

**Environmental
Resources
Management**

3352 128th Avenue
Holland, MI 49424
(616) 399-3500
(616) 399-3777 (fax)

13 March 2012
Reference: 0004065

U.S. Nuclear Regulatory Commission
Region III
Attn: Materials License Branch
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532



Re: Troxler Nuclear Density Gauges #19239 and #20669
Transfer of Ownership/Proper Disposal

Dear Sir or Madam:

The purpose of this document is to record the transfer of ownership by Environmental Resources Management, Inc. (ERM) of two Troxler Nuclear Density Gauges, Model 3440 for proper disposal. The licensed material contained in the gauges is regulated by the Nuclear Regulatory Commission (NRC), and we understand that the sale/transfer of ownership of the material may only occur if both the buyer and seller have valid NRC licenses that permit them to own the regulated material. ERM shipped the gauges under ERM's NRC Materials License #21-25861-01 to Troxler Electronic Laboratories, Inc. of North Carolina, who received the gauges on 6 February 2012, under Troxler's North Carolina Radioactive Material License #032-0182-1. A copy of the transfer of ownership letter and ERM's license is enclosed with this letter.

Specific information about the two Troxler Nuclear Density Gauges is as follows:

Model:	3440	3440
Serial No:	20669	19239
ERM ID:	16250 (#2)	16251 (#3)

Detailed specific information about the sealed source contained within the Troxler Nuclear Density Gauges is as follows:

Gauge Serial No. 20669

Serial No.	Nuclide	Activity (GBq)	(mCi)
47-16149	AM-241:BE	1.48	40
75-2054	CS-137	0.296	8

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Gauge Serial No. 19239

Serial No.	Nuclide	Activity (GBq)	(mCi)
47-14708	AM-241:BE	1.48	40
50-8891	CS-137	0.296	8

Since ownership of the troxler gauges has been transferred to Troxler, and ERM owns no other equipment containing regulated material, ERM is requesting the NRC to cancel ERM's license (#21-25861-01) for the two troxler gauges.

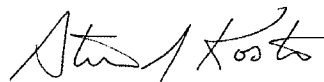
Because ERM transferred ownership of the Troxlers on 6 February 2012, ERM has made an inquiry to the NRC's fees section to determine if ERM can be assessed a pro-rated fee for the partial fiscal year of October 2011 through 6 February 2012. No determination has been provided to ERM; therefore, please let us know if ERM can be assessed a pro-rated fee for this fiscal year.

If you should have any questions or comments concerning this letter, please feel free to contact Dan Rusiecki at (616) 738-7322 or Steve Koster at (616) 738-7306.

Sincerely,



Daniel R. Rusiecki
Project Engineer - RSO



Steven J. Koster, P.E.,
Partner-in-Charge

DRR:km/SJK
Attachments
cc: File



Troxler Electronic Laboratories, Inc. - Troxler International, Ltd.
3008 Cornwallis Road, P.O. Box 12057, Research Triangle Park, NC 27709 - USA
Telephone: 919/549-8661 Telefax: 919/549/0761

February 7, 2012

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FEB 14 2012
ERM

Environmental Resources Management, Inc.
Attn: Dan Rusiecki
3352 128th Avenue
Holland, MI 49424

Attn: Dan Rusiecki

This is to acknowledge receipt and transfer of ownership of the nuclear gauge(s) listed below, and the radioactive sources contained therein, to Troxler under North Carolina Radioactive Material License #032-0182-1. You should retain this letter in your files for future reference.

