



Full Service Environmental Consulting, Testing & Contracting
2418 Merriam Lane, KCK 66106 | Phone: 913-432-5500 | www.titankc.com

July 13, 2018

Director, Office of Nuclear Material Safety & Safeguards
ATTN: Document Control Desk/GLTS
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: NRC Transfer of Industrial Devices Report: Get The Lead Out, LLC

Dear Sir or Madam,

Per the requirements in 105CMR 120.122(D)(3)(g), Titan Environmental Services, Inc. (TES) relinquished possession of the following instrument to Get The Lead Out, LLC; who upon receipt sent it to the manufacturer for resourcing.

| Manufacturer | Model # | Serial # | Isotope | Activity | Transfer Date | Received From |
|-----------------------------|---------|----------|------------------|----------|---------------|------------------------|
| RMD Instruments Corporation | LPA-1B | 1113 | Co ⁵⁷ | 12 mCi | 03/24/2014 | General Licensee (TES) |

The instrument was shipped to Peter M. Hubicki, of Get The Lead Out, LLC (2121 Commonwealth Ave., Suite 202, Charlotte, NC 28205: 704-376-3594 [at time of transfer]); placed out of service by the manufacturer on January 27, 2014; and leak tested prior to disposal of the old source/replacement of a new one on January 30, 2014. Get The Lead Out, LLC retains possession of the instrument. The contact name and current office address follows: Kathryn Hubicki, 3717 Latrobe Dr., Suite 760, Charlotte, NC 28211. The phone number has not changed.

Please don't hesitate to contact me with any questions or concerns. You can reach me directly at 913-432-5500 (office), 816-507-8298 (cell), or my e-mail at kgranger@titankc.com.

Respectfully Submitted,

Karla Granger
Environmental Scientist/RSO
Titan Environmental Services, Inc.

CERTIFICATION

Dear Customer:

This is to certify that the radioactive source, previously installed in your XRF analyzer, has been removed for decommissioning as part of the resource process of your unit.

The source, Co-57, will be disposed in accordance with all applicable rules and regulations.

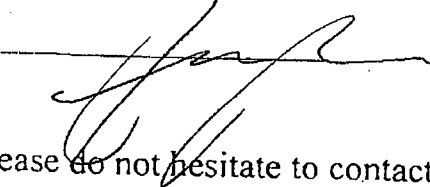
Model: LPA-1 _____ LPA-1B LTR1000 _____

Unit Serial Number: 1113

Source Model: IPL

Source Serial Number: I1-772

Date of Removal: 27 JAN 14

Performed by: 

If you have any questions, please do not hesitate to contact us at telephone 617-668-6901 or lpa@dynasilproducts.com.

Sincerely
Radiation Safety Officer
RMD Instruments Corp. dba Dynasil Products



Leak Test Certificate

Customer: Titan Environmental Services

System: LPA-1B **Serial Number:** 1113 **Test Date:** 30 JAN 14

Source Manufacturer: IPL **Source Model:** A3901-2

Active Material: Co⁵⁷ **Source Activity:** 444 MBq (12 mCi)

Source Serial Num.: K8-964

Assay Date: 30 JAN 14

Source Enclosure: Stainless Steel in Tungsten Holder

Type of Test:

Wipe

Areas Tested and Results:

Front and Sides of Bezel

Results:

All Below .005 μ Ci

Comments:

Test Performed By:

MC170C_R2



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Director, Office of Nuclear Material Safety & Safeguards
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: NRC Transfer of Industrial Devices Report: Heuresis Corporation

Dear Sir or Madam,

Titan Environmental Services, Inc. (TES) has received possession of the following instruments from the manufacturer:

| Manufacturer | Model # | Serial # | Isotope | Activity | Transfer Date | Received From |
|----------------------|---------|----------|------------------|----------|---------------|----------------------|
| Heuresis Corporation | Pb200i | 1045 | Co ⁵⁷ | 5 mCi | 07/10/2018 | Heuresis Corporation |
| Heuresis Corporation | Pb200i | 1056 | Co ⁵⁷ | 6 mCi | 07/13/2018 | Heuresis Corporation |

The instruments were shipped from Brian Carbonneau, of Heuresis Corporation (330 Nevada St., Newton, MA 02458: 617-467-5526).

As of July 10, 2018, TES has received a Radioactive Materials License from the Kansas Department of Health & Environment (License #: 22-B1028, Expiration Date: July 31, 2023). As such, TES now has permission to possess, store and use these instruments for lead-based paint activities in the state of Kansas. The intended use of these instruments is to conduct lead-based paint risk assessments and inspections; and will be maintained according to the state of Kansas Radiation Regulations (28-35-1 through 505).

