



K2 Environmental LLC Voluntary Corrective Actions Letter

DATE: April 4th, 2022

To: Mr. Jason vonEhr
Health Physicist
Commercial, Industrial, Research & Development, and Academic Branch,
Division of Radiological Safety and Security,
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

From: Mr. Kevin D. Kosko
President/Owner
K2 Environmental LLC.
120 North Market St.
Lisbon, Ohio 44432

Mr. VonEhr,

Based on our conversations and emails, it has become clear that K2 Environmental LLC (K2) performed licensed activities in West Virginia, a non-agreement state, without first applying for a specific NRC license under 10 CFR Part 30 or applying for general license under reciprocity (10 CFR 150.20). Specifically, K2 conducted waste characterization, waste processing, and/or waste brokerage services for waste containing short-lived radioactive tracer by-product material generated from flowback of a non-conventional well exploration and production well.

K2 concurs with NRC's opinion on this matter, and we propose the following voluntary corrective actions detailed below:

1. During the initial planning phase of work involving regulated radioactive material, K2 will identify the state or states where work will occur. K2 will apply for and be granted reciprocity from the applicable state regulatory body or the NRC prior to commencing work.
2. K2 will strictly adhere to the terms and conditions of the reciprocity agreement.
3. K2 operates in a niche' market where regulatory primacy and regulated work scope are not always easily defined. K2 will maintain a questioning attitude and seek written regulatory guidance from state and/or NRC authorities when doubt exists whether a specific work activity is regulated and if so, by whom.



Please do not hesitate to contact me should you or your colleagues have any questions, comments or additional need for information. We sincerely regret this mistake and can assure you it will not happen again.

Respectfully,

Kevin Kosko

Kevin Kosko
President/Owner
K2 Environmental LLC.