TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

February 5, 2008

U.S. Nuclear Regulatory Commission
Region III
ATTN: Colleen Carol Casey, Materials Licensing Branch
2443 Warrenville Road, Ste 210
Lisle, Illinois 60532-4352

Reference: Radioactive Materials License Number 24-24817-01
13715 Rider Trail North, Earth City, MO 63045
Request to Change Facility Name (as represented on License)
Additional information to Control Number 316406

Dear Commission:

We would like to request that the name on our RAM license be changed as our facility has been acquired by new ownership. Our facility address, structure, and personnel will remain the same. I am enclosing information for this request pertinent to the information requested by NUREG 1556, Vol. 7, Appendix E as well as Section 8.2 of that same document:

1. New name – TestAmerica Laboratories – St. Louis;
2. Licensee contact and Phone # - Michael J. Ridenhower, (314) 298-8566;
3. No new individuals to be named to the license – Michael J. Ridenhower remains as the RSO, Jim Kleszczewski remains as Authorized User.
4. The transferor will not remain in non-licensed business without the license, Severn Trent Laboratories will no longer exist.
5. Severn Trent Laboratories has been acquired in full by TestAmerica, therefore all stocks, assets, and the like will now be under management and control of TestAmerica and the name Severn Trent Laboratories will no longer exist. However, no local personnel changes for the facility in St. Louis (to which this license governs) are planned.
6. No changes will be made in St. Louis as far as organization, location, storage, or operating/emergency procedures.
7. No changes will be made to the use, possession, location, or storage of the licensed materials.
8. No changes will be made in organization, location, facilities, equipment, procedures, or personnel that would require a license amendment.
9. All records, including calibrations, leak tests, surveys, inventories, etc., are current at the time of transfer. We are continuing as "business as usual" and plan to only change the name in which we do business.

13715 Rider Trail North Earth City, MO 63045 **tel** 314.298.8566 **fax** 314.298.8757 **www.testamericainc.com**

10. This does not apply as all records have been transferred to the new licensee and all activities will remain in the same location. Business as usual will proceed as the only change is the name in which we do business.
11. The facility will not change, currently there is no known contamination to the facility and no decommissioning is planned. TestAmerica has assumed all liability for potential decommissioning of the facility.
12. The facility structure has not changed and will continue under the same decommissioning plan as before. A new letter of credit has been established under the new company's name and is being attached to this request as **Attachment 1**. The decommissioning plan will be attached to this request as **Attachment 2**.
13. The transferee confirms that it will abide by all commitments and representations previously made to the NRC by the transferor. The facility will not be decommissioned at this time as the facility remains in business as usual. There are currently no corrective actions or open inspection items or enforcement actions by the NRC to this facility. With regard to contamination of the facility and equipment, the transferee accepts full liability of the site, will provide evidence of adequate resources to fund potential decommissioning (as made evident by Attachment 1 to this letter).
14. The transferor, Severn Trent Laboratories, and the transferee, TestAmerica Laboratories, agree to the transfer of control of the licensed material and activity. Severn Trent Laboratories has seized to exist upon completion of the transaction with TestAmerica Laboratories. TestAmerica Laboratories has accepted full responsibility and full liability for all licensing commitments. At this time there are no open NRC inspection items or enforcement actions.
15. The transferee commits to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license.

If you have any questions, please feel free to contact me at (314) 298-8566. Thank you for your help and guidance to implement the changes to the subject license.

Sincerely,

Michael J. Ridenhower
Radiation Safety Officer
TestAmerica Laboratories – St. Louis

ATTACHMENT 1

Letter of Credit

HARRIS

Harris N.A., Chicago, Illinois

STANDBY/LETTERS OF CREDIT
C/O Bank of Montreal
234 Simcoe Street
3rd Floor
Toronto, Ontario M5T 1T4
Tel: 1-877-801-0414
Fax: 1-877-801-7787
SWIFT: HATRUS44

DOCUMENTARY COLLECTIONS
C/O Bank of Montreal
129 St Jacques Street, 10th Floor
Montreal, Quebec H2Y 1L6
Tel: 1-888-258-6378
Fax 1-888-258-6380
SWIFT: HATRUS44

Irrevocable
Standby Letter of Credit No.: HACH205940OS

Date issued: February 6, 2008

Beneficiary:
U.S. Nuclear Regulatory Commission Nuclear Materials Safety Branch
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532

Applicant:
H.I.G. Test America, Inc.
c/o H.I.G. Capital Partners III, L.P.
1001 Brickell Bay Drive, 27th Floor
Miami, Fl 33131

Amount: Three Hundred Thirty Six Thousand Six Hundred Fifty Two and 00/100's United States Dollars (USD336,652.00)

Expiry Date: February 1, 2009

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. in your favor, at the request and for the account of H.I.G. Test America, Inc., c/o H.I.G. Capital Partners III, L.P., 1001 Brickell Bay Drive, 27th Floor, Miami, Fl 33131 (the "Applicant") for:

NRC License Number 24-24817-01
TestAmerica Laboratories, Inc. (TestAmerica-St. Louis)
13715 N. Rider Trail
Earth City, MO 63045
USD294,652.00
And

ORIGINAL

HARRIS. Harris N.A. Chicago

NRC License Number 06-30139-01
TestAmerica Laboratories, Inc. (TestAmerica-Connecticut)
128 Long Hill Cross Road
Shelton, CT 06484
USD42,000.00

up to the aggregate amount of Three Hundred Thirty-Six Thousand, Six Hundred Fifty-Two, U.S. dollars (USD336,652.00), available upon presentation of:

(1) Your sight draft, bearing reference to this Letter of Credit No. HACH205940OS, and

(2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the U.S. Nuclear Regulatory Commission."

This letter of credit is issued in accordance with regulations issued under the authority of the U.S. Nuclear Regulatory Commission (NRC), an agency of the U.S. Government, pursuant to the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974. NRC has promulgated regulations in title 10, Chapter I of the Code of Federal Regulations, Part 30, which require that a holder of, or an applicant for, a materials license issued under 10 CFR Part 30 provide assurance that funds will be available when needed for decommissioning.

This letter of credit is effective as of February 6, 2008 and shall expire on February 1, 2009.

Whenever this letter of credit is drawn on, under and in compliance with the terms of this letter of credit, we shall duly honor such draft upon its presentation to us, and we shall deposit the amount of the draft directly into the standby Trust fund of TestAmerica Laboratories, Inc. in accordance with your instructions.

Each draft must bear on its face the clause: "Drawn under Letter of Credit No. HACH205940OS, dated February 6, 2008, and the total of this draft and all other drafts previously drawn under this letter of credit does not exceed USD336,652.00."

This credit is subject to the Uniform Customs and Practice for Documentary Credits (2007 Revision), International Chamber of Commerce, Publication No. 600.

Signing Officer
HACH205940OS

Authorized Signing Officer

ORIGINAL

ATTACHMENT 2

Decommissioning Plan for facility

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

February 5, 2008

Nuclear Material Licensing Branch
US Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4352

Subject: Financial Assurance for Materials Licensees, RIN 3150-AG85, final rule, Amendment dated October 3, 2006

Dear Commission:
Consistent with the Amendment dated October 3, 2006 to the NRC Financial Assurance for Materials Licensees, RIN 3150-AG85, final rule, TestAmerica St. Louis is submitting this assessment of its Standby Trust Agreement for your review. The decommissioning plan outlined here is based upon estimated costs as outlined in NUREG/CR6477.

Laboratory Facility

The facility consists of 33,000 square feet (sq ft) leased in an Industrial Park. Approximately half of the facility space is utilized as administration offices, hallways, lunchroom and restrooms. Of the approximately 16,500 sq ft which is allocated to laboratory space, approximately one quarter of the facility is rated as low risk area for contamination, because it is used as instrument areas, hallways and storage areas for materials and/or contained samples. The remaining 8,500 sq ft, approximately one quarter of the facility is used as laboratory preparation area. Of the laboratory preparation areas, approximately half (one eighth of the total laboratory space, 4,500 sq ft), is designated as Radiation Control Areas.

TestAmerica St. Louis Laboratory Total Square Footage = 33,000 sq ft	
Administrative Areas: Offices, hallways, lunchroom, conference room	16,000 sq ft
Laboratory: instrument areas, storage areas (low risk)	8,500 sq ft
Laboratory Prep area: low level preparation areas	4,250 sq Ft
Laboratory Preparation area: Radiation Control Areas	4,250 sq ft

13715 Rider Trail North Earth City, MO 63045 **tel** 314.298.8566 **fax** 314.298.8757 **www.testamericainc.com**

The function of the TestAmerica St. Louis laboratory at 13715 Rider Trail North, Earth City, MO, is to perform chemical and radiochemical analytical measurements on a variety of environmental and mixed waste samples.

The samples analyzed by the laboratory are contracted from primarily commercial engineering companies, private industry, the Department of Defense (DOD) and the Department of Energy (DOE) for site contamination survey, remediation or waste characterization purposes.

Those samples received for analysis may contain radioactivity from virtually nothing (environmental background) to nanocurie/gram quantities of radioactivity. However, TestAmerica St. Louis maintains a rigorous radiation safety and waste minimization plan. Clients wishing to send samples of higher activity are limited to volumes which contain only microcurie quantities of radioactivity.

The samples containing radioactivity are handled by trained radiation workers, in Radiation Control Areas (RCA), using measures which maximize containment of sample and minimize the potential spread of the samples and hence any contamination. Working surfaces in the laboratory areas, e.g. workbenches and horizontal bases of hoods, are lined with disposable bench paper, which is routinely surveyed and replaced. Survey meters are placed at the entrance/exit point of all RCA's and are used to scan the existing personnel to prevent the potential spread of radioactive contamination. Samples are kept in sealed containers. Laboratory area swipe surveys are conducted on a monthly basis to further monitor appropriate containment of radioactive material.

