



November 15, 2018

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

Subject: Application for Importation of Non-Party Low-Level Radioactive Waste for Class A Non-compactable and compactable DAW (Dry Active Waste)

Please see the enclosed application by Alaron Nuclear Services to import Class A Dry Active Waste into the state of Texas. All waste will be disposed of at the Waste Control Specialists, LLC facility located in Andrews, Texas. This application includes the importation of non-compactable and compactable DAW from all 50 states and U.S. Territories except Texas and Vermont. Alaron Nuclear Services will provide a signed Generator Authorization Form (TLLRWDC Gen Auth 110912) for each generator and export permits (when applicable) from all Low-Level Waste Compacts that require exportation permits. Generator authorization forms and applicable export permits will be provided and Alaron will not ship the material without a Conditional Removal Letter from the Commission.

Alaron Nuclear Services respectfully requests that the petition be considered and approved by the Texas Low-Level Radioactive Waste Compact Commission at its next meeting.

If you have any question concerning this importation application, please contact me via phone at (724) 535-5777 or via e-mail at [Michael.otlowski@veolia.com](mailto:Michael.otlowski@veolia.com).

Sincerely,

Michael Otlowski  
Health Physics Specialist  
Alaron Nuclear Services

Enclosures:

Annex A- Texas Low-Level Radioactive Waste Disposal Compact Commission  
Application for Importation of Non-Party Low-Level Radioactive Waste

Annex B- Term Sheet

2138 State Route 18  
Wampum, PA 16157

Phone: 724-535-5777  
Fax: 724-535-1165

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: Veolia ES Alaron, L.L.C.

Contact Person, Title: Michael Otlowski-Health Physics Specialist

Phone: 724-657-7155

Email: Michael.otlowski@veolia.com

Website: Veolia.com

Business Address: 2138 State Route 18

Wampum, PA 16157

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Mailing Address: Same as Business Address

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Is applicant:

Generator

Broker

Licensed Waste Processor

Licensed WasteCollector

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?

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August 31, 2019

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**IV. Waste proposed for importation:**

Waste Volume (Cubic Feet): 700

Waste Radioactivity (Curies): 6.0

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): All US States and Territories except Texas and Vermont

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Waste Description: Compactable and non compactable Dry Active Waste

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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 Otlowski

*Print or type name*



*Signature*

Health Physics Specialist

*Title*

11-15-18

*Date*

**VIII. ATTACHMENTS:**

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