

August 15, 2017

VIA E-mail and UPS mail

TLLRWDCC
Mrs. Leigh Ing
505 West 15th St
Austin, Texas 78701

Tel (512) 820-2930

Via Email: administration@tllrwdcc.org

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

Dear Mrs. Ing:

Please find enclosed an application of Philotechnics to import Class A, B or C low level radioactive waste and sealed sources for disposal at the Compact Waste Disposal Facility at Waste Control Specialists, LLC in Andrews, Texas. Philotechnics respectfully requests that the Petition be considered and approved by the Texas Low-Level Radioactive Waste Compact Commission at its next meeting. Philotechnics understands that the application requires export permits from the Southwest and Rocky Mountain compacts and written authorization from the generator authorizing Philotechnics to act as the Broker for disposal of their radioactive material. Copies of approved petitions and copies of letters from the generator are being provided to satisfy the Commission for a tentative shipment before the 2017 calendar year. Additional export permits and letters from generators will be submitted for generators not already included in this request to satisfy the requirement for future shipments. The additional copies will be provide to the commission in one single package per shipment for a maximum of five shipments or until the agreement expires. No shipments will be made into the disposal facility without written confirmation from the commission that the evidence is satisfactory.

Enclosed with the application you will find the following documents:

- Annex B Term Sheet
- Generator Certification Approval Letter
- Letter of Authority from TX DSHS
- Generator Authorization Letter
- Export Permits

The Philotechnics Petition is being sent via-FedEx and or through certified mail to the following three organizations and via email as noted below:

Texas Low Level Radioactive Waste Disposal Compact Commission
505 West 15th Street
Austin, Texas 78701
Email: administration@tllrwdcc.org

Texas Commission on Environmental Quality

Bobby Janecka Radioactive Materials Licensing Section Manager
Radioactive Materials Division
Attn: Bobby Janecka
12100 Park 35 Circle Bldg. F Office #1306A
Austin, TX 78711-3087
Email: Bobby.Janecka@tceq.texas.gov

Compact Facility operator- Waste Control Specialists LLC Waste Control Specialists LLC
WCS Import Notification Mailstop
Three Lincoln Centre
Attn: Greta Greer
5430 LBJ Freeway, Suite 1700
Dallas, TX 75240
Email: DL_WCS_Importation@wcstexas.com

Please confirm receipt via email. We would be pleased to provide you with any further information upon your request if you or the Commission needs more information in order to act upon the Petition. Please contact me if there are any questions.

Respectfully submitted,

Elizabeth Broda
Waste Logistics Manager
Philotechnics, Ltd.



attachments:
Generator Certification Approval Letter
Letter of Authority from TX DSHS

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: Philotechnics, Ltd.

Contact Person, Title: Elizabeth Broda, Waste Logistics Manager

Phone: 865-285-3004

Email: ebroda@philotechnics.com

Website: www.philotechnics.com

Business Address: 201 Renovare Blvd.
Oak Ridge, TN 37830

Mailing Address: Same as above

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?

September 1, 2017 to August 31, 2018

IV. Waste proposed for importation:

Waste Volume (Cubic Feet): 50

Waste Radioactivity (Curies): 30

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):

Will include all US Territories with the exception of Texas and Vermont contingent upon approval from the compacts that require an export permit for their radioactive waste.

Waste Description: Domestic sealed sources and special form material that is no

longer in use or wanted. Debris and other discarded radioactive material will also be included.

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:

Elizabeth Broda

Print or type name

Elizabeth Broda

Signature

Waste Logistics Manager

Title

July 21, 2017

Date

VIII. ATTACHMENTS:

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

Current Generator Certification Approval Letter

Current Letter of Authority from Texas DSHS

Export Permits as applicable will be submitted as a different attachment



Generator Certification Approval Letter

April 11, 2017

Ms. Elizabeth Broda
Waste Logistics Coordinator
Philotechnics, Ltd.
201 Renovare Blvd.
Oak Ridge, TN 37830

RE: Philotechnics, Ltd. Generator Certification Identification Number **TNPHILOPH**

Generator Certification Valid **April 11, 2017** through **April 30, 2018**

Dear Ms. Elizabeth Broda,

On April 11, 2017, Waste Control Specialists LLC completed a review of the submitted Generator Certification Packet and found Philotechnics, Ltd. to have an acceptable waste management program and is authorized to ship waste materials to the Compact Waste Disposal Facility (CWF) and the Federal Waste Facility (FWF).

Be reminded, any change to Philotechnics, Ltd.'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 LBJ Freeway, Ste. 1700
Three Lincoln Centre
Dallas, TX 75240
Ph. 972.715.9800
Fx. 972.448.1419

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



March 28, 2017

PHILOTECHNICS LTD
ATTN ELIZABETH BRODA
201 RENOVARE BLVD
OAK RIDGE TN 37830

Expiration Date: **April 1, 2018**
Registration No.: W0010
Authorized Use: Shipper/Transporter

Ms. Broda:

Philotechnics Ltd., 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:

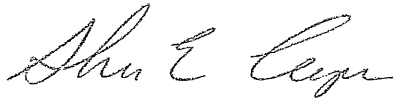
1. The registrant shall have the following in their possession at all times when shipping LLRW in Texas to the Texas LLRW disposal facility, and make them available for Texas Department of State Health Services (DSHS) review upon request:
 - a) a copy of this registration letter,
 - b) a copy of the registrant's Emergency Plan, and
 - c) a uniform LLRW manifest.
 - d) a copy of Proof of Financial Responsibility (i.e. insurance certificate).
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: shawn.garza@dshs.state.tx.us

Philotechnics Ltd.,
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3. If at any time during the registration period the Emergency Plan, Packaging Information (COC) and QA/QC Procedures are 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.
4. After this registration has expired Philotechnics Ltd., 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 2628; or by electronic mail at shawn.garza@dshs.texas.gov.

Sincerely,



Shawn Garza, Program Coordinator
Industrial Licensing Program
Radiation Safety Licensing Branch

Enclosures: Emergency Telephone Notice