## **USEcology**

an American Ecology company

April 9, 1992

Mr. Edward J. Nikula
WASHINGTON UTILITIES and
TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr., S.W.
Olympia, WA 98504-8002

RE: Docket No. TG-920234 Staff Data Requests 1-8

Dear Mr. Nikula:

Enclosed are US Ecology's responses to Staff Data Request Nos. 1, 2, 3, 4, 5, 7(6), and 8(1) in the above proceeding.

Please let me know if you have questions with respect to any responses. I may be reached at (206) 754-3733.

Sincerely

Barry C. Bede

BCB:ph Enclosures

Copy: Mr. James Van Nostrand

STATE OF WASH.
TIL. AND TRANSP.
COMMISSION

92 APR 10 PH 3: 44

# US Ecology, Inc. Docket No. TG-920234

### Response to Staff Data Request No. 1

Request:

Please supply a copy of the 1991 Annual Report of American Ecology as soon as it becomes available.

Response:

Witness: Robert L. Ash

Attached hereto is a copy of American Ecology's Annual Report to shareholders for 1991.

## American Ecology

American Ecology Corporation is the oldest commercial low-level radioactive waste disposal company in the United States and a 20-year veteran in the hazardous waste disposal business.

The company operates two of the nation's three low-level radioactive waste disposal facilities in Nevada and Washington, having received the nation's first commercial LLRW disposal license in 1962. With license applications pending to develop and operate new low-level waste disposal facilities in California and Nebraska, American Ecology continues to lead this market.

American's two hazardous waste disposal facilities, located in Nevada

and Texas, offer packaging, transportation, consulting and clean-up services, in addition to pretreatment of certain wastes prior to landfill disposal. Both facilities operate under Resource Conservation and Recovery Act (RCRA) Part B permits. Also, the Nevada facility is one of fewer than 10 landfills in the country with a Toxic Substances Control Act (TSCA) permit for disposal of PCB-contaminated materials.

American Ecology's 219 employees, located in eight states, work to promote the best interests of our customers, shareholders, the communities in which we operate, and the environment.

This annual report reviews American Ecology Corporation's financial performance and a profile of its operations during calendar year 1991.

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### TO OUR SHAREHOLDERS:

Nineteen ninety-two marks the 40th anniversary of the founding of US Ecology, American Ecology's principal operating subsidiary. It has been 40 years of rapid change not only for US Ecology, but also for the entire world. The change in our individual understanding of and attitude toward the environment is among the most dramatic. In the 1950s, few realized that, in attempting to build a "high-tech" society, we were placing adverse stresses on the ecosystem.

In the early 1960s, Rachel Carson launched the environmental revolution with Silent Spring, a book describing the effect of toxic materials on the environment. While society continues to debate the need for, and the effectiveness of, the volumes of environmental laws and regulations promulgated over the last 30 years, one aspect of this revolution—and probably the most important—is unassailable: now, there is a real understanding that there are environmental consequences to almost all individual and collective actions. Responsible individuals, corporations and governments now recognize that

they all must manage their affairs in such a way that will promote growth and development while protecting our natural resources.

How has American Ecology fit into this 40-year era of changing environmental awareness? In truth, much like everyone else — extremely well by some measures, not as well by others. Viewed from today's perspective, the Company's pioneering efforts in low-level radioactive waste disposal should be given high marks for choosing locations that have effectively isolated wastes from human contact. On the other hand, some early disposal cell designs, although acceptable and commonly used at the time, did not have the benefit of today's environmental knowledge, understanding and regulatory standards. Drawing on its 40 years of pioneering experience, the Company has continuously upgraded its operations. Today, it offers low-level radioactive and hazardous waste landfill services, in both arid and rainfall areas. that provide protection to the environment, the public and to its customers.

Most important, the people of US Ecology and American Ecology have grown in environmental awareness, along with everyone else. These employees take pride in being part of the solution to a better environment, as well as being part of a growing, successful business enterprise. This annual report is dedicated to the people of your Company, each of whom plays an important role in its environmental and business success.

We are pleased to report favorable financial performance for 1991. Both low-level radioactive waste and hazardous chemical waste disposal performed well during the year. The strategy of focusing on the Company's strength — landfills and related services — continues to pay off, and is establishing a solid base for future growth.

This will likely be my last annual letter to share-holders as Chairman of the Board. I have agreed to step down in favor of Mr. Harry J. Phillips, Jr. at the annual meeting, if the Company's major shareholder, ECOL Partners, Ltd., demonstrates voting control. Mr. Phillips, who already is integrated into the Company's management as Chief Executive Officer as part of a transition agreement, has informed the Board of Directors that he will make such a demonstration. I look forward to assisting Mr. Phillips in continuing on the course we have set for the Company.

To that end, we, as shareholders, owe a special note of thanks to our President, Mr. R. Lee Armbruster, who has been the principal architect of the operating resurgence of American Ecology over the past two years. Mr. Armbruster has agreed to remain as President and Chief Operating Officer through 1992 to help assure a smooth transition to new management.

What will the next 40 years bring for American Ecology? While the future is impossible to predict, certain trends are discernible. The business of waste disposal will continue to be driven by regulation and politics. Landfill assets, like those of American Ecology, will be almost impossible to replicate. By carefully supplementing these assets with related-value technologies and services, American Ecology should be able to sustain growth and increase the useful life of its landfills. Mr. Phillips has stated his desire to achieve growth in this way and, with the availability of sufficient capital, such growth should be possible.

The business of American Ecology has been an exciting challenge for the past eight years. I want to thank both the employees of the Company and its shareholders for their unflagging support. Together, we have positioned American Ecology as a strong competitor in the growing environmental services market.

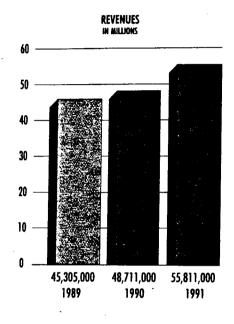
W. E. Pracher

William E. Prachar

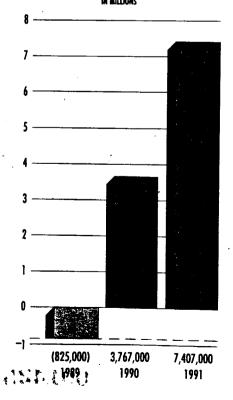
Chairman of the Board

### FINANCIAL HIGHLIGHTS

Revenues
Income from Continuing Operations
Shareholders' Equity
Income Per Share from Continuing Operations
Total Assets



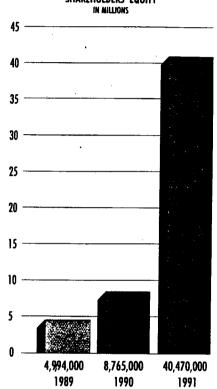
### INCOME FROM CONTINUING OPERATIONS



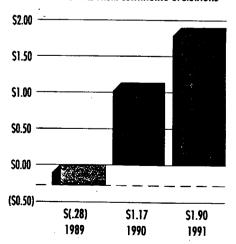
### Years ended December 31,

1991	1990	1989
\$55,811,000	\$48,711,000	\$45,305,000
\$ 7,407,000	\$ 3,767,000	\$ (825,000)
\$40,470,000	\$ 8,765,000	\$ 4,994,000
\$ 1.90	\$ 1.17	\$ (.28)
\$84,691,000	\$79,343,000	\$76,995,000

### SHAREHOLDERS' EQUITY



### INCOME PER SHARE FROM CONTINUING OPERATIONS

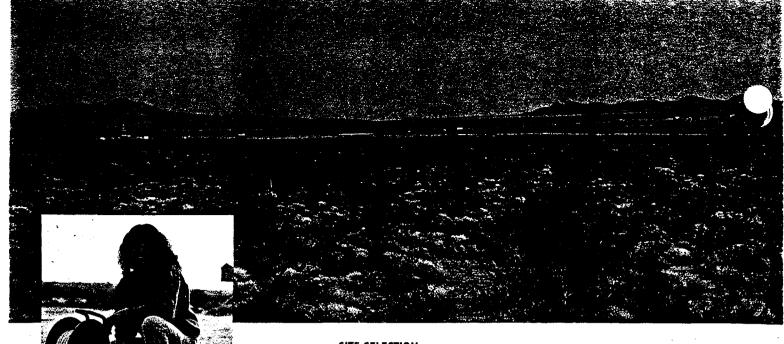




# THE PEOPLE AND PLACES OF AMERICAN ECOLOGY

The success of our business depends on the quality of our operations and our staff. Our 219 employees nationwide are among the best in the industry, committed to protecting the environment through responsible management

of low-level radioactive and hazardous wastes. One-third of our operations personnel have been with the company 10 years or longer, giving American Ecology a core of experience and knowledge on which to build. The following pages outline the phases of our operations and feature some of the staff whose skill and hard work have made American Ecology the successful business it is today. This annual report is dedicated to them.



Alejandru Gonzalez Radiological Control & Safety Technicium Noodles, California



Charles Colomon Project Hoolth Physicist Lincoln, Nobraska



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Carel Liewer Public Information Coordinator Butto, Nobraska

### SITE SELECTION

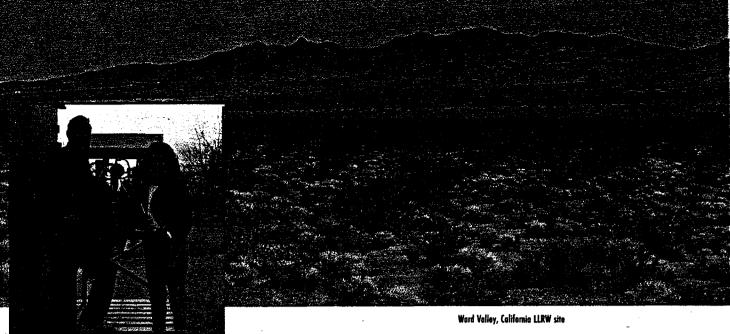
The process begins with choosing the location that provides the best natural isolation for a disposal facility. It includes comprehensive tests and studies, performed under strict regulatory guidelines. From the results of these studies, the company prepares and submits a license application to construct and operate the disposal facility. By the close of 1991, American Ecology had submitted two license applications to regulatory agencies in California and Nebraska for new low-level radioactive waste

disposal facilities to be sited under the federal Low-Level Radioactive Waste Policy Amendments Act of 1985. Both applications were declared "complete" by California and Nebraska regulators, making American Ecology the only company in the United States to receive two such designations.



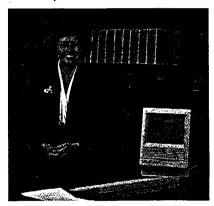
Bob Crandell
Radiological Central & Safety Technician
Needles, California
001428





Frank Bordell, Radiation Protection Manager & Facility Quality Assurance/Quality Control Officer, and Control Jewell, Purchasing Agent/Bookkeeper, at metrological monitoring station in the Jewell backyard Goffs, California





Sharen Hillyard Decument Centrel Supervisor Lincoln, Nebraska



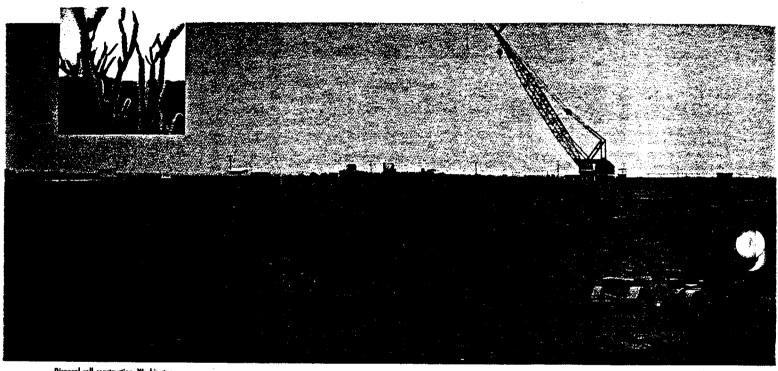
### CONSTRUCTION -

The building doesn't stop when the gates open at a new facility. In order to assure adequate capacity that will meet the needs of present and future customers, additional disposal cells are designed accord-

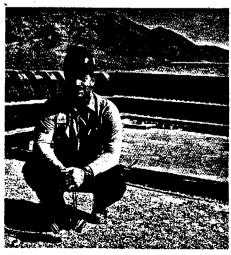
ing to the specifications outlined in our operating permits. And, when operating disposal cells are filled, they are enclosed with engineered caps to further isolate the waste while enhancing environmental protection.



Construction Foremo Relisteum, Texas



Disposal cell construction, Weshington



Jeff Cooper Assistant Cell Feren

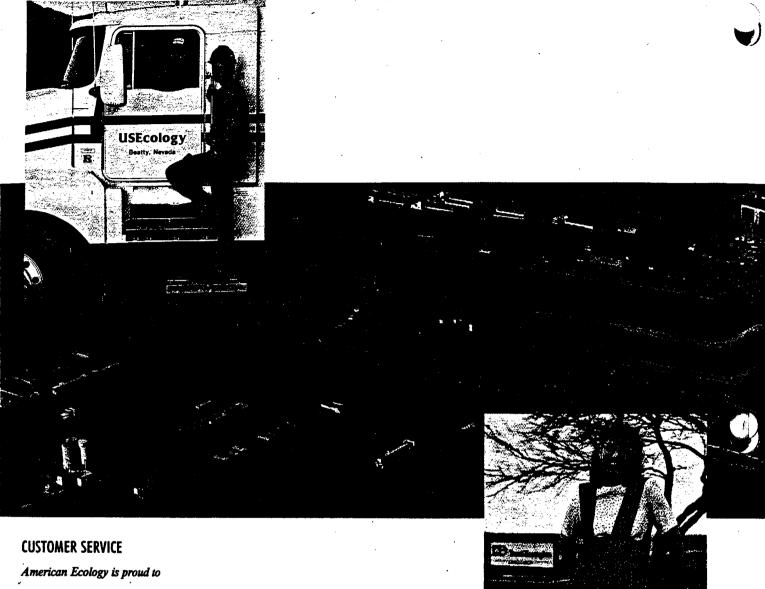
Operations Supervisor Richland, Washington



Don Gill Operations Supervisor Needles, California



Den Shoerer, Mochenic, and Phil Mines, Chief Safety Office Reetty Mounds



American Ecology is proud to provide comprehensive answers to the waste management challenges faced by industries and businesses nationwide. While our disposal operations are a key factor in our success, our ability to provide the

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services our customers require
when they need them keeps
American Ecology ahead of the
competition. Our service team
includes sales, service, transportation and data processing experts
dedicated to supporting our growing network of satisfied customers.

Donne Thomas Office Manager Robstown, Texas



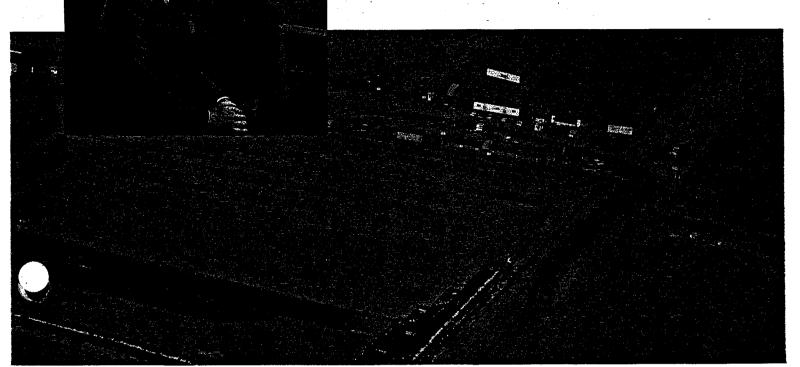
Caroline Martinson Sonior Programmes Lauisville, Kenturk

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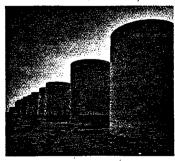
Kevia Wittmer, Environmental Sales & Marketing Manager, as Gury Yuung, Nuclear Sales Manager Lauisville, Kontucky



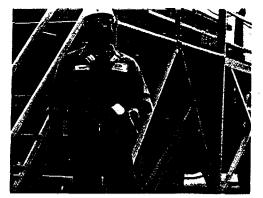
Dean Kepp Terminal Manager Princeton, Illinois



Hazardous waste disposal operations, Nevada



Engineered concrete overpack for LLRW disposal



Ernest Garze Chemicul Technicia: Relistown, Texas



Gilbert Avales Assistant Chemical Safety Officer Relisteum, Texes



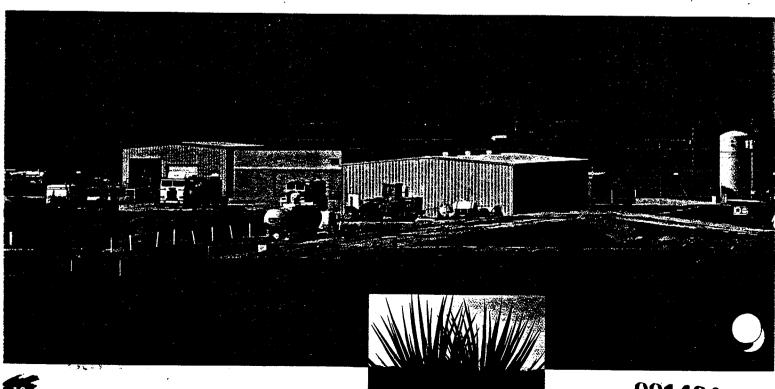
Doug Greffia Radiation Safety Officer Boatty, Neveda

### **OPERATIONS**

With nearly 40 years of experience,
American Ecology's disposal
operations are the cornerstone
of our business. We have been
pioneers in the industry, often
setting the pace in regulatory
compliance and operations innovation. Our commitment to our

business is evident in our ability to provide safe disposal service while protecting the public, the environment and the well-being of our personnel. By keeping safety and regulatory compliance as our top priorities, American Ecology enjoys a commendable record with its state and federal oversight agencies.

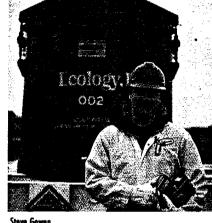






Barbara Quinn end Rosaleen Adamson Laboratory Technicians Beatty, Nevoda



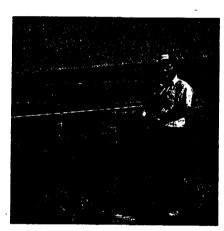


Steve Gowen Radiological Technician Richland, Washington



Hathrious weste disposel eperations, Texas



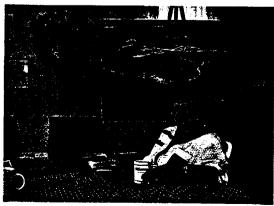


Doug Long Chemical Safety Officer Sheffield, Illinois

### A COMMITMENT TO TOMORROW

When disposal operations at a facility cease, a closure plan is developed in conjunction with the appropriate state and federal agencies. We're in the disposal business for the long haul, and

that includes completing all
closure and post-closure requirements. It also means being part of
the communities where we operate,
doing our part to help them achieve
their goals.



Mergeret Heenscheid Public Information Clerk Shoffield Illinois





## -FINANCIAL RESULTS

## MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

### Operating Results and Other Financial Information

The business of American Ecology Corporation (the "Company" or "American") is hazardous waste disposal. The Company processes, transports and disposes of low-level radioactive and chemical wastes. Low-level radioactive waste ("LLRW" or "low-level waste") consists of materials contaminated with low levels of radioactivity and is generated by nuclear power facilities, industry, hospitals, universities and laboratories. Chemical waste consists primarily of industrial and agricultural waste.

The following table sets forth operating results and other financial information for the last five years.

Dollars in thousands, except per share amounts Years ended December 31,

·	1991	1990	1989	1988	1987
Revenues	\$55,811	\$48,711	\$45,305	\$41,265	\$53,775
Operating income (loss) from continuing operations	8,232	6,163	245	(26,363)	6,964
Income (loss) from continuing operations	7,407	3,767	(825)	(23,761)	4,067
Income (loss) from continuing operations per share	1.90	1.17	(.28)	(8.08)	1.37
Long-term debt	543	22,977	23,656	7,142	2,035
Shareholders' equity	40,470	8,765	4,994	2,204	27,481
Assets	84,691	79,343	76,995	56,012	55;902
Capital expenditures	7,469	9,145	8,887	6,374	5,922
Depletion, depreciation and amortization expense	1,650	1,152	3,223	1,511	1,307

The Company has not declared or paid cash dividends and does not intend to declare a dividend in the foreseeable future.

### Results of Operations

The following table sets forth items in the Statements of Operations for continuing operations for the three years ended December 31, 1991, as a percentage of revenues:

	Percentage of revenues for the years ended December 31,			
Revenues Cost and Expenses:	<b>1991</b>	1 <b>990</b>	<b>1989</b>	
	100.0	100.0	100.0	
Cost of revenues:	Ÿ.			
Operating costs  Future site maintenance, remediation and closure costs	67.2	68.8	73.0	
	2.7	2.9	9.3	
Selling and administrative expenses Interest expense Interest income	69.9	71.7	82.3	
	15.7	16.2	18.8	
	2.9	4.5	3.3	
	(3.3)	(5.0)	(4.9)	
Total costs and expenses	85.2	87.4	99.5	
Income from continuing operations before provision for income taxes  Provision for income taxes	14.8	12.6	0.5	
	1.5	4.9	2.3	
Income (loss) from continuing operations	13.3	7.7	(1.8)	

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### Comparison of 1991 to 1990

Revenues from continuing operations in 1991 were \$55,811,000, a 14.6% increase from 1990. Revenue increased \$7.1 million as a result of a \$3.1 million increase in chemical waste disposal revenues and a \$5.1 million increase in LLRW disposal activity, offset by a reduction in revenues related to the discontinuance of the nuclear engineering operation (Associated Technologies, Inc.) in December 1990. While chemical waste disposal volumes increased slightly over 1990 volumes, the average price obtained by the Company improved 3.9% in 1991 due to price increases in April 1991. While LLRW volume increased 55% in 1991 compared to 1990, prices declined 3.1% because the Company lowered prices in an increasingly competitive market.

Operating costs, as a percentage of revenues, decreased from 68.8% to 67.2%. This decrease is primarily a result of the improved revenues from LLRW disposal activity and the discontinuance of the nuclear engineering operation in December 1990.

The provision for future site maintenance, remediation and closure costs increased to \$1.5 million in 1991 from \$1.4 million in 1990 due to the higher waste volumes disposed.

Selling and administrative expenses include charges of \$1,281,000 in 1991 for settlement of the 1988 severance agreements between the Company and certain executive officers and a charge of \$895,000 for the value of a warrant issued to ECOL Partners, Ltd. ("ECOL") in August 1991 (see Note 5 to the Consolidated Financial Statements). Without these charges, selling and administrative expenses would have declined \$1,270,000 due to the discontinuance of unprofitable operations in the latter part of 1990.

Interest income declined because of the decrease in interest rates during the year and the decrease in funds available for investment. Interest-bearing investments decreased from \$27.9 million at December 31, 1990, to \$24.7 million at December 31, 1991. Interest expense declined as a result of the conversion of debentures in August and November 1991. (See Note 5 to the Consolidated Financial Statements.)

The provision for income taxes is lower because the Company recognized tax benefits attributable to operating loss carry-forwards (\$2,578,000 in 1991 and \$213,000 in 1990).

### Comparison of 1990 to 1989

Revenues from continuing operations in 1990 were \$48,711,000, a 7.5% increase from 1989. Revenue increased \$3.4 million as a result of a \$9.9 million increase in chemical waste disposal revenues, which was reduced primarily by a \$4.1 million decrease in LLRW disposal activity. Chemical waste disposal volumes increased 91% over 1989's volumes, but the average price obtained by the Company declined 12% in 1990 due to increased competition and changes in the types of wastes received. LLRW volume declined 31% in 1990 compared to 1989.

Operating costs, as a percentage of revenues, decreased from 73.0% to 68.8%. This decrease is primarily a result of the \$1.7 million writedown recorded in 1989 on waste processing equipment and related intangible costs.

The provision for future site maintenance, remediation and closure costs decreased to \$1.4 million in 1990 from \$4.2 million in 1989. The provision in 1989 included a \$1.5 million charge recorded for capping certain pre-RCRA (Resource Conservation and Recovery Act of 1976) disposal cells at the Company's Texas facility, and certain other charges which did not recur in 1990.

Selling and administrative expenses declined in 1990 by 2.6% as a percentage of revenues because of reductions in work-force. Interest expense increased in 1990 over 1989 because the Company's convertible debentures issued in August 1989 were outstanding for the entire year. Interest income increased due to the higher level of funds available for investment during 1990 compared to 1989 as a result of increased cash provided by operating activities and the 1989 debenture issuance.

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### Capital Resources and Liquidity

As of December 31, 1991, the Company had approximately \$5 million in cash and cash equivalents. The Company generated cash from operating activities of \$2,371,000 in 1991, \$5,138,000 in 1990, and \$3,141,000 in 1989. In addition, ECOL converted the \$22,500,000 of debentures into 1,500,000 common shares in 1991 (see Note 5 to the Consolidated Financial Statements). The current ratio at each of December 31, 1991 and 1990, was approximately 1.8 to 1.

The Company believes that its cash flow and current level of cash and cash equivalents available is currently sufficient to support the Company's present level of operations, provide funds for investment in existing LLRW and hazardous waste site development activities, and meet financial assurance obligations. Completion of these activities may require further capital. The Company must develop and acquire advanced waste disposal and treatment technologies and facilities to compete successfully. Opportunities to expand its hazardous waste activities may require further significant capital expenditures. If additional capital is required, the Company may have to seek outside financing.

Capital expenditures for property and equipment, and California and Nebraska LLRW facilities siting were \$7,469,000 in 1991, \$9,145,000 in 1990 and \$8,887,000 in 1989. The Company anticipates capital expenditures in 1992 of approximately \$.9 million in addition to expenditures for the California and Nebraska LLRW facilities discussed below.

In 1985, US Ecology (US Ecology, Inc., a wholly owned subsidiary of the Company) was selected as California's license designee to locate, develop and operate the State's LLRW facility. In connection with the development of the California facility, the Company has expended \$23.3 million and anticipates expending a further \$23.1 million, assuming commencement of construction is not delayed beyond the end of 1992. The California Department of Health Services has notified US Ecology that all technical requirements for licensing have been satisfactorily addressed and that the Department has completed its technical review. The Department also has informed US Ecology that it now has all information necessary to make its decision regarding licensing of the facility.

The final steps prior to construction include documentation of the State's Record of Decision, Certification of the California Environmental Quality Act requirements and acquisition of the subject property by the State. The State's acquisition of the land is currently being delayed by concerns expressed by public officials, certain environmental interests and others. As a result, the Company expects the opening of the facility will be delayed beyond the January 1, 1993, federal deadline. US Ecology had been expecting license approval by the end of 1991. It is not possible to assess the length of the delay at this time, nor can there be any assurance that a license will be issued. US Ecology continues to urge the State to promptly license the facility and acquire the land so that construction may begin. US Ecology expects to incur expenses of approximately \$500,000 per month until the license is received. Once the seven-month construction period commences, expenditures are expected to be about \$15 million, including purchase of the land.

In 1987, US Ecology was designated by the Central Interstate Low-Level Radioactive Waste Compact Commission to develop and operate a LLRW facility. The facility, scheduled to be completed in 1995, will cost an estimated \$107 million to site, design and construct. Project costs through 1991 totaled \$35 million. Initial funding totaling \$37 million of the pre-licensing phase of the contract is provided by the generators of the waste in the compact. The Compact Commission is presently funding the project on a quarterly basis, pending contract amendment resolution. The Company's portion of the project's costs through 1991 totaled \$6.3 million, and the Company anticipates no additional investment in this project. The Company intends to seek additional capital or funding by the waste generators to finance the completion of the project. There can be no assurance that the facility will be licensed.