Date Received: 02-06-12

Job Number	Model	Serial Number
21774	3440	20669
21775	3440	19239

Regards,

Emily Davis
Service/Repair Department
Troxler Electronics

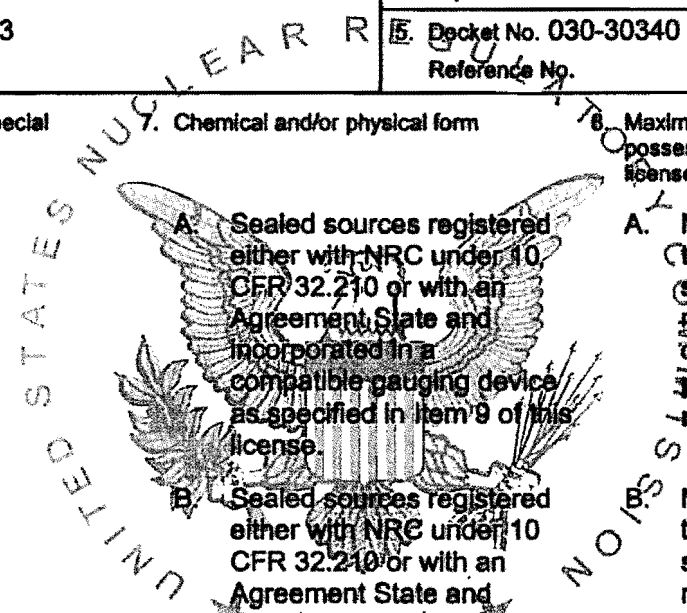
DRR 2/16/12

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

<p style="text-align: center;">Licensee</p> <p>1. Environmental Resources Management, Inc.</p> <p>2. 3352 128th Avenue Holland, MI 49424-9263</p>	<p>In accordance with letter dated October 27, 2006,</p> <p>3. License number 21-25861-01 is amended in its entirety to read as follows:</p> <hr/> <p>4. Expiration date November 30, 2012</p> <hr/> <p>5. Docket No. 030-30340 Reference No.</p>
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<p>6. Byproduct, source, and/or special nuclear material</p> <p>A. Cesium-137</p> <p>B. Americium-241</p>	<p>7. Chemical and/or physical form</p> <p>A. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license.</p> <p>B. Sealed sources registered either with NRC under 10 CFR 32.210 or with an Agreement State and incorporated in a compatible gauging device as specified in Item 9 of this license.</p>	<p>8. Maximum amount that licensee may possess at any one time under this license</p> <p>A. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State, total possession limit of 24 millicuries.</p> <p>B. No single source to exceed the maximum activity specified in the certificate of registration issued by NRC or an Agreement State, total possession limit of 120 millicuries.</p>
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9. Authorized Use:
- A. To be used in Troxler Models 3411, 3440, 3400 Series, 4640, 4545 or 3565 portable gauging devices for measuring physical properties of materials.
 - B. To be used in Troxler Models 3400 Series, 3216 or 3218 portable gauging devices for measuring physical properties of materials.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
21-25861-01Docket or Reference Number
030-30340

Amendment No. 07

CONDITIONS

10. Licensed material may be stored at the licensee's facilities located at 3352 128th Avenue, Holland, Michigan and may be used at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.
11. A. The Radiation Safety Officer for this license is Daniel R. Ruslecki.
B. Before assuming the duties and responsibilities as RSO for this license, future RSOs shall have successfully completed one of the training courses described in Criteria in Section 8.8 of NUREG-1556, Volume 1, Rev. 1 dated November 2000.
12. Licensed material shall only be used by, or under the supervision and in the physical presence of, individuals who have received the training described in application dated October 4, 2002.
13. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State.
B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State prior to the transfer, a sealed source received from another person shall not be put into use until tested.
C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U. S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.