Please don't hesitate to contact me with any questions or concerns. You can reach me directly at 913-432-5500 (office), 816-507-8298 (cell), or my e-mail at kgranger@titankc.com.

Respectfully Submitted,

Karla Granger
Environmental Scientist/RSO
Titan Environmental Services, Inc.

Valentin-Rodriguez, Celimar

From: Karla Granger <kgranger@titankc.com>
Sent: Tuesday, July 17, 2018 11:38 AM
To: Kathryn Hubicki
Cc: Valentin-Rodriguez, Celimar
Subject: [External_Sender] FW: RMD 1113 & Heuresis XRFs 1045 & 1056

Katie,

Hey, we're working with the NRC to get this cleared up. Would you please respond to Celimar Valentin-Rodriguez (copied on this email) with your RAM license number? Thanks!!

Karla Granger, Environmental Scientist
Titan Environmental Services, Inc.
2418 Merriam Lane
Kansas City, KS 66106
(913) 432-5500 (office)
(913) 432-0704 (fax)
(816) 507-8298 (cell)
kgranger@titankc.com (company email)
www.titankc.com (company website)

From: Valentin-Rodriguez, Celimar [mailto:Celimar.Valentin-Rodriguez@nrc.gov]
Sent: Monday, July 16, 2018 10:39 AM
To: Karla Granger <kgranger@titankc.com>
Subject: RE: RMD 1113 & Heuresis XRFs 1045 & 1056

Hi Karla,

Could you provide me with the RAM license number for Get the Lead Out, LLC?

Thank you,
Celimar

From: Karla Granger [mailto:kgranger@titankc.com]
Sent: Friday, July 13, 2018 1:48 PM
To: Valentin-Rodriguez, Celimar <Celimar.Valentin-Rodriguez@nrc.gov>
Cc: Paul Ehrhardt <pehrhardt@titankc.com>; Kyle Gunion <kgunion@titankc.com>; Angelique Rodriguez-Gunion <agunion@titankc.com>
Subject: [External_Sender] RMD 1113 & Heuresis XRFs 1045 & 1056

Celimar,

Per our correspondence of 6/19/18 (and our recent conversation), we've been able to track movement of RMD 1113 (please see first 2 attachments). We've also recently obtained a radioactive materials license from the state of Kansas (please see 3rd attachment transfer letter). Please let us know if there's anything else you need. Thanks!!

Karla Granger, Environmental Scientist
Titan Environmental Services, Inc.

2418 Merriam Lane
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(913) 432-5500 (office)
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(816) 507-8298 (cell)
kgranger@titankc.com (company email)
www.titankc.com (company website)

Valentin-Rodriguez, Celimar

From: Kathryn Hubicki <koh@gettheleadout.biz>
Sent: Tuesday, July 17, 2018 11:48 AM
To: Valentin-Rodriguez, Celimar
Cc: Karla Granger
Subject: [External_Sender] Get the Lead Out's NC Rad. License
Attachments: 0989-1a16_license.pdf

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**RADIOACTIVE MATERIALS BRANCH
RADIATION PROTECTION SECTION
N. C. DEPARTMENT OF HEALTH AND HUMAN SERVICES**

RADIOACTIVE MATERIALS LICENSE

Pursuant to North Carolina Regulations for Protection Against Radiation and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, own, possess, transfer, and import radioactive materials listed below; and use such radioactive material for the purpose(s) and at the place(s) designated below. This License is subject to all applicable rules and regulations of the North Carolina Radiation Protection Section now and hereafter in effect and to any conditions specified below.