US Ecology operates its chemical sites under RCRA permits. The LLRW sites are operated under licenses from state and, in some cases, federal agencies. When these facilities reach capacity, or lease or license termination dates, as the case may be, they must be closed and maintained for a period of time prescribed by law or by license. In the case of the RCRA-permitted chemical sites, federal regulation requires that operators demonstrate the financial capability to close sites on an immediate, unscheduled (worst-case) basis. The estimated costs of such a closure are set forth in the operator's RCRA closure/post-closure plan.

To secure closure/post-closure obligations of its chemical waste disposal sites under federal and state regulations, US Ecology has provided letters of credit and certificates of insurance as financial assurance. Additional cash and marketable securities of \$2,672,000 were pledged as collateral for financial assurance requirements during 1991. Cash and marketable securities totaling \$19,903,000 and \$17,231,000 at December 31, 1991 and 1990, respectively, have been pledged as collateral for the closure/post-closure obligations, performance of a remedial investigation and feasibility ("RI/FS") study and performance of corrective action at Sheffield, Illinois, and in lieu of performance bonds.

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The RI/FS was completed and approved by the EPA in 1990. The Company has begun implementing the Remedial Design/Remedial Activities phase of the Program as set forth in the EPA's Corrective Measures Implementation Plan. The Company reserved for the estimated costs to provide for the closure and long-term care and maintenance of the site in 1988. The estimated \$13 million cost of implementing the current Plan is within the reserve amount recorded. (See Notes 3, 6 and 11 to the Consolidated Financial Statements.)

Certain contingencies could materially affect the liquidity of the Company. An appeal is pending in Illinois related to the closed chemical disposal site near Sheffield, Illinois, which is being maintained and monitored by US Ecology. The underlying action sought the exhumation of the chemical waste site which, if ordered, would result in substantial expenditures over a number of years. The action was dismissed by the State Court on June 6, 1991. While US Ecology believes it will prevail on the appeal, an adverse judgment may result in the case going to trial on the merits. An adverse result at the trial level will lead to continued litigation. At this time the Company cannot predict the ultimate outcome of such litigation.

The nature of the hazardous material handled by US Ecology could give rise to substantial damages if spills, accidents or migration of hazardous material occurs. The occurrence of such events could have an adverse effect upon the Company's liquidity.

#### **Future Considerations**

The implementation of the Low-Level Radioactive Waste Policy Amendments Act of 1985 ("Low-Level Act") has resulted in a reduction of waste receipts at the Company's low-level waste disposal sites because the Act provides incentives for waste generators to reduce volumes by high-density compaction, increased operational efficiency or other methods. The Low-Level Act allows interstate regions ("compacts"), beginning January 1, 1992, to impose significant surcharges of \$40 or \$120 per cubic foot for out-of-compact waste, depending on compliance with the Low-Level Act milestones. This regulatory program, which started in 1986, has had a negative effect on LLRW receipts. In addition, the Low-Level Act places upon individual states the responsibility for disposing of their low-level waste and authorizes the states to form interstate compacts and to construct regional disposal facilities by 1993. The Low-Level Act also provides that any compact approved by Congress may restrict the use of its disposal facility to low-level waste generated within the member states and may limit the export of waste from their respective compacts. Revenues from disposal activities at the Richland, Washington and Beatty, Nevada sites were approximately \$12.7 million and \$4.2 million, respectively, in 1991. A significant amount of the low-level waste received by US Ecology's sites in Richland, Washington and Beatty, Nevada originates from outside their respective proposed regional compacts. Furthermore, the Rocky Mountain Compact has scheduled the Beatty, Nevada LLRW facility to close at the end of 1992. In addition, as noted previously, there can be no assurance that the licenses for the California and Nebraska LLRW facilities will be issued. At this time, it is not possible to predict the effect of these events on the Company's future operations.

In December 1991, the United States Supreme Court agreed to hear an appeal of a decision from the Second Circuit Court of Appeals by the State of New York (State of New York v. United States of America), which challenged the constitutionality of the Low-Level Act. New York has challenged the statute on the basis that it impermissibly abridges the rights of states under Article X of the U.S. Constitution by requiring them to involuntarily take title to LLRW under certain circumstances. The Court of Appeals had upheld the decision of the trial court dismissing New York State's lawsuit challenging the Act. Other courts, including a Nebraska Federal District Court, have upheld the constitutionality of the Act. The Supreme Court could choose to uphold the statute, strike portions of it, or declare the entire Act unconstitutional. At this time, the Company cannot predict what effect a decision in New York State's favor would have on the Company's siting processes in California and Nebraska, nor on the operations of the Company's existing facilities in Washington and Nevada. At this time, it is not possible to predict the effect of these events on the Company's future operations.

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# AMERICAN ECOLOGY CORPORATION CONSOLIDATED BALANCE SHEETS

	Decen	nber 31,
	1991	199
Assets	·	
Current assets:		
Cash and cash equivalents	\$ 5,050,000	\$10,774,000
Receivables	14,602,000	11,129,000
Deferred income taxes	1,458,000	2,012,000
Prepaid expenses	5,227,000	5,362,000
Total current assets	26,337,000	29,277,000
Marketable securities, pledged	19,903,000	17,231,000
Property and equipment, net	6,538,000	6,257,000
Intangible assets less accumulated amortization of		
\$503,000 in 1991 and \$474,000 in 1990	602,000	631,000
Deferred income taxes	1,791,000	<del></del>
Deferred site development costs	29,198,000	23,639,000
Other assets	322,000	2,308,000
	\$84,691,000	\$79,343,000
Liabilities and Shareholders' Equity	· ·	
Current liabilities:		
Current maturities of long-term debt	* 770,000	£ (70,000
Accounts payable	\$ 779,000	\$ 679,000
Accrued liabilities	4,698,000	6,376,000
Income taxes payable	8,958,000 (153,000)	9,119,000 80,000
Total current liabilities	14,282,000	16,254,000
Deferred site maintenance	29,396,000	31,347,000
Long-term debt	543,000	22,977,000
Commitments and contingencies	2 13,000	22,577,000
Shareholders' equity:		
Convertible preferred stock, \$.01 par value,		
1,000,000 shares authorized, 200,000 shares		
issued and outstanding	2,009	2,000
Common stock, \$.01 par value.	2,000	2,000
10,000,000 shares authorized, 4,576,010 and		
2,959,858 shares issued and outstanding		
in 1991 and 1990, respectively	46,000	20.000
Additional paid-in capital	46,000 35,705,000	30,000
Retained earnings (deficit)	4,717,000	11,423,000
Total shareholders' equity	40,470,000	(2,690,000) 8,765,000
	\$84,691,000	
	304,071,000	\$79,343,000

See accompanying notes.

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# AMERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF OPERATIONS

		Years ended Decemb	er 31,
	1991	1990	1989
Revenues	\$55,811,000	\$48,711,000	\$45,305,000
Costs and expenses:			
Cost of revenues:			
Operating costs	37,526,000	33,491,000	33,076,000
Future site maintenance, remediation	-	•	• •
and closure costs	1,477,000	1,392,000	4,186,000
	39,003,000	34,883,000	37,262,000
Selling and administrative expenses	8,778,000	7,872,000	8,522,000
Interest expense	1,630,000	2,216,000	1,503,000
Interest income	(1,832,000)	(2,423,000)	(2,227,000)
	47,579,000	42,548,000	45,060,000
Income from continuing operations	·,···,···	,,.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
before income taxes	8,232,000	6,163,000	245,000
Provision for income taxes	825,000	2,396,000	1,070,000
Income (loss) from continuing operations	7,407,000	3,767,000	(825,000)
Loss from discontinued operations,	., 107,000	3,707,000	(023,000)
net of tax		·	(2,167,000)
Loss on sale of discontinued operations,			(2,107,000)
net of tax	_	. <del>-</del>	(174,000)
Net income (loss)	\$ 7,407,000	\$ 3,767,000	\$(3,166,000)
Per share information:			*(0,000,000)
Primary —			
Income (loss) from continuing operations	\$ 1.90	<b>\$</b> 1.17	<b>6</b> (00)
Loss from discontinued operations	3 1.90	\$ 1.17	\$ (.28)
Loss on sale of discontinued operations	<del>-</del>	<del></del> ,	(.73)
			(.06)
Net income (loss)	\$ 1.90	\$ 1.17	\$ (1.07)
Fully diluted —			
Net income	\$ 1.82		

See accompanying notes:

# AMERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF SHAREHOLDERS' EQUITY

	Convertible Preferred Stock	Common Stock	Additional Paid-In Capital	Retained Earnings (Deficit)	Shareholders' Equity
Balance, December 31, 1988 Convertible preferred stock and	<b>\$</b> —	\$29,000	\$ 5,466,000	\$ (3,291,000)	\$ 2,204,000
warrant issued, net	2,000	_	5,891,000		5,893,000
Common stock issued, net of repurchases	_	1,000	62,000		63,000
Net loss	<del></del>	<del></del> .	<del>-</del>	(3,166,000)	(3,166,000)
Balance, December 31, 1989	2,000	30,000	11,419,000	(6,457,000)	4,994,000
Common stock issued, net of repurchases	_		4,000	_	4.000
Net income		_	_	3,767,000	3,767,000
Balance, December 31, 1990	2,000	30,000	11,423,000	(2,690,000)	8,765,000
Common stock issued, net of repurchases	_	16,000	23,387,000		23,403,000
Warrant issued	_	<u>-</u>	895,000	_	895,000
Net income			<u>_</u>	7,407,000	7,407,000
Balance, December 31, 1991	\$ 2,000	\$46,000	\$35,705,000	\$ 4,717,000	\$40,470,000

See accompanying notes.

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# AMERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF CASH FLOWS

	Ye	Years ended December 31,		
	1991	1990	1989	
Cash flows from operating activities:		•		
Net income (loss)	\$ 7,407,000	\$ 3,767,000	\$ (3,166,000)	
Adjustments to reconcile net income (loss) to	•			
net cash provided by operating activities:				
Depletion, depreciation and amortization	1,650,000	1,152,000	3,223,000	
Gain on sale of assets	1,000	(300,000)	(81,000)	
Warrant issued	895,000	- '	<del>-</del>	
Changes in assets and liabilities:	٠,			
Marketable securities	<del>_</del>	_	652,000	
Receivables	(2,518,000)	1,612,000	1,724,000	
Prepaid expenses	135,000	716,000	(2,022,000)	
Deferred income taxes	(1,237,000)	(16,000)	1,024,000	
Accounts payable	(1,678,000)	(1,054,000)	729,000	
Accrued liabilities	694,000	(120,000)	1,103,000	
Income taxes payable	(233,000)	80,000	1,103,000	
Deferred site maintenance	(2,806,000)	377,000	(110,000)	
Other	61,000	(1,076,000)	(118,000)	
Outci			73,000	
Net cash provided by operating activities	(5,036,000)	1,371,000	6,307,000	
14ct cash provided by operating activities	2,371,000	5,138,000	3,141,000	
Cash flows from investing activities:				
Capital expenditures	(940,000)	(2,698,000)	(1,320,000)	
LLRW siting costs	(5,559,000)	(6,447,000)	(7,462,000)	
Change in marketable securities, pledged	(2,672,000)	(273,000)	(3,462,000)	
Payments received on notes from sale of assets	656,000	646,000	300,000	
Proceeds from sale of assets	7,000	170,000	449,000	
Net cash used in investing activities	<del> </del>			
iver cash used in investing activities	(8,508,000)	(8,602,000)	(11,495,000)	
Cash flows from financing activities:		•		
Proceeds from issuance of long-term debt, net	_		17,293,000	
Principal payments on long-term debt	(804,000)	(706,000)	(747,000)	
Preferred and common stock and warrant issued, net	1,217,000	4,000	5,956,000	
Net cash provided by (used in) financing activities	413,000	(702,000)	22,502,000	
Increase (decrease) in cash and cash equivalents				
Cash and cash equivalents at beginning of year	(5,724,000) 10,774,000	(4,166,000) 14,940,000	14,148,000 792,000	
Cash and cash equivalents at end of year	\$ 5,050,000	\$10,774,000	\$ 14,940,000	
Supplemental disclosures of cash flow information:				
Cash paid during the year for:	-			
Interest	\$ 2,052,000	\$ 1,924,000	\$ 868,000	
Income taxes	\$ 1,971,000	\$ 2,143,000	\$ 240,000	
Supplemental schedule of non-cash investing and	•		•	
financing activities:	•			
Capital lease obligations incurred	\$ 970,000	s —	\$ 105,000	
			·	

See accompanying notes.

## AMERICAN ECOLOGY CORPORATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

### Note 1. Summary of Significant Accounting Policies

Principles of Consolidation. The accompanying financial statements present the consolidated accounts of American Ecology Corporation and its subsidiaries (the "Company" or "American"). All material intercompany accounts and transactions have been eliminated.

Revenue Recognition. Revenues from hazardous waste disposal are recognized as the waste materials are buried or processed. Revenue on long-term contracts is recognized on a percentage of completion method, based primarily on the ratio of costs incurred to date to total estimated contract costs. Anticipated losses under contracts are recorded as they become evident. Amounts due under long-term contracts were not material at December 31, 1991 and 1990.

Gross Revenue Tax. Gross revenue taxes imposed by the State of Washington are included in hazardous waste revenues and cost of revenues. These taxes were \$1,185,000 in 1991, \$1,400,000 in 1990 and \$3,245,000 in 1989.

Prepaid Expenses. Included in prepaid expenses at December 31, 1991 and 1990, are \$4,282,000 and \$4,651,000, respectively, of unamortized costs related to waste disposal space preparation.

Property and Equipment Property and equipment are recorded at cost and depreciated on straight-line and declining balance methods over their estimated useful lives. The estimated useful lives of buildings is 15 to 30 years and of equipment is 3 to 7 years. Site and leasehold improvements are amortized over the life of the lease or the useful life of the improvement, whichever is less. Land is depleted over the estimated useful life of the disposal site on a straight-line basis. Fully depreciated assets of \$4,207,000 and \$4,195,000 at December 31, 1991 and 1990, respectively, were not included in the accounts but are still in use.

Intangible Assets. Intangible assets are amortized on a straight-line basis over 40 years.

Deferred Site Development Costs. The Company has been selected to locate, develop and operate the LLRW facilities for the State of California and the Central Interstate LLRW Compact Commission in Nebraska.

All allowable costs, except interest, relating to the siting process of the California facility have been deferred and are expected to be realized from the revenues of the LLRW site when operational. The current estimate of additional capital investment required to make this facility operational is approximately \$23 million to be incurred over the next two years, excluding interest.

All unreimbursed costs and fees relating to the Nebraska facility have been deferred and are expected to be realized from the revenue of the LLRW site when operational. No additional capital investment is expected to be required from the Company.

Receivables. Receivables are presented net of reserves for doubtful accounts of \$337,000 and \$90,000 at December 31, 1991 and 1990, respectively. Included in Receivables at December 31, 1991, is \$1,154,000 for Washington leasehold taxes paid under protest which are expected to be refunded in 1992. (See Note 11.)

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Site Maintenance. The Federal government, under the Resource Conservation and Recovery Act of 1976 ("RCRA"), requires that companies provide financial assurance for the closure/post-closure care and maintenance of their chemical sites for at least thirty years following closure. The Company charges amounts against income for future chemical site maintenance and LLRW site maintenance based on the quantity of waste buried. The deferred site maintenance liability represents amounts which are not expected to be expended within one year (see Notes 3, 6 and 11).

For the states of Washington and Nevada, amounts are remitted to the states currently for future maintenance of the state-owned LLRW disposal sites.

Convertible Preferred Stock. In August 1989, the Company issued 200,000 shares of its Series B Preferred Stock. This stock is convertible into an equal number of common shares at the holder's option for up to three years. In November 1988 and in April 1989 the Company issued 500,000 and 300,000 shares, respectively, of its Series A Preferred Stock (the "Preferred Stock") to its wholly-owned subsidiary, US Ecology, Inc. The 800,000 shares had been pledged as security for the \$8 million loan (see Note 5). The Series A shares have been released and subsequently cancelled by the Company.

Net Income (Loss) Per Share. Net income per share for 1991 is based on the weighted average number of common stock and common stock equivalents outstanding of 4,416,000 computed in accordance with the modified treasury stock method. For purposes of computing earnings per share in accordance with the modified treasury stock method, net income for 1991 has been adjusted to \$8,399,000 for primary earnings per share and \$8,028,000 for fully diluted earnings per share. The 1991 reported quarterly earnings per share, when aggregated, do not equal the reported annual earnings per share of \$1.90 because of the required change to the modified treasury stock method, commencing in the Third Quarter of 1991.

Net income (loss) per share for 1990 and 1989 is calculated based on the weighted average shares and equivalents outstanding of 3,214,000 in 1990 and 2,953,000 in 1989.

Supplementally, primary earnings per share, assuming conversion of all converted securities at the beginning of each year, would have been \$1.76 in 1991, \$1.06 in 1990 and unchanged in 1989.

Cash Equivalents. Cash equivalents consist of short-term, highly liquid investments with original maturities of three months or less which are readily convertible into cash.

#### Note 2. Discontinued Operations

In November 1989, the Company sold the principal operating assets of its refuse derived fuel processing and engineering subsidiary, National Triple R, Inc. (formerly National Ecology, Inc.), to a subsidiary of The Babcock & Wilcox Company. A sales price of \$251,000 was recognized in calculating the loss on sale of discontinued operations as shown in the Consolidated Statements of Operations. The operating results have been classified as discontinued operations in the financial statements for the period presented through the sale date.

The revenues from discontinued operations were \$11,096,000 for the year ended December 31, 1989.

The loss from discontinued operations is net of a credit for income taxes of \$1,553,000 in 1989. The loss on disposal of discontinued operations is net of a credit for income taxes of \$147,000.

### Note 3. Cash, Cash Equivalents and Marketable Securities

Cash, cash equivalents and marketable securities at December 31, 1991 and 1990, consist of the following:

	1991	1990
Cash	\$ 263,000	\$ 68,000
-United States Treasury Notes	10,782,000	10,724,000
Commercial Paper	4,386,000	8,000,000
Eurodollar Time Deposits	_	2,085,000
Certificates of Deposit	2,836,000	6,426,000
Money Market and other deposits	6,686,000	702,000
	\$24,953,000	\$28,005,000

Cash and marketable securities totaling \$19,903,000 and \$17,231,000 at December 31, 1991 and 1990, respectively, have been classified in non-current assets as marketable securities, pledged. The United States Treasury Notes and other marketable securities are stated at cost plus accrued interest, which approximates market.

At December 31, 1991, the Company has pledged cash and marketable securities as collateral for financial assurance under RCRA for the Illinois and Texas chemical waste disposal sites, performance of a RI/FS and corrective action at Sheffield, Illinois, and in lieu of performance bonds. The RI/FS was completed and approved by the EPA in 1990. The Company has begun implementing the Remedial Design/Remedial Activities phase of the Program as set forth in the EPA's Corrective Measures Implementation Plan.

### Note 4. Property and Equipment

Property and Equipment at December 31, 1991 and 1990, were as follows:

	1991	1990
Land	\$ 219.000	\$ 219,000
Buildings	1,038,000	1,017,000
Equipment	6,905,000	7,246,000
Site improvements	3,956,000	2,030,000
Leasehold improvements	610,000	588,000
•	12,728,000	11,100,000
Accumulated depletion, depreciation and amortization	(6,190,000)	(4,843,000)
	\$ 6,538,000	\$ 6,257,000

Included in Equipment at December 31, 1991 and 1990, is \$1,478,000 and \$1,109,000, respectively, of assets under capital leases.

### Note 5. Capital Infusion and Loan Repayment

On August 11, 1989, the Company issued to Browning-Ferris Industries, Inc. ("BFI") 200,000 shares of convertible preferred stock for \$3 million, \$22.5 million of 8.5% 10-year convertible secured debentures, interest payable semi-annually, and \$3 million for a warrant to purchase 1.5 million shares of common stock at \$15 per share (collectively, the "Securities").

These Securities were acquired by ECOL Partners, Ltd. ("ECOL"), a Texas limited partnership, on July 24, 1991. The 200,000 shares of preferred stock are convertible one-for-one into common stock until August 1992, and have a liquidation preference of \$15 per share. On August 19, 1991, ECOL converted \$12,000,000 of the debentures for 800,000 shares of common stock. In consideration for this early retirement of the debentures, the Company extended the term of the Warrant for an additional year. The exercise price is \$15 per share until August 11, 1992, and will be \$17.50 for the period from August 12, 1992, through August 11, 1993. On November 25, 1991, ECOL converted the remaining \$10,500,000 of debentures for 700,000 shares of common stock.

During 1988, BFI made a \$5 million short-term loan to the Company due in October 1989. Additional amounts of \$2.5 million and \$.5 million were borrowed in April and June 1989, respectively. The \$8,000,000 of loans with interest at the prime rate plus one percent was repaid in full out of the proceeds from the BFI transaction.



#### Note 6. Accrued Liabilities

Accrued liabilities at December 31, 1991 and 1990, were as follows:

1991	1990
\$5,347,000	\$5,790,000
1,595,000	923,000
<del>-</del>	183,000
2,016,000	2,223,000
\$8,958,000	\$9,119,000
	\$5,347,000 1,595,000 2,016,000

Accrued site maintenance includes amounts for closure and post-closure costs. See Note 1. An estimate of the total site closure/post-closure costs, including remedial action, is made annually. Because of increased governmental regulation and demands by various agencies, including the Environmental Protection Agency ("EPA"), the estimated cost of closure/post-closure plans has significantly increased in recent years and may continue to do so.

The amounts of closure and perpetual care and maintenance paid for the Beatty chemical and low-level radioactive sites and the Richland low-level radioactive site are periodically negotiated with or established by the respective states. Those amounts are paid currently.

During 1988, US Ecology settled the litigation with the State of Illinois (see Note 11) over the legal obligations of the parties relative to the scope and nature of the closure requirements for the Sheffield, Illinois low-level radioactive site. Those costs, which will be expended during the coming year, are included in accrued site maintenance and the remainder of the estimated costs is included in the Consolidated Balance Sheets as deferred site maintenance.

The estimated schedule for expenditure of the deferred site maintenance liability is based on estimates of work requirements, the related costs and the date when the site closure, remediation and maintenance work will be performed. It also assumes that the supporting plans will be acceptable to the respective regulatory agencies at the time the work is to be performed. The schedule is therefore not indicative of when the actual expenditures will occur or that the amounts are sufficient. Because these estimates and assumptions may prove to be incorrect, actual amounts may be significantly higher or lower. The estimated schedule is as follows: 1992 — \$3,582,000; 1993 — \$6,623,000; 1994 — \$6,822,000; 1995 — \$2,182,000; 1996 — \$1,353,000; thereafter — \$12,416,000. (See Note 11.)

#### Note 7. Income Taxes

The provision (credit) for income taxes from continuing operations for the years ended December 31, 1991, 1990 and 1989, was as follows:

	•		1991	1990	1989
Current	- Federal - State		\$ 1,213,000 576,000	\$ 1,927,000 485,000	\$ (62,000) 108,000
-	1	. ,	1,789,000	2,412,000	46,000
Deferred	- Federal	····	(964,000)	(16,000)	1,024,000
			\$ 825,000	\$ 2,396,000	\$ 1,070,000

The components of deferred income taxes for the years ended December 31, 1991, 1990 and 1989, were as follows:

	1991	1990	1989
Deferred site maintenance Other, net	\$ (740,000) (224,000)	\$ — (16,000)	\$ 1,203,000 (179,000)
•	\$ (964,000)	\$ (16,000)	\$ 1,024,000



The reasons for the difference between income taxes computed by applying the statutory federal income tax rate and provision (credit) for income taxes from continuing operations in the financial statements for the years ended December 31, 1991, 1990 and 1989, were as follows:

	1991	1990	1989
Tax expense at statutory rate	\$ 2,799,000	\$2,095,000	\$ 83,000
State income taxes, net of federal tax benefit	576,000	320,000	108,000
Losses and/or expenses without current income tax benefit	_		830,000
Realization of book loss carryforward	(2,578,000)	(213,000)	<u> </u>
Other, net	28,000	194,000	49,000
Total	\$ 825,000	\$2,396,000	\$1,070,000

At December 31, 1991, the Company has a federal net operating loss carryforward for financial statement reporting purposes of approximately \$18,000,000. The loss is comprised of deductions to be claimed in future tax returns principally related to provisions for future site closure, maintenance and remediation costs. In February 1992, the Financial Accounting Standards Board issued a statement of Financial Accounting Standard No. 109, "Accounting for Income Taxes," which is effective for fiscal years beginning after December 15, 1992. The Company has not determined when it will adopt nor the impact of adopting this standard, which will be primarily dependent of future earnings.

### Note 8. Long-term Debt

Less current maturities	779,000 \$ 543,000	679,000 \$22,977,000
T	1,322,000	23,656,000
Capital lease obligations	977,000	345,000
12.75% five-year term loan, secured by equipment with a cost of \$2,520,000, due in equal monthly payments of \$45,250, including interest	345,000	811,000
8.5% ten-year convertible debentures, secured, (see Note 5), interest payable semi-annually, principal due in 1999 if not converted by August 11, 1992	<b>s</b> –	\$22,500,000
Long-term debt consists of the following at December 31, 1991 and 1990:	1991	1990

All of the debt, excluding capital lease obligations (see Note 11), matures in 1992.

### Note 9. Pension Plans

The Company sponsors a defined contribution pension plan and a 401-k plan covering all eligible employees. Total pension expense under these plans was \$561,000, \$591,000 and \$529,000, for the years ended December 31, 1991, 1990 and 1989, respectively. The Company contributes amounts equal to accrued pension expense on a current basis.

### Note 10. Stock Option Plans

The Company has Stock Option Plans covering an aggregate of 400,000 shares of American's common stock. Under the Stock Option Plans, options to purchase shares of American common stock may be granted to certain key employees. The exercise price of the options to be granted is the fair market value of the shares when the option is granted. Options have a term of not longer than ten years, and are exercisable in installments. The following is a summary of the transactions under the plans:

Hadas Ossiana	1991	1990
Under Option: Options outstanding, beginning of year	354,500	166,250
Granted Exercised	35,000 (116,200)	219,000 (1,000)
Cancelled	(14,200)	(29,750)
Options outstanding end of year	259,100	354,500
Price range per share of outstanding options	\$ 4.19- \$19.25	\$ 4.19- \$16.38
Price range per share of options exercised	\$ 4.19- \$13.00	\$ 4.19
Options exercisable at end of period	194,000	253,900
Options available for future grant	23,700	44,500

### Note 11. Commitments and Contingencies

Chemical Disposal Sites. The State of Illinois instituted a legal action against the Company related to the chemical landfill operations at the closed Sheffield, Illinois chemical waste disposal sites, which seeks injunctive relief, including exhumation of all the waste buried at the sites. The Company has been performing a remedial investigation and feasibility study of the Sheffield chemical facility since 1985. In October 1988, the Company's contractor submitted a draft of the remedial investigation study ("RI") to the Environmental Protection Agency ("EPA"). In the fall of 1990, the Remedial Investigation/ Feasibility Study was proposed by the EPA and subjected to extensive public comment. At the close of the public comment period, the EPA issued its Corrective Measures Implementation Plan, which recommended that a corrective plan be implemented which included pumping and treating contaminated groundwater and installation of containment walls in certain areas. The EPA Plan specifically rejected exhumation as an appropriate alternative. The Company has begun implementing the Remedial Design/Remedial Activities phase of the Program which is expected to take from 12 to 18 months. The current total estimated cost of the implementation of the current EPA Plan is approximately \$13 million. In 1988, a provision for future site maintenance, remediation and closure costs was recorded for future estimated costs which management believes will be adequate to provide a technical solution for the stabilization and long-term care and maintenance of the site. Management believes that the performance of this work satisfies the concerns raised by the lawsuit. Following approval of the EPA Plan, US Ecology filed a motion for Summary Judgment in Bureau County Circuit Court asking that the State's action be dismissed. The basis for the motion was that the EPA Plan was in direct conflict with the requested State remedy, and thus was "preempted" by the federal order. On June 6, 1991, the trial court judge granted US Ecology's motion and dismissed the State's action. The State filed an appeal and the case was argued in February 1992. A decision from the State Appeals Court is expected before the end of 1992.

