 5, 2008, and California order dated June 5, 2008, signed by Gary Butner, Acting Chief, Radiologic Health Branch. The licensee shall complete implementation of said requirements prior to the time that radioactive materials are possessed at or above the quantities of concern as specified in "Table 1: Radionuclides of Concern" contained within the Order.
32. Before radioactive materials may be used at a temporary job site at any federal facility, the jurisdictional status of the job site must be determined. If the jurisdictional status is unknown, the federal agency should be contacted to determine if the job site is under exclusive federal jurisdiction. A response shall be obtained in writing or a record made of the name and title of the person at the federal agency who provided the determination and the date that it was provided. Authorization for use of radioactive materials at the job sites under exclusive federal jurisdiction shall be obtained either by:
- a) Filing an NRC Form-241 in accordance with the Code of Federal Regulations, Title 10, Part 150.20 (b), "Recognition of Agreement State Licenses", or
  - b) By applying for a specific NRC license.

Before radioactive material can be used at a temporary job site in another State, authorization shall be obtained from the State if it is an Agreement State, or from the NRC for any non-Agreement State, either by filing for reciprocity or applying for a specific license.

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33. At least 30 days prior to vacating any address of use listed in Condition 10 of this license, the licensee shall provide written notification thereof to the California Department of Public Health, in accordance with Title 17, California Code of Regulations, Section 30256 (b).
34. A copy of this license and a copy of all documents pertaining to this license shall be maintained available for inspection at 3106 South Faith Home Road, Turlock, CA.
35. The licensee will provide the Low Level Radioactive Waste (LLRW) reports specified in the California Health and Safety Code section 115000.1(h) to the California Department of Public Health (CDPH) on an annual basis for both shipped and stored LLRW. Alternatively, LLRW shipment information may be provided on a per shipment basis. LLRW shipment information and annual reports shall be mailed to:

Attn: LLRW Tracking Program  
California Department of Public Health  
Radiologic Health Branch, MS 7610  
P.O. Box 997414  
Sacramento, CA 95899-7414

36. The licensee shall comply with the inventory and transaction reporting requirements in 10CFR 20.2207 (1-1-08 Edition) for nationally tracked sources. Note that transaction reports are required for any manufacture, transfer, receipt, disassembly, or disposal of a nationally tracked source, otherwise allowed by this license, by the next business day after the transaction. A nationally tracked source, as defined in 10 CFR 20.1003 (1-1-08 Edition) refers to a sealed source containing a quantity equal to or greater than Category 1 or Category 2 levels of any radioactive materials listed in Appendix E to 10 CFR Part 20 – "Nationally Tracked Source Thresholds." (1-1-08 Edition).

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Issued for the California Department of Public HealthDate: April 21, 2015By: 

Ronald Rogus  
Senior Health Physicist  
Radiologic Health Branch  
MS 7610, P.O. Box 997414  
Sacramento, CA 95899-7414



## *Generator Certification Approval Letter*

October 27, 2014

Mr. Harold Sims  
Radiation Safety Officer  
EMC - Thomas Gray & Associates  
3106 S Faith Home Road  
Turlock, CA 95380

**RE:** EMC-Thomas Gray and Associates Generator Certification Identification Number –**CAEMCIEMC**

Generator Certification Valid **October 27, 2014** through **October 31, 2015**

**Dear Mr. Harold Sims,**

On October 27, 2014, Waste Control Specialists LLC completed a review of the submitted Generator Certification Packet and found EMC - Thomas Gray & Associates 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 EMC - Thomas Gray & Associates 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

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