Cost estimates for decontamination, removal and disposal of radioactive material

Assumptions

Using the format contained in NUREG/CR-6477 for cost estimates for decontamination, removal and disposal of radioactive material, the following assumptions are based upon TestAmerica St. Louis' laboratory operation and the control measures practiced at the laboratory:

1) The criteria to be used for free release will be 100 cpm above background for 100^2cm using a GM44-9 α,β,γ probe of materials and surfaces.

2) "Surface contaminated objects" will be decontaminated with appropriate detergents with the objective being to allow free release of the material, prior to cutting and disposal.

3) Only objects or surfaces with fixed contamination greater than 100 cpm above background will be disposed to radioactive waste.

4) The onsite hydraulic compactor will be used to minimize waste volume added to 208 liter drums.

Itemization of cost estimate (see following table for associated costs):

1) Disposal of 6 month collection of radioactive waste drums on site;

2) Disposal of residual radioactive sample volumes and containers on site;

3) Disposal of non-radioactive soil waste on site;

4) Labor to dispose of remaining sample volumes on site, including opening and frisking each container's contents and discarding any sample reading > 100 cpm above background to a radioactive material drum and samples reading < 100 cpm above background to a non-radioactive waste drum for further testing;

5) Analysis of drums for radioactive and hazardous waste constituents, survey and decontaminate laboratory, sample receiving, sample storage, waste accumulation area surfaces for free release;

6) Removal and disposal of 6 sinks and drains;

7) Survey of 17 hoods and the removal and of approximately 25%, assuming that 25% of the material will necessitate disposal as a radioactive waste;

8) Decontamination of ceilings 0 m^2, due to containment of materials ceiling tiles not contaminated;

9) Decontamination of walls 30m^2 , due to containment of materials this estimate is added for minor areas near sinks and benches which have potential for contamination;

10) Decontamination of floors.

Cost Breakdown

Cost Item	Calculation / Assumptions	Total
1) Rad Drum Disposal	6 drums x $4100.00* per drum to dispose	$24,600.00
2) Residual Rad volumes	12 drums x $4100.00* per drum to dispose	$49,200.00
3) Disposal of non-rad wastes	18 drums x $150.00 per drum to dispose	$2,700.00
4) Labor for surveying laboratory	2 technicians x 80 hours each x $43.85 per hr	$7,016.00
5) Characterization of drums	36 drums x $1000.00 per drum to dispose	$36,000.00
6) Survey & Decontaminate the laboratory	6 persons including 1foreman, 1 H.P. tech, 4 technicians x 176 hours each x $50.00/hr	$52,800.00
7) Removal & disposal of sinks	6 sinks/drains x $2,200.00	$13,200.00
8) Survey and Removal of hoods	4.25 hoods x 7600.00 per hood	$32,300.00
9) Decontamination of ceilings	0 m^2, due to containment of materials ceiling tiles not contaminated.	$0.00
10) Decontamination of walls		
11) Decontamination of flooring	Assuming 60 m^2	$9230.00
	Subtotal	$233,281.00
	25% contingency	$58320.00
	Total Estimate	$291,601.00

* - These costs based on waste profiles set up with Perma-Fix of Florida. TestAmerica-St. Louis' standard low-level radioactive waste costs range from roughly $2900.00 to $4100.00 per 208 liter drum based on drum constituents. Since the radioactive waste market can be volatile at times, we are assuming the higher cost for each drum of waste sent to protect ourselves from a potential higher charge in disposal costs.

We believe that these cost estimates are liberal and that any actual decommissioning costs would be less than estimated.

Severn Trent Laboratories, Inc. currently possesses a Standby Trust Agreement, in the amount of $294,652.00. As required, a copy of the Standby Trust Agreement is attached with this document.

In accordance with the regulations, this decommissioning plan will be reviewed on a triennial basis or more frequently as necessary.

Sincerely,

Michael J. Ridenhower
Radiation Safety Officer

13715 RIDER TRAIL NORTH • EARTH CITY, MO • 63045
PHONE: 314-298-8566 • FAX: 314-298-8757

Insert airbill here

RT 595 D 6764
FZ 0 02.08

From: Origin ID: ALNA (314)298-8566
Sample Control
Test America
13715 RIDER TRAIL NORTH

EARTH CITY, MO 63045

Ship Date: 07FEB08
ActWgt: 1 LB
System#: 3102719/INET8011
Account#: S *********

Delivery Address Bar Code

Ref #
Invoice #
PO #
Dept #

SHIP TO: 630-829-9841 BILL SENDER

Carol Colleen Casey
US NRC, Region III
2443 Warrenville Road
Materials Licensing Branch
Lisle, IL 605324352

FRI - 08FEB A2
STANDARD OVERNIGHT

TRK# 0201 7904 4300 6764

60532
IL-US
ORD

NY ENLA