LLRW Disposal Sites. In December 1986, US Ecology received notice from the EPA that it was a potentially responsible party ("PRP") for certain actions to be undertaken at the closed Maxey Flats LLRW disposal facility. The Maxey Flats site, which is owned by the Commonwealth of Kentucky, was operated by US Ecology from 1963 to 1978. In 1978, the Commonwealth of Kentucky entered into an agreement with US Ecology to permanently close the facility and the Commonwealth of Kentucky agreed, in part, to "assume any and all liabilities of whatsoever nature of US Ecology, Inc. . . . arising out of US Ecology, Inc.'s operations of the Maxey Flats site," and to "exercise responsibility for the perpetual care and maintenance of the site and US Ecology, Inc. shall have no further responsibility or liability therefore." The Company believes that the 1978 Agreement is valid and is seeking full release and recovery from the Commonwealth of Kentucky in the event that any liability is assessed against US Ecology. In May 1988, the Commonwealth filed suit in state court seeking a declaration that the 1978 Agreement is unconstitutional. The Company subsequently removed that action to Federal court as well as instituted two separate actions against the Commonwealth seeking in part to enforce the provisions of the 1978 Agreement. The Company has moved for Summary Judgment and the Court will hear arguments in the First Quarter of 1992.

In response to the EPA's notification, a number of major PRPs have been performing the RI/FS pursuant to a Participation Agreement entered into with the EPA. The Agreement contains covenants not to sue other participating PRPs during the pendency of the studies and assigns each PRP a monetary contribution for completion of the initial studies. The Agreement does not cover the remedial phase of the project. The Company's contribution for the initial studies has totaled over \$900,000. US Ecology has had no role in the maintenance of or responsibility for the site since 1979 and had received no communication from either the EPA or the Commonwealth of Kentucky alleging that it bore any responsibility for the site until it received its PRP letter from the EPA. On September 30, 1991, a final Remedial Plan was issued. The final Remedial Plan set forth in the Record of Decision is estimated to cost approximately \$33.5 million to implement. The PRPs have not reached an agreement with the EPA to perform the Plan. No agreement on allocation of costs among the PRPs has been reached.

In April 1987, the Company filed actions against a number of former insurers who had underwritten general liability and radiation hazard risks at the closed Sheffield, Illinois and Maxey Flats, Kentucky facilities operated by the Company. The Company sought recovery of all defense costs it had expended to date as well as any continuing defense costs and complete coverage for all costs incurred by the Company and damages being claimed relating to the Illinois and Kentucky sites. During the past five years the Company received \$1,257,000 from its insurance carriers as partial reimbursement for defense costs incurred by the Company. These payments, in addition to more than \$700,000 in payments made directly to legal firms on behalf of the Company, were all made under a reservation of rights letter which the insurers believe may permit recovery of these amounts if the insurers prevail on the merits of the litigation. The Company is continuing its efforts to secure reimbursement from its insurance companies for all previously expended legal defense costs as well as those being presently incurred. The present litigation is expected to determine the liability of the various insurers for defense costs and indemnity payments to the Company resulting from the administrative and legal actions pending at the Sheffield and Maxey Flats disposal sites. At the same time, insurers filed a declaratory action disclaiming any liability under the policies at issue.



Washington Taxes. On June 27, 1989, US Ecology, Inc. received notice from the State of Washington, Department of Revenue, that the Company owed \$3,452,879 in back taxes for a Leasehold Excise Tax allegedly applicable to the Richland LLRW disposal facility. The Leasehold Excise Tax applies to government-owned property which is leased by a private entity and is intended to provide tax revenues to local communities, which revenues they would otherwise be deprived of because of the government ownership. The Company had never been given notice by the Department of Revenue prior to this time that it owed any of these taxes.

The tax is based upon the value of the leasehold interest. The Company believes that the value of the leasehold is the \$6,000 annual leasehold payment. The Department of Revenue, however, included amounts that the Company collected on behalf of the State for surcharge payments, site surveillance fees, and perpetual care and maintenance fees as part of the leasehold value. Based upon an initial motion by the Company, the surcharge payments were deleted from the assessment, and the assessment was reduced to \$1,371,000. A hearing was held on the remaining assessment in December 1989. The Department of Revenue Hearing Board reduced the final assessment to \$995,000 after determining that further assessments had been improperly made. However, the Department determined that amounts which the Company paid to the Perpetual Care and Maintenance Fund should be included as part of the leasehold value. The Company paid the tax and immediately filed a suit for a refund in the Thurston County Circuit Court in Olympia, Washington. The Company has made subsequent payments under this assessment for the periods after the initial assessment. These payments, aggregating \$1,154,000 at December 31, 1991, and \$1,100,000 at December 31, 1990, are included in the Consolidated Balance Sheets as Accounts Receivable and Other Assets, respectively. The Company believed that the inclusion of perpetual care and maintenance fees was inappropriate and filed a Motion for Summary Judgment which was granted by the Court. The State and Benton County filed an appeal; however, the Company expects to favorably settle the matter before the appeal is heard.

Nevada. On November 18, 1991, the Nevada Environmental Commission passed regulations which imposed two new fees on the disposal of wastes at the Beatty facility. The first fee amounts to \$5, \$15, or \$25 per ton, depending on the volume of waste disposed of by a particular generator. The intent of this graduated fee was to reduce the amount of waste disposed of at the Beatty site by generators located outside the State of Nevada. The second fee amounts to \$.25 per cubic foot on all hazardous waste disposed of at the Beatty facility. The effect of these additional fees is not known at this time.

US Ecology filed two suits on January 9, 1992, challenging, among other things, that the fees are an unconstitutional interference with interstate commerce, violate the terms of US Ecology's lease with Nevada and are invalid under State law. The Company also challenged a previously enacted fee which charged out-of-state generators a \$20 a ton fee for disposal and Nevada generators only \$10 a ton. The State has denied that the fees are unconstitutional. In February 1992, the Nevada Environmental Commission passed a regulation which increased the previous fee of \$10 a ton for Nevada generators up to \$20 a ton.

Washington Rate Regulation. In 1991, the Washington State legislature passed a bill which concluded that with the implementation of the Low-Level Radioactive Waste Policy Amendments Act of 1985, US Ecology could have a monopoly for disposal of LLRW produced by Northwest Compact generators in 1993 and beyond. The legislation requires US Ecology to file a rate case by March 1, 1992, under the assumption that a monopoly will exist. There are provisions in the law which will allow the Washington Utilities and Transportation Commission to determine that a monopoly condition does not exist, but this finding will not be made before the filing of the rate case. The Company does not believe that monopoly conditions will exist on January 1, 1993, but cannot assure that the Washington Utilities and Transportation Commission will make such a determination.

Financial Assurance and Insurance. Under RCRA, US Ecology is required to develop closure and post-closure plans for each of its chemical waste disposal sites. In conjunction with these plans, US Ecology must prepare closure and post-closure cost estimates and give financial assurance that the planned actions will be completed. Financial assurance must be given by either funding a trust, posting a bond, providing a letter of credit, providing a certificate of insurance or, if the operator meets certain financial tests, giving a corporate guarantee. If any mechanism other than trust funding is given, the operator must also establish a standby trust (with cash or other collateral). US Ecology currently covers this requirement by pledging letters of credit, providing certificates of insurance and establishing standby trusts. If the trusts were required to be funded, \$10,895,000 would have to be paid into the trusts. Also see Note 3.

RCRA regulations require the Company to carry environmental impairment insurance against sudden and accidental occurrences, as well as against non-sudden occurrences such as subsurface migration. The required coverage for non-sudden accidental occurrences is at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs. For sudden accidental occurrences, the requirement is at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. Although the Company's current level of coverage exceeds these minimum requirements (except for the Sheffield chemical site) there is no assurance that insurance carriers will continue to provide such coverage to operators, or that such coverage will be obtainable in future years. Should this insurance be unobtainable it could have a significant adverse impact on future operations.



Other Litigation. In December 1987, the Company and its National Triple R, Inc. ("National") subsidiary were named as defendants along with the Company's former parent, Teledyne Industries, Inc., in a lawsuit arising out of National's prior operation of a county-owned sanitary landfill and related resource recovery operation in Weber County, Utah. National's operations at this location ceased in July 1986 after Weber County unilaterally elected to terminate the contract based on its desire not to construct a waste-to-energy facility. Among other allegations, the plaintiff, an individual claiming certain rights from development of the project, has alleged a cause of action for breach of contract and is seeking compensatory damages of approximately \$11,235,000, and punitive damages in the amount of \$15,000,000. Based on a review of the litigation to date, outside counsel has advised that the claims for damages against American and National are grossly inflated and that punitive damages are not justified. The Company believes it has substantial defenses to these claims and does not expect the suit to have a material adverse effect on the Company's consolidated financial position.

Lease Commitments. Future minimum lease commitments as of December 31, 1991, are as follows:

-	Capital Leases	Operating Leases
1992	\$ 516,000	\$294,000
1993	364,000	125,000
1994	230,000	
Total minimum payments	1,110,000	\$419,000
Less interest	133,000	\ <u></u>
Present value of minimum lease payments	\$ 977,000	

Rental expense, which also includes month-to-month equipment rentals, was \$1,312,000, \$1,912,000 and \$2,136,000, for the years ended December 31, 1991, 1990 and 1989, respectively.

#### REPORT OF INDEPENDENT AUDITORS

### The Board of Directors and Shareholders American Ecology Corporation

We have audited the accompanying consolidated balance sheets of American Ecology Corporation and subsidiaries as of December 31, 1991 and 1990, and the related consolidated statements of operations, shareholders' equity and cash flows for each of the three years in the period ended December 31, 1991. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of American Ecology Corporation and subsidiaries at December 31, 1991 and 1990, and the consolidated results of their operations and their cash flows for each of the three years in the period ended December 31, 1991, in conformity with generally accepted accounting principles.

Woodland Hills, California February 4, 1992 Ernst + Young

## Supplemental Shareholder Information (unaudited) (dollars in thousands except per share data)

### Quarterly Financial Data from continuing operations

Quarter Ended	March 31	June 30	September 30	December 31
1991 -		•		
Revenues	\$11,053	\$13,404	\$12,627	\$18,727
Gross profit	2,894	3,906	3,377	6,631
Net income	744	1,687	897	4,079
Weighted average shares outstanding	3,270	3,342	4,566	5,165
Net income per share	\$ .23	\$ .51	\$ .24	\$ .82
1990				•
Revenues	\$ 8,075	\$14,120	\$12,056	\$14,460
Gross profit	1,479	4,821	2,826	4,702
Net income (loss)	(278)	1,694	498	1,853
Weighted average shares outstanding	- 2,959	3,159	3,260	3,259
Net income (loss) per share	\$ (.09)	\$ .54	\$ .15	\$ .57

The 1991 reported quarterly earnings per share, when aggregated, do not equal the reported annual earnings per share of \$1.90 because of the required change to the modified treasury stock method, commencing in the Third Quarter of 1991.

### Stock Prices, Dividends and Shareholders

Period		. 1991		199	1990	
	•	High	Low	High	Low	
1st Quarter		10	5-1/2	6-1/4	4	
2nd Quarter		14-1/2	8-3/4 ′	5-1/4	4	
3rd Quarter	•	20	13	12	5-1/4	
4th Quarter		19-3/4	17	9	6-1/4	

The Company has not declared or paid cash dividends and does not intend to declare a dividend in the foreseeable future. The Company is restricted from paying or declaring dividends without the prior written consent of ECOL Partners, Ltd. As of February 28, 1992, there were approximately 10,600 record holders of common stock.



#### CORPORATE DIRECTORY

87.1 P(11)

001457

#### DIRECTORS

William E. Prachar Chairman of the Board

Harry J. Phillips, Jr. Chief Executive Officer

R. Lee Armbruster
President and Chief Operating Officer

John J. Scoville President J.J. Scoville & Associates, Inc.

Charles A. Simms President Rescon Incorporated

John T. Lurcott
Environmental Business Consultant

OFFICERS
William E. Prachar
Chairman of the Board

Harry J. Phillips, Jr. Chief Executive Officer

R. Lee Armbruster
President & Chief Operating Officer

C. Clifford Wright, Jr. Chief Financial Officer

Karl J. Eimer
Secretary and Treasurer

Bradley E. Dillon General Counsel and Assistant Secretary

#### **OPERATING COMPANIES**

US Ecology, Inc. 9200 Shelbyville Road, Suite 300 Louisville, Kentucky 40222

Texas Ecologists, Inc. Petronila Road Robstown, Texas 78380

#### COMMON-STOCK

American Ecology Corporation common stock trades over-the-counter. Its NASDAQ symbol is ECOL.

#### 10-K REPORT

A copy of the American Ecology Corporation 1991 Annual Report on Form 10-K filed with the Securities and Exchange Commission may be obtained by writing to the Secretary, American Ecology Corporation, 9200 Shelbyville Road, Suite 300, Louisville, Kentucky 40222.

### CORPORATE REGISTRAR AND TRANSFER AGENT

Manufacturers Hanover Trust Company of California 300 South Grand Avenue Los Angeles, California 90071

#### **AUDITOR**

Ernst & Young Warner Corporate Center 21300 Victory Boulevard Woodland Hills, California 91367

#### **CORPORATE OFFICES**

American Ecology Corporation 9200 Shelbyville Road, Suite 300 Louisville, Kentucky 40222 Telephone: 502/426-7160

2400 Texas Commerce Tower 600 Travis Houston, Texas 77002 Telephone: 713/225-3117

#### US Ecology, Inc. Docket No. TG-920234

#### Response to Staff Data Request No. 2

Request:

Please supply a copy of the financial statements for US Ecology, Inc. for 1990, 1991 and for the 12 months ended September 30, 1991. Please also supply separated balance sheets and income statements showing the Company's operation of the LLRW facility at Richland, Washington for the same periods.

#### Response:

Witness: Robert L. Ash

Separate financial statements are not available for US Ecology, Inc. for 1990, 1991 and for the 12 months ended September 30, 1991. However, attached hereto is a copy of American Ecology's Annual Report for 1990 and the Third Quarter Report to Shareholders for the period ending September 30, 1991 reflecting the consolidated financial statement information requested. For 1991 reference Staff Data Request No. 1 above.

Please be advised that American Ecology Corporation is the parent company of US Ecology, Inc. and US Ecology's subsidiary...Texas Ecologists, Inc.

Attached hereto is income statements for US Ecology's operations of the LLRW facility at Richland, Washington for 1990, 1991 and for the 12 months ended September 30, 1991. Separate balance sheet statements for the requested periods are not available. However, attached hereto is a detailed listing of property and equipment for 1990, 1991 and the 12 months ending September 30, 1991.

BLA:ph Attachments 04/09/92 US ECOLOGY, INC.

Richland, Washington LLRW Facility

Income Statement
for
Years 1990, 1991
and
12 Months Ending September 30, 1991

(\$000's omitted)

•	<u>Year 1991</u>	<u>Year 1990</u>	12 Months Ending 09/30/91
REVENUES	\$13,032	\$ 9,604	\$10,500
Cost and Expenses:			
Cost of Revenues			
<ul><li>Operating Costs</li></ul>	\$ 5,617	\$ 4,862	<u>\$ 4,931</u>
	\$ 7,415	\$ 4,742	\$ 5,569
<ul> <li>Selling and Administrative Expense</li> </ul>	<u>\$ 1,125</u>	<u>\$ 994</u>	\$ 1,098
SITE INCOME BEFORE INCOME TAXES	\$ 6,290 ======	\$ 3,748 ======	\$ 4,471 ======

US ECOLOGY, INC. ASHINGTON PROPERTY & EQUIPMENT LISTING JECEMBER, 1991

DATE ACQ	DESCRIPTION	COST	ACCUM DEPR
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
11/85	IBM SELECTRIC	1,013.00	1,013.00
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67
5/85	BEEBE JIB CRANE	4,560.00	4,560.00
6/85	WISCONSIN MIXER	1,711.44	1,711.44
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00
12/85	WILTON BAND SAW	1,564.55	1,564.55
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50
6/79	CLARK FORKLIFT	40,078.83	40,078.83
1/81	CATERPILLAR DOZER	71,428.10	71,428.10
2/90	CAT DOZER REPAIR	37,440.53	19,469.08
<b>'81</b>	CAT TRACTOR/SCRAPER	175,875.00	
'81	LOADING DOCK-FRUEHAUF TR		175,875.00
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LINCOLN SAE-400 WELDER	3,725.00	3,725.00
9/81	1961 CAT 12E ROAD GRADER	5,428.22	5,428.22
12/82	LIFTALL FORKLIFT	21,780.45	21,780.45
4/83	50-TON HYDRAULIC PULLER	46,183.19	46,183.19
9/83	REST AREA TRAILER	5,836.59	5,836.59
10/83	AIR MASK-PRESSURE DEMAND	5,086.40	5,086.40
10/03	OFFICE TRAILER	6,740.25	6,740.25
11/75		4,889.00	4,889.00
4/88	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55
7/87	ALPHA /BETA COUNTING SYSTEM	37,208.47	29,394.67
1/86	XEROX 1038 COPIER	5,624.63	2,531.06
4/86	CATERPILLAR FORKLIFT	128,760.00	128,760.00
	CATERPILLAR 926 WHEEL LOADER	66,825.00	66,825.00
4/86	CATERPILLAR WATER WAGON	22,373.00	22,373.00
5/86	GENERATOR	6,824.28	6,824.28
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	3,008.93
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	3,008.92
7/87	VCR CAMCORDER	1,589.95	1,022.14
7/88	DIP PAK 200 MIG WELDER	1,534.58	1,212.30
11/87	CATERPILLAR V50D FORKLIFT	20,871.74	18,384.44
1/90	ALLLADIN 1440 PRESSURE WASHER	5,252.01	2,731.04
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	1,056.61
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10	3,615.61
9/91	LUDLUM NEUTRON DETECTOR	1,662.16	332.43
?/91	DUAL ALPHA BETA/GAMMA SCALER	2,485.70	0.00
	TOTAL WASHINGTON	873,700.15	830,794.73

US ECOLOGY, INC. WASHINGTON PROPERTY & EQUIPMENT LISTING DECEMBER, 1990

DATE ACQ	DESCRIPTION	COST	ACCUM DEPR
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
11/85	IBM SELECTRIC	1,013.00	1,013.00
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67
5/85	BEEBE JIB CRANE	4,560.00	4,560.00
6/85	WISCONSIN MIXER	1,711.44	1,711.44
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00
12/85	WILTON BAND SAW	1,564.55	1,564.55
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50
6/79	CLARK FORKLIFT	40,078.83	40,078.83
1/81	CATERPILLAR DOZER	71,428.10	71,428.10
2/90	CAT DOZER REPAIR	37,440.53	7,488.11
3/81	CAT TRACTOR/SCRAPER	175,875.00	175,875.00
/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
ა/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,836.59
9/83	REST AREA TRAILER	5,086.40	5,086.40
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25
10/73	OFFICE TRAILER	4,889.00	4,889.00
11/75	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	21,580.90
7/87	XEROX 1038 COPIER	5,624.63	1,968.60
1/86	CATERPILLAR FORKLIFT	128,760.00	128,760.00
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	66,825.00
4/86	CATERPILLAR WATER WAGON	22,373.00	22,373.00
5/86	GENERATOR	6,824.28	6,824.28
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	2,407.17
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,407.14
7/87	VCR CAMCORDER	1,589.95	795.00
7/88	DIP PAK 200 MIG WELDER	1,534.58	890.04
11/87	CATERPILLAR V50D FORKLIFT	20,871.74	14,001.38
1/90	ALLLADIN 1440 PRESSURE WASHER	5,252.01	1,050.40
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	406.39
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10	1,390.62
	TOTAL WASHINGTON	869,552.29	799,413.25

HS ECOLOGY, INC. SHINGTON PROPERTY & EQUIPMENT LISTING SEPTEMBER, 1991

DATE ACQ	DESCRIPTION	COST	ACCUM Depr
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
11/85	IBM SELECTRIC	1,013.00	1,013.00
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67
5/85	BEEBE JIB CRANE	4,560.00	4,560.00
6/85	WISCONSIN MIXER	1,711.44	1,711.44
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00
12/85	WILTON BAND SAW	1,564.55	1,564.55
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50
6/79	CLARK FORKLIFT	40,078.83	40,078.83
1/81	CATERPILLAR DOZER	71,428.10	71,428.10
2/90	CAT DOZER REPAIR	37,440.53	16,473.84
31	CAT TRACTOR/SCRAPER	175,875.00	175,875.00
<b>8</b> 1	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,836.59
9/83	REST AREA TRAILER	5,086.40	5,086.40
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25
10/73	OFFICE TRAILER	4,889.00	4,889.00
11/75	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	27,441.23
7/87	XEROX 1038 COPIER	5,624.63	2,390.43
1/86 4/86	CATERPILLAR FORKLIFT	128,760.00	128,760.00
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	66,825.00
5/86	CATERPILLAR WATER WAGON	22,373.00	22,373.00
3/87	GENERATOR	6,824.28	6,824.28
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	2,858.52
7/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,858.49
7/88	VCR CAMCORDER	1,589.95	965.37
11/87	DIP PAK 200 MIG WELDER CATERPILLAR V50D FORKLIFT	1,534.58	1,131.73
1/90	ALLLADIN 1440 PRESSURE WASHER	20,871.74	17,288.67
7/90	10HP 30GAL GAS AIR COMPRESSOR	5,252.01	2,310.88
8/90	BOBCAT 440B SKID STEER LOADER	2,031.93	894.06
9/91	LUDLUM NEUTRON DETECTOR	6,953.10	3,059.36
• •	NEOTHON DETECTOR	1,662.16	0.00
	TOTAL WASHINGTON	871,214.45	822,700.08

American Ecology

merican Ecology Corporation in experienced waste management company. Through its submary, HS Ecology Inc., the company provides disposal, packaging, transportation, consulting and clean-up services for both in w-level radioactive and hazardous chamical wastes.

The company operates two of the nation's three low-level radioactive waste disposal facilines in Nevada and Washington. and expects to receive the first iwe licenses issued for new lowlevel radioactive waste disposal recities in California and Nebraska in 1991. Two bazardous chemical waste disposal facilities ere located in Nevada and Texas. The employees of American Coology and its subsidiaries provide professional services to commercial customers and government entities nationwide.

This annual report provides a review of American Ecology
Corporation's financial performance and a profile of its operations during 1990.

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#### TO OUR SHAREHOLDERS:

The 1990 results reflect the changes that have taken place in American Ecology over the past two years. Two primary fiscal factors, the Browning-Ferris Industries, Inc. ("BFI") investment in 1989 and the ongoing divestiture of all business activities not directly related to hazardous and low-level radioactive waste disposal, coupled with the hard work and dedication of American's employees, have returned the Company to profitability. These results relate directly to the performance of the Company's current base businesses. With adequate disposal space (made possible by the BFI investment) and an increased marketing and sales effort, the disposal operations have been performing well in recent months. If the Illinois and Kentucky litigation can be successfully resolved in the near future and if the California LLRW facility can be opened as scheduled (prior to January 1993). American should become a solid financial performer in its industry segment.

The Company made progress in 1990 in dealing with the Illinois problem and the development of the California facility. During 1990, the Company completed (under a 1985 Consent Order) a remedial investigation and feasibility study of its closed Sheffield, Illinois, hazardous chemical waste disposal facility. As a result, the U.S. Environmental Protection

Agency issued a "Corrective Measure Implementation Program" which is currently estimated to cost \$13 million in today's dollars. The plan, which specifically rejects exhumation as an acceptable remedy, is thus inconsistent with the remedy sought by Illinois in its lawsuit. The Company has filed a motion to dismiss the State's suit on grounds of Federal preemption. If the suit is resolved, either by a favorable judicial ruling or by settlement, the Company will be able to fully implement the EPA endorsed plan. We believe this result, if obtained, would be in the best interests of the environment, the residents of the Sheffield area, the Company and its shareholders.

The substantial effort made by American (almost five years and approximately \$19 million to date) in developing a new LLRW facility in California is in its final stages. A license application has been filed with the State of California and a license could issue during the second half of 1991. If all goes according to schedule, the facility could open to receive waste in 1992. Political, technical or regulatory delays in siting any waste facility are possible and the California project is not immune from such adverse developments. However, the Company's personnel have worked closely with state and local officials, as well as with local residents. in developing the project and have

attempted to eliminate or mitigate all known serious concerns with the project. Once operating, the California facility should help the Company regain LLRW revenue and profits which have been eroding over the past five years.

The Central States LLRW facility siting project is also moving forward, albeit on a slower timetable than California. Although the project has been the center of a heated political debate in the host state, Nebraska, it continues to progress. Currently, American has invested approximately \$5.4 million in the project while the nuclear power utilities within the Central States Compact region have invested almost \$22 million. If completed on schedule in early 1993, the Central States facility should further enhance LLRW revenues and profits.

With the chemical hazardous waste operations beginning to perform up to potential and with renewed prospects for increased LLRW revenues, the future holds promise for American. However, as with most hopeful prospects, there remain several problems which must be successfully resolved before the Company can realize its full potential. In addition to the uncertainty surrounding the Illinois litigation and the Maxey Flats, Kentucky Superfund site (see the notes to the financials), the Company also faces uncertainty regarding the final disposition

of the August 1989 BFI investment.

BFI has announced its intent to sell its interest in American and apparently will not be converting its debt or exercising its warrants to gain a further ownership position in American. This means that the additional \$22.5 million in capital expected by American prior to August 1992 will not be forthcoming. American (as well as BFI) is attempting to find a buyer for the BFI position who will support the Company's efforts to expand its capabilities. Several parties have expressed initial interest and discussions are ongoing.

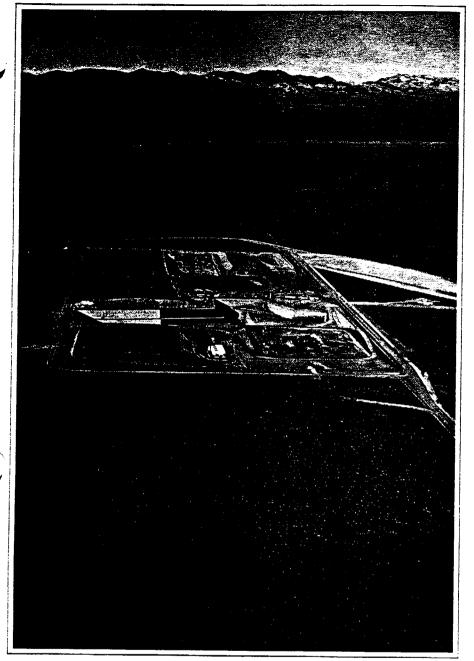
Although operations are expected to provide adequate working capital for the next 12 months, the Company has retained Bear, Stearns & Co. Inc. to obtain project financing for the California facility. If successful, this financing will help American meet its working capital needs beyond the next year.