| | | |
|--|--|--|
| <p>1. Licensee Name: Get the Lead Out, LLC</p> <p>2a. Mailing Address: 3717 Latrobe Drive, Suite 760 Charlotte, NC 28211-4826</p> <p>b. Physical Address: 3717 Latrobe Drive, Suite 760 Charlotte, NC 28211-4826</p> <p>c. Radiation Safety Officer: Peter M. Hubicki,</p> | <p>3. License No: 060-0989-1</p> <p>4. Expiration Date: December 31, 2019</p> <p>Application Type: Amendment Application</p> <p>5. a. Amendment No.: 16 b. Issuance Date: November 08, 2016</p> | <p style="text-align: center;">License Type</p> <p style="text-align: center;">00310</p> |
| <p>6. Radioactive Material (element and mass no.)</p> <p>A. Cobalt 57</p> <p>B. Cadmium 109</p> <p>C. Americium-241 / Beryllium</p> <p>D. Cobalt 57</p> | <p>7. Chemical and/or Physical Form</p> <p>A. Sealed Source MA-0573 -D-1 03-B</p> <p>B. Sealed Source MA-1159-D-101-B</p> <p>C. Sealed Source MA-1159-D-101-B</p> <p>D. Sealed Source MA-1397-D-101 -B</p> | <p>8. Maximum Amount of Radioactivity and/or Quantity of Radioactive material which Licensee May Possess at Any One Time.</p> <p>A. Total Possession not to exceed 60.00 mCi. 4.00 source(s), not to exceed 15.00 mCi.</p> <p>B. Total Possession not to exceed 200.00 mCi. 4.00 source(s), not to exceed 50.00 mCi.</p> <p>C. Total Possession not to exceed 120.00 mCi. 4.00 source(s), not to exceed 30.00 mCi.</p> <p>D. Total Possession not to exceed 40.00 mCi. 4.00 source(s), not to exceed 10.00 mCi.</p> |

9. Authorized Use:

- A. To be used in an RMD Model LPA-1 X-ray Fluorescence Analyzer to test for lead content in paint. Sealed Source & Device Registry No. MA-0573-D-103-B, with a leak test frequency of twelve months.
- B. To be used in a Niton Model XLp 300 analyzer to test for lead content in paint. Sealed Source & Device Registry No. MA-1159-D-101-B, with a leak test frequency of six months.
- C. To be used in a Niton Model XLp 300 analyzer to test for lead content in paint. Sealed Source & Device Registry No. MA-1159-D-101-B, with a leak test frequency of six months.
- D. To be used in an Heuresis Model Pb200i X-ray Fluorescence Analyzer to test for lead content in paint and in qualitative analysis of soils and other bulk samples, dust wipes, and other thin-film samples to determine the concentration of elemental lead and other heavy elements. It can be used as a handheld device or mounted on a test stand for continuous operation.



RADIOACTIVE MATERIALS LICENSE

 CONDITIONS

10. A. The authorized place of receipt and storage of radioactive material is the licensee's address stated in condition 2b. above.
- B. Additional authorized places of receipt and use of radioactive material are listed below if applicable:
- No Additional Locations
- C. Radioactive materials may be used at temporary jobsites of the licensee throughout the State of North Carolina in areas not under exclusive Federal jurisdiction (Federal installations such as military bases, V.A. Hospitals, etc.). Authorization for the use of radioactive materials at temporary jobsites under exclusive Federal Jurisdiction shall be obtained either by (1) filing a NRC Form 241 [10 CFR 150.20(b)], or (2) applying for reciprocity, or (3) applying for a specific license from the NRC if the length of the job is to exceed six (6) months.
- D. This condition does not prohibit the use of radioactive materials in other states; however, before radioactive materials can be used at a temporary jobsite in another state, authorization must be obtained from the State, if it is an Agreement state, or from the Nuclear Regulatory Commission for any non-Agreement State, either by filing for reciprocity or applying for a specific license.
11. The licensee shall comply with the provisions of 10A NCAC 15 .1600 "Standards for Protection Against Radiation," and 10A NCAC 15 .1000 "Notices, Instructions, Reports and Inspections." (The North Carolina Regulations for Protection Against Radiation are contained in 10A NCAC 15.)
12. A. Licensed material shall only be used by:
- Peter Hubicki
- OR individuals who (1) have successfully completed a manufacturers training program for gauge users, (2) have been instructed in the licensee's routine operating and emergency procedures, and (3) have been designated in writing as having completed these requirements by the Radiation Safety Officer.
- B. Records of these designations shall be maintained for three (3) years after the company no longer employs the individual.
- C. The licensee shall establish a method of identification and documentation of training for the persons authorized in condition A above. This shall be made available for review by the agency at the time of either a field or home office inspection.
- D. The Radiation Safety Officer for the activities authorized under this license shall be Peter M. Hubicki .
13. A. Each sealed source containing radioactive material, other than Hydrogen 3 with a half-life greater than thirty (30) days and in any form other than gas, shall be tested for leakage and/or contamination at intervals prescribed in the respective Registry of Radioactive Sealed Sources and Devices sheet. In the absence of a Registry of Radioactive Sealed Sources and Devices sheet, tests for leakage and/or contamination shall be conducted at intervals not to exceed six (6) months, except that each source designed for the purpose of emitting alpha particles shall be tested at intervals not to exceed three (3) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to the transfer, the sealed source shall not be put into use until tested.
- B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the agency.
- C. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with agency regulations. A report shall be filed within five (5) days of the test with the **Radioactive Materials Branch, Radiation Protection Section, 1645 Mail Service, Raleigh, NC 27699-1600**, describing the equipment involved, the test results, and the corrective action taken.
- D. Tests for leakage and /or contamination shall be performed by persons specifically authorized by the agency to perform such services.
14. The licensee may transport licensed material or deliver licensed material to a carrier for transport in accordance with the provision of Section 71.5, Title 10, Code of Federal Regulations, Part 71, "Packaging of Radioactive Material For Transport."