**MATERIALS LICENSE
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- E. Tests for leakage and/or contamination shall be performed by persons specifically licensed by the Commission or an Agreement State to perform such services. In addition, the licensee is authorized to collect leak test samples but not perform the analysis: analysis of leak samples must be performed by persons specifically licensed by the Commission or an Agreement State to perform such services.
14. Sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee.
 15. When performing tests at temporary job sites, the authorized user shall not leave the moisture/density gauge unattended. Upon completion of tests the device shall be locked in the licensee's vehicle or a secure building to prevent unauthorized use, loss, or theft.
 16. Except for maintaining labeling as required by 10 CFR Part 20 or 71, the licensee shall obtain authorization from NRC before making any changes in the sealed source, device, or source-device combination that would alter the description or specifications as indicated in the respective Certificates of Registration issued either by the Commission pursuant to 10 CFR 32.210 or by an Agreement State.
 17. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by NRC, to account for all sources and/or devices received and possessed under the license.
 18. The licensee is authorized to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
 19. Each portable nuclear gauge shall have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The gauge or its container must be locked when in transport, storage, or when not under the direct surveillance of an authorized user. A minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal whenever the portable gauge is not under the control and constant surveillance of the licensee are required.
 20. Any cleaning, maintenance, or repair of the gauge(s) that requires removal of the source rod shall be performed only by the manufacturer or by other persons specifically licensed by the Commission or an Agreement State to perform such services.
 21. In addition to the possession limits in Condition 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.
 22. A. If the licensee uses unshielded sealed sources extended more than 3 feet below the surface, the licensee shall use surface casing that extends from the lowest depth to 12 inches above the surface and other appropriate procedures to reduce the probability of the source or probe becoming lodged below the surface. If it is not feasible to extend the casing 12 inches above the surface, the licensee shall implement procedures to ensure that the cased hole is free of obstruction before making measurements.

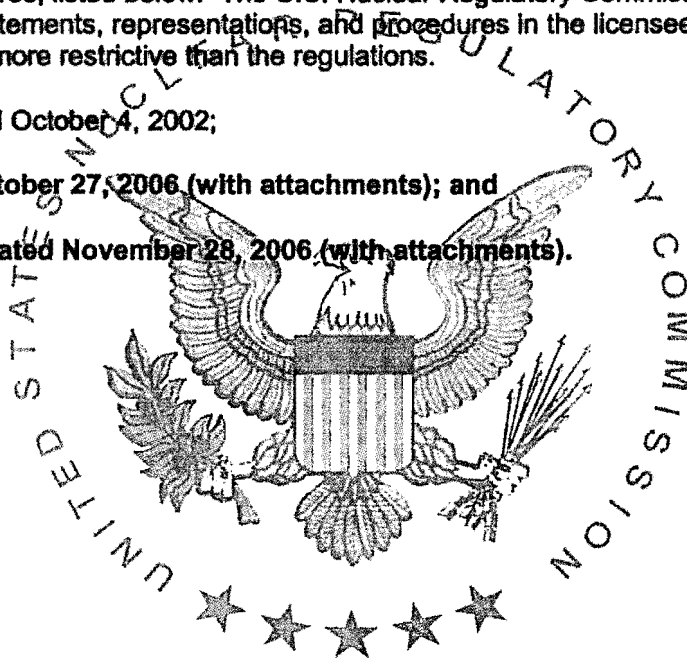
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SUPPLEMENTARY SHEET**

License Number
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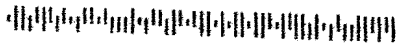
- B. If a sealed source or a probe containing sealed sources becomes lodged below the surface and it becomes apparent that efforts to recover the sealed source or probe may not be successful, the licensee shall notify the U. S. Nuclear Regulatory Commission and submit the report required by 10 CFR 30.50(b)(2) and (c). The licensee shall not abandon the sealed source or probe without obtaining the Commission's prior written consent.
23. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated October 4, 2002;
- B. Letter dated October 27, 2006 (with attachments); and
- C. Memorandum dated November 28, 2006 (with attachments).



FOR THE NUCLEAR REGULATORY COMMISSION

Date NOV 29 2006

By Loren J. Huefer
Loren J. Huefer
Materials Licensing Branch
Region III



Environmental
Resources
Management

3352 128th Avenue
Holland, MI 49424



US NUCLEAR REGULATORY
COMMISSION
REGION III
ATTN: MATERIALS LICENSE
BRANCH
2443 WARRENVILLE RD STE 210
LISLE IL 60532