This year's annual report focuses on the current face of American. After several years of changes, we hope a brief pictorial overview of the Company's operations will be of interest to our shareholders.

The employees of American thank you for your continued support.

W. Z. Practor

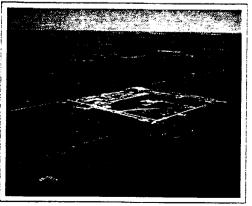
W. E. Prachar Chairman



Nevada facility

## SECURE DISPOSAL IS OUR BUSINESS

Corporation received the first license issued for commercial land disposal of low-level radioactive waste and began operating its Nevada facility. In 1970, the company expanded its business to include disposal services for hazardous wastes with facilities in Texas and Nevada. The company continues to excel in disposal expertise, regulatory compliance and customer service.

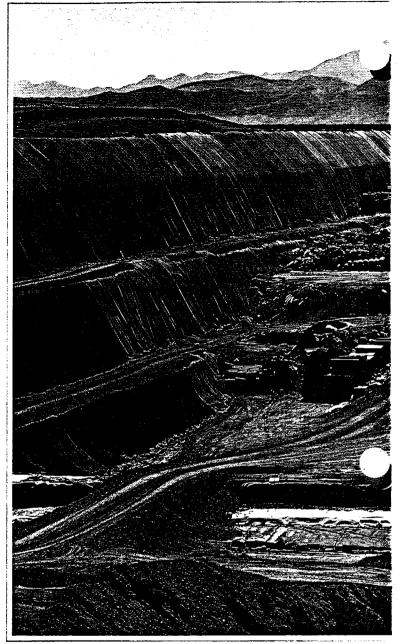


Texas facility

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## SAFETY — THE KEY TO OPERATIONS

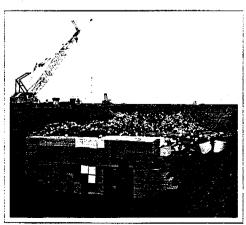
afe management of low-level radioactive and hazardous wastes continues to be the foundation of American Ecology's business. Facility operations are designed to protect the environment, our workers and customer interests, while complying with strict state and federal regulations. In 1990, substantially more hazardous waste than low-level radioactive waste was disposed of at the company's four operating facilities. This continuing trend differs from the early to mid-1980s, when volumes of low-level radioactive waste exceeded hazardous waste quantities received at our facilities.



Nevada hazardous waste disposal cell



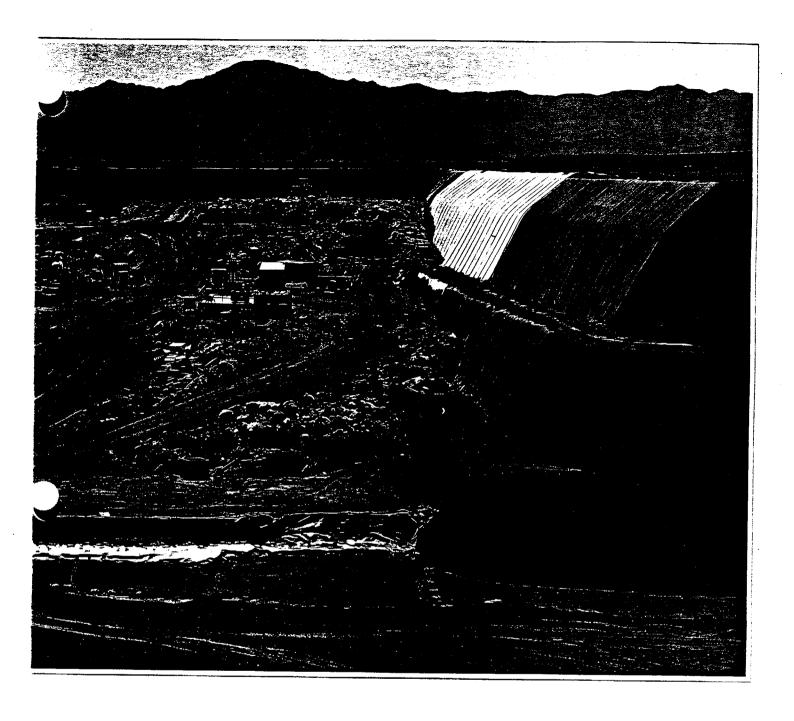
Performing radiological survey of incoming waste

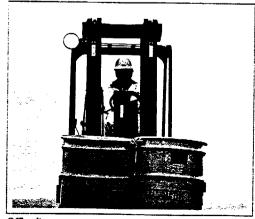


Washington low-level radioactive waste disposal facility

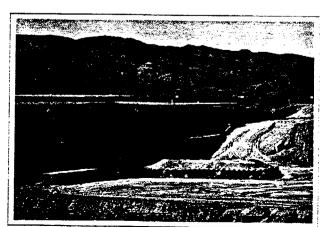


Conducting survey inside shielded container





Offloading



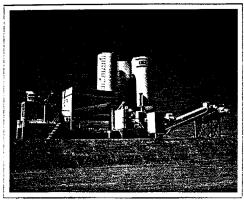
Nevada low-level radioactive waste disposal cell

# KEEPING PACE WITH CHANGING INDUSTRY NEEDS

art of American Ecology's success is the ability to meet the ever-changing disposal regulations, resulting in service that is responsive to customer needs. Stabilization services were introduced in May 1990 at the Nevada hazardous waste facility. To expedite an on-site groundwater remediation program, the company applied for and received regulatory authority to construct a mile-deep injection well in Texas, expected to be in operation by mid-1991.



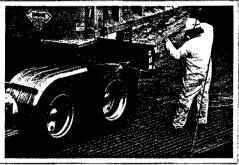
Waste verification



Waste stabilization unit



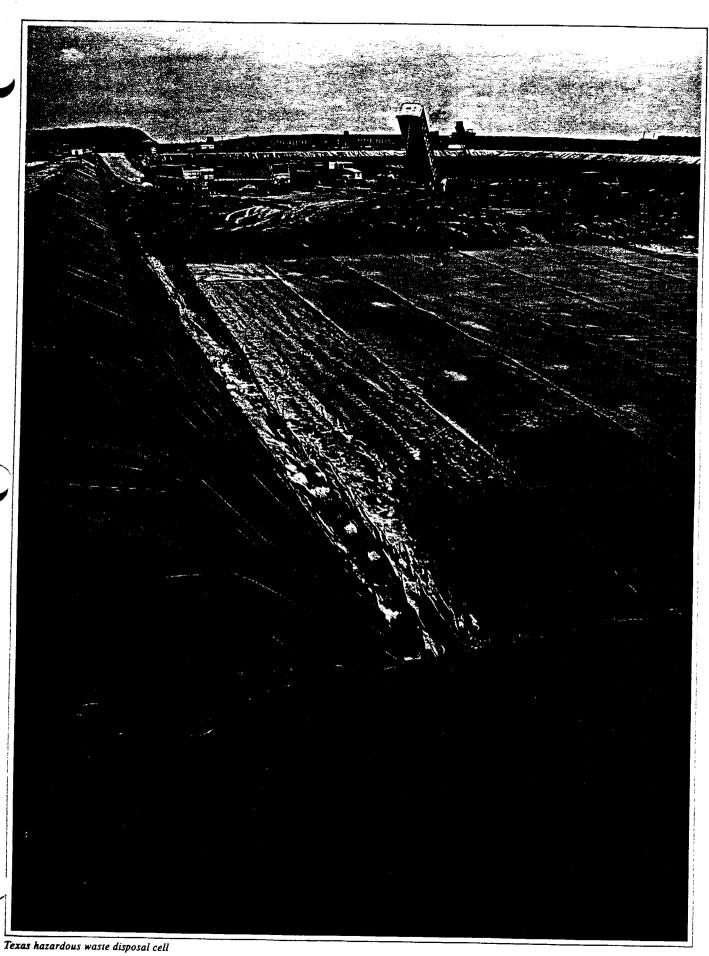
Overview of capping operations



Truck decontamination



Initial borings prior to injection well installation

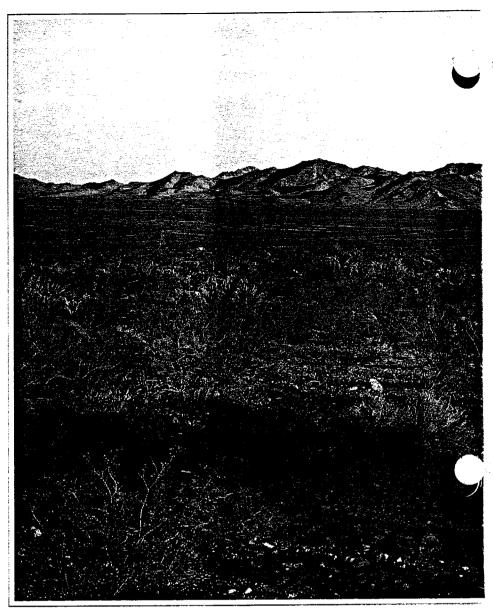


#### STILL THE FIRST

laws governing the siting of low-level radioactive waste disposal facilities will close that portion of the company's Nevada facility in 1992, the company has already taken steps to maintain its leadership in this industry. It is the only company nationwide to have submitted license applications for new low-level radioactive waste disposal facilities, and those applications are the first submitted in more than 20 years. The two new facilities will be located



Desert tortoise preservation



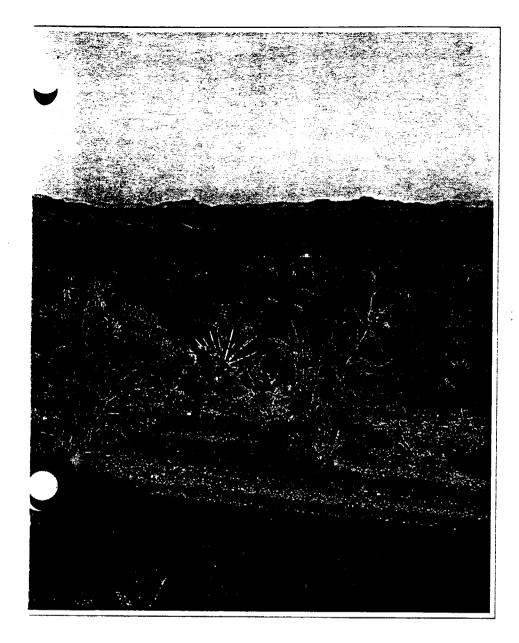
Ward Valley, California, site



Collecting meteorological data



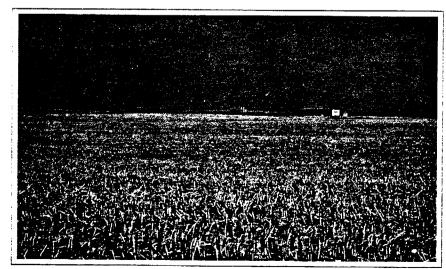
Groundwater monitoring





Technician at monitoring station

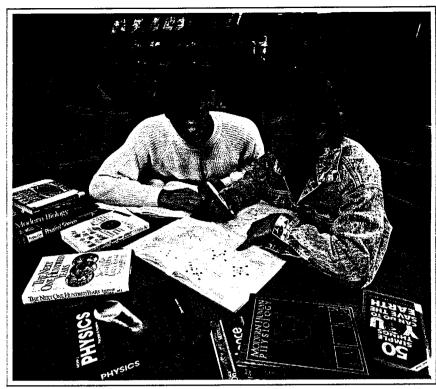
in California and Nebraska. The California facility, to serve members of the Southwest Interstate Compact, should be licensed by mid-1991. The Nebraska facility, located near Butte, is expected to be licensed by the end of 1991 and will serve the 5 members of the Central States Compact. It will be the first above-grade low-level radioactive waste disposal facility built in the United States.



Butte, Nebraska, site

## COMMITTED TO THE FUTURE

merican Ecology recognizes that the future depends on education. Since the mid-1980s, the company has awarded 45 scholarships to graduating seniors from high schools near our facilities. Recipients are selected by committees at their respective schools, based on academic achievement and financial need. Students selected pursue college studies in engineering, medicine, electronics and other science-related fields. David Rascon, a freshman at the University of Nevada Las Vegas, is studying architectural engineering, thanks to the company's scholarship. In addition, the company donates textbooks and other educational materials to schools near our facilities.



Needles, California, High School students



David Rascon, scholarship winner

To support environmental education, the company actively assisted the University of California, Los Angeles in developing its highly successful and innovative continuing education certificate programs in hazardous waste management and solid waste management. The company is represented on the advisory boards of these programs and employees serve as instructors and guest lecturers.

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### ANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

#### Operating Results and Other Financial Information

The continuing business of American Ecology Corporation (the "Company") is hazardous waste disposal. The Company processes, transports and disposes of low-level radioactive and chemical wastes. Low-level radioactive waste ("LLRW" or "low-level waste") consists of materials exposed to various levels of radiation and is generated by nuclear power facilities, industry, hospitals, universities and laboratories. Chemical waste consists primarily of industrial and agricultural waste.

The following table sets forth operating results and other financial information for the last five years.

Dollars in thousands, except per share amounts					
Years ended December 31,	1990	1989	1988	1987	1986
Revenues	\$48,711	\$45,305	\$41,265	\$53,775	\$40,653
Operating income (loss) from continuing operations	6,163	245	(26,363)	6,964	5,860
Income (loss) from continuing operations	3,767	(825)	(23,761)	4,067	3,020
Income (loss) from continuing operations per share	1.17	(.28)	(8.08)	1.37	1.02
Long-term debt	22,977	23,656	7,142	2,035	· -
Shareholders' equity	8,765	4,994	2,204	27,481	22,835
Assets	79,343	76,995	56,012	55,902	38,610
Capital expenditures	9,145	8,887	6,374	5,922	8,825
Depletion, depreciation and amortization expense	1,152	3,223	1,511	1,307	965

#### Results of Operations

The following table sets forth items in the Statements of Operations for continuing operations for the three years ended December 31, 1990, as a percentage of revenues:

Percentage of revenues for the			
years ended December 31,	1990	1989	1988
Revenues	100.0	100.0	100.0
Cost and expenses:			
Cost of revenues:			
Operating costs	68.8	73.0	76.9
Future site maintenance, remediation and closure costs	2.9	9.3	68.6
	71.7	82.3	145.5
Selling and administrative expenses	16.2	18.8	20.4
Interest expense	4.5	3.3	1.0
Interest income	(5.0)	(4.9)	(3.0)
Total costs and expenses	87.4	99.5	163.9
Income (loss) from continuing operations before provision for income taxes	12.6	0.5	(63.9)
Provision (credit) for income taxes	4.9	2.3	(6.3)
Income (loss) from continuing operations	7.7	(1.8)	(57.6)

#### Comparison of 1990 to 1989

Revenues from continuing operations in 1990 were \$48,711,000, a 7.5% increase from 1989. Revenue increased \$3.4 million as a result of a \$9.9 million increase in chemical waste disposal revenues, which was reduced primarily by a \$4.1 million decrease in LLRW disposal activity. Chemical waste disposal volumes increased 91% over 1989's volumes, but the average price obtained by the Company declined 12% in 1990 due to changes in the types of wastes received. LLRW volume declined 31% in 1990 compared to 1989.

Operating costs, as a percentage of revenues, decreased from 73.0% to 68.8%. This decrease is primarily a result of the \$1.7 million writedown on waste processing equipment and related intangible costs recorded in 1989.

The provision for future site maintenance, remediation and closure costs decreased to \$1.4 million in 1990 from \$4.2 million in 1989. The provision in 1989 included a \$1.5 million charge recorded for capping certain pre-RCRA (Resource Conservation and Recovery Act of 1976) disposal cells at the Company's Texas facility, and certain other charges which did not recur in 1990.

Selling and administrative expenses declined in 1990 by 2.6% as a percentage of revenues because of reductions in workforce. Interest expense increased in 1990 over 1989 because the Company's convertible debentures issued in August 1989 were outstanding for the entire year. Interest income increased due to the higher level of funds available for investment during 1990 compared to 1989 as a result of the 1989 debenture issuance and improved cash flow.

Comparison of 1989 to 1988 Continuing Operations

Revenues from continuing operations were \$45,305,000, a 9.8% increase from 1988. The revenue increase is the result of work on the development of the Central States Low-Level Radioactive waste disposal facility in Nebraska. Revenue increases from the Company's chemical waste disposal activities were offset by a decline in nuclear engineering and processing revenues.

Operating costs, as a percentage of revenues, decreased from 76.9% to 73.0%. This decrease is a result of an average 17% reduction in workforce from 1988 levels, principally in those areas which were not satisfactorily contributing to the financial results of the Company. In addition, equipment supporting those areas was either sold or returned to the lessors. These cost reductions were partially offset by the \$1.7 million writedown of waste processing equipment and related intangible costs after an evaluation of the competitiveness of this market.

The provision for future site maintenance, remediation and closure costs decreased to \$4.2 million from \$28.3 million. In 1988, the Company recorded additional expenses totaling \$27.4 million, \$23.5 million in the fourth quarter, in connection with the Sheffield, Illinois radioactive site litigation settlement; provision for the estimated Sheffield, Illinois chemical site litigation reserve; Maxey Flats, Kentucky closure and remediation costs; increased Texas and Nevada chemical site closure and maintenance costs associated with the final operating (Part B) permit issuance; and certain other remedial costs related to the assessment and cleanup of the Texas site's contaminated groundwater.

Selling and administrative expenses remained level during 1989 while decreasing as a percentage of revenues. Interest income and expense both increased due to the borrowings from Browning-Ferris Industries, Inc. ("BFI") initiated in October 1988. Borrowings were increased to \$8 million in the first half of the year and in August 1989, the Company entered into a transaction with BFI which provided \$28.5 million in debt and equity for the Company. The \$8 million note and related interest was paid out of the proceeds, with the remainder used for working capital and currently invested in short-term interest bearing investments.

The net loss from continuing operations was \$825,000. The loss is the result of the provision for income taxes on financial statement deductions not currently available for tax benefit. The loss decreased from the prior year primarily due to the reduction in provision for future site maintenance, remediation and closure costs described above.

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#### Discontinued Operations

As more fully described in Note 2 to the Consolidated Financial Statements, the operations of National Ecology, Inc. which provides refuse derived fuel processing ("RDF"), engineering and other services, were sold to a subsidiary of The Babcock & Wilcox Company on November 6, 1989. The losses from discontinued operations were caused by delays in the final acceptance testing and unanticipated construction costs. The Company has recognized a \$174,000 net loss on the sale, based on a \$251,000 sales price which was preliminarily agreed upon in February 1990. The final sales price is dependent on the RDF portion of the West Palm Beach RDF facility's meeting certain performance requirements and is still in dispute.

#### Income Taxes

In December 1987, the Financial Accounting Standards Board issued Statement of Financial Accounting Standards No. 96 "Accounting for Income Taxes." The Company changed its method of accounting for income taxes in 1988. The cumulative effect of the accounting change on prior years was additional expense of \$1,918,000. Prior years' results of operations have not been restated to reflect the accounting change.

#### Capital Resources and Liquidity

As of December 31, 1990, the Company had approximately \$10.8 million in cash and cash equivalents. The Company generated cash from operating activities of \$5,138,000 in 1990 and \$3,141,000 in 1989, and used cash of \$2,920,000 in 1988. The current ratio at December 31, 1990, was 1.8 to 1, compared to approximately 1.7 to 1 for the previous year. The improvement in the current ratio was primarily caused by the 1990 improvement in operational results as compared to 1989 and by a reduction in the dollar amount of the estimated work to be completed on site maintenance, remediation and closure costs in 1991 compared to 1989's estimate for 1990.

The Company believes that its cash flow and current level of cash and cash equivalents available is currently sufficient to support the Company's present level of operations, provide funds for investment in LLRW and hazardous waste site development activities, and meet financial assurance obligations for approximately the next twelve months. However, if additional capital is required, the Company will have to seek outside financing.

Capital expenditures for property and equipment, and California and Nebraska low-level radioactive waste facilities' siting were \$9,145,000 in 1990, \$8,887,000 in 1989, and \$6,374,000 in 1988. The Company anticipates capital expenditures in 1991 of approximately \$1.0 million in addition to approximately \$10 million required for the continued development of new LLRW facilities in California and Nebraska. The Company must develop and acquire advanced waste disposal and treatment technologies and facilities to compete successfully. In addition, opportunities to expand its hazardous waste activities may require further significant capital expenditures.

In 1985, US Ecology (US Ecology, Inc., a wholly owned subsidiary of the Company) was selected as California's license designee to locate, develop and operate the state's LLRW facility. The application for license is currently being reviewed by the State of California Department of Health Services, which is responsible for the licensing of the facility. US Ecology expects the license to be issued in 1991 and the site to be operational in 1992. The Company has invested \$18.3 million in this project and expects to make an additional capital investment of approximately \$9 to \$12 million over the next two years. The Company is seeking additional capital to finance the completion of this project.

In 1987, US Ecology was designated by the Central Interstate Low-Level Radioactive Waste Compact Commission to develop and operate a LLRW facility. The facility, scheduled to open in 1993, will-cost an estimated \$94 million to site, design and construct. Project costs through 1990 totaled \$25.1 million. Initial funding totaling \$25.5 million of the prelicensing phase of the contract was provided by the generators of the waste in the compact. The Company's portion of the project's costs through 1990 totaled \$5.3 million, and an additional estimated Company investment of \$1.2 million in costs, excluding interest, is necessary to complete this project. The Company intends to seek additional capital or funding by the waste generators to finance the completion of the project.

US Ecology operates its chemical sites under RCRA permits. The LLRW sites are operated under licenses from state and, in some cases, federal agencies. When these facilities reach capacity, or lease or license termination dates, as the case may be, they must be closed and maintained for a period of time prescribed by law or by license. In the case of the RCRA-permitted chemical sites, federal regulation requires that operators demonstrate the financial capability to close sites on an immediate, unscheduled (worst-case) basis. The estimated costs of such a closure are set forth in the operator's RCRA closure/post-closure plan.

To secure closure/post-closure obligations of its chemical waste disposal sites under federal and state regulations, US Ecology has provided letters of credit and certificates of insurance as financial assurance. Financial assurance requirements increased slightly during 1990. (See Notes 3, 6 and 11 to the Consolidated Financial Statements.)

Certain contingencies could materially affect the liquidity of the Company. One lawsuit is pending in Illinois relating to the closed chemical disposal site near Sheffield, Illinois, which is being maintained and monitored by US Ecology. The action seeks certain remedies including exhumation of the chemical waste site which, if ordered, would result in substantial expenditures over a number of years. While US Ecology believes it has substantial defenses to this action, an adverse judgment could materially decrease the Company's liquidity and/or render it insolvent. As discussed earlier, the Company has reserved for the estimated costs to provide for the closure and long-term care and maintenance of the site.

The nature of the hazardous material handled by US Ecology could give rise to substantial damages if spills, accidents or migration of hazardous material occurs. The occurence of such events could have an adverse effect upon the Company's liquidity.

#### **Future Considerations**

The implementation of the Low-Level Radioactive Waste Policy Amendments Act of 1985 ("Low-Level Act") has resulted in a reduction of waste receipts at the Company's low-level waste disposal sites because the Act provides incentives for waste generators to reduce volumes by high-density compaction, increased operational efficiency or other methods. The Low-Level Act allows interstate regions ("compacts") to impose significant surcharges of \$40 per cubic foot effective January 1990 for out-of-compact waste. This regulatory program, which started in 1986, has had a negative effect on LLRW receipts. In addition, the Low-Level Act places upon individual states the responsibility for disposing of their low-level waste and authorizes the states to form interstate compacts and to construct regional disposal facilities by 1993. The Low-Level Act also provides that any compact approved by Congress may restrict the use of its disposal facility to low-level waste generated within the member states and may limit the export of waste from their respective compacts. A significant amount of the low-level waste received by US Ecology's sites in Richland, Washington and Beatty, Nevada originates from outside their respective proposed regional compacts. At this time, it is difficult to predict the full effect of the Low-Level Act on the Company's future operations.

# MERICAN ECOLOGY CORPORATION CONSOLIDATED BALANCE SHEETS

December 31,	1990	1989
Assets		
Current assets:	#10.774.000	£14 040 000
Cash and cash equivalents	\$10,774,000	\$14,940,000
Receivables	11,129,000	12,363,000
Deferred income taxes	2,012,000	1,996,000
Prepaid expenses	5,362,000	6,078,000 35,377,000
Total current assets	29,277,000	33,377,000
Marketable securities, pledged	17,231,000	16,958,000
Property and equipment, net	6,257,000	5,202,000
ntangible assets less accumulated amortization	0,237,000	3,202,000
of \$474,000 in 1990 and \$1,556,000 in 1989	631,000	790,000
Deferred site development costs	23,639,000	17,192,000
Other assets	2,308,000	1,476,000
3000	\$79,343,000	\$76,995,000
보기들의 보통 전기 보고는 그렇게 되는 생기들이 되었다.		
		i eta e e
iabilities And Shareholders' Equity		
Current liabilities:		
Current maturities of long-term debt	\$ 679,000	\$ 706,000
Accounts payable	6,376,000	7,430,000
Accrued liabilities	9,119,000	12,013,000
Income taxes payable	80,000	-
Total current liabilities	16,254,000	20,149,000
Deferred site maintenance	31,347,000	28,196,000
원하장 사람들은 회사 이렇게 된 사람이 들어 있었다. 이 회사		
ong-term debt	22,977,000	23,656,000
Commitments and contingencies		
hareholders' equity:		
Convertible preferred stock, \$.01 par value,		
1,000,000 shares authorized, 200,000 shares		
issued and outstanding	2,000	2,000
Common stock, \$.01 par value,	<b></b>	_,,,,,,
10,000,000 shares authorized, 2,959,858 and		
2,958,943 shares issued and outstanding		
in 1990 and 1989, respectively	30,000	30,000
Additional paid-in capital	11,423,000	11,419,000
Accumulated deficit	(2,690,000)	(6,457,000
	8,765,000	4,994,000
Total shareholders' equity	6,700,000	7,227,000

See accompanying notes

## MERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF OPERATIONS

Years ended December 31,	1990	1989	1988
Revenues	\$ 48,711,000	\$ 45,305,000	\$ 41,265,000
Costs and expenses:			,,
Cost of revenues:		· · · · · · · · ·	
Operating costs	33,491,000	33,076,000	31,725,000
Future site maintenance, remediation	,		,,,,
and closure costs	1,392,000	4,186,000	28,313,000
	34,883,000	37,262,000	60,038,000
Selling and administrative expenses	7,872,000	8,522,000	8,426,000
Interest expense	2,216,000	1,503,000	408,000
Interest income	(2,423,000)	(2,227,000)	(1,244,000)
	42,548,000	45,060,000	67,628,000
Income (loss) from continuing operations			
before income taxes	6,163,000	245,000	(26,363,000)
Provision (credit) for income taxes	2,396,000	1,070,000	(2,602,000)
Income (loss) from continuing operations	3,767,000	(825,000)	(23,761,000)
Loss from discontinued operations,		(121,111,	(_0,, 0_1,000)
net of tax	₹	(2,167,000)	(211,000)
Loss on sale of discontinued operations,	* *:	(_,,,,,,	(===,000)
net of tax	•	(174,000)	_
Cumulative effect of changes in accounting	_	<u> </u>	(1,343,000)
Net income (loss)	\$ 3,767,000	\$ (3,166,000)	\$(25,315,000)
		+ (0,100,000)	<del>+ (2010101000</del> )
Per share information:			
Income (loss) from continuing operations	\$ 1.17	\$ (.28)	\$ (8.08)
Loss from discontinued operations		(.73)	(.07)
Loss on sale of discontinued operations		(.06)	(.07)
Cumulative effect of changes in accounting		(.50)	(.46)
Net income (loss)	\$ 1.17	\$ (1.07)	\$ (8.61)
		+ (2.57)	<del>- (0.01</del> )

See accompanying notes.

# MERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF SHAREHOLDERS' EQUITY

	Convertible Preferred Stock	Common Stock	Additional Paid-In Capital	Accumulated Deficit	Shareholders' Equity
Balance, December 31, 1987	\$ -	\$ 29,000	\$ 5,428,000	\$ 22,024,000	\$ 27,481,000
Common stock issued, net of repurchases Net loss		- -	38,000	(25,315,000)	38,000 (25,315,000)
Balance, December 31, 1988	•	29,000	5,466,000	(3,291,000)	2,204,000
Convertible preferred stock and warrant issued, net	2,000	•	5,891,000		5,893,000
Common stock issued, net of repurchases Net loss		1,000	62,000	(3,166,000)	63,000 (3,166,000)
Balance, December 31, 1989	2,000	30,000	11,419,000	(6,457,000)	4,994,000
Common stock issued, net of repurchases			4,000		4,000
Net income	-	<u> </u>	-	3,767,000	3,767,000
Balance, December 31, 1990	\$ 2,000	\$ 30,000	\$11,423,000	\$ (2,690,000)	\$ 8,765,000

See accompanying notes.

## MERICAN ECOLOGY CORPORATION CONSOLIDATED STATEMENTS OF CASH FLOWS

Years ended December 31,	· -	1990	19	89		1988
Cash flows from operating activities:			٠	•		
Net income (loss)	5	3,767,000	\$ (3,166,	000)	\$	(25,315,000
Adjustments to reconcile net income (loss)	•	5,767,000	\$ (5,100,	000)	Ψ,	(23,313,000
to net cash provided by (used in) operating						-
activities:			•			
Depletion, depreciation and amortization		1,152,000	3,223,	,000		1,511,000
Gain on sale of assets		(300,000)		000)	•	
Cumulative effect of accounting changes		-	•	_		1,343,000
Changes in assets and liabilities:						
Marketable securities			652,	000		2,604,000
Receivables		1,612,000	1,724,			1,728,000
Prepaid expenses		716,000	(2,022,			(2,306,000)
Deferred income taxes		(16,000)	1,024,	-		(2,346,000)
Accounts payable		(1,054,000)	729,			(934,000)
Accrued liabilities		(120,000)	1,103,			(3,385,000)
Income taxes payable		80,000	_,,			(1,430,000)
Deferred site maintenance	٠.	377,000	(118,0	)00)		25,785,000 <i>)</i>
Other		(1,076,000)	73,0	-		(175,000)
		1,371,000	6,307,0			22,395,000
Net cash provided by (used in) operating activities		5,138,000	3,141,0			(2,920,000)
Cash flows from investing activities:				-		
Capital expenditures		(2,698,000)	(1,320,0	100)		(3,128,000)
LLRW siting costs		(6,447,000)	(7,462,0			(3,246,000)
Change in marketable securities, pledged		(273,000)	(3,462,0	•		(4,288, <del>00</del> 0)
Payments received on notes from sale of assets		646,000	300,0	-		(4,200,000)
Proceeds from sale of assets		170,000	449,0			156,000
Net cash used in investing activities		(8,602,000)	(11,495,0		(1	10,506,000)
Cash flows from financing activities:		• •				
Proceeds from issuance of note payable	• *			٠		5,000,000
Proceeds from issuance of long-term debt, net			17,293,0	m ·		982,000
Principal payments on long-term debt		(706,000)	(747,0			(594,000)
Preferred and common stock and warrant	er.	(700,000)	(747,0	·00).		(354,000)
issued, net		4,000	5,956,0	100		20 000
Net cash provided by (used in) financing activities		(702,000)	22,502,0			38,000
Increase (decrease) in cash and cash equivalents		(4,166,000)	14,148,0			5,426,000
Cash and cash equivalents at beginning of year		14,940,000	792,0		,	(8,000,000)
Cash and cash equivalents at end of year		10,774,000	\$ 14,940,0		\$	8,792,000
	4	10,774,000	J 14,540,0	<u> </u>	Þ	792,000
Supplemental disclosures of cash flow information:				•		
Cash paid during the year for:						
Interest	\$	1,924,000	\$ 868,0	00	\$	294,000
Income taxes	\$	2,143,000	\$ 240,0		\$	1,620,000
Supplemental schedule of non-cash investing						
and financing activities:						
Capital lease obligations incurred	\$	-	\$ 105,0	00	\$	982,000
	<u> </u>	• • • • • • • • • • • • • • • • • • •	<u>پ ۱</u> ۵۶٫۵	00	<b>3</b>	982,

See accompanying notes.

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### MERICAN ECOLOGY CORPORATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1. Summary of Significant Accounting Policies

Principles of Consolidation. The accompanying financial statements present the consolidated accounts of American Ecology Corporation and its subsidiaries (the "Company" or "American"). All material intercompany accounts and transactions have been eliminated.

Revenue Recognition. Revenues from hazardous waste disposal are recognized as the waste materials are buried or processed. Revenue on long-term contracts is recognized on a percentage of completion method, based primarily on the ratio of costs incurred to date to total estimated contract costs. Anticipated losses under contracts are recorded as they become evident.

Gross Revenue Tax. Gross revenue taxes imposed by the State of Washington are included in hazardous waste revenues and cost of revenues. These taxes were \$1,400,000 in 1990, \$3,245,000 in 1989, and \$2,717,000 in 1988.

*Prepaid Expenses*. Included in prepaid expenses at December 31, 1990 and 1989, are \$4,651,000 and \$5,314,000, respectively, of unamortized costs related to waste disposal space preparation.

Property and Equipment. Property and equipment is recorded at cost and depreciated on straight-line and declining balance methods over their estimated useful lives. The estimated useful lives of buildings is 15 to 30 years and of equipment is 3 to 7 years. Leasehold improvements are amortized over the life of the lease or the useful life of the improvement, whichever is less. Land is depleted over the estimated useful life of the disposal site on a straight-line basis. Fully depreciated assets of \$4,195,000 and \$3,859,000 at December 31, 1990 and 1989, respectively, were not included in the accounts but are still in use.

Intangible Assets. Intangible assets are amortized on a straight-line basis over 5 to 40 years.

Deferred Site Development Costs. The Company has been selected to locate, develop and operate the low-level radioactive waste facilities for the State of California and the Central Interstate LLRW Compact Commission in Nebraska.

All allowable costs, except interest, relating to the siting process of the California facility have been deferred and are expected to be realized from the revenues of the LLRW site when operational. The current estimate of additional capital investment required to make this facility operational is approximately \$9 to \$12 million to be incurred over the next two years, excluding interest. The operating license is expected to be issued in 1991, and the site to be operational in 1992.

All unreimbursed costs and fees relating to the Nebraska facility have been deferred and are expected to be realized from the revenue of the LLRW site when operational. The current estimate of additional capital investment required from the Company is approximately \$1.2 million to be incurred in 1991, excluding interest. The site is expected to be operational by 1993.

Receivables. Receivables are presented net of reserves for doubtful accounts of \$90,000 and \$226,000 at December 31, 1990 and 1989, respectively. Included in accounts receivable at December 31, 1989, is \$1,139,000 of income tax refund receivable.

Site Maintenance. The Federal government, under the Resource Conservation and Recovery Act of 1976 ("RCRA"), requires that companies provide financial assurance for the closure/post-closure care and maintenance of their chemical sites for at least thirty years following closure. The Company charges amounts against income for future chemical site maintenance and low-level radioactive waste site maintenance based on the quantity of waste buried. The deferred site maintenance liability represents amounts which are not expected to be expended within one year (see Notes 3, 6, 11 and 12).

For the states of Washington and Nevada, amounts are remitted to the states currently for future maintenance of the state-owned low-level radioactive waste disposal sites.

Convertible Preferred Stock. In August 1989, the Company issued 200,000 shares of its Series B Preferred Stock to Browning-Ferris Industries, Inc. ("BFI"). This stock is convertible into an equal number of common shares at the holder's option for up to three years. In November 1988 and in April 1989 the Company issued 500,000 and 300,000 shares, respectively, of its Series A Preferred Stock (the "Preferred Stock") to its wholly-owned subsidiary, US Ecology, Inc. The 800,000 shares had been pledged as security for the \$8 million loan (see Note 5). The Series A shares have been released and subsequently canceled by the Company.

Net Income (Loss) Per Share. Net income (loss) per share is calculated based on the weighted average shares and equivalents outstanding of 3,214,000 in 1990, 2,953,000 in 1989, and 2,939,000 in 1988.

Accounting Changes. In 1988, the Company changed its method of accounting for income taxes (see Note 7) and waste disposal space preparation costs. Prior to 1988, waste disposal space preparation costs were expensed as incurred. Under the new method, costs are capitalized and amortized as the waste disposal space is used. The Company believes that the new method is preferable since it results in a better matching of revenue and expenses and it also conforms to the predominant industry practice.

As a result of this change, the loss from continuing operations before credit for income taxes for 1988 was decreased by \$1,595,000 and the net loss (before the cumulative effect of the change on prior years) was reduced by \$1,451,000 or \$.49 per share.

Cash Equivalents. Cash equivalents consist of short-term, highly liquid investments with original maturities of three months or less which are readily convertible into cash.

#### Note 2. Discontinued Operations

In November 1989, the Company sold the principal operating assets of its refuse derived fuel processing and engineering subsidiary, National Ecology, Inc., to a subsidiary of The Babcock & Wilcox Company. An estimated sales price of \$251,000 has been recognized in calculating the loss on sale of discontinued operations as shown in the Consolidated Statements of Operations. An estimated sales price increase of \$250,000 is in dispute over the attainment of one aspect of the performance requirements. The operating results of National Ecology, Inc. have been classified as discontinued operations in the financial statements for the periods presented through the sale date.

The revenues from discontinued operations were \$11,096,000, and \$17,894,000, for the years ended December 31, 1989 and 1988, respectively.

The loss from discontinued operations is net of a credit for income taxes of \$1,553,000 in 1989 and \$203,000 in 1988. The loss on disposal of discontinued operations is net of a credit for income taxes of \$147,000.

#### Note 3. Cash, Cash Equivalents and Marketable Securities

Cash, cash equivalents and marketable securities at			
December 31, 1990 and 1989, consist of the following:		1990	1989
Cash	<b>,</b> \$	68,000	\$ 50,000
United States Treasury Notes		10,724,000	 12,041,000
Commercial Paper		8,000,000	13,040,000
Eurodollar Time Deposits		2,085,000	1,850,000
Other, principally certificates of deposit		7,128,000	4,917,000
	\$	28,005,000	\$ 31,898,000

Cash and marketable securities totaling \$17,231,000 and \$16,958,000 at December 31, 1990 and 1989, respectively, have been classified in non-current assets as marketable securities, pledged. The United States Treasury Notes and other marketable securities are stated at cost plus accrued interest, which approximates market.

At December 31, 1990, the Company has pledged cash and marketable securities as collateral for financial assurance under RCRA for the Illinois and Texas chemical waste disposal sites, performance of a remedial investigation and feasibility study at Sheffield, Illinois which further characterizes geohydrological and waste containment capabilities and performance of corrective action, and in lieu of performance bonds.

#### Note 4. Property and Equipment

Property and Equipment at December 31,					
1990 and 1989, were as follows:			1990		1989
Land		\$	219,000	\$	219,000
Buildings		. ja	1,017,000		760,000
Equipment			7,246,000		6,338,000
Site improvements	1.2		2,030,000		1,824,000
Leasehold improvements			588,000		539,000
			11,100,000	17 7.	9,680,000
Accumulated depletion, depreciation and amortization			(4,843,000)		(4,478,000)
		\$	6,257,000	\$	5,202,000
	- ,				

Included in Equipment at December 31, 1990 and 1989, is \$1,109,000 and \$1,159,000, respectively, of assets under capital leases.

#### Note 5. Capital Infusion and Loan Repayment

On August 11, 1989, the Company issued to BFI 200,000 shares of convertible preferred stock for \$3 million, \$22.5 million of 8 1/2 percent 10-year convertible secured debentures, interest payable semi-annually, and \$3 million for a warrant to purchase 1.5 million shares of common stock at \$15 per share. The debentures are convertible into common stock at \$15 per share. The 200,000 shares of preferred stock are convertible one-for-one into common stock and have a liquidation preference of \$15 per share. These conversion rights and warrant expire in August 1992. The debentures are secured by accounts receivable, the capital stock of the operating subsidiaries, and by a portion of the disposal space at the Nevada and Texas chemical hazardous waste facilities. In addition, the debentures place restrictions on declaring or paying dividends and on incurring secured debt or other long-term commitments exceeding specified dollar amounts.

During 1988, BFI made a \$5 million short-term loan to the Company due in October 1989. Additional amounts of \$2.5 million and \$.5 million were borrowed in April and June 1989, respectively. The \$8,000,000 of loans with interest at the prime rate plus one percent was repaid in full out of the proceeds from the BFI transaction.

#### Note 6. Accrued Liabilities

Accrued liabilities at December 31, 1990 and 1989, were as follows:	1990	1989
Accrued site maintenance	\$ 5,790,000	\$ 7,889,000
Salaries and wages	923,000	1,135,000
Customer advances	183,000	383,000
Other	 2,223,000	2,606,000
	\$ 9,119,000	\$ 12,013,000

Accrued site maintenance includes amounts for closure and post-closure costs. See Note 1.

An estimate of the total site closure/post-closure costs, including remedial action, is made annually. Because of increased governmental regulation and demands by various agencies, including the Environmental Protection Agency ("EPA"), the estimated cost of closure/post-closure plans has significantly increased in recent years and may continue to do so.

The Company received its operating permits for the Nevada and Texas chemical sites in July and December 1988, respectively. The RCRA permit site closure/post-closure costs estimated for the Texas site are significantly higher than those applicable under the former interim status permit. As a result of obtaining operating permits, the Company recorded additional expense during 1988 related to the utilized site capacity and other permit-related costs (see Note 12).

The amounts of closure and perpetual care and maintenance paid for the Beatty chemical and low-level radioactive sites and the Richland low-level radioactive site are periodically negotiated with or established by the respective states. Those amounts are paid currently.

During 1988, US Ecology settled the litigation with the State of Illinois (see Note 11) over the legal obligations of the parties relative to the scope and nature of the closure requirements for the Sheffield, Illinois low-level radioactive site. Those costs, some of which will be expended during the coming year, are included in accrued site maintenance and the remainder of the estimated costs is included in the Consolidated Balance Sheets as deferred site maintenance.

The estimated schedule for expenditure of the deferred site maintenance liability is based on estimates of work requirements, the related costs and the date when the site closure, remediation and maintenance work will be performed. It also assumes that the supporting plans will be acceptable to the respective regulatory agencies at the time the work is to be performed. The schedule is therefore not indicative of when the actual expenditures will occur or that the amounts are sufficient. Because these estimates and assumptions may prove to be incorrect, actual amounts may be significantly higher or lower. The estimated schedule is as follows: 1991 - \$4,437,000; 1992 - \$4,531,000; 1993 - \$5,450,000; 1994 - \$5,260,000; 1995 - \$2,486,000; thereafter - \$13,620,000 (see Notes 11 and 12).

#### Note 7. Income Taxes

In December 1988, the Company changed its method of accounting for income taxes to comply with the provisions of SFAS No. 96, "Accounting For Income Taxes." The effect of this accounting change on continuing operations was to reduce the 1988 credit provision for income taxes and increase the net loss by \$1,906,000 or \$.64 per share. The cumulative effect of the change on prior years was \$1,918,000.

The provision (credit) for income taxes from continuing operations for the years ended December 31, 1990, 1989 and 1988,

was as follows:	1990	1989	1988
Current - Federal \$	1,927,000 485,000	\$ (62,000) 108,000	\$ (317,000) 102,000
- State	2,412,000	46,000	(215,000)
Deferred - Federal - State	(16,000)	1,024,000	(2,289,000) (98,000)
- State	(16,000)	1,024,000	(2,387,000)
. <del>-                                   </del>	2,396,000	\$ 1,070,000	\$ (2,602,000)

The components of deferred income taxes for the years ended December 31, 1990, 1989 and 1988, were as follows:

했을 수는 하는 이 사람들이 모르게 하는 그리고 있다면 아버지는 살았다.	1990	1989	1988
- 사용물이 되었다. 그런 그런 그런 그런 사용 시간 사용되는 것 같습니다. 			
Deferred site maintenance \$	- \$		(2,163,000)
Other, net	(16,000)	(179,000)	(224,000)
s <del>- The state of </del>	(16,000) \$	1,024,000 \$	(2,387,000)

The reasons for the difference between income taxes computed by applying the statutory federal income tax rate and provision (credit) for income taxes from continuing operations in the financial statements for the years ended December 21, 1990, 1989, were as follows:

31, 1990, 1989 and 1988, were as follows:	1990	1989	1988
Tax expense (benefit) at statutory rate	2,095,000	\$ 83,000	\$ (8,963,000)
State income taxes, net of federal tax benefit	320,000	108,000	3,000
Losses and/or expenses without current income tax benefit		830,000	6,400,000
Realization of book loss carry forward Other, net	(213,000) 194,000	49,000 -	(42,000)
Total	2,396,000	\$ 1,070,000	\$ (2,602,000)

At December 31, 1990, the Company has a federal net operating loss carry forward for financial statement reporting purposes of approximately \$25,000,000. The loss is comprised of deductions to be claimed in future tax returns principally related to provisions for future site closure, maintenance and remediation costs.

#### Note 8. Long-term Debt

Long-term debt consists of the following at December 31,		1990	•	1989
8 1/2% ten-year convertible debentures issued to BFI, secured, (see Note 5), interest payable semi-annually, principal due in 1999 if not converted by August 10, 1992	\$	22,500,000	\$	22,500,000
12.75% five-year term loan, secured by equipment with a cost of \$2,520,000, due in equal monthly payments of \$45,250, including interest		811,000		1,222,000
Capital lease obligations (Note 11)	 	345,000		640,000
Less current maturities		23,656,000 679,000		24,362,000 706,000
	<u>\$</u>	22,977,000	\$	23,656,000

Maturities of the debt, excluding capital leases (see Note 11), are as follows: 1991 - \$466,000; 1992 - \$345,000; 1999 - \$22,500,000.

#### Note 9. Pension Plans

The Company sponsors a defined contribution pension plan and a 401-K plan covering all eligible employees. Total pension expense under these plans was \$591,000, \$655,000, and \$418,000, for the years ended December 31, 1990, 1989 and 1988, respectively. The Company contributes amounts equal to accrued pension expense on a current basis.

The Company terminated two defined benefit pension plans effective December 31, 1988. Participants will receive a distribution of the plan assets at least equal to their current vested benefits in the form of cash or annuity contracts. Substantially all of the two defined benefit plans' assets will be distributed to the participants. The estimated actuarial present value of vested accumulated plan benefits payable under the defined benefit pension plans is \$948,000 and the amount of net assets available for payment of plan benefits is \$999,000.

#### Note 10. Stock Option Plans

The Company has Stock Option Plans covering an aggregate of 400,000 shares of American's Common Stock. Under the Stock Option Plans, options to purchase shares of American Common Stock may be granted to certain key employees. The exercise price of the options to be granted is the fair market value of the shares when the option is granted. Options have a term of not longer than ten years, and are exercisable in installments.

The following is a summary of the transactions under the plans:

• · · · · · · · · · · · · · · · · · · ·		in the second		1990	1989	1988
77 1 0		-		1 1		
Under Option:	• •					
Options outstanding	ng, beginning of year			156,250	268,150	265,600
Granted		_		219,000		75,000
Exercised				(1,000)	(19,000)	(10,000)
Canceled				(39,750)	(92,900)	(62,450)
Options outstanding	ng end of year			334,500	156,250	268,150
	<del>-</del> '					
Price range per sh	are of outstanding			\$ 4.19-	\$ 11.00-	\$ 4.125-
options			•	\$ 16.38	<b>\$</b> 16.38	\$ 34.94
						31.51
Price range per sh	are of shares		3 - T		*	
exercised				\$ 4.19	\$ 4.125	\$ 4.125
Options exercisab	le at end of year		<b>5</b> *	233,900	129,125	170.250
- F				233,300	149,143	179,350
Options available	for future grant			64,500	243,750	166,250
	_ ·					

#### Note 11. Commitments and Contingencies

Chemical disposal sites. The State of Illinois instituted a legal action against the Company related to the chemical landfill operations at the closed Sheffield, Illinois chemical waste disposal sites, which seeks injunctive relief, including exhumation of all the waste buried at the sites. The Company has been performing a remedial investigation and feasibility study of the Sheffield chemical facility since 1985. In October 1988, the Company's contractor submitted a draft of the remedial investigation study ("RI") to the Environmental Protection Agency ("EPA"). In the spring of 1990, the Remedial Investigation/Feasibility Study was proposed by the EPA and subjected to extensive public comment. At the close of the public comment period, the EPA issued its Corrective Management Plan which recommended that a corrective plan be implemented which included pumping and treating contaminated groundwater and installation of containment walls in certain areas. The EPA Plan specifically rejected exhumation as an appropriate alternative. The Company has begun implementing the Remedial Design/Remedial Activities phase of the Program which is expected to take from 12 to 18 months. The current total estimated cost of the implementation of the EPA Plan is approximately \$13 million. In 1988, a provision for future site maintenance, remediation and closure costs was recorded for future estimated costs which management believes will be adequate to provide a technical solution for the stabilization and long-term care and maintenance of the site. Management believes that the performance of this work may satisfy the concerns raised by the lawsuit. However, the ultimate outcome cannot presently be determined (see Note 12).

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LLRW disposal sites. The legal action involving the closed Sheffield, Illinois LLRW disposal facility was settled in May 1988 and the case dismissed per an Agreed Order entered that date. The lawsuit was originally filed in 1978 and alleged that the disposal facility caused injury to the public safety, to the environment and to the property of the State of Illinois, and sought damages in the amount of \$97 million. The Company entered into a settlement agreement with the State of Illinois which provides for the closing, care and maintenance of the disposal site. Pursuant to the settlement, the Company recorded estimated costs for the closure, care and maintenance of the disposal site over a ten-year period of time. The Company recorded an additional expense of \$3.9 million in the second quarter of 1988. Included in the total cost is a provision to fund the long-term custodial care of the site by paying forty \$62,500 quarterly installments.

In December 1986, US Ecology received notice from the EPA that it was a potentially responsible party ("PRP") for certain actions to be undertaken at the closed Maxey Flats low-level radioactive waste disposal facility. The Maxey Flats site, which is owned by the Commonwealth of Kentucky, was operated by US Ecology from 1963 to 1978. In 1978, the Commonwealth of Kentucky entered into an agreement with US Ecology to permanently close the facility and the Commonwealth of Kentucky agreed, in part, to "assume any and all liabilities of whatsoever nature of US Ecology, Inc... arising out of US Ecology, Inc.'s operations of the Maxey Flats site," and to "exercise responsibility for the perpetual care and maintenance of the Site and US Ecology, Inc. shall have no further responsibility or liability therefore." The Company believes that the 1978 Agreement is valid and is seeking a full indemnification from the Commonwealth of Kentucky in the event that any liability is assessed against US Ecology. In May 1988, the Commonwealth filed suit in state court seeking a declaration that the 1978 Agreement is unconstitutional. The Company subsequently removed that action to Federal court as well as instituted two separate actions against the Commonwealth seeking in part to enforce the provisions of the 1978 Agreement. These actions are still pending.

In response to the EPA's notification, a number of major PRP's have been performing the RI/FS pursuant to a Participation Agreement entered into with the EPA. The Agreement contains covenants not to sue other participating PRP's during the pendency of the studies and assigns each PRP a monetary contribution for completion of the initial studies. The Agreement does not cover the remedial phase of the project. The Company's contribution for the initial studies has totaled approximately \$854,000. US Ecology has had no role in the maintenance of or responsibility for the site since 1979 and had received no communication from either the EPA or the Commonwealth of Kentucky alleging that it bore any responsibility for the site until it received its PRP letter from the EPA.

In April 1987, the Company filed actions against a number of former insurers who had underwritten general liability and radiation hazard risks at the closed Sheffield, Illinois and Maxey Flats, Kentucky facilities operated by the Company. The Company sought recovery of all defense costs it had expended to date as well as any continuing defense costs and complete coverage for all costs incurred by the Company and damages being claimed relating to the Illinois and Kentucky sites. During the past four years the Company received \$1,257,000 from its insurance carriers as partial reimbursement for defense costs incurred by the Company. These payments, in addition to approximately \$700,000 in payments made directly to legal firms on behalf of the Company, were all made under a reservation of rights letter which the insurers believe may permit recovery of these amounts if the insurers prevail on the merits of the litigation. The Company is continuing its efforts to secure reimbursement from its insurance companies for all previously expended legal defense costs as well as those being presently incurred. The present litigation is expected to determine the liability of the various insurers for defense costs and indemnity payments to the Company resulting from the administrative and legal actions pending at the Sheffield and Maxey Flats disposal sites. At the same time, insurers filed a declaratory action disclaiming any liability under the policies at issue.

Washington taxes. On June 27, 1989, US Ecology, Inc. received notice from the State of Washington, Department of Revenue, that the Company owed \$3,452,879 in back taxes for a Leasehold Excise Tax allegedly applicable to the Richland Low-Level Waste Disposal Facility. The Leasehold Excise Tax applies to government-owned property which is leased by a private entity and is intended to provide tax revenues to local communities, which revenues they would otherwise be deprived of because of the government ownership. The Company had never been given notice by the Department of Revenue prior to this time that it owed any of these taxes.

The tax is based upon the value of the leasehold interest. The Company believes that the value of the leasehold is the \$6,000 annual leasehold payment. The Department of Revenue, however, included amounts that the Company received for surcharge payments, site surveillance fees, and perpetual care and maintenance fees as part of the leasehold value. Based upon an initial motion by the Company, the surcharge payments were deleted from the assessment, and the assessment was reduced to \$1,371,000. A hearing was held on the remaining assessment in December of 1989. The Department of Revenue Hearing Board reduced the final assessment to \$995,000 after determining that further assessments had been improperly made. However, the Department determined that amounts which the Company paid to the Perpetual Care and Maintenance Fund should be included as part of the leasehold value. The Company paid the tax and immediately filed a suit for a refund in the Thurston County Circuit Court in Olympia, Washington. The Company has made subsequent payments under this assessment for the periods after the initial assessment. These payments, aggregating \$1,100,000, are included in the Consolidated Balance Sheets as Other assets. The Company believes that the inclusion of perpetual care and maintenance fees is inappropriate and has filed a Motion for Summary Judgment which should be heard and decided in 1991.

In December 1989, the Company filed suit against the State of Washington seeking to recover taxes paid to the State pursuant to the Washington State Business and Occupational tax. The basis of the Company's suit is that the state tax rate is confiscatory. The Company later entered into an agreement with the State of Washington which stated that the Company would not pursue the litigation further if the Washington State Legislature passed certain legislation negotiated between the parties which reduced the effective rate of the Washington tax by half in 1990. The legislation passed and the lawsuit was withdrawn. However, the Company does retain the right to reinstitute litigation in the event that the State imposes certain other fees upon the Company.

Financial assurance and insurance. Under RCRA, US Ecology is required to develop closure and post-closure plans for each of its chemical waste disposal sites. In conjunction with these plans, US Ecology must prepare closure and post-closure cost estimates and give financial assurance that the planned actions will be completed. Financial assurance must be given by either funding a trust, posting a bond, providing a letter of credit, providing a certificate of insurance or, if the operator meets certain financial tests, giving a corporate guarantee. If any mechanism other than trust funding is given, the operator must also establish a standby trust (with cash or other collateral). US Ecology currently covers this requirement by pledging letters of credit, providing certificates of insurance and establishing standby trusts. If the trusts were required to be funded, \$10,747,000 would have to be paid into the trusts. Also see Note 3.

