



Earth
Engineers,
Inc.

2411 Southeast 8th Avenue • Camas • WA 98607

Phone: 360-567-1806

www.earth-engineers.com

Mail Control Number: 639944
Docket Number : 3039182
License Number : 53-3555-01
Licensee Name : Earth Engineers, Inc.
ML24078A427

Earth Engineers, Inc wishes to transfer control of its USNRC Radioactive Materials license 53-3555-01; Docket# 030-39182 to new ownership by March 8, 2024.

Please see below for Earth Engineers' answers to questions that pertain to the Information Needed for Transfer Control Information Appendix E – Radioactive Materials License.

1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.

· RMA Group Northwest, LLC is purchasing substantially all of the assets of Earth Engineers, Inc. The FEIN # for the new licensee is: [Redacted]. RMA Group Northwest, LLC will file for the trade name "Earth Engineers" immediately after the transfer of assets from Earth Engineers, Inc.

While the ownership of the assets is changing, the parties expect that operations will continue without disruption after the transaction is consummated.

RMA Group Northwest, LLC is member managed and the sole member is Royal Holdco Corporation, a Delaware corporation.

The licensee office address, RSO and phone number are not changing and are provided below for convenience.

- 99-1421 Koaha Place, Aiea HI, 96701
- RSO: Troy Hull, [Redacted]

2. Describe any changes in personnel or duties that relate to the licensed program.

· There are no changes in personnel or duties that relate to the licensed program.

3. Describe any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

· There are no changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

4. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to

transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.

Surveys, leak tests, and quality control are currently performed in accordance with our license requirements, and this will remain true through the transfer. The status of calibrations, leak tests, training, and quality control are all up to date and maintained at the office location.

5. If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.

Item 5 is not applicable in this case.

6. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

Item 6 is not applicable in this case.

7. Confirm that both the transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

- The transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer.
- There are no open inspection items at this time.

8. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the licensed program.

- The transferee will abide by all constraints, conditions, requirements, and commitments of the transferor.

9. The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.

-Item 9 relating to fuel cycle facilities does not apply in this case.

We appreciate your consideration in this matter. Please let me know if there is anything else you need.



Troy Hull, President & RSO

Earth Engineers, Inc.



Troy Hull, Vice President & RSO

RMA Group Northwest, LLC