RADIOACTIVE MATERIALS LICENSE

15. Sealed sources containing radioactive material shall not be opened or removed from their respective source holders by the licensee.
16. The licensee shall keep records for each device authorized in this license showing which authorized user has the device, the time and date the device was removed from storage, job where device was used and the time and date the device was placed back into storage. Records of use shall be kept for three (3) years for inspection by the agency or until they have been reviewed by the agency and if the records are determined to be satisfactory, then they may be disposed of.
17. The licensee shall conduct a physical inventory of all sealed sources received and possessed under this license at intervals not to exceed six (6) months. Records of the inventories shall be maintained for inspection by the agency and shall include the quantities and kinds of radioactive material, location of sources and the date of the inventory.
18. In addition to the possession limits in condition 8 above, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10A NCAC 15 .0353 for establishing decommissioning financial assurance.
19. The licensee shall annually review its Radiation Protection Program for content and implementation [Reference 10A NCAC 15 .1603(c)]. Documentation of the Radiation Protection Program reviews shall be retained for inspection by the agency [Reference: 10A NCAC 15 .1636].
20. The licensee shall institute the provisions of 10A NCAC 15 .1610 when an occupationally exposed woman voluntarily informs her supervisor, in writing, of the pregnancy and the estimated date of conception.
21. The licensee shall ensure that no individual "member of the public" [Reference: 10A NCAC 15 .0104(81)] receives a radiation dose in excess of the limits specified in 10A NCAC 15 .1611(a) while conducting licensed activities.
22. This license may be subject to amendment, revision, modification, suspension, or revocation in accordance with the provisions of 10A NCAC 15 .0344.
23. In addition to the possession limits referenced in condition 8. above, the licensee shall further restrict possession of radionuclides listed in the table below to the quantities noted within the table. Sum of fractions for the radionuclides listed below shall not exceed

| Radionuclide | Quantity (curies) | Radionuclide | Quantity (curies) |
|--------------|-------------------|--------------|-------------------|
| Am-241 | 16 | Pm-147 | 10,800 |
| Am-241: Be | 16 | Pu-238 | 16 |
| Cf-252 | 5.4 | Pu-239:Be | 16 |
| Cm-244 | 13.5 | Ra-226 | 10.8 |
| Co-60 | 8.1 | Se-75 | 54 |
| Cs-137 | 27 | Sr-90 (Y-90) | 270 |
| Gd-153 | 270 | Tm-170 | 5,400 |
| Ir-192 | 21.6 | Yb-169 | 81 |



RADIOACTIVE MATERIALS LICENSE

24. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in conditions 6., 7., and 8. of this license in accordance with statements, representations and procedures and attachments listed below. The *North Carolina Regulations for Protection Against Radiation* shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application for renewal with attachments dated March 24, 2014, signed by Peter M. Hubicki, RSO.
 - B. Application with attachments dated April 29, 2014, signed by Peter M. Hubicki, Assistant VP, RSO.
 - C. Application with attachments, dated April 13, 2016, signed by Peter M. Hubicki, Treasurer, RSO. Administrative correction of amendment number and previous tie down statements.. Mailing address remains the same until decommissioning is accomplished. Radionuclide activity adjustments made based on maximum activity of SS&D sheets.
 - D. Application for amendment with attachments dated May 18, 2016, signed by Peter M. Hubicki, RSO.
 - E. Application for amendment with attachments dated October 31, 2016, signed by Peter M. Hubicki, RSO.

Digitally signed by Randy Crowe
 DN: cn=Randy Crowe, o=Radioactive
 Material Branch, ou=NC-DHHS/RPS,
 email=randy.crowe@dhhs.nc.gov,
 c=US
 Date: 2016.11.08 12:52:11 -05'00'

For: **W. Lee Cox, III**

Chief, Radiation Protection Section