

## McCracken, Chuck

---

**From:** Helmer, Stephen  
**Sent:** Wednesday, December 11, 2013 9:41 AM  
**To:** McCracken, Chuck  
**Subject:** FW: Analytical Request Clarification


We can discuss this at our meeting today.

*Stephen Helmer*

Stephen Helmer  
Program Administrator  
Bureau Radiation Protection



Ohio Department of Health  
35 E. Chestnut St., 7<sup>th</sup> Floor  
Columbus, Ohio 43215  
Office: 614-728-3611  
Fax: 614-466-0381

 Please consider the environment before printing this email.

**From:** [koskokd@aol.com](mailto:koskokd@aol.com) [<mailto:koskokd@aol.com>]  
**Sent:** Wednesday, December 11, 2013 9:26 AM  
**To:** Helmer, Stephen  
**Cc:** [jbement@austinmasterservices.com](mailto:jbement@austinmasterservices.com)  
**Subject:** Analytical Request Clarification

Steve,

Per our conversation I would like to clarify exactly what we are requesting at this point. We have 80 vacuum boxes we can analyze next week; we would like to use our in-situ methodology to count these boxes. We are proposing that if the measured concentration falls within +/- 20% of the decision limit (5.6 pCi/g to 8.4 pCi/g combined Ra-226/228) the boxes will be sequestered and sampled/analyzed the traditional way (samples sent to an accredited lab). If the in-situ measurements indicate the waste material is greater than 20% above or below the limit we would like to disposition the waste based solely on the ISOCS readings.

If you folks are uncomfortable with +/- 20% at this time we would consider increasing the error band, perhaps +/- 40% (9.8 pCi/g to 4.2pCi/g) on waste that would have to go to the lab for analysis.

Please let me know if you have any questions.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41890 Union St. Lisbon, OH. 44432

## McCracken, Chuck

---

**From:** Helmer, Stephen  
**Sent:** Wednesday, December 11, 2013 5:28 PM  
**To:** koskokd@aol.com  
**Cc:** McCracken, Chuck  
**Subject:** BRP Rules

**Importance:** High

Kevin,

Chuck McCracken is the supervisor assigned to review and issue a license.

McCracken, Chuck [Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)  
Phone: 614-466-5136  
Fax: 614-466-0381

You are offering a different approach from what we have seen for analyzing oil and gas industry waste. This will take some time to review, but we are aware of your concerns to get started as soon as you can. We will just have to see how this plays out. Your presentation and documentation is well organized and thorough. This will make it easier for us to review.

Also,

Chuck is requesting for you to include that you will be in compliance with the follow citations:

Our bureau starts with what's in law Ohio Revised Code 3748:

<http://codes.ohio.gov/orc/3748>

Our bureau uses the following Ohio Administrative Codes to ensure compliance:

<http://codes.ohio.gov/oac/3701%3A1>

- 3701:1-38 General Radiation Protection Standards for Sources of Radiation
- 3701:1-40 Licensing Requirements for By-Product and Accelerator Produced Radioactive Materials
- 3701:1-43 Technologically Enhanced Naturally Occurring Radioactive Material (TENORM)
- 3701:1-44 Licensing of Source Material
- 3701:1-46 General Licenses and Licenses for Manufacturing and Distribution
- 3701:1-48 Radioactive Material Standards - Industrial Radiographers
- 3701:1-49 Radioactive Material Standards - Well Logging
- 3701:1-50 Packaging and Transportation of Radioactive Materials
- 3701:1-52 Radioactive Material Standards - Irradiators
- 3701:1-54 Low-Level Radioactive Waste
- 3701:1-56 Special Nuclear Materials

3701:1-58 Medical Use of Radioactive Materials

3701:1-66 Radiation Generating Equipment Requirements and Quality Assurance Standards

3701:1-67 Therapy Radiation Generating Equipment

3701:1-68 Industrial Radiation-Generating Equipment

Please do not hesitate to call if you have any questions.


Thanks,

*Stephen Helmer*

Stephen Helmer  
Program Administrator  
Bureau Radiation Protection



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35 E. Chestnut St., 7<sup>th</sup> Floor  
Columbus, Ohio 43215  
Office: 614-728-3611  
Fax: 614-466-0381

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## McCracken, Chuck

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**From:** koskokd@aol.com  
**Sent:** Thursday, December 12, 2013 5:00 PM  
**To:** McCracken, Chuck; Helmer, Stephen  
**Cc:** jbement@austinmasterservices.com; joebement@austinmasterservices.com  
**Subject:** License Application  
**Attachments:** Facility\_Tracking.xlsx

Chuck/Steve,

I just wanted to let you know that the documents you requested (2 copies of the RPP and 1 copy of the implementing procedures) were completed and mailed earlier today. During our discussion yesterday you indicated that we may be able to soon begin work on some of the business lines requested in our 3219 application while others may take a while longer to review/approve.

We made a FOIA request for information on all companies currently working with TENORM that will soon require licensing, I attached the list we received. Austin Master Services desires to market turn-key services to these facilities that include:

- License application submittal assistance
- Radiation worker training
- Personal, workplace and environmental monitoring (dosimeters and air sampling)
- Radiological Safety Officers and ANSI qualified radiological control technicians staff augmentation
- A proven Radiation Protection Plan, complete with implementing procedures
- Radiation detection equipment
- Waste profiling and manifesting
- Expedited TENORM analysis with same day results

It would be great if we could get permission to perform consulting, staff augmentation, training and analysis initially and then approval for the waste processing portion of our request could come later. We would love to get Austin Masters added to the 3219 licensee list before the ODNR notification goes out later this month.

We sincerely appreciate your willingness to work with us during our application process; many thanks.

V/r

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655

---Original Message-----

From: DNR oilandgas <[oilandgas@dnr.state.oh.us](mailto:oilandgas@dnr.state.oh.us)>  
To: koskokd <[koskokd@aol.com](mailto:koskokd@aol.com)>  
Sent: Thu, Dec 12, 2013 9:30 am  
Subject: RE: FOIA Request

Hi Kevin,

Attached please find a copy of the facility tracking spreadsheet.

Thank you for your request, please let me know if you have any further questions.

*Kelly Rice*

Office Assistant III  
ODNR, Division of Oil and Gas Resources Management  
2045 Morse Rd, Bldg F-2  
Columbus, OH 43229  
P:614-265-6927  
F:614-265-6910  
[Kelly.Rice@dnr.state.oh.us](mailto:Kelly.Rice@dnr.state.oh.us)

---

**From:** Trivisonno, Ron  
**Sent:** Wednesday, December 11, 2013 7:31 AM  
**To:** Rice, Kelly  
**Subject:** FW: FOIA Request

Kelly:  
Please provide Kevin with the current version of the facility tracking spreadsheet that resides on the M.

Thanks,

Ron Trivisonno, P.E.  
ODNR Division of Oil and Gas Resources Management  
2045 Morse Rd., Bldg. F-2  
Columbus Ohio 43229-6693

614.265.6924 office

**From:** [koskokd@aol.com](mailto:koskokd@aol.com) [mailto:[koskokd@aol.com](mailto:koskokd@aol.com)]

**Sent:** Tuesday, December 10, 2013 6:53 AM

**To:** Trivisonno, Ron

**Cc:** [jbement@austinmasterservices.com](mailto:jbement@austinmasterservices.com)

**Subject:** FOIA Request

Ron,

I am requesting information regarding notices that will be sent out to Ohio TENORM users requiring them to attain radioactive materials licenses. Specifically, I would like the contact information for these operators. This request is being made in accordance with the freedom of information act.

Thank you.

Kevin  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655

41990 Union St. Lisbon, OH. 44432



## McCracken, Chuck

---

**From:** koskold@aol.com  
**Sent:** Thursday, December 12, 2013 5:08 PM  
**To:** McCracken, Chuck  
**Subject:** Dave Groff

A good person for you to talk with at Canberra is Dave Groff Sr. Scientist, his number is (630) 842-7966.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432



## McCracken, Chuck

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**From:** koskokd@aol.com  
**Sent:** Thursday, December 12, 2013 6:09 PM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com; joebement@austinmasterservices.com; Helmer, Stephen; Light, Mark; Colleli, Jim; Snee, Michael  
**Subject:** Re: Licensed activities

Thanks for the clarification Chuck.  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41950 Union St. Lisbon, OH. 44432

-----Original Message-----

**From:** McCracken, Chuck <Chuck.McCracken@odh.ohio.gov>  
**To:** koskokd <koskokd@aol.com>  
**Cc:** jbement <jbement@austinmasterservices.com>; joebement <joebement@austinmasterservices.com>; Helmer, Stephen <Stephen.Helmer@odh.ohio.gov>; Light, Mark <Mark.Light@odh.ohio.gov>; Colleli, Jim <Jim.Colleli@odh.ohio.gov>; Snee, Michael <Michael.Snee@odh.ohio.gov>  
**Sent:** Thu, Dec 12, 2013 6:03 pm  
**Subject:** Licensed activities

Kevin:

In general, an ODH issued radioactive materials license is required to handle licensable quantities of radioactive materials in Ohio.

ODH category 3219 licenses are required for entities that provide "hands-on" radiological services to customers to comply with a regulatory requirement.

Providing radiological consultation services in itself does not necessarily require an ODH license.

**Below is your bulleted list indicating Y (yes) a license is needed or N (no) it is not needed.**

N - License application submittal assistance  
100% consultation, no radioactive material handling at all.

N - Radiation worker training  
Classroom training & testing with no handling of or exposure to licensable radioactive materials.

Y - Personal, workplace and environmental monitoring (dosimeters and air sampling)  
Providing a radiological service to comply with a regulatory requirement.  
No – if for training purposes only.

- N - Radiological Safety Officers and ANSI qualified radiological control technicians staff augmentation  
Providing trained personnel to a client (supplement staff).  
Yes – if client does not already have an ODH license, thus the staff is providing a radiological service to comply with a regulatory requirement.

- N - A proven Radiation Protection Plan, complete with implementing procedures  
100% consultation, no radioactive material handling at all.

- Y - Radiation detection equipment  
Providing instrument calibration services.  
No – if simply providing instruments that are calibrated by the manufacturer, an ODH, USNRC or agreement state licensed calibration lab.

- Y - Waste profiling and manifesting  
Providing a service to comply with a regulatory requirement.

Y - Expedited TENORM analysis with same day results  
Providing a service to comply with a regulatory requirement.

Give me a call if you have any questions with the above determination.

Thanks,

## Chuck McCracken

Supervisor, Bureau of Radiation Protection  
Ohio Department of Health  
246 N. High Street - 7th Floor 35 Bldg.  
Columbus, OH 43215  
(ph) 614.466.5136  
(fx) 614.466.0381  
[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

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**Cc:** [jbement@austinmasterservices.com](mailto:jbement@austinmasterservices.com); [joebement@austinmasterservices.com](mailto:joebement@austinmasterservices.com)  
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V/r

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Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655

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*Kelly Rice*

Office Assistant III  
ODNR, Division of Oil and Gas Resources Management  
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Columbus, OH 43229  
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## McCracken, Chuck

---

**From:** GROFF Dave <dave.groff@canberra.com>  
**Sent:** Friday, December 13, 2013 3:18 PM  
**To:** McCracken, Chuck; GOOGINS Shawn (CANBERRA)  
**Cc:** koskokd@aol.com; Colleli, Jim  
**Subject:** RE: Demonstrating regulatory compliance with ISOCS

Hello Chuck – I appreciate your interest in the ISOCS methodology. To expedite our reply I am forwarding your request to Shawn Googins, Director of our Application Support Group. Shawn should be able to provide the information you need more quickly than I could do so.

Shawn – can you please reply to Mr. McCracken ASAP?

### Dave Groff

*Training Development Specialist*

**CANBERRA**

1039 Hawthorn Drive

Itasca, IL 60143

office: (630) 250-4515

mobile: (630) 842-7966

fax: (630) 250-9555

e-mail: [dave.groff@canberra.com](mailto:dave.groff@canberra.com)

*Nuclear Measurement Solutions for Safety Security and the Environment*

---

**From:** McCracken, Chuck [<mailto:Chuck.McCracken@odh.ohio.gov>]

**Sent:** Friday, December 13, 2013 1:44 PM

**To:** GROFF Dave

**Cc:** [koskokd@aol.com](mailto:koskokd@aol.com); Colleli, Jim

**Subject:** Demonstrating regulatory compliance with ISOCS

**Importance:** High

Dave:

As recommended during our brief conversation this afternoon, I am sending this message to explain the information I am looking for and why.

The State of Ohio Department of Health, Bureau of Radiation Protection is presently reviewing an application for a license to provided radiological services to clients in Ohio. One of the services that we are being asked to authorize is regulatory criteria determination using the ISOCS system as a stand-alone device.

I would like to know if the ISOCS system has ever been used in the United States as a stand-alone system to demonstrate a regulatory criteria to the documented satisfaction of a Federal, State or local radiation regulatory authority. If yes, I would like as much information as possible on the where, when and who I can talk with at the regulatory agency or agencies.

If you are not the one within Canberra who can best help me in this matter, please forward my request accordingly.

And, if you or anyone else at Canberra has any questions, please feel free to contact me.

In closing, our license applicant is anxious to receive our approval, so thank you in advance for your prompt attention to this request.

Sincerely,

*Chuck McCracken*

Supervisor, Bureau of Radiation Protection  
Ohio Department of Health  
246 N. High Street - 7th Floor 35 Bldg.  
Columbus, OH 43215  
(ph) 614.466.5136  
(fx) 614.466.0381  
[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

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**To:** McCracken, Chuck  
**Subject:** Dave Groff

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Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



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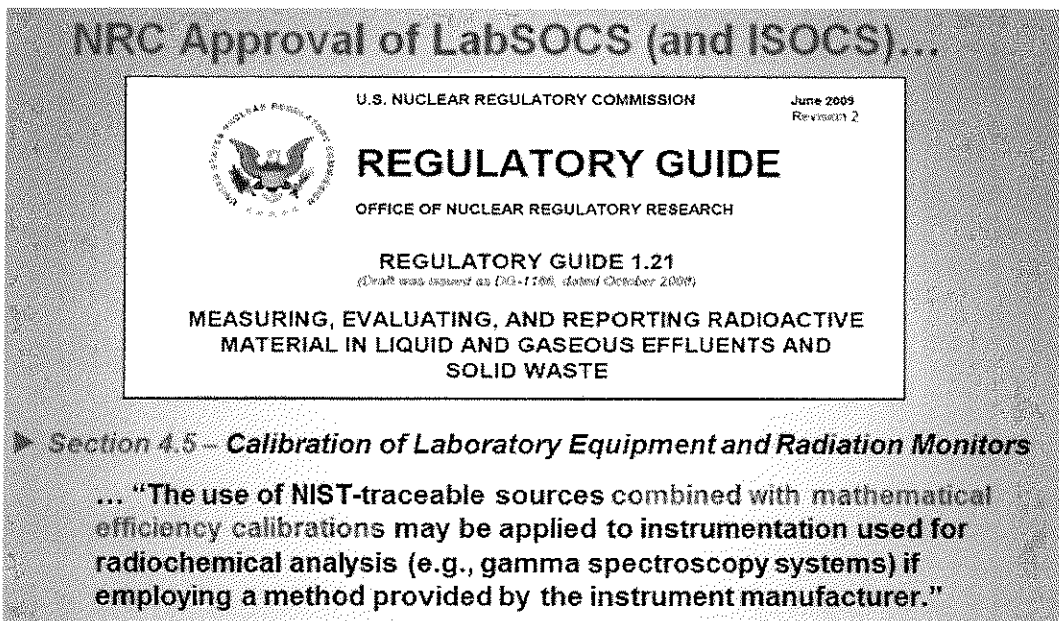
**McCracken, Chuck**

---

**From:** GOOGINS Shawn (CANBERRA) <shawn.googins@canberra.com>  
**Sent:** Monday, December 16, 2013 10:11 AM  
**To:** GROFF Dave; McCracken, Chuck  
**Cc:** koskokd@aol.com; Colleli, Jim  
**Subject:** RE: Demonstrating regulatory compliance with ISOCS

Chuck,

Good talking with you. I will get you some references and people to talk to as well. Here is the Regulator Reference:



**Shawn W. Googins, MS, CHP**

*Director, Application Support Group*

**CANBERRA**

800 Research Parkway

Meriden, CT 06450

office: (203) 639-2341

mobile: (203) 427-1821

fax: (203) 639-2067

e-mail: [shawn.googins@canberra.com](mailto:shawn.googins@canberra.com)

*Nuclear Measurement Solutions for Safety Security and the Environment*

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**To:** McCracken, Chuck; GOOGINS Shawn (CANBERRA)

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*Training Development Specialist*

**CANBERRA**

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In closing, our license applicant is anxious to receive our approval, so thank you in advance for your prompt attention to this request.

Sincerely,

*Chuck McCracken*

Supervisor, Bureau of Radiation Protection

Ohio Department of Health

246 N. High Street - 7th Floor 35 Bldg.

Columbus, OH 43215

(ph) 614.466.5136

(fx) 614.466.0381

[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

**From:** [koskokd@aol.com](mailto:koskokd@aol.com) [<mailto:koskokd@aol.com>]

**Sent:** Thursday, December 12, 2013 5:08 PM



**To:** McCracken, Chuck

**Subject:** Dave Groff

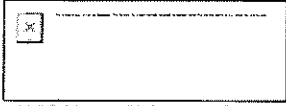
A good person for you to talk with at Canberra is Dave Groff Sr. Scientist, his number is (630) 842-7966.

Kevin D. Kosko

Marketing Director

Austin Master Services

Mobile:(937) 470-2655



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## McCracken, Chuck

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**Sent:** Monday, December 16, 2013 2:11 PM  
**To:** McCracken, Chuck; Dave.Groff@canberra.com  
**Cc:** Colleli, Jim; jbement@austinmasterservices.com  
**Subject:** Re: Demonstrating regulatory compliance with ISOCS  
**Attachments:** Brookhaven ISOCS Paper.pdf; ISOCS Waste Char. Oak Ridge.pdf; 252-2098-ISOCS forFreeRe.pdf; Texas Waste\_Disposal\_Exemption\_Options.pdf

Chuck,

I spoke with Shawn Googins from Canberra earlier today and he is working to send you information regarding regulatory acceptance of ISOCS for waste characterization. I also performed a search and came up with the attached documents detailing ISOCS waste characterization (for burial) performed at Brookhaven National Laboratory and Oak Ridge.

There is also a power point presentation from the state of Texas included, (please take a look at page 16) they typically require a NELAP accreditation for waste samples but also state that "In-Situ Object Counting System (ISOCS) may be used if combined with sampling of some of the waste to establish a relationship".

I also included information detailing regulatory approval of ISOCS use for free release.

I am sure Shawn and the folks at Canberra will provide other examples of regulatory acceptance. Please let me know if I can provide additional assistance.

V/r  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655

-----Original Message-----

From: McCracken, Chuck <[Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)>  
To: Dave.Groff <[Dave.Groff@canberra.com](mailto:Dave.Groff@canberra.com)>  
Cc: koskokd <[koskokd@aol.com](mailto:koskokd@aol.com)>; Colleli, Jim <[Jim.Colleli@odh.ohio.gov](mailto:Jim.Colleli@odh.ohio.gov)>  
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Mobile:(937) 470-2655

41990 Union St. Lisbon, OH. 44432

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## McCracken, Chuck

---

**From:** York, Jan  
**Sent:** Monday, December 16, 2013 10:56 AM  
**To:** McCracken, Chuck  
**Subject:** NRC Guide 1.21 rev. 1 (2009)

Hi Chuck,

This is the pdf for the guide.

<http://pbadupws.nrc.gov/docs/ML0911/ML091170109.pdf>

Janice L. York, Librarian, MLS  
Bureau of Radiation Protection  
Ohio Department of Health  
35 E. Chestnut, 7<sup>th</sup> floor  
Columbus, Ohio 43215  
Office Phone: 614-644-5639  
Fax Number: 614-466-0381

## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Monday, December 30, 2013 8:34 AM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com  
**Subject:** ISOCS use for Waste Characterization  
**Attachments:** SPFM\_BSFR Studsvik.pdf

Chuck,

I did some additional research and found that the state of Tennessee routinely uses the ISOCS technology as a stand alone method for waste characterization. Tennessee has implemented a program called Bulk Survey for Release (BSFR). This program allows licensees (IMPACT, Studsvik-RACE, Toxco and Duratek/Energy Solutions) to accept waste from US wide generator sites that has been characterized using ISOCS. The waste is re-analyzed using ISOCS at the waste processing facility and then disposed of at one of four Class I landfills in Tennessee authorized to receive wastes under the BSFR program: Chestnut Ridge landfill facility in Heiskell (Anderson County), North Shelby County, South Shelby County, and Carter Valley in Hawkins County.

The state contact for information regarding BSFR is listed as:

**Debra G. Shults, Director**

William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15th Floor  
Nashville, TN 37243  
615-532-0364

I also attached a power point presentation from Studsvik-RACE describing the process.

Did you get a chance to talk with Jeff Vollmer (the CHP who validated our data) regarding your questions?

Please let me know if you need anything else.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432

## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Monday, December 30, 2013 9:33 AM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com  
**Subject:** Waste Facility in Youngstown

Chuck,

Previously we discussed an incremental approval of our license application. You stated that in order to allow us to accept TENORM waste you and/or your colleagues would have to inspect our facility. Previously we did not have a facility to inspect, however last week we entered into a business relationship with Industrial Waste Control located at 240 Sinter Court in Youngstown, Ohio.

Our intent is to apply our license (when granted permission) to this facility. We believe that when the ODNR notices are sent to facilities currently storing/handling TENORM there may be a bit of uncertainty regarding what to do with waste containers currently residing at these unlicensed facilities. We would like to accept containerized waste at the Sinter Court facility and safely store it in lined/bermed laydown areas. When allowed to do so we would then analyze the waste using ISOCS and disposition it to proper disposal facilities.

Eventually we plan to construct a facility to down blend waste, but initially operations at the site will include tank cleaning, waste staging, waste analysis, waste container radiological surveys for release and shipping.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432

## McCracken, Chuck

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**From:** koskokd@aol.com  
**Sent:** Friday, January 03, 2014 12:55 PM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com  
**Subject:** Additional Documentation Supporting ISOCS Survey Methodology  
**Attachments:** MARSAME.pdf

Chuck,

Thanks for taking the time to speak with me this morning; great conversation. I completely understand and sympathize with your position as a regulator as it applies to defending a decision against public and/or legal scrutiny. While I think we are on the same page regarding the use and overall accuracy of in-situ gamma spectroscopy for waste concentration determination, we also recognize issues potentially caused by deviation from a long standing norm or the "we have always done it this way" mentality. Our goal is to offer your agency a defensible position while creating a workable solution to delays caused by traditional laboratory analysis of waste.

As we discussed, Ohio would not be the first government entity to approve the in-situ approach for waste characterization. Tennessee through their Bulk Survey for Release program has used in-situ (ISOCS) measurements as the sole means of characterization for waste destined for disposal at several municipal landfills within that state. Texas, Michigan and Idaho also currently accept In-situ gamma spectroscopy for characterization of waste. Additionally, NUREG 1575 *Multi-Agency Radiation Survey and Assessment of Material and Equipment Manual* (MARSAME Jan. 2009) has established standards for survey, characterization and release of materials, waste and equipment. This document was developed jointly by the US Environmental Protection Agency, US Department of Energy, US Nuclear Regulatory Commission and US Department of Defense. Section 5.9.3 details instruments that are permitted for use, and Tables 5.1 and 5.2 examine the pros and cons of each. In-situ gamma spectroscopy consistently performed well and is clearly permitted for use.

I would think that this document in conjunction with waste characterization standards already in place in Texas, Tennessee, Michigan and Idaho would provide adequate insulation against those that might question our approach.

Austin Masters is very willing to assist the state in rigorously defending this methodology, we will be happy to provide industry experts in the event of public questioning and/or litigation.

Have a good Friday Chuck.

Kevin

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432



## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Tuesday, January 07, 2014 2:19 PM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com; mattcampbell23@comcast.net  
**Subject:** Re: ODH Review of Austin Masters 03219 license app  
**Attachments:** AMS\_Response\_to\_ODH\_License\_Letter.pdf; RP-AMS-035-TENORM\_.docx

Chuck,

Please see the attached AMS response to the ODH letter dated January 3, 2014 regarding our 03219 License application. I also included a draft TENORM sampling and analysis procedure for your review and comment. This procedure RP-AMS-035 will be added to our operational procedures in support of our 03219 License application.

I tried calling you a bit earlier and you were out of the office, I would like to discuss our response and a couple of other issues when you get a minute.

On behalf of AMS I would like to thank you and your colleagues for being so responsive.

Very respectfully,

Kevin  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432

-----Original Message-----

**From:** McCracken, Chuck <[Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)>  
**To:** koskokd <[koskokd@aol.com](mailto:koskokd@aol.com)>  
**Cc:** Light, Mark <[Mark.Light@odh.ohio.gov](mailto:Mark.Light@odh.ohio.gov)>; Colleli, Jim <[Jim.Colleli@odh.ohio.gov](mailto:Jim.Colleli@odh.ohio.gov)>  
**Sent:** Fri, Jan 3, 2014 4:25 pm  
**Subject:** ODH Review of Austin Masters 03219 license app

Kevin:

Attached are copies of the documents that are being mailed to you this afternoon.

Have a great weekend!

## Chuck McCracken

Supervisor, Bureau of Radiation Protection  
Ohio Department of Health  
246 N. High Street - 7th Floor 35 Bldg.  
Columbus, OH 43215  
(ph) 614.466.5136  
(fx) 614.466.0381  
[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

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## McCracken, Chuck

---

**From:** Helmer, Stephen  
**Sent:** Friday, February 14, 2014 9:40 AM  
**To:** McCracken, Chuck  
**Subject:** RE: Austin Masters  
**Attachments:** Austin Masters Open House 2.18.14.pdf

See attached.

*Stephen Helmer*

Stephen Helmer  
Program Administrator  
Bureau Radiation Protection



Ohio Department of Health  
35 E. Chestnut St., 7<sup>th</sup> Floor  
Columbus, Ohio 43215  
Office: 614-728-3611  
Fax: 614-466-0381



Please consider the environment before printing this email.

## McCracken, Chuck

---

**From:** Matt Campbell <mcampbell@austinmasterservices.com>  
**Sent:** Monday, May 05, 2014 1:33 PM  
**To:** McCracken, Chuck  
**Cc:** Kevin Kosko (kevinkosko@austinmasterservices.com)  
**Subject:** Re: AMS Trade Secret Request form 4.3.2014  
**Attachments:** AMS Trade Sec HEA5519, Revision A.pdf

Chuck,

The revised forms are attached. I forwarded to Kevin this am so you may get a response from both of us. I believe we incorporated all of your questions/comments from the prior e-mail.

Please let me know if you need anything else.

Best Regards,  
Matt

On Mon, May 5, 2014 at 1:17 PM, McCracken, Chuck <[Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)> wrote:

Greetings Matt:

I am assuming that since you signed the 4/3/2014 Trade Secret Designation Request, you are the "management" person that Kevin is referring to in his email to me.

If so, I need to know how you are progressing with creation of an amended Trade Secret Designation Request and if you any related questions?

Be advised, that we currently have two (2) records requests for all ODH files, documents, etc... associated with Austin Masters license application.

We are required to respond promptly to records requests, so if you do want to submit a modified request, you need to do it this week.

I have attached a copy of your 4/3/2014 submission and a blank form as well.

Thanks,

*Chuck McCracken*

Supervisor, Bureau of Radiation Protection

Ohio Department of Health

246 N. High Street - 7th Floor 35 Bldg.

Columbus, OH 43215

(ph) [614.466.5136](tel:614.466.5136)

(fx) [614.466.0381](tel:614.466.0381)

[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)



Save a tree. Don't print this e-mail unless it's really necessary.

**From:** Kevin Kosko [<mailto:kevinkosko@austinmasterservices.com>]

**Sent:** Friday, April 25, 2014 4:04 PM

**To:** McCracken, Chuck

**Subject:** Re: AMS Trade Secret Request form 4.3.2014

Chuck,

I passed this along to my management.

Have a good weekend.

Kevin

On Fri, Apr 25, 2014 at 3:50 PM, McCracken, Chuck <[Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)> wrote:

Kevin:

Your request has to go through our legal department and I know they're going to ask that you be more specific on exactly what needs to be protected.

So, I am asking you to submit another request form that is more specific such as:

For Document #1 –

You've submitted 4 versions of RP-AMS-035 on 4 different occasions. So, if you want to protect them all –

You'll need to state in the Unique Designator/Number box: **RP-AMS-035, all revisions**

And in the Name/Description box: **Austin Master Services Radiation Safety Procedure for Ohio TENORM Waste Acceptance Procedure**

For Document #2 –

The AMS QA/QC document I believe you want to protect is the one submitted with your application that explains how you conducted the comparison study and what your results were – correct?

If yes –

You need to state in Unique Designator/Number box: **AMS QAQC (12/7/2013)**

And in the Name/Description box: **Austin Master Services Quality Assurance/Field Sampling and Analysis Plan dated 12/7/2013.** (you don't need to specifically note the AMS data CD of any of the Pace/Summit table data because is it all included since they are specifically mentioned in the QAQC doc narrative).

For Document #3 –

You simply state AMS RPP and Radiation Protection Plan. So, to be clear if you want to protect the AMS Radiation Protection Plan including all implementing procedures associated with the plan, you're going to need to say so.

You need to state in Unique Designator/Number box: **AMS RPP (12/7/2013)**

And in the Name/Description box: **Austin Master Radiation Protection Plan (RPP) dated 12/7/2013 including implementing procedures RP-AMS-01 through RP-AMS-034.**

If you have any questions, give me a call.

Thanks,

*Chuck McCracken*

Supervisor, Bureau of Radiation Protection

Ohio Department of Health


246 N. High Street - 7th Floor 35 Bldg.

Columbus, OH 43215

(ph) 614.466.5136

(fx) 614.466.0381

[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

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Kevin Kosko

Director of Sales and Business Development

Austin Master Services LLC

Mobile: (937) 470-2655

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--

Matt Campbell

CEO

Austin Master Services, LLC

1157 Phoenixville Pike, Suite 102

West Chester, PA 19380

484-256-5249

[mcampbell@austinmasterservices.com](mailto:mcampbell@austinmasterservices.com)



## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Wednesday, January 08, 2014 8:56 AM  
**To:** McCracken, Chuck  
**Subject:** OSHA Regulations and Supporting Documents  
**Attachments:** 2PA DEP Paper Radon Exposure Limits.pdf; OSHA Radon Q&A Letter.docx

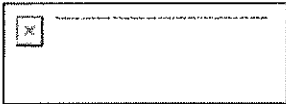
Chuck,

The link for the applicable OSHA Regulation (29 CFR 1910.1096) we discussed is  
[https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10098](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10098)

I attached a question/answer letter between OSHA and the US Army Corps of Engineers regarding workplace monitoring for radon. Additionally I attached a well written white paper the PA DEP put together regarding compliance with OSHA radon monitoring requirements.

Please let me know if you need anything else.

Kevin  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lebanon, OH. 44432

## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Monday, January 13, 2014 8:58 AM  
**To:** McCracken, Chuck  
**Cc:** "mattcampbell23 mattcampbell23"@comcast.net; jbement@austinmasterservices.com  
**Subject:** Austin Masters' License Request

Chuck,

AMS is working with Canberra to determine count times, MDA's, and relative uncertainty for in-situ measurements so we can request a decision limit that we can meet and that would be sufficiently conservative. We expect to have our answers early next week,

We are however eager to get started performing other services included in our license application. If we request to move forward without the ability to perform ISOCS analytical services and soil blending, how long would it take to get a license amendment after providing the additional information requested in your letter dated Jan, 10, 2014?

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432

## McCracken, Chuck

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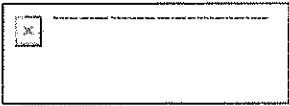
**From:** koskokd@aol.com  
**Sent:** Wednesday, January 29, 2014 3:44 PM  
**To:** McCracken, Chuck  
**Subject:** Re: DRAFT - FOR YOUR EYES ONLY

Chuck,

Our new address is 1157 Phoenixville Pike, Suite 102, West Chester Pa. 19380.

Many thanks for all your help Chuck.

Kevin  
Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41950 Union St. Lisbon, OH. 44432

-----Original Message-----

**From:** McCracken, Chuck <[Chuck.McCracken@odh.ohio.gov](mailto:Chuck.McCracken@odh.ohio.gov)>  
**To:** koskokd <[koskokd@aol.com](mailto:koskokd@aol.com)>  
**Sent:** Tue, Jan 28, 2014 9:46 pm  
**Subject:** DRAFT - FOR YOUR EYES ONLY

Kevin:

Attached is a DRAFT of the license that I will be submitting for signature.  
Look it over and call me tomorrow.

Chuck McCracken  
Supervisor, Bureau of Radiation Protection  
Ohio Department of Health  
246 N. High Street - 7th Floor 35 Bldg.  
Columbus, OH 43215  
(ph) 614.466.5136  
(fx) 614.466.0381  
[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)<<mailto:chuck.mccracken@odh.ohio.gov>>

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## McCracken, Chuck

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**From:** koskokd@aol.com  
**Sent:** Tuesday, January 28, 2014 8:55 AM  
**To:** McCracken, Chuck  
**Cc:** Colleli, Jim  
**Subject:** Re: ODH Request for additional information #3 (RFI #3)  
**Attachments:** Pete\_Collopy\_Resume.doc

Chuck,

Please see AMS' responses to your request for additional information below:

- 1) Since our initial application our Ohio office address has changed, the new address is 240 Sinter Ct. Youngstown, Ohio 44510
- 2) Our RSO for Ohio Operations will be Mr. Pete Collopy CHP, CIH, CSP; Pete's resume is attached.
- 3) At this time AMS has no plans to possess non-exempt or specifically licensed sources. If at some point our operations require licensed sources we will notify the state prior to bringing said sources into Ohio.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432

-----Original Message-----

**From:** McCracken, Chuck <Chuck.McCracken@odh.ohio.gov>  
**To:** koskokd <koskokd@aol.com>  
**Cc:** Colleli, Jim <Jim.Colleli@odh.ohio.gov>  
**Sent:** Mon, Jan 27, 2014 5:55 pm  
**Subject:** ODH Request for additional information #3 (RFI #3)

Kevin:

In preparing the Austin Masters 03219 license, I find that I have the following additional questions:

- (1) Your application states that 120 North Market Street, Lisbon Ohio will be the AMS in-state location where your offices, inspectable records, etc... will be located.  
Is this correct?
- (2) Your application lists Kevin Kosko as the RSO, however your AMS-RP procedures only list a position of Corporate RSO. Please confirm who the RSO for the AMS Ohio operations will be and also submit their qualification documentation.
- (3) Will the AMS Ohio operations be using any specifically licensed sealed sources [i.e., non-exempt instrument calibration sources]?  
If yes, please provide a listing for inclusion on the license document.

Thanks,

**Chuck McCracken**

Supervisor, Bureau of Radiation Protection  
Ohio Department of Health  
246 N. High Street - 7th Floor 35 Bldg.

Columbus, OH 43215  
(ph) 614.466.5136  
(fx) 614.466.0381  
[chuck.mccracken@odh.ohio.gov](mailto:chuck.mccracken@odh.ohio.gov)

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## McCracken, Chuck

---

**From:** koskokd@aol.com  
**Sent:** Tuesday, January 21, 2014 12:37 PM  
**To:** McCracken, Chuck  
**Cc:** jbement@austinmasterservices.com; mcampbell@austinmasterservices.com  
**Subject:** Request for Clairification and Supporting Documents  
**Attachments:** Final\_RESRAD\_for\_a\_Typical\_Landfill\_contianing\_Ra\_Contaminated\_sludge.docx;  
ISOCS\_Capability\_MDA\_Calculations-TENORM.pdf

Chuck,

I have attached two documents, the first is an evaluation of ISOCS performance based on applicable specific information (isotopes of concern, ambient background etc.). This information demonstrates that ISOCS can easily meet minimum detectable concentrations required by Ohio disposal facility waste acceptance criteria with reasonable count times. The second is a RESRAD report detailing the difference in potential dose consequence between 5pCi/g Ra-226/228 and 13 pCi/g Ra-226/228 in a typical landfill; as you will see the difference is extremely low ( $\leq 0.1$  mRem/yr) when waste is placed in the middle of a landfill. You will notice that the RESRAD calculation is based on a large amount of waste (50,000 tons/yr) and a resident farmer scenario, therefore it is very conservative.

We are providing this additional information because we are very concerned about our ability to market a technology given a conservative decision limit. Potential customers that we have held discussions with (Hess and CONSOL) require an internal and 3rd party audit of our analytical capabilities prior to issuing a master services agreement. A conservative DL may quite possibly create hesitation in the minds of our customers thereby leaving us with no business. We are unsure how to market our technology if results less than the regulatory threshold are determined to be inconclusive. For instance if the conservative DL of lets say 4.5pCi/g is established what is to be done with waste that is found to be between 4.5pCi/g and 6.99pCi/g?

We have discussed your letter dated January 10, 2014 internally and do not quite understand the reasoning provided in section 2(b). We fully understand that the state promulgated background of 2pCi/g was developed for the ease of industry use, but are unsure how or why an EPA permitted disposal facility would ever attempt to get the background lowered. Typically when performing MARSSIM surveys determination of background is one of the most contested elements of the entire survey. When the regulatory body promulgates a background I know of no reason to ever challenge it, especially to get the limit lowered. Additionally, if background were to be challenged it would be for the site where the waste is generated not the disposal site correct?

Chuck, we have put a significant amount of time, resources and money into this effort. We understand BRP's concerns and have no issue with performing confirmatory QA sampling and analysis; but understand AMS's goal is to comply with our license and be profitable company. While establishing a conservative DL may make sense from a regulatory standpoint it will be an extremely hard sell to the oil/gas industry.

Kevin D. Kosko  
Marketing Director  
Austin Master Services  
Mobile:(937) 470-2655



41990 Union St. Lisbon, OH. 44432