

February 3, 2022

To: Director, Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Attn:** Document Control Desk/Exempt Distribution

**RE:** NRC License No. 07-35288-01E, Docket No. 03038897  
10 CFR 32.12 Material Transfer Report – 2021

Dear Sir/Madam:

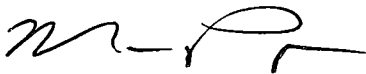
Pursuant to a condition of Tracerco's License No. 07-35288-E and 10 CFR 32.12, enclosed is the required material transfer report for 2021.

All transfers were performed in compliance with licensing conditions that authorize Tracerco to introduce by-product material as contaminants in tracer studies and to transfer ownership of the material with the contaminate to persons exempt from the licensing requirements found in 10 CFR 30.14.

The concentrations of by-product materials at the time of transfer did not exceed the concentrations in 10 CFR 30.70 nor were the products incorporated in any food, beverage, cosmetic, or other commodity or product designed for ingestion or inhalation by, or application to, a human being.

Should you have any questions regarding the enclosed report, please do not hesitate to contact Monte Pope.

Best Regards,



Monte Pope  
Corporate Radiation Safety Officer  
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Enclosure: 10 CFR 32.12 By-product Material Transfer Report — 2021

**Tracerco**  
**NRC Exempt Distribution License No. 07-35288-01E**  
**10 CFR 32.12 Material Transfer Report**  
**01/01/2021 through 12/31/2021**

10 CFR 32.12(b)(1)		10 CFR 32.12(b)(2)			10 CFR 32.12(b)(3)		10 CFR 32.12(b)(4)		
Recipient Product/Material		Recipient Information			Radionuclide Introduced		Initial Transfer Concentration		
Type	Quantity	Name	City	State	Type	Quantity (mCi)	Liquid (μCi/ml)	Solid (μCi/g)	Gas (μCi/ml)
Liquid	424000 gal	Marathon	Cattlettsburg	KY	H-3	1000	6.23E-04	N/A	N/A
Solid	1300000 lbs	Valero	St. Charles	LA	La-140	50	N/A	8.48E-05	N/A
Liquid	7400000 gal	LyondellBasell	Westlake	LA	H-3	4000	1.43E-04	N/A	N/A
Liquid	4830 gal	Calumet	Shreveport	LA	H-3	20	1.09E-03	N/A	N/A
Solid	67439 Lbs	Calumet	Shreveport	LA	Br-82	82.04	N/A	2.68E-03	N/A
Liquid	500000 gal	Marathon	Texas City	TX	Na-24	60	3.17E-05	N/A	N/A
Liquid	8931 gal	Phillips 66	Belle Chasse	LA	H-3	20	5.92E-04	N/A	N/A
Liquid	3000000 gal	BASF	Port Arthur	TX	H-3	1000	8.81E-05	N/A	N/A
Solid	67439 lbs	Calumet	Shreveport	LA	Br-82	90	N/A	2.94E-03	N/A
Liquid	30000 lbs	Calumet	Cotton Valley	LA	Br-82	40	2.94E-03	N/A	N/A
Liquid	2100000 gal	BASF	Port Arthur	TX	H-3	250	3.15E-05	N/A	N/A
Liquid	10000 gal	LyondellBasell	Houston	TX	Br-82	100	0.003	N/A	N/A
Liquid	10000 Gal	LyondellBasell	Houston	TX	Br-82	100	2.64E-03	N/A	N/A
Liquid	3000 gal	Marathon	Cattlettsburg	KY	H-3	20	1.76E-03	N/A	N/A
Liquid	2500000 gal	BASF	Freeport	TX	Br-82	24	2.54E-06	N/A	N/A
Liquid	3000 gal	Chevron	Richmond	CA	H-3	250	2.20E-01	N/A	N/A
Liquid	12600 gal	Marathon	Robinson	IL	Br-82	50	1.05E-03	N/A	N/A
Liquid	550000 gal	Flint Hills Resources	Rosemont	MN	H-3	2000	9.61E-04	N/A	N/A
Liquid	1038153 gal	Marathon	Carson	CA	Br-82	200	5.09E-05	N/A	N/A
Liquid	175000 gal	Phillips 66	Westlake	LA	H-3	400	6.04E-04	N/A	N/A
Liquid	8700 gal	Linde Gas	Oregon	OH	Na-24	65	1.97E-03	N/A	N/A
Solid	67439 lbs	Calumet	Shreveport	LA	Br-82	90	N/A	2.94E-03	N/A
Solid	700000 lbs	PBF Energy	Toledo	OH	La-140	60	N/A	1.89E-04	N/A