



OHIO DEPARTMENT OF HEALTH

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John R. Kasich / Governor

Theodore E. Wymyslo, M.D. / Director of Health

January 10, 2014

Austin Master Services, LLC
ATTN: Kevin Kosko
P.O. Box 275
Pottstown, PA 19464

SUBJECT: REVIEW OF AUSTIN MASTER SERVICES, LLC 1/6/2014 RESPONSES TO BRP'S 1/3/2014 REQUEST FOR ADDITIONAL INFORMATION.

Dear Mr. Kosko:

On January 7, 2014, the Ohio Department of Health, Bureau of Radiation Protection (BRP) received your January 6, 2014 response to our request for additional information dated 1/3/2014. BRP staff have completed its' review of your responses and have the following questions / comments that must be resolved before we can grant our final approval.

1. AMS response to ODH comment #4 requests certain modifications to the elements of the model sampling analysis procedure recommended by BRP.
 - a. The BRP model procedure was proposed for example purposes only. AMS may propose an alternate process that achieves equivalent or better quality data results.
 - b. The BRP recommended ISOCS Decision Level of 3.5pCi/g \pm 3.1 proposes an initial BRP approval of a +90% error when using ISOCS. You state you believe you would have trouble obtaining clients at that Decision Level. In consideration that the OAC 3701:1-43-07 (A) TENORM exemption criteria (i.e., OEPA landfill acceptance criteria) is 5.0 pCi/g combined Ra226 & Ra228 above natural background, the BRP believes that it is paramount that any ISOCS Decision Level must be below 5.0 pCi/g at this time. I make this point because the 2.0 pCi/g Ra226 & Ra228 Ohio natural background number is a number established by BRP for industry convenience. However, if an OEPA licensed landfill wanted to, they could (through robust sampling and analysis approved by BRP) get approval of a site specific background number which could be higher or lower than 2.0 pCi/g. And lastly, when proposing an alternate Decision Level, it is 100% mandatory that the documented results of an ISOCS analysis, when counting error is added, must NEVER exceed 6.99 pCi/g combined Ra226 & Ra228 for waste going to an OEPA permitted landfill.

Please submit a modified RP-AMS-35 TENORM Waste Acceptance Procedure for BRP review and consideration.

If you have any questions with any of the above, please contact me directly.

We will continue our review once we have received your responses to the above questions/concerns.

Thanks,

A handwritten signature in black ink, appearing to be 'CMC', written over a circular scribble.

Chuck McCracken, Supervisor
Nuclear Materials Safety Section
Bureau of Radiation Protection
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cc: M. Light, Administrator – BRP NMSS
S. Helmer, Administrator – BRP TS
J. Colleli, Sr. HP – BRP NMSS