RCRA regulations require the Company to carry environmental impairment insurance against sudden and accidental occurrences, as well as against non-sudden occurrences such as subsurface migration. The required coverage for non-sudden accidental occurrences is at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs. For sudden accidental occurrences, the requirement is at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. Although the Company's current level of coverage exceeds these minimum requirements (except for the Sheffield chemical site) there is no assurance that insurance carriers will continue to provide such coverage to operators, or that such coverage will be obtainable in future years. Should this insurance be unobtainable, it could have a significant adverse impact on future operations.

Other litigation. In December 1987, the Company and its National Ecology subsidiary were named as defendants along with the Company's former parent, Teledyne Industries, Inc., in a lawsuit arising out of National Ecology's prior operation of a county-owned sanitary landfill and related resource recovery operation in Weber County, Utah. National's operations at this location ceased in July 1986 after Weber County unilaterally elected to terminate the contract based on its desire not to construct a waste-to-energy facility. Among other allegations, the plaintiff, an individual claiming certain rights from development of the project, has alleged a cause of action for breach of contract and is seeking compensatory damages of approximately \$11,235,000, and punitive damages in the amount of \$15,000,000. Based on preliminary investigation, outside counsel has advised that the claims do not appear to be well-founded, the damages sought appear to be grossly overstated, and that punitive damages are not justified in this case. The Company believes it has substantial defenses to these claims and does not expect the suit to have a material adverse effect on the Company's consolidated financial position.

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Other commitments. The Company has entered into severance agreements with certain of its executives. Such agreements provide for the payment of amounts up to 2.99 times their annual compensation if a change in control (as defined) is followed within two years by a termination (as defined) of employment. BFI's right to acquire at least 50.1% of the Company's then outstanding Common Stock is a "change of control" for the purposes of the Severance Agreements (see Note 5). The maximum contingent liability of the Company pursuant to all such agreements is approximately \$1,200,000 at December 31, 1990. These agreements expire on August 10, 1991, as they relate to the BFI transaction.

Future minimum lease commitments as of December 31, 1990, are as follows:

1991       \$ 236,000       \$ 502,00         1992       132,000       291,00         1993       8,000       125,00			Capital	Operating
1992     132,000     291,00       1993     8,000     125,00       Total minimum payments     376,000     \$918,00       Less interest     31,000	강화를 하는데 얼굴을 보고 하루를 막아 들어 먹는다면 되었다. 그렇게 된		Leases	Leases
1993       8,000       125,00         Total minimum payments       376,000       \$918,00         Less interest       31,000	ide se <del>nte la tradición de la composition de la composition de la composition de la composition de la composition</del> 1991 - Angle Composition de la composit		\$ 236,000	\$ 502,000
Total minimum payments         376,000         \$918,00           Less interest         31,000	1992		132,000	291,000
Less interest 31,000	1993		8,000	125,000
	Total minimum payments		376,000	\$ 918,000
Present value of minimum lease payments \$ 345,000	Less interest	100 - 120	31,000	
	Present value of minimum lease payments		\$ 345,000	

Rental expense, which also includes month-to-month equipment rentals, was \$1,912,000, \$2,136,000, \$2,609,000, for the years ended December 31, 1990, 1989 and 1988, respectively.

#### Note 12. Fourth Quarter Adjustments

During the fourth quarter of 1989 the Company recorded income tax benefit for losses recorded earlier in the year due to taxable income generated in this quarter. In addition, a \$1.7 million writedown of waste processing equipment and related intangible assets was recorded after an evaluation of the competitiveness in this market.

During the fourth quarter of 1988, the Company recorded a provision for future site closure, maintenance and remediation costs totaling \$23.5 million for the following: estimated litigation settlement costs associated with the closed Sheffield, Illinois chemical waste disposal sites; the Company's estimated share of the remedial and administrative costs for the closed Maxey Flats, Kentucky LLRW disposal site; increased costs associated with the Texas site's contaminated groundwater cleanup; increased closure/post-closure costs associated with the final operating permit issued in December 1988 for the Texas chemical waste disposal site; and certain permit required studies and improvements at both the Texas and Nevada chemical waste disposal sites.

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#### EPORT OF ERNST & YOUNG INDEPENDENT AUDITORS

The Board of Directors and Shareholders

American Ecology Corporation

We have audited the accompanying consolidated balance sheets of American Ecology Corporation as of December 31, 1990 and 1989, and the related consolidated statements of operations, shareholders' equity and cash flows for each of the three years in the period ended December 31, 1990. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of American Ecology Corporation at December 31, 1990 and 1989, and the consolidated results of its operations and its cash flows for each of the three years in the period ended December 31, 1990, in conformity with generally accepted accounting principles.

As discussed in Note 11 to the financial statements, a lawsuit has been filed against the Company by the State of Illinois, seeking injunctive relief and claiming damages relating to the chemical landfill operations of the Company. The Company has prepared an assessment and recorded a reserve for the expected resolution of this matter, however, the ultimate outcome cannot presently be determined.

As discussed in Notes 1 and 7 to the financial statements, the Company changed its method of accounting for waste disposal space preparation costs and income taxes in 1988.

Ernst + Young

Woodland Hills, California February 6, 1991

#### Supplemental Shareholder Information (unaudited) (dollars in thousands except per share data)

#### Quarterly Financial Data from continuing operations

Quarter Ended	March 31	June 30	September 30	December 31
1990			1.0	
Revenues	\$ 8,075	\$ 14,120	\$ 12,056	\$ 14,460
Gross profit	1,479	4,821	2,826	4,702
Net income (loss)	(278)	1,694	498	1,853
Weighted average shares outstanding	2959	3159	3260	3259
Net income (loss) per share	\$ (.09)	\$ .54	\$ .15	\$ .57
1989				
Revenues	\$ 10,382	\$ 9,601	\$ 11,418	\$ 13,904
Gross profit	647	1,384	1,218	1,544
Income (loss) from continuing operations	452	(319)	(476)	(482)
Weighted average shares outstanding	2,953	2,953	2,959	2,959
Income (loss) per share from continuing operations	\$ .15	\$ (.11)	\$ (.16)	\$ (.16)
Net income (loss) per share	\$ .10	\$ (.94)	\$ (.60)	\$ .38

The 1990 revenues for the first three quarters have been restated for certain non-revenue project development activities. The 1989 revenues have been restated for certain chemical hazardous waste material disposal taxes which were previously included in revenues and operating costs.

#### Stock Prices, Dividends and Shareholders

			199	0		1989	100
면 문단함.							
Period	불학(11일) [전	얼마 아이는	High	Low	High	1	Low
1st Quarter			6 1/4	4	10 3	/4	8 5/8
2nd Quarter			5 1/4	4	10		8 3/4
3rd Quarter			12	5 1/4	93	/8	8 1/8
4th Quarter			9	6 1/4	8 1	<i>1</i> 8	5 3/4

The Company has not declared or paid cash dividends and does not intend to declare a dividend in the foreseeable future. The Company is restricted from paying or declaring dividends without the prior written consent of BFI. As of February 28, 1991, there were approximately 11,200 registered owners of American shares.

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#### DIRECTORS

William E. Prachar
Chairman of the Board, President
and Chief Executive Officer
American Ecology Corporation

R. Lee Armbruster
Executive Vice President and
Chief Operating Officer
American Ecology Corporation

John J. Scoville

President

J.J. Scoville & Associates, Inc.

Charles A. Simms
President
Rescon Incorporated

John T. Lurcott
Senior Vice President
Halliburton Environmental
Technologies, Inc.

#### **OFFICERS**

William E. Prachar Chairman of the Board, President and Chief Executive Officer

R. Lee Armbruster
Executive Vice President and
Chief Operating Officer

Ronald K. Gaynor Vice President

Oscar P. Wong Vice President

Karl J. Eimer Chief Financial Officer and Secretary

Harries A. Lloyd
Treasurer and Assistant Secretary

Bradley E. Dillon General Counsel and Assistant Secretary

Alan L. Harrington
Assistant Secretary

#### OPERATING COMPANIES

US Ecology, Inc. 9200 Shelbyville Road Louisville, Kentucky 40222

Texas Ecologists, Inc. Petronila Road Robstown, Texas 78380

#### **COMMON STOCK**

American Ecology Corporation common stock trades over-thecounter. Its NASDAQ symbol is ECOL.

#### 10-K REPORT

A copy of the American Ecology Corporation 1990 Annual Report on Form 10-K filed with the Securities and Exchange Commission may be obtained by writing to the Secretary, American Ecology Corporation, 30423 Canwood Street, Suite 201, Agoura Hills, California 91301.

CORPORATE REGISTRAR AND TRANSFER AGENT

Bank of America, N.T. & S.A. Corporate Agency Service Center P.O. Box 38002 San Francisco, California 94137

#### GENERAL COUNSEL

Bradley E. Dillon

American Ecology Corporation
9200 Shelbyville Road

Louisville, Kentucky 40222

#### AUDITOR

Ernst & Young
Warner Corporate Center
21300 Victory Boulevard
Woodland Hills, California 91367

#### CORPORATE OFFICES

American Ecology Corporation 30423 Canwood Street Suite 201 Agoura Hills, California 91301 Telephone: 818/991-7361

## MERICAN ECOLOGY CORPORATION CONSOLIDATED BALANCE SHEET

(unaudited)(in 000's)

Assets

September 30, 1991

Deferred income taxes Prepaid expenses	Cash and cash equivalents Receivables	Current assets:
--	--	-----------------

\$ 7,496 8,372 2,101

5,427

27,883 18,530 6,776 609

1,596

\$78,790

other assets

Intangible assets, net

erred site development costs

Property and equipment, net Marketable securities, pledged

Total current assets

23,396

Liabilities and Shareholders' Liquity

Current liabilities:

Accounts payable

Accrued liabilities Income taxes payable

Current maturities of long-term debt

Shareholders' equity

\$78,790

25,467

10,902 30,041

12,380

(224)

4,495 7,315

794

Commitments and contingencies

Long-term debt

Deferred site maintenance

Total current liabilities

buuted on recycled paper

Fiscal Year 1991 3rd Quarter Report

American Ecology Corporation 30423 Canwood Street, Suite 201 Agoura Hills, California 91301

001498

THIRD QUARTER REPORT

PERIOD ENDED SEPTEMBER 30, 1991

American Ecology CORPORATION

# TO OUR SHAREHOLDERS:

1991 increased to \$12.6 million, a 5% increase compared to \$.5 million or \$.15 per share in the slightly. The 1991 provision for income taxes is creased to 71% from 74% of revenues. This from the same quarter a year ago. The net profit prior year; however, pretax income declined ognizing tax benefits attributable to operating decrease is primarily the result of higher gross Revenues for the quarter ending September 30, ower by \$.4 million due to the Company recoss carryforwards. Cost of revenues defor the period was \$.9 million or \$.24 per share. margins from waste disposal and relat services

charge against earnings representing the Results for the quarter include a \$550,000 estimated increased value of a new warrant given to Ecol Partners, Ltd. in exchange for he old warrant in consideration for their August 19, 1991 conversion of \$12 million of convertible debentures into 800,000 shares of the Company's Common Stock.

Phillips, Jr., who is the President and sole panded its board of directors from five to On August 7, 1991, the Company exwhich is the General Partner of Ecol, to fill to the newly created position. The Company also has held discussions with Mr. Phillips inees to be added to the management slate six members and appointed Mr. Harry J. shareholder of Phillips Investments, Inc. regarding his taking a more active role in the management of the Company. In the course ners have the right to designate certain nomfor election / Company's board of direcmanagement and directors Officer of the Company and that Ecol Park of these discussions, Mr. Phillips has proposed that he become Chief Executif

lion of Mr. Phillips into a leadership role in have been working with Mr. Phillips to reach an accord that will provide an orderly transithe Company.

Chairman of the Board and Chief Executive Officer William E. Prachar

. Lee Armbrust

President and Chie Operating Officer

. I vember 22, 1991

CONSOLIDATED STATEMENTS OF OPERATIONS MERICAN ECOLOGY CORPORATION

(unaudited) (in 000's except per share amounts)

	Three Ended Sep	Three Months Ended September 30,	Nine A Ended Sep	Nine Months Ended September 30,
	1991	1990	1991	1990
Revenues Cost and expenses:	\$12,627	\$12,056	\$37,084	\$34,251
Cost of revenues	8,985	8,889	25,773	24,118
Future site maintenance, remediation and closure costs	265	341	1,134	1,007
Selling and administrative expenses	2,329	1,739	6,370	5,872
Interest income	(459)	(282)	(1,434)	(1,944)
Interest expense	421	266	1,454	1,631
	11,541	10,950	33,297	30,684
income before income taxes	1,086	1,106	3,787	3,567
Provision for income taxes	189	809	459	1,653
Net income	\$ 897	\$ 498	\$ 3,328	\$ 1,914
Per share information:				
Primary	\$ .24	\$ .15	\$ .92	9.
Fully diluted	\$ .24	\$ .15	\$ 86	9.
Weighted average shares and equivalents outstanding:				
Primary Fully diluted	4,566	3,260 3,260	4,2° 4,:	3,197 3,197

#### Response to Staff Data Request No. 3

#### Request:

Please supply a calculation of the consolidated capital structure and the embedded cost of debt for American Ecology for the same time period as the latest consolidated balance sheet supplied as your response to Staff Request No. 1. Please supply all work papers supporting the calculation of the consolidated capital structure and the embedded cost of debt. Please also supply the same data for US Ecology.

#### Response:

Witness: Robert L. Ash

Information to calculate the consolidated capital structure and the embedded cost of debt for American Ecology Corporation for 1991 is provided herein. Please refer to American Ecology Corporation's 1991 Annual Report (see Staff Data Request No. 1).

Information is not available to supply the requested data for US Ecology, Inc.

BLA:ph 04/09/92 Attachment

#### Response to Staff Data Request No. 4

#### Request:

On page 16 of the 1990 Annual Report of American Ecology Corporation, \$6,257,000 of net property and equipment is shown. Please supply for the test period in this case, the 12 months ended September 30, 1991, the net property and equipment value. Please show as part of this request the original cost, the accumulated depreciation and the depreciable life of the property for the 12 months ending both September 30, 1990 and September 30, 1991. For all property and equipment allocated to the State of Washington please show how the property and equipment was allocated.

#### Response:

Witness: Robert L. Ash

For the 12 months ended September 30, 1991 the net property and equipment value for American Ecology Corp. is \$6,776,000...see Third Quarter Report to Shareholders for period ended September 30, 1991 referenced in "Staff Data Request No. 2" for details.

Attached hereto are copies of a listing of property and equipment for the 12 months ending September 30, 1990 and September 30, 1991 for US Ecology's LLRW facility at Richland, Washington. This list depicts the original cost, accumulated depreciation and date of acquisition.

BLA:ph 04/09/92 Attachments

"S ECOLOGY, INC.
SHINGTON PROPERTY & EQUIPMENT LISTING SEPTEMBER, 1991

TOTAL WASHINGTON

DATE ACQ	DESCRIPTION	COST	ACCUM DEPR
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
11/85	IBM SELECTRIC	1,013.00	1,013.00
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67
5/85	BEEBE JIB CRANE	4,560.00	4,560.00
6/85	WISCONSIN MIXER	1,711.44	1,711.44
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00
12/85	WILTON BAND SAW	1,564.55	1,564.55
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50
6/79	CLARK FORKLIFT	40,078.83	40,078.83
1/81	CATERPILLAR DOZER	71,428.10	71,428.10
2/90	CAT DOZER REPAIR	37,440.53	16,473.84
<b>`1</b>	CAT TRACTOR/SCRAPER	175,875.00	175,875.00
81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81 <sub>3 m</sub>	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,836.59
9/83	REST AREA TRAILER	5,086.40	5,086.40
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25
10/73	OFFICE TRAILER	4,889.00	4,889.00
11/75	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	27,441.23
7/87	XEROX 1038 COPIER	5,624.63	2,390.43
1/86	CATERPILLAR FORKLIFT	128,760.00	128,760.00
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	66,825.00
4/86	CATERPILLAR WATER WAGON	22,373.00	22,373.00
5/86	GENERATOR	6,824.28	6,824.28
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	2,858.52
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,858.49
7/87	VCR CAMCORDER	1,589.95	965.37
7/88	DIP PAK 200 MIG WELDER	1,534.58	1,131.73
11/87	CATERPILLAR V50D FORKLIFT	20,871.74	17,288.67
1/90	ALLLADIN 1440 PRESSURE WASHER	5,252.01	2,310.88
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	894.06
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10	3,059.36
° ′91	LUDLUM NEUTRON DETECTOR	1,662.16	0.00
	707.1		

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871,214.45 822,700.08

US ECOLOGY, INC.
"SHINGTON PROPERTY & EQUIPMENT LISTING
'TEMBER, 1990

TEHBER	, 1//0		ACCUM
DATE ACQ	DESCRIPTION	COST	DEPR
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
9/84	CONCORD 224 MODEM	1,256.40	1,256.40
11/85	IBM SELECTRIC	1,013.00	1,013.00
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67
5/85	BEEBE JIB CRANE	4,560.00	4,560.00
6/85	WISCONSIN MIXER	1,711.44	1,711.44
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00
12/85	WILTON BAND SAW	1,564.55	1,564.55
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50
6/79	CLARK FORKLIFT	40,078.83	40,078.83
1/81	CATERPILLAR DOZER	71,428.10	71,428.10
2/90	CAT DOZER REPAIR	37,440.53	5,241.68
₹/81	CAT TRACTOR/SCRAPER	175,875.00	175,875.00
· 31	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,836.59
9/83	REST AREA TRAILER	5,086.40	5,086.40
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25
10/73	OFFICE TRAILER	4,889.00	4,889.00
11/75	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	19,627.46
7/87	XEROX 1038 COPIER	5,624.63	1,827.97
1/86	CATERPILLAR FORKLIFT	128,760.00	122,638.74
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	63,647.15
4/86	CATERPILLAR WATER WAGON	22,373.00	21,684.36
5/86	GENERATOR	6,824.28	6,499.81
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	2,256.73
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,256.71
7/87	VCR CAMCORDER	1,589.95	738.23
7/88	DIP PAK 200 MIG WELDER	1,534.58	809.47
11/87	CATERPILLAR V50D FORKLIFT	20,871.74	12,905.61
1/90	ALLLADIN 1440 PRESSURE WASHER	5,252.01	763.93
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	162.56
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10	347.66
	TOTAL WASHINGTON	869,552.29	781,653.29

#### Response to Staff Data Request No. 5

Request:

On pages 15-19 of Dr. Olson's testimony he discusses the Needles, California site and capital structure. He indicates that it is appropriate to use 100 percent equity. Please supply the source of all funds associated with the construction of the Needles facility to date.

Response:

Witness: Robert L. Ash

Financing of the proposed Needles, California LLRW site has been supplied by internally generated funds loaned to US Ecology, Inc. by its parent company, American Ecology Corporation. To date no outside source of funds has been used on the project.

BLA:ph 04/09/92

Response to Staff Data Request No. 7(6)

Request:

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6) Exhibit \_\_\_ (BLA-5) shows the total revenue requirement as \$11,118,102. Please supply a work paper showing that the proposed rates in Exhibit \_\_\_ (BLA-6) will produce this amount.

Response:

Witness: Robert L. Ash

Attached hereto is a schedule depicting a calculation of revenue requirements for 1993 based on proposed rates and projected volumes for the Richland, Washington LLRW site.

Since the calculation is based on the volume levels assumed for 1993 (100,000 cubic feet and 1,780,666 millicuries), a total revenue figure is produced that is slightly higher than the stated revenue requirement. This allows for some shortfall in actual volumes below current projections for 1993.

BLA:ph 04/09/92 Attachment

#### CALCULATIONS OF REVENUE REQUIREMENT

YEAR ... 1993

VOLUME/ACTIVITY <sup>1</sup>	PRICES <sup>2</sup>	1993 PROJECTED REVENUES	
100,000 cubic fee of waste disposed	\$44.78/cu. ft.	\$ 4,478,000	
1,780,666 millicuries of associated activity	\$ 3.77/millicurie	\$ 6,713,110	
		\$11,191,110	

BLA:ph 04/09/92

<sup>1</sup> Reference Exhibit No. T - (RES-1) page 16
2 Reference Exhibit No. \_\_\_\_ (BLA-6) Schedule A Disposal Charges

Response to Staff Data Request No. 8(1)

Request: Please explain how the \$19,202,082 rate base shown on Exhibit (BLA-5) is intended to reflect your investment incurred over the term of its operations at the Richland site.

#### Response:

Witness: Charles E. Olson

The basis for the \$19,202,082 figure is set forth in Dr. Olson's testimony. The approach used in Dr. Olson's testimony to value the investment cost of the Richland facility is appropriate under RCW 81.108.030(2)(a), which authorizes the Commission, in setting fair, just, reasonable and sufficient rates, to consider, among other things, the value of the site operator's leasehold and license interests, the site operator's investment incurred over the term of its operations, and the rate of return equivalent to that earned by comparable enterprises.

**USEcology** 

an American Ecology company

April 30, 1992

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STATE OF WASH.
LILL AND TRANSP.

Mr. Edward J. Nikula
WASHINGTON UTILITIES and
TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr., S.W.
Olympia, WA 98504-8002

RE: Docket No. TG-920234 Staff Data Requests 1-8

Dear Mr. Nikula:

Enclosed are US Ecology's responses to Staff Data Request Nos. 4, 6, 7(1-5) and 8(2) in the above proceeding. These responses, along with those submitted April 9, supply all data requested in the Commission's March 26 letter.

Please let me know if you have questions with respect to any of our responses. I may be reached at (206) 754-3733.

Sincerely.

Barry C. Bede

BCB; bb Enclosures

Copy: Mr. James Van Nostrand

Mr. Robert Ash

001508



#### Response to Staff Data Request No. 4

#### Request:

On page 16 of the 1990 Annual Report of American Ecology \$6,257,000 of net property and equipment is shown. Please supply for the test period in this case, the 12 months ended September 30, 1991, the net property and equipment value. Please show as part of this request the original cost, the accumulated depreciation and the depreciable life of the property for the 12 months ending both September 30, 1990 and September 30, 1991. For all property and equipment allocated to the State of Washington please show how the property and equipment was allocated.

#### Response:

Witness: Robert L. Ash

Additional information to supplement our previous response on April 9th is provided herein. Attached hereto are revised copies of a listing of property and equipment for the 12 months ending September 30, 1990 and September 30, 1991 for US Ecology's LLRW facility at Richland, Washington. The only change on the schedules from the prior information submitted on April 9, 1992 is the inclusion of the depreciable life of the property and equipment. It should be noted that this is the depreciable life used for tax purposes, and is probably not appropriate for ratemaking purposes.

BLA:ph Attachments 4/28/92

US ECOLOGY, INC. WASHINGTON PROPERTY & EQUIPMENT LISTING SEPTEMBER, 1990

JEI ILIIDEN	, 1//		ACCUM	DEPR
DATE ACQ	DESCRIPTION.	COST	DEPR	LIFE
2/84	LUDLUM STRETCH SCOPE	3,990.00	3,990.00	5
9/84	CONCORD 224 MODEM	1,256.40	1,256.40	5
9/84	CONCORD 224 MODEM	1,256.40	1,256.40	5
11/85	IBM SELECTRIC	1,013.00	1,013.00	5
2/84	74 KENWORTH TRACTOR	9,000.00	9,000.00	5
9/85	83 SERVICE BOX-F250	2,682.50	2,682.50	5
10/83	1977 GMC GENERAL TRACTOR	21,460.00	21,460.00	5
1/84	10 HP GAS AIR COMPRESSOR	2,060.02	2,060.02	5
7/84	CAT V50C FORKLIFT	23,718.67	23,718.67	5
5/85	BEEBE JIB CRANE	4,560.00	4,560.00	5
6/85	WISCONSIN MIXER	1,711.44	1,711.44	5
5/85	BEEBE LIFT HOIST	3,300.00	3,300.00	5
12/85	WILTON BAND SAW	1,564.55	1,564.55	5
8/81	IBM CORRECTING SELECTRIC	1,136.16	1,136.16	5
2/72	1972 FRTLINER WHITE TRACTOR	27,272.00	27,272.00	5
7/71	45' FLATBED TRAILER-217	14,760.00	14,760.00	5
4/75	1960 SPOMAC DUMP TRAILER	1,837.50	1,837.50	5
6/79	CLARK FORKLIFT	40,078.83	40,078.83	5
1/81	CATERPILLAR DOZER	71,428.10	71,428.10	5
2/90	CAT DOZER REPAIR	37,440.53	5,241.68	5
3/81	CAT TRACTOR/SCRAPER	175,875.00	175,875.00	5
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00	5
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00	5
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22	5
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45	5
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19	5
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,836.59	5
9/83	REST AREA TRAILER	5,086.40	5,086.40	5
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25	5
10/73	OFFICE TRAILER	4,889.00	4,889.00	5
11/75	YALE ELECTRIC FORK STACKER	6,890.55	6,890.55	5
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	19,627.46	5
7/87	XEROX 1038 COPIER	5,624.63	1,827.97	10
1/86	CATERPILLAR FORKLIFT	128,760.00	122,638.74	5
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	63,647.15	5
4/86	CATERPILLAR WATER WAGON	22,373.00	21,684.36	5
5/86	GENERATOR	6,824.28	6,499.81	5
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.93	2,256.73	5
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,256.71	5
7/87	VCR CAMCORDER	1,589.95	738.23	7
7/88	DIP PAK 200 MIG WELDER	1,534.58	809.47	5
11/87	CATERPILLAR V50D FORKLIFT	20,871.74	12,905.61	5
1/90	ALLLADIN 1440 PRESSURE WASHER	5,252.01	763.93	5 5
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	162.56	5 5
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10	347.66	כ
	TOTAL WASHINGTON	869,552.29	781,653.29	

US ECOLOGY, INC. WASHINGTON PROPERTY & EQUIPMENT LISTING SEPTEMBER, 1991

DATE ACQ	DESCRIPTION	COST	ACCUM Depr	DEPR LIFE
		7 000 00	3,990.00	5
2/84	LUDLUM STRETCH SCOPE	3,990.00	1,256.40	5
9/84	CONCORD 224 MODEM	1,256.40	1,256.40	5
9/84	CONCORD 224 MODEM	1,256.40	1,013.00	5
11/85	IBM SELECTRIC	1,013.00	9,000.00	5
2/84	74 KENWORTH TRACTOR	9,000.00 2,682.50	2,682.50	5
9/85	B3 SERVICE BOX-F250	•	21,460.00	5
10/83	1977 GMC GENERAL TRACTOR	21,460.00 2,060.02	2,060.02	5
1/84	10 HP GAS AIR COMPRESSOR	23,718.67	23,718.67	5
7/84	CAT V50C FORKLIFT	4,560.00	4,560.00	5
5/85	BEEBE JIB CRANE		1,711.44	5
6/85	WISCONSIN MIXER	1,711.44	3,300.00	5
5/85	BEEBE LIFT HOIST	3,300.00	1,564.55	5
12/85	WILTON BAND SAW	1,564.55	1,136.16	5
8/81	IBM CORRECTING SELECTRIC	1,136.16	27,272.00	5
2/72	1972 FRILINER WHITE TRACTOR	27,272.00	14,760.00	5
7/71	45' FLATBED TRAILER-217	14,760.00	1,837.50	5
4/75	1960 SPOMAC DUMP TRAILER	1,837.50		5
6/79	CLARK FORKLIFT	40,078.83	40,078.83 71,428.10	5
1/81	CATERPILLAR DOZER	71,428.10	16,473.84	5
2/90	CAT DOZER REPAIR	37,440.53	•	5
3/81	CAT TRACTOR/SCRAPER	175,875.00	175,875.00	5
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00	5
5/81	LOADING DOCK-FRUEHAUF TR	3,725.00	3,725.00	5
5/81	LINCOLN SAE-400 WELDER	5,428.22	5,428.22	5
9/81	1961 CAT 12E ROAD GRADER	21,780.45	21,780.45	5
12/82	LIFTALL FORKLIFT	46,183.19	46,183.19 5,836.59	5
4/83	50-TON HYDRAULIC PULLER	5,836.59	5,086.40	5
9/83	REST AREA TRAILER	5,086.40	-	5
10/83	AIR MASK-PRESSURE DEMAND	6,740.25	6,740.25 4,889.00	5
10/73	OFFICE TRAILER	4,889.00	6,890.55	5
11/75	YALE ELECTRIC FORK STACKER	6,890.55	27,441.23	5 -
4/88	ALPHA /BETA COUNTING SYSTEM	37,208.47	2,390.43	10
7/87	XEROX 1038 COPIER	5,624.63	128,760.00	5
1/86	CATERPILLAR FORKLIFT	128,760.00	66,825.00	5
4/86	CATERPILLAR 926 WHEEL LOADER	66,825.00	22,373.00	5
4/86	CATERPILLAR WATER WAGON	22,373.00	6,824.28	5
5/86	GENERATOR TERRATAL MENTOLE	6,824.28 3,008.93	2,858.52	5
3/87	4-WHEEL ALL TERRAIN VEHICLE	3,008.92	2,858.49	5
3/87	4-WHEEL ALL TERRAIN VEHICLE	1,589.95	965.37	7
7/87	VCR CAMCORDER		1,131.73	5
7/88	DIP PAK 200 MIG WELDER	1,534.58 20,871.74	17,288.67	5
11/87	CATERPILLAR V50D FORKLIFT	5,252.01	2,310.88	5
1/90	ALLLADIN 1440 PRESSURE WASHER	•	894.06	5
7/90	10HP 30GAL GAS AIR COMPRESSOR	2,031.93	3,059.36	5 5
8/90	BOBCAT 440B SKID STEER LOADER	6,953.10 1,662.16	0.00	5
9/91	LUDLUM NEUTRON DETECTOR	1,002.10	0.00	,
	TOTAL WASHINGTON	871,214.45	822,700.08	

#### Response to Staff Data Request No. 6

Request:

Please submit in the same format as Exhibit (BLA-3) for the Richland, Washington operation all revenues, expenses (including taxes, fees and surcharges), actual net investment at the Richland site and/or allocated and pro forma adjustments for any increases in the rates during the test period or subsequent to the test period.

#### Response:

Witness: Robert L. Ash

Attached hereto is a schedule of the Richland, Washington operations for the 12-month test period ending September 30, 1991 in the same format as Exhibit (BLA-3) reflecting revenue and expenses (including taxes and state fees) and pro forma adjustments.

Additionally, attached hereto is a reconstructed statement of assets and liabilities as of December 31, 1991 for the Richland, Washington site. Please be advised that in US Ecology's present general ledger system a separate balance sheet is not maintained for the Richland, Washington site. Moreover, the amounts shown for accumulated depreciation on the attached statement of assets and liabilities reflect the depreciation taken for tax purposes, and are probably not appropriate for ratemaking purposes. The Company has not performed an "actual net investment" calculation for the Richland site that would be appropriate for ratemaking purposes inasmuch as it is not proposing to determine its revenue requirement on the basis of such a calculation.

WASHINGTON FACILITY
ACTUAL RESULTS OF OPERATIONS
PERIOD:OCT. 1, 1990 TO SEPT. 30, 1991

ACCOUNT DESCRIPTION	OCT-DEC 90 ACTUALS	JAH-SEPT 91 ACTUALS	TOTALS OCT90-SEPT91	ADJUSTMENTS	RESTATED Results	PROFORMA ADJUSTMENTS	PROFORMA TOTALS	СОНИЕНТS
MENO:CU.FT.WASTE DISPOSED	99,330	213,430	312.760		312.760		312.760	
	***************************************	*************	***************************************			************	************	
TOTAL REVENUE	3,109,715	7.390.270	10.499.985	***********	10,499,985		10,499,985	
OPERATING EXPENSES:								
SALARIES	190,514	625,642	816,156	45,076 *	861,232	(16,830)**	844,402	* ADJREF. SCHEDULE 1
PAYROLL TAXES	15,085	62,540	77,625	4,100 *		(10,000)	81,725	**ADJREF. SCHEDULE 2
RETIREMENT FUND	12.971	40,892	53,863	3,207 *			57,070	NDG. KEI. GONEDULE E
ENPLOYEE INS	24,297	115.823	140,120	5,054 *	145,174		145,174	
BIR CHG-LEGAL	6,438	12,573	19,011	3,034	19,011		19.011	
DIR CHG-P.A.	83	1,379	1,462		1,462		1,462	
DIR CHG-GOYT.AFF.	1,408	321	1,729		1.729		1.729	
DIR CHG-POST OPS	64	135	199		199		199	
DIR CHG-ACCOUNTING	0	1.370	1,370		1.370		1,370	
DIR CHG-RAD ADM	5,165	28,734	33,899		33,899		33,899	
DIR CHG-RAD SALES	0	357	357		357		357	
DIR CHG-RAD SERVICES	ō	962	962		962		962	
DIR CHG-RAD SITE OPS	6,191	25,262	31,453		31,453		31.453	
BIR CHG-ENY SITE OPS	0	447	447		447		447	
LABOR CAPITALIZED	·	(20,608)	(20,608)		(29,608)		(20,608)	
PERMITS/LICENSES	3,133	656	3.789	229 \$	4.018		4,818	
REPAIR & MAINT.	16,744	92,767	109,511	•••	109,511		109.511	
SAFETY COMPLIANCE	22.839	80,561	103,400		103,400		103,400	
GROUNDWATER TRMT.	37	0	37		37		37	
FACILITY SECURITY	419	66	485		485		485	
MATERIALS	2,434	5,844	7,478		7,478		1,478	
FUELS & LUB.	6,044	11.181	17,225		17,225		17,225	
CONTAINERS	3.794	40,942	44,736		44.736		44.736	
SUBCONTRACTORS	5.051	43,564	48,615		48,615		48,615	
DEPREC-OPER.EQ.	17,762	24,493	42.255		42,255		42.255	
ANORTIZATION-CELL	14.780	24,897	39,677		39.677		39,677	
CELL CAP EXPENSE	6.898	14,630	21,528		21.528		21.528	
EQUIP. LEASES	35,574	106,722	142.296		142,296		142,296	
INSURANCE	33,471	117.348	150.819	·	150.819		150.819	
PROF FEES-ENG.	912	0	912		912		912	
EMP UNIFORMS	3,528	5,276	8,804		8.804		8,804	
SALES & USE TAX	184	1.357	1.541		1,541		1,541	
TRAVEL	10.442	31.566	42.008	18,878 *	60,886		60,886	
ADVERTISING	0	1.041	1.041	128 *	1.169		1.169	
PUBLIC AFFAIRS	C	406	406	51 *	457		457	
REP & MAINT-NON OP	1,794	3.837	5,631	1.576 *	7.207		7,207	
FUEL & LUB-NON OP	3,107	7.766	10,873	2.026 *	12.899		12,899	
SUPPLIES	8,300	20,260	28.560	2.194 *	30,754		30,754	
FREIGHT & POSTAGE	803	3,363	4,166	367 \$	4.533		4.533	

UTILITIES	2,143	1,765	9,908	146 *	10.054		10,054	
TELEPHONE	5,154	21,638	26,792	1.897 *	28,689		28.689	
DEPRECIATION	5,544	16,209	21.753	•	21,753		21.753	
RENT/LEASES-OTHER	4,127	12.254	16.381	3,672 *	20,053	44.800	64,053	LEASEHOLD RENT INC. TO \$50,000 FROM \$6,000 EFFECTIVE 1/93
PROPERTY TAXES	2,940	9,450	12,390		12.390	6,420	18,810	LEASEHOLD EXCISE TAX OF 12.84% OF \$50.000 EFFECTIVE 1/93
PROPERTY INS	3,886	16,265	20,151		20.151	*****	20,151	ECHALINED ENGINE IN OF 11:074 OF \$30,000 EFFECTIVE 1773
LEGAL FEES	35,602	95,452	131,054		131.054		131.054	
GAIN ON ASSET SALE	0	(650)	(650)	650	8		191,034	NONRECURRING ITEM
EMP RELATIONS	1,933	343	2,276	•••	2,276		2,276	NUMERO ITEM
UNION RELATIONS	0	224	224		224		224	
HEMBERSHIPS & SUB.	407	4,743	5,150	509 \$	5,659		5,659	
SENINARS	1,602	1,945	3,547		3,547		3,547	
CHARITABLE CONTR.	8,525	10,800	19.325		19,325		19.325	
AMORT-GOODWILL	1,251	3,750	5.001		5,001		5,001	
PROF FEES-OTHER	4,383	2,301	6.684	30 *	6.714		6,714	
DIR CHG-D.P.OPS	900	2.057	2.957	•	2,957		2.957	
DIR CHG-ENGINEERING	9.960	33,120	43.080		43,080		43.080	
DIR CHG-HEALTH PHY.	11.472	79,813	91.285		91,285			
DIR CHG-REG.COMP.SAFETY	170	1,771	1,941		1,941		91.285	
ALLOC-RAD SITE OPS	36,117	157.357	193,474		193,474		1,941	NO ADJ.PROPOSED-REF.SCHEDULE 3
RATE CASE EXPENSE	00,117	131,031	1/4,4/4		173,474	350,000	193,474 350,000	COST ASSOCIATED WITH RATE CASE HEARING
NUTC REGULATORY COMP.			0		0	140,000		
Pere RECOENTANT CONF.	**********	**********			***********	140.000	140,000	ON-GOING COMPLIANCE COST
SUBTOTAL	\$596.382	\$2,010,179	\$2,606,561	\$89.790	\$2,696,351	\$523.590	\$3,219,941	
STATE FEES:								
SURVEILLANCE FEE	170 (20	714 7/9	457 700		(** ***			
PCEN PCEN	139.420 159.727	314,362 379,793	453,782		453,782		453.782	
BUSINESS & OCCUPATIONAL	389,351		539.520		539.520		539,520	
REGULATORY FEE	307,331	771.665	1,161,016		1.161.016		1.161.016	
PERMINES IFF		168,523	168.523		168,523		168.523	
SUBTOTAL-STATE FEES	\$688,498	\$1,634.343	\$2.322.841	\$0	\$2,322,841	\$0	\$2,322,841	
SELLING & GEN.& ADH.EXP.:								
CUSTOMER SERVICE	£7 ACA	161 666	A15 A5A					
GEA-ACCOUNTING	53,958	191,292	245.250		245.250	33,080	278.330	ADJREF. SCHEDULE 4
GRA-PERSONNEL	38,410	114,700	153,110		153,110	(66.333)	86,777	ADJREF. SCHEDULE S
GAA-DATA PROCESSING	12.563	52,521	65,084		65.084	(29,956)	35.128	ADJREF. SCHEDULE 6
GEA-QUALITY ASSURANCE	28,870 96,612	63,219	92.089	/88 1/814	92.089	(32,020)	60.069	ADJREF. SCHEDULE 7
CORPORATE FEE	88,000	141.657	238,269	(89,140)*	149,129	(86,782)	62,347	ADJREF. SCHEDULE 8
CONFORMIL TEE	00,000	217.000	305.000		305.000	152,000	457.000	ADJREF. SCHEDULE 9
SUBTOTAL-SELLING & GRA	\$318,413	\$780,389	\$1.098.802	(\$89,140)	\$1,009,662	(\$30,011)	\$979,651	
TOTAL EVACUACA								
TOTAL EXPENSES	\$1,603,293	\$4,424,911	\$6.028,204	\$650	\$6,028,854	\$493,579	\$6.522.433	
SITE INCOME BEFORE TAX	\$1,506,422	\$2,965,359	\$4,471,781	(\$650)	\$4,471,131	(\$493,579)	\$3,977,552	
INCORE TAX	\$611,000	\$1,140,000	\$1,751,000		\$1,751,000		\$1,751,000	
	********	*********	441147144	**********	41.11.444	***************************************	41,131,000	
SITE INCOME AFTER TAX	\$895,422	\$1.825,359	\$2,720,781	(\$650)	\$2,720,131	(\$493,579)	\$2,226.552	
	***********					***************************************		

US ECOLOGY - WASHINGTON STATEMENT OF ASSETS AND LIABILITIES DECEMBER 31, 1991

	332,660.42	62,760.00	88,607.00	712,172.81	00.0	0.00	FC 00C 70F +	1,170,200.63						4,493,042.36					5,689,242.59
LIABILITIES	ACCOUNTS PAYABLE	ACCRUED LIABILITIES - PAYROLL	ACCRUED LIABILITIES - RESERVES	ACCRUED LIABILITIES - OTHER	INTERCOMPANY ACCOUNT	NOTES PAYABLE		IUIAL LIABILIIIES						MASHINGTON SITE CAPITAL					TOTAL LIABILITIES AND SITE CAPITAL
ASSETS	4,000.00	00.00	4,000.00	4,195,638.71	(47,700.00)	4,152,738.71	0.00	129,664.00	1,269,208.17	0.00	294,567.42	(255,361.91)	128,672.65	(85,767.23)	167,626.01	(135,575.85)	114,161.09	19,470.62	5,689,242.59
	CASH MADVETABLE CECUDITIES	ACCRUED INTEREST	TOTAL CASH	ACCOUNTS RECEIVABLE - TRADE	MILUMPINE FOR BUDBITUE MCCOUNIS	NET TRADE RECEIVABLES	UNBILLED RECEIVABLES	NET CELL COSTS	PREPAID EXPENSES	LAND	BUILDINGS	ACCUM DEPR - BUILDINGS	EQUIPMENT	ACCUM DEPR - EQUIPMENT	LEASEHOLD IMPROVEMENTS	ACCUM DEPR - LEASEHOLD IMPR	NET PROPERTY PLANT & EQUIPMENT	OTHER ASSETS	TOTAL ASSETS

The book depreciation totals above are at accelerated rates.
The assets and liabilities above are those identifiable to the Richland, Washington site only. These amounts may not be indicative of a separate stand alone audited balance sheet. NOTE:

#### Response to Staff Data Request No. 7(1)

Request:

1) Depreciation and amortization are shown on several lines. Please supply a copy of the depreciation and amortization schedules that support these expenses.

#### Response:

. Witness: Robert L. Ash

Attached hereto is a schedule of depreciation expense by asset description for Richland, Washington site for the 12 month test period ending September 30, 1991.

Please be advised that the amortization expense on Exhibit \_\_\_ (BLA-3) consists of cell space amortization and goodwill amortization for the 12 month test period ending September 30, 1991.

BLA:ph Attachment 4/27/92

## DEPRECIATION EXPENSE US ECOLOGY RICHLAND, WASHINGTON SITE FOR THE 12 MONTHS ENDED, SEPTEMBER 30, 1991

ASSET NO.	DESCRIPTION OF ASSET	4TH QTR. 1990	Y.T.D. SEPT. '91	TOTAL
221	Alpha/Beta Counting System	\$ 1,953.44	\$ 5,860.33	\$ 7,813.77
289	Xerox 1038 Copier	140.63	421.83	562.46
335	3860 FT Chain Link	95.67	229.59	325.26
340	CNI Land Improvement	1,247.73	3,743.10	4,990.83
383	Caterpillar Forklift	6,121.26		6,121.26
385	Caterpillar 926 Wheel Loader	3,177.85		3,177.85
386	Caterpillar Water Wagon	688.64		688.64
387	Generator	324.47		324.47
388	Four Wheel All Terrain Vehicle	150.44	451.35	601.79
389	Four Wheel All Terrain Vehicle	150.43	451.35	601.78
390	VCR Camcorder	56.77	170.37	227.14
391	DIP Pak 200 MIG Welder	80.57	241.69	322.26
436	40x75 Steel Warehouse	324.83	974.52	1,299.35
437	Office Bldg 24x40	193.74	464.94	658.68
438	Change Inspection Bldg	2,670.32	8,010.93	10,681.25
439	Office Bldg Addition	499.91	1,249.76	1,749.67
440	Shop Bldg Alteration	314.74	944.21	1,258.95
454	Caterpillar V50D Forklift	1,095.77	3,287.29	4,383.06
510	Alladin 1440 Pressure Washer	286.47	1,260.48	1,546.95
518	CAT D8-H Undercarriage Repair	2,246.43	8,985.73	11,232.16
614	10 HP 30 Gal Gas Air Compressor	243.83	487.67	731.50
619	Bobcat 440B Skid Steer Loader	1,042.96	1,668.74	2,711.70
607	1988 Ford Tempo	199.77	1,797.93	1,997.70
	TOTAL	\$23,306.67	\$40,701.81	\$64,008.48
			========	=========

#### Response to Staff Data Request No. 7(2)

Request:

2) Charitable contributions in the amount of \$19,325 are shown. Please supply a schedule detailing each item of expense.

#### Response:

Witness: Robert L. Ash

Attached hereto is a schedule detailing by payee each item of expense under the classification charitable contributions for the 12-month test period ending September 30, 1991. The line item should have been listed only as "contributions".

BLA:ph Attachment 04/27/92

## US ECOLOGY - WASHINGTON CHARITABLE CONTRIBUTIONS OCT. 1, 1991 TO SEPT. 30, 1991

	250.00
Senate Rep. Campaign	
Committee to Re-elect	5,250.00
Benton Co. Sheriff	120.00
Columbia Basin Boxing	150.00
	2,755.00
United Way	100.00
Boy Scouts of America	
Richland Prof. Firefighters	100.00
Port of Pasco Police Off. Assoc	100.00
United Way of Franklin & Benton	200.00
Tri-Cities Renaissance	2,000.00
	2,500.00
Bryn Mawr College	
University of Washington	2,500.00
Tri-City Assoc. of Realtors	100.00
Columbia Basin Boxing Club	150.00
Cornell University	2,500.00
Richland Columbia Little League	200.00
	200.00
Dune Busters 4-H Club	
Benton Co. Sheriffs Posse	75.00
Finley Youth Council	75.00
Total Charitable Contributions	19,325.00
• • • • • • • • • • • • • • • • • • •	

Response to Staff Data Request No. 7(3)

Request:

3) Rate case expense is shown as \$350,000. However, Exhibit T. \_\_\_ (BLA-1), page 6 indicates that the \$350,000 of rate case expense will be amortized over 2 years. Is the total \$700,000 or \$350,000? Also, please supply any detail that you used to arrive at your estimated total rate case expense.

#### Response:

Witness: Robert L. Ash

The total estimate for Rate Case Expense is \$350,000. Attached hereto is a schedule reflecting the estimated cost of \$350,000 for rate case expense.

BLA:ph Attachment 04/27/92

#### ESTIMATED COST ASSOCIATED WITH RATE CASE HEARING

#### US ECOLOGY'S RICHLAND, WASHINGTON SITE

#### For the Period October 1, 1991

#### through

#### December 1992

DESC	RIPTION OF EXPENSE	VENDOR/EMPLOYEE	EST. AMOUNT
with 3/01 proc	mated cost associated filing rate case by /92 and public hearing ess expected 2nd and Quarter 1992:		
1).	Professional Legal Services	Perkins Coie	\$140,000.00
2).	Expert Witness Charles Olsen	H. Zinder & Assoc.	\$120,000.00
3).	Travel Expense (i.e. B. Dillon, R. Ash, R. Sauer, B. Bede	US Ecology Personnel	\$ 40,000.00
	No. of Trips Est.15-20 Trips  Avg. Cost/Trip \$ 2,000/Trip		
4).	Staff Time Preparation, Document Producti	on	\$ 50,000.00
ТОТА	\$350,000.00		

001521

#### Response to Staff Data Request No. 7(4)

Request:

4) WUTC regulatory compliance costs are shown as \$140,000. Please supply any detail that you have in support of this amount.

#### Response:

Witness: Robert L. Ash

Attached hereto is a schedule in support of the estimated cost for WUTC regulatory compliance.

BLA:ph Attachment 04/28/92

### ESTIMATE OF WUTC REGULATORY COMPLIANCE COST US ECOLOGY'S RICHLAND, WASHINGTON SITE

#### for

#### 12-MONTH PERIOD

	CATEGORY OF EXPENSE	ESTIMATE AMOUNT
I.	Professional Services: Assistance in complying with rate regulation	
	A. Legal Cost - Perkins Coie & Internal	\$ 45,000
	B. Economist - Charles Olson	\$ 25,000
II.	Salary and fringe of employee responsible for complying with Accounting requirements, preparing periodic rate filing and various reports (1/2 of person)	\$ 35,000
III.	Time of Company personnel to respond to audits by WUTC staff	\$ 8,000
IV.	Travel Expense of Company personnel	\$ 15,000
	Subtotal	\$128,000
٧.	Contingency 10%	\$ 12,000
	TOTAL - WUTC REGULATORY COMPLIANCE ESTIMATE	\$140,000 ======

Response to Staff Data Request No. 7(5)

#### Request:

- 5) The corporate fee is shown as \$457,000 at the pro forma level. Schedule 9 shows that prior to allocation the total amounts is \$3.558.000
  - a. Please supply account detail of the breakdown of the total expense.
  - b. Please supply invoices associated with the portion applicable to Legal and Governmental Affairs.

#### Response:

Witness: Robert L. Ash

Attached hereto are schedules for American Ecology Corporate expense and Legal & Governmental Affairs expense detailing by account description the total expense for the 12-month test period ending September 30, 1991.

For request 5b. above, invoices and/or other accounting records will be made available during WUTC audit.

BLA:ph 04/28/92

#### AEC CORPORATE EXPENSES

ACCOUNT NO.	DESCRIPTION	Y.T.D. SEPTEMBER '91	4TH QTR. 1990	TOTAL
801-802,698	Salaries & Wages	\$1,447,088	\$142,779	\$1,589,867
822-837	Fringe Benefits	123,656	45,147	168,803
841	Travel	46,888	21,029	67,917
843	Telephone	16,848	4,951	21,799
845	Supplies	7,807	2,769	10,576
847	Depreciation & Amortization	9,842	20,970	30,812
849	Rent	85,187	26,615	111,802
851	Insurance	79,932	132,134	212,066
854	Energy - Electricity	4,081	1,413	5,494
855,856	Bank and Loan Fees	8,605	2,500	11,105
858	Maintenance and Repairs	5,466	1,122	6,588
859,871	Legal	104,589	46,037	150,626
863	Dues, Subs, Publications	10,691	7,034	17,725
864	Postage	9,023	2,820	11,843
865	O/S Clerical Services	19,674	0	19,674
866	Shareholders Relations	235,249	30,734	265,983
868	Auditor's Services	95,029	155,000	250,029
869	Consulting Services	12,322	( 6,348)	5,974
870	Taxes & Licenses	48,401	20,577	68,978
850,852,		•	•	•
860-862,				
867,880,				
899	Other	6,790	( 20,794)	( 14,004)
898-4X	Reimbursed Services-USE Compacts	( 91,750)	( 23,181)	( 114,931)
898-4X	Reimbursed Services-USE Kentucky	( 402)	( 5,540)	( 5,942)
898-5X	Reimbursed Services - ALEX	(850)	(3,337)	(4,187)
TOTAL	••••••	\$2,284,166	\$604,431 ======	\$2,888,597

BLA:ph 4/28/92

#### LEGAL & GOVERNMENTAL AFFAIRS EXPENSE

DESCRIPTION	Y.T.D. <u>SEPT. 1991</u>	4TH QTR. 1990	TOTAL
Salaries Fringe Benefits Repair & Maintenance Professional Fees Rent/Leases Insurance Travel Seminars Supplies Freight & Postage Telephone Depreciation Employee Relations	\$411,138 82,943 3,321 272,773 24,332 27,648 45,871 560 2,444 2,480 9,737 405 101	\$144,589 11,947 485 39,514 16,142 7,926 22,870 0 1,813 751 4,665 122 169	\$ 555,727 94,890 3,806 312,287 40,474 35,574 68,741 560 4,257 3,231 14,402 527 270
Memberships & Subscriptions Other	7,449 ( <u>81</u> )	4,114 5	11,563 (7 <u>6</u> )
Subtotal	\$891,121	\$255,112	\$1,146,233
Less: Direct Charge to other US Ecology Departments	( <u>371,376</u> )	( <u>105,480</u> )	( <u>476,856</u> )
TOTAL	\$519,745	\$149,632	\$ 669,377

Response to Staff Data Request No. 8(2)

#### Request:

2) Staff Request No. 6, in part, asks that you supply the net investment at the Richland site, or allocated to the Richland site. Using that net investment, please indicate what the revenue requirement would be in the same format as Exhibit \_\_\_ (BLA-5). Please supply a copy of your work papers showing that calculation.

#### Response:

Witness: Robert L. Ash

As indicated in the response to Staff Request No. 6, the Company has not calculated an "actual net investment" for the Richland site that would be appropriate for ratemaking purposes inasmuch as it is not proposing to determine its revenue requirement on the basis of such a calculation. If such a net investment were calculated, the revenue requirement suggested by using such an approach could easily be determined on the basis of the information and format shown in Exhibit \_\_\_ (BLA-5).

BLA:ph 4/28/92

# PERKINS COIE

A Law Partnership Including Professional Corporations

One Bellevue Center. Suite 1800 • 411-108th Avenue Northeast • Bellevue, Washington 98004

Telephone: (206) 453-6980

May 18, 1992

Mr. Edward J. Nikula
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-8002

RECEIVED

MAY 2 2 1992

ATTY GEN DIV WUTC

WUTC

Re: Docket No. TG-920234
Staff Data Requests 9-15

Dear Mr. Nikula:

Enclosed are US Ecology's responses to Staff data requests 9 through 15 in the above proceeding.

Please contact Barry Bede at (206) 754-3733 if you have questions with respect to any responses.

Very truly yours

James M. Van Nostrand

JMV:goc Enclosures

cc: Barry C. Bede
Brad Dillon
Washington Public Power
Supply System
Portland General Electric
Precision Castparts
Teledyne Wah Chang

Response to Staff Data Request No. 9

Request: During the test period, the 12 months ended September 30, 1991, 121,202 cubic feet of waste and 1,870,803 millicuries of activity (Exhibit T-1, pages 16-17) was received at the Richland facility from generators within the Northwest Compact.

- (1) If the Envirocare facility in Utah was operational for all twelve months of the test period and had its current license, please indicate the number of cubic feet of waste and the millicuries of activity that could have been sent to the Envirocare facility in Utah. For this calculation please use the shipments as received at Richland. By received, I mean the shipment would require no separation of the contents. That is, if a mixed shipment was received and only after separation could part of the volume go to the Envirocare facility, you would not include this shipment.
- (2) Please supply a copy of the manifest for each shipment in part 1 above.
- (3) Please supply a copy of the actual invoice for each shipment in part 1 above.
- (4) Please indicate on the invoice supplied as part 3 above the charge that would have been assessed by Envirocare if the shipment had gone to Utah rather than to the US Ecology facility in Richland.

#### Response:

Witness: Richard E. Sauer

(1) US Ecology has performed no such analysis to determine the amount of waste which could have been sent to the Envirocare Facility in Utah during the test period. Such an analysis would require a review of documents for each shipment of waste recieved at the Richland site, and a determination regarding the types of waste which the Envirocare facility can receive. Any such determination, in turn, may be subject to an interpretation which differs from that of the company.

- (2) See response to (1) above.
- (3) See response to (1) above.
- (4) US Ecology has no information regarding the schedule of charges imposed by Envirocare for disposal of waste at the its facility. US Ecology is aware, however, that waste disposed at the Envirocare facility would not be subject to certain charges that are applicable at the Richland site, including surcharges, site closure and perpetual care and maintenance (PC&M) fees, other charges imposed by the state of Wahington, and compact fees.

Response to Staff Data Request No. 10

Request: On page 16 of Exhibit T-1, the company estimates that it will receive in 1993 100,000 cubic feet of waste with an associated activity level of 1,780,666 millicuries. Please supply all workpapers showing the assumptions and calculations supporting this estimate.

#### Response:

Witness: Richard E. Sauer

As discussed on pages 15-17 of Exhibit T-1, the company's estimate of 100,000 cubic feet of volume for calendar year 1993 is based upon historical levels of waste received from Northwest Compact generators, including amounts received during the test period. The company's estimate was based primarily on the data set forth in Exhibit 8, Schedule 1. The company's analysis considered unusual deliveries during 1991 that were not likely to recur. For example, U.S. Navy shipped an usually large amount of waste during the last half of 1991.

The company's estimate of activity levels for 1993 was based on historical activity levels in waste received from Northwest Compact generators, as discussed on pages 15-17 of Exhibit T-1. In particular, the company relied upon the historical levels of activity as set forth in Exhibit 8, Schedule 2. The company's estimate of 1,780,666 millicuries for 1993 can be supported by both a simple average of the last five years' results (which suggests 1,755.68 curies annually) or a weighted average of the last five years' results (which suggests 1,809 curies annually). Calculations for these figures are shown on the attached workpaper.

ACTIVITY LEURL

SIMPLE AVERAGE

LAST 5 YEARS' (1987-1991) APTIVITY LAURES

5-19.9 + 1994.8 + 1986.9 + 1562.2 + 1524.6

255.68 Conces

WELLIAMS MURIN. OF CAST STEARS (1987-1991) ACTURE LAVACE

5x 1- 9 = 8549.5

4 x 3 = 7979-2

3x 19: = 5960.7

2x (5. = = 3124.4

1X15 - 1546

= 15 = 1809 curies\_

Response to Staff Data Request No. 11

Request: For this calculation please assume the Commission sets the rates based on the 100,000 cubic feet of waste and 1,780,666 millipuries of activity. If the Richland site receives in 1993 121,202 cubic feet of waste and 1,870,803 millicuries of activity please indicate what the rates should be using the proposed volume adjustment as reflected on Exhibit 16. Please supply all workpapers showing the assumptions and the supporting calculations.

#### Response:

Witness: Robert 1. Ash

The cubic foct rate for volume would be reduced to \$36.69, while the activity charge would be reduced to \$3.57 per millicuris. Calculations are shown on the attached workpaper

VOLUME (PER CU. ET.) 844-78 BEUINNING MAXIMUM SATTE Appreciation or Course Appresioner \$11,118,102 x 4070 121,202 ...Fr. \$ 36.69 ADDISTRO MAXINUM RATE ACTIVITY (PAL MULLICURIE) Believer marine street 23.77 APPLICATION OF COLUMN ARRISMENT 1,872,863 ARTHUR MORILLIA SOME £3.57

Response to Staff Data Request No. 12

Request: For this calculation please use the same date as Straff Request No. 11 except treat the additional volume and activity as extraordinary volumes using the proposed esetraordinary volume adjustment as reflected on Ethibit 110. Please supply all workpapers showing the assumptions and the supporting calculations.

#### Response:

Writness: Robert L. Ash

The rate paid per cubic foot by the customer making time extraordinary volume delivery would be \$23.05. The mmaximum rate per cubit foot would be reduced from \$44.78 to \$40.21. Calculations are shown on the attached cubickpaper.

Higher levels of activity are not subject to the Ecktraordinary delivery mechanism, as described at TDages 22-23 of Exhibit T-9.

ASSUMPTIONS: (1) NORME VOLUME OF 100,000 ! URLE FRAT;
(2) PRAKEMENT RATE OF \$44.78; (3) PRAS COST RATE OF 97%
AND (4) EXTRACIONALE COMMENT ALLIERY SE 21, 202 CU FT.

BY CUSTOMER X.

ALLOGATION OF EXTRAORAMEN GELLERY:

Pote whome or 21,200 in Et. 15 proper mo two early.

Anca among Cosane X:

1960 cour. of 866.78

8474,712

19,001 co. et. (2 \$44.13 x (1 - 27)

(6 \$1.34

14,205

Averson me for our cosu for By Lusanes X

\$23.00

•	SUBSBOURNE REQUESSE IN MAXIMUM RATE .	ion Au Custon	MS:
	(0,60) LUBIC FRET IN EXMINISIONAL	rry voivne	
· · · · · · · · · · · · · · · · · · ·	100,000 (URIC MEET IN NORMAN SIS	POSM SITE VOLU	ma puwary
	110,601 CUBIC PERENT TONIN WOLLOW		
• =		·	
	ROVENIA PARIMEMENT FOR VOLUME	CHANGES	
	811, (18, 102 x 4076 =		,
	•		
	Now Marion none son circ voor		
	\$4,447,240= 110,601		840.21
		*** ***	
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		-	WWW
		**	
• • •			

Response to Staff Data Request No. 13

Request: For this calculation assume that the Commission sets rates based on the actual volumes and activity leevels received during the test period.

- (1) What would be the rate for volume and what would be the rate for activity? Please supply any assumptions and workpapers used to determine these rates.
- (2) What would be the rate for volume and activity if actual volumes and activity were as the commany estimated using the proposed volume adjustment as reflected on Exhibit 16. Please supply all workpapers showing the assumptions and the supporting calculations.

#### Response:

Witness: Robert L. Ash

- (1) Rate for volume would be \$36.69. (\$11,118, $\pm$ 02 revenue requirement x 40%  $\div$  121,202 cu.ft.
  - Rate for activity would be \$3.57 per millicurie. (\$11,118,102 revenue requirement  $\times$  60%  $\div$  1..870,803 millicuries.)
- (2) If actual volumes and activity were as the company forecasted, no change in rates would be required by the volume adjustment.

Response to Staff Data Request No. 14

Request: Exhibit 14, Schedule B shows Surcharges and Other Special Charges. However, the pro forma revenue for this proceeding which produces \$11,191,110 does not include any revenues for these surcharges and other special charges.

- (1) Please explain why no revenues are shown for these surcmarges and special charges in the pro forma calculation of rates.
- (2) Based on the test period and the volumes and activity generated by the Northwest Compact, that is, the 121,202 cubic feet and the 1,870,803 millicuries of activity and the actual shipments received and the actual services performed, what would the revenues be at the rates proposed on Exhibit 14, Schedule B.

#### Response:

Witness: Richard E. Sauer

- (1) The services indicated on Schedule B are performed infrequently, and the revenue generated therefrom cannot be predicted reliably. Moreover, provision of the services on Schedule B typically require the company to incur incremental costs, and the rates generally are set so as to recover these incremental costs. Recovery of the overall revenue requirement is therefore not dependent upon performing an assumed level of Schedule B special services.
- (2) During the test period, revenue from services included on Schedule B provided only about 3% of the company's total revenue. Actual shipments received during the test period included approximately sixty casks, 4 Poly HICS, approximately 300 Heavy Objects of about 10,000 pounds each, and about 9,000 grams of Special Nuclear Material.

Response to Staff Data Request No. 15

Request: During the staff visit to the Richland site on April 27,1992, a copy of invoice 62643 dated January 8, 1991, was obtained which related to Teledyne Isotopes Radiological. This invoice shows three different rates for the disposal of Radioactive waste. The three items and their rates are as follows:

(1) Solid Rad Waste \$32.11 per cubic foot;

(2) Vials \$39.65 per cubic foot; and

(3) Biological \$34.13 per cubic foot.

As Exhibit 14 only shows one rate does this mean that the company will only be charging one rate for all three types listed above or does it mean that vials and biological will not be accepted after January 1, 1993.

#### Response:

Witness: Richard E. Sauer

The company will continue to accept vials and biological waste after January 1, 1993, but will charge the same rate as for solid rad waste.

# PERKINS COIE

A Law Partnership Including Professional Corporations

One Bellevue Center, Suite 1800 • 411-108th Avenue Northeast • Bellevue, Washington 98004

Telephone: (206) 453-6980

May 21, 1992

Ms. Julia Parker
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-8002

Re: Docket No. TG-920234 Staff Data Requests 16-35

Dear Ms. Parker:

Enclosed are US Ecology's responses to Staff data requests 16 through 35 in the above proceeding.

Please contact Barry Bede at (206) 754-3733 if you have questions with respect to any responses.

Very truly yours,

James M. Van Nostrand

JMV:goc Enclosures

cc: Barry C. Bede

Brad Dillon

Melvin Hatcher (Washington Public Power

Supply System)

J. Jeffrey Dudley (Portland General Electric)

James C. Paine (Precision Castparts) Rich Williams (Teledyne Wah Chang)

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Response to Staff Data Request No. 16

Request: Provide price lists for services at US Ecology, Inc.'s low-level radioactive waste (LLRW) dump site at Beatty, Nevada covering the period 1965 to present.

#### Response:

Witness: Richard E. Sauer

The Company has not retained price lists for all services provided by the Company since 1965. Attached are the price lists which are available, which show disposal rates since April 1975.

Q-16

# Beatty, Nevada Low-Level Radioactive Waste Disposal Facility

: 5-21-92 : 1:46PM :

**Schedules of Charges** For the Period April 1, 1975 Through March 1, 1992



# Nuclear Engineering Company, Inc. 9200 SHELBYVILLE ROAD, SUITE 526 - P.O. BOX 7246

LOUISVILLE, KENTUCKY 40207 PHONE (502) 426-7160

April 1, 1975

#### Dear Customer:

Effective April 1, 1975, the following disposal charges will be in effect for the Nevada Nuclear Center and the Washington Nuclear Center. These prices are f.c.b. the respective site.

Radiation Levels	Charge
0 - 200 mm/nm	<b>\$1.7</b> 5
201 - 999 mr/hr	2.25
1 R - 2 P/hr	3.00
2.001 - 5 R/hr	3.75
5.001 - 10 R/hr	4 - 50

Prices for higher radiation levels will be given upon request.

Attached for your files are License Limits and Requirements for both Nuclear Centers.

If you desire any additional service, please do not hesitate to call.

Yours very truly,

NUCLEAR ENGINEERING COMPANY, INC.

B. V. Roberts Vice President - Corporate Sales

BVR/jf Enclosure ROV BY: PERMINS COIE

# MUCLEAR ENGINEERING COMPANY, INC.

#### Beatty, Nevada Pacility

#### SCHEDULE OF CHARGES

1. Disposal Charges - Solid

a: By-product material:

R/RR at Container Surface

Price Per Cu. Ft.

0.00 - 0.20 0.21 - 1.00 1.00 - 2.00

\$ 2.50 2.75

From 2 R/hr to 150 R/hr: \$3.00 per cubic foot plus \$0.20 per R/hr per cubic foot.

S. Disposal Charges - Liquido

For solidification Bulk Shipments:

\$ 3.00/gallon By Request

b. Scintillation vials:

\$ 3.00/cu.ft.

c. Absorbed liquids:

\$ 2.50/cu.ft.

3. Surcharge for heavy objects:

a. Crane: Less than 10,000 lbs: 10,001 lbs. and greater:

No Charge

\$ 50.00 plus \$0.01/1b.

7. fling:

\$100.00 per use

. Curie Surcharge:

0 - 100 curies 101 - 300 curies

301 and over

No Charge

\$300.00 per container \$300.00 per container plus \$0.05 per curie

5. Minimum charge per shipment:

\$ 75.00

Cask handling fee:

\$200,00

7. Unirradiated Special Nuclear Materials, subject to liconse limits:

By Request

3. Irradiated Special Nuclear Materials, subject to license limits:

By Request

i. Surcharge for man-Rem exposure because of design or physical container defect:

\$ 3.00/msn/m\_12irem

## NUCLEAR ENGINEERING COMPANY, INC.

### BEATTY, NEVADA FACILITY

#### SCHEDULE OF CHARGES

## 1. DISPOSAL CHARGES - NON-TRANSURANIC WASTE

#### A. \_Steel drums, wood or fiber boxes

	R/HR AT CONTAINER SURFACE		PRICE PER CU. FT.
	0.00 - 0.20		\$ 2.65
•	0.20 - 1.00		3.00
	1.01 - 2.00		3.50
	2.01 - 5.00		4.55
	5.01 - 10.00		5.60
	10.01 - 20.00	·	<b>7</b> .60
	20.01 - 40.00		10.05
	40.01 - 60.00		15.50
	50.01 - 80.00		19.10
	80.01 -100.00	•	21.00
	Over -100.00		By Request
В.	DISPOSABLE LINERS	STROTT LD OF	
	FIRE AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PUR CU. FT.
	0.00 - 0.20	NONE	\$ 2,e5
	e.20 - 1.00	\$ 50.00	2.65 -
	1.01 - 2.00	125.00	2.95
	2.01 - 5.00	175.00	2 35
	5.01 - 10.00	250.00	2.65
	10.01 - 20.00	\$25.00	<b>2</b> . 6 <b>5</b>
	20.01 - 40.00	4G0.00	2.65
	40.01 - 60.00	475.00	2.65
	6C.01 - 80.00	550.00	2.65
		AAC AA	41 A 7

#### J. MINIMUM DISPOSAL CHARGE

80.01 -100.00

Over -100.00

\$100.00/mhipment

2.65

By Request

D. Radiation readings are maximum generated at surface of the burial container, irrespective of physical size or configuration.

625.00

# II. JURCHANIE(8)

# A. ( MIE SURCHARGE (PER LOAD)

1.	Zero	_	100 curies
£.	101	res.	300 curies
	301		Ideanse Limits

\$300.00 \$300.00 plus \$0.05 per cl

No Charge

GCITT G3→

B. Man-rom exposure (because of design or physical defect of container or shield)

\$3.00 per man/millirom

2064537350;# 1

C. Biological (on containers which are not sealed vapor tight.)

5:5B/cu. ft.

# D. TORANE

1. 0 - less than 10,000 lbs.

2. 10,000 to limit of site equipment

No Charge \$50.00 plus 10/1b. above 10,000 lbs. By special quotation

3. Special equipment

# E. SPECIAL SLINGS

Each use

\$100.00

T. Minimum charge for unloading a shielded container.

\$200.00

# II. LIQUID RADIOACTIVE WASTE MATERIAL

## A. FOR SOLIDIFICATION

In small quantities

Bulk shipments in Spec. tanker 2.

\$3.00/galicn Special quotation

### B. FOR BURIAL

1. Scintillation vials

\$3.15/cu.ft. \$2.65/cu.ft.

2. Absorbed liquids

Small quantities (no more than one gallon per inner container)

\$3.15/cu.ft.

# V. SPECIAL QUOTES

Unirradiated Reactor Components (non-fuel)

B. Irradiated Reactor Components (non-fuel)

C. Chemical Waste, non-radioactive, at Beatty, Nevada only.

# Normal site unloading hours (excluding weekends, holidays and special arrangments.)

A. Daily: October through April May through August 8:00 a.m. to 4:30 p.m. 6:00 a.m. to 2:30 p.m. September through October 7:00 a.m. to 3:30 p.m.

Questions regarding packaging and site possession limits may be directed to our Mestern Headquarters, (415) 837-1561.

Nuclear Engineering Company reserves the right to change the foregoing price schedule and site hours.

Effective: September 1, 1977

51/2

# MUCLEAR ENGINEERING COMPANY, INC.

## Beatty, Nevada Facility

## SCHEDULE OF CHARGES BADIOACTIVE WASTE

#### 1. Disposal Charges:

#### A. Solid Material

Steel-Drums, Wood Boxes, Liners:

B/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00 5.01 - 10.00 10.01 - 20.00 20.01 - 40.00 40.01 - 60.00 60.01 - 80.00 80.01 - 100.00	\$ 4.75 5.20 5.80 7.10 8.40 10.85 13.85 20.60 24.85
Over 100.00	27.30 By Request

Disposable Liners Removed From Shield:

4 HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00 5.51 - 10.00 10.61 - 26.00 20.01 - 40.00 40.01 - 60.00 60.01 - 80.00 80.01 - 100.00 Over 100.00	No Charge \$ 65.00 160.00 225.00 325.00 415.00 515.00 610.00 705.00 800.00	\$ 4.75 4.75 4.75 4.75 4.75 4.75 4.75 4.75
	Py Request	By Request

#### B. Siguid Material

Scintillation Viels

\$ 6.50 per ou. ft.

#### to Strenge For heavy Objects:

Less nam 10,000 pounds 35,00 pounds to Capacity of Site Equipment

No Charge \$ 50.00 plus \$.01 per 1b. above 10,000 lbs.

For Salmierge For Curies (Per Load)

mes than 100 curies .0? - 300 curies sol - License Limits

### Charge \$ 375.00 \$ 375.00 plus \$.05 per curie

4 Succearge For Eiological Timeus Faste on Containers which are not scaled apor tight

\$ 2.50 per cu. ft.

5. Einimum Charge Per Shipment:

\$150.00

6. Cank Handling Fee:

\$250.00 minimum esch

 Unirradiated Special Nuclear Naterials, subject to license limits;

By Request

8. Erradiated Special Nuclear Materials, subject to dicense limits:

By Request

# SCHEDULE OF CHARGES

#### Page 2

- 5-21-82 , 1:50PM -

B. Plutonium, Transuranics:

NONE ACCEPTED

10. Surenerge for non-routine man-Rem exposure (due to design or physical defect of container or shield):

\$ 7:50 per mas %11lirem

11. Description Services (if required):

\$27.00 per man hour plus supplies at cost plus 15%

12. Container Volumes:

72.5

55 Gallon Drums - 7.50 cu. ft. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

Prices Effective June 1, 1978

2084537350;#10

#### NUCLEAR ENGINEERING COMPANY, INC.

# WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER

#### SCHEDULE OF CHARGES RADIOACTIVE WASTE

#### L. Disposal Charges

A. Solid Material

Steel Drums, Wood Boxes, Liners:

R/HE AT CONTAINER SURFACE	PRICE PER CU. FT.	
0.00 - 0.20	<b>\$ 5.75</b>	
0.201 - 1.00	<b>6.3</b> 0	
1.01 - 2.00	7.05	
2.01 - 5.00	8.60	
5.01 - 10.00	10.15	
10.01 - 20.00	13.15	
20.01 - 40.00	16.75	
40.01 - 60.00	24.95	
60.01 - 80.00	30.10	
BO.01 - 100.00	33.05	
Over 100.00	By Request	

Disposable Liners Removed From Shield:

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 5.75
0.201 - 1.00	\$ 78.65	5.7 <b>5</b>
1.61 - 2.00	193.60	5.75
2.01 - 5.00	272.25	5.75
<b>5.01 - 10.0</b> 0	393.25	5.75
10.01 - 20.00	502.15	- , 75
20.01 - 40.00	623.15	- 5
40.01 - 60.00	738.10	5 15
<b>50.01 - 80.00</b>	853.05	5.75
80-01 - 100.00	968.00	5.75
Over 100.00	By Request	By Request

- 5. Odintillation Vials \$7.90/cu.ft.
- ". ;iological daste \$6.30/cu.ft.
- "Asposal Charges Transuranic Material By Request (Washington Only)

Surmarge For Heavy Objects:

THUS than 10.300 pounds
13,002 pounds to Capacity of Site Equipment

No Charge \$ 60.00 plus \$.01 per 1b. above 10,000 lbs.

4. Suitharge For Curies (Per Load):

Le-s than 100 curies - 300 curies
361 - License Limits No Charge \$ 455,00 \$ 455.00 plus \$.06 per curic

5. A rimum Charge Per Shipment:

\$ 180.00

.xsk Handling Fee:

\$ 300.00 minimum each

SCHEDULE OF CHARGES Page 2

Unirradiated Special Nuclear Materials, subject to license limits:

Trradiated Special Nuclear Materials, subject to license limits:

3. Surcharge for non-routine man-Rem exposure (due to design or physical defect of container or shield):

Decontamination Services (if required)

.. Container Volumes:

55 Galien Drums - 7.50 tu. ft. 20 Gallen Brums - 4.01 eu. ft. 5 Gallen Drums - 0.67 eu. ft.

ices Effective October 15, 1979

By Request

By Request

\$ 8.50 per man millirem

\$30.00 per man hour plus supplies at cost plus 15%

2064637350;#11

#### NUCLEAR ENGINEERING COMPANY, INC.

# WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIDACTIVE WASTE

#### 1. Disposal Charges

#### A. Solid Material

Steel brung, Wood Boxes, Liners:

B/HR AT CON	TAI	NER SURFACE	PRICE PER CU. FT.
0.00	_	0.20	\$ 7.75
0.201	-	1.00	\$. <b>5</b> 0
1.01	-	2.00	9.5C
2.01	-	5.00	11.60
5.01	_	10.00	13.70
10.61	-	20.00	17.75
20.01	_	40.00	22.60
40.61		60.00	33.70
60.01	-	80.00	40.65
80.01	•	130.00	44.65
Qver	20	0.00	By Request

Disposable Liners Removed From Shield:

RIFE AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00	No Charge 5 106.00 261.00 367.00	\$ 7.75 7.75 7.75 7.75 7.75
5.01 - 10.00 10.01 - 20.00 20.01 - 40.00 40.01 - 60.00 60.01 - 80.00	530.00 677.00 840.00 996.00	7.75 7.75 7.75 7.75
80.01 - 100.00 Over 100.00	1,150.00 1,306.00 By Request	7.75 7.75 By Request

- E. Liquid Scintillation Vials \$10.25/Cu. ft.
- C. Biological Waste, Animal Carcasses \$ 6.45/cu. ft.
- 2. Surcharge For Heavy Objects:

Less than 10.000 pounds No Charge 10.001 pounds to Capacity of Site Equipment \$ 78.00 plus \$.02 per 15. above 10.000 lbs.

3. Surcharge For Curies (Per Load):

- 4. Minimum Charge Per Shipment:
- 5. Cask Mandling Fee:
- E. Waste Containing Chelating Agents in Packages Amount Greater than 11 of Package Volume:
- Surcharge for Non-routine Man-Rem Exposure (due to design or physical defect of container or shield):
- 8. Decontamination Services (if required)
- 9. Container Volumes:

55 Gailon Drums - 7.50 cu. ft. 30 Gailon Drums - 4.01 cu. ft. 5 Gailon Drums - 0.67 cu. ft. \$11.00 per man millirem

\$ 300.00 minimum each

\$ 200.00

By Request

\$40.00 per man hour plus supplies at cost plus 15%

Prices Effective March 1, 1980

# WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER

# SCHEDULE OF CHARGES RADIOACTIVE WASTE

- 1. Disposal Charges
  - A. Solid Material

Steel Drums, Wood Boxes, Liners:

R/HR	AT CON	TAI	NER SURFACE	PRICE PER CU. PT.
	0.00	_	0.20	8 1.70
	0.201	-	1.00	9.50
	1.01	-	2.00	10.65
	2.01	-	5.00	13.00
	5.01	_	10.00	15,35
	16.01	-	20.00	19.50
	20.01	-	40.00	24.65
	40.01	_	60.00	37.75
	6D.01	-	80.00	45,35
	30.01	_	100.00	50.00
	Over			By Request

Disposable Liners Removed From Shield:

R/HP AT CONTAINER SURFACE	SURCHARCE PER LINER	PRICE PER CU. FT.
6.00 - 0.20	No Charge	\$ 8.70
8.201 - 1.00	\$ 119.00	B.70
1.01 - 2.00	292.00	8.70
2.01 - 5.00	411.00	8.70
5.01 - 10.00	594.00	8.7¢
10.01 - 20.00	758.00	\$.70
20.01 - 40.00	941.00	8.70
40.01 - 60.00	1,116.00	E.70
60.01 - 80.00	1,288.00	8.70
80.01 - 100.00	1,463.00	8.70
Over 100.00	By Raquest	By Request

- \$11.50/qu. ft. B. Liquid Scintillation Vials
- C. Biological Waste, Animal Carcasses \$ 9.50/cu. ft.
- D. State of Weshington Surcharge
- 80.30/cu, ft.
- 2. Surcharge For Heavy Objects:

Less than 10,000 pounds 10,001 pounds to Capacity of Site Equipment

No Charge \$87.50 plus \$.02 per 1b. above 10,000 lbs.

3. Surcharge For Curies (Per Load):

Loss than 100 curies 101 - 300 curies 301 - License Limits

- 4. Minimum Charge Per Shipment:
- 5. Cask Handling Fee:
- Waste Containing Chelating Agents in Fackages Amount Greater than 11 of Fackage Volumes
- 7. Suzcharge for Non-routine Man-Rem Exposure (due to design or physical defect of container or shield):
- 8. Decontamination Services (if required)
- a. Container Volumes:

55 Gallon Drums - 7.50 cu.ft. 30 Gallon Drums - 4.01 cu.ft, 5 Gallon Drums - 0.67 cu.ft.

\$ 660.00 \$ 660.00 plus \$.09 per curie

\$ 224.00

No Charge

\$ 335.00 minimum each

By Request

- \$ 12.35 per man millirem
- \$ 45.00 per man hour plus supplies at cost plus 15%

: 5-21-92 ; 1:52PM ;

# MENNY WITH COUNTY

#### Schedule of Charges

#### Andioactive Waste

- 1. Disposal Charges
  - A. Solid Material

Steel Drums, wood Boxes, Liners:

A/HR AT CONTAINER SURFACE			NER SURFACE	PRICE PER CU. PT.	
-	0.00	0.20		# # £5	<b>9.</b> 65
	0.301		1.00	•	10.50
	1.01	-	2.00		11.80
	2.01	-	5.00		14.40
	5.01	-	10.00		17.00
	10.01	_	20.00		22.05
	20.61	-	40.00		27.35
	40.01	-	60.00		41.90
	6C.G)	-	8C.00		50.30
	80.31	-	100.00		55.50
	Over	10	D.00	Ву	Request

Disposal Liners (Over 12.0 Cubic Feet; Removed from Shield:

R/HR AT CONTAINER SURFACE	SURCHARGE FER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	s S.65
0.201 - 1.00	\$ 132.00	9.65
1.51 - 2.00	324.00	9.65
2.01 - 5.00	456.00	9.65
5.01 - 10.00	659.00	9.65
10.01 - 20.00	841.00	9.65
20.01 ~ 49.00	1,045,00	9.65
40.01 - 60.00	1,239,00	9.65
<b>60.01 -</b> 60.00	1,430.00	9.65
80.01 - 100.00	1,624.00	9.65
Over 100.00	By Request	By Request

E. Liquid Scintillation Vials

\$12.75/eu. ft.

C. Elological Waste, Animal Carpasses

\$10.50/cu. ft.

1. Surcharge For Heavy Objects:

Less than 10,000 points 10.00% pounds to Capetaty of Site Equipment No Charge \$100.00 plus 8.05 per 1b. above 10.000 lbs.

1. Surcharde For Curies (Per Load):

Less than 100 curies 101 - 300 curies 301 - License Limite No Charge \$ 730.00 By Request

4. Nitimum Charge Per Shipment:

\$225.00

D. Cask Handling Fee:

\$370.00 minimum each

6. Waste Containing Chelating Agents an Peckages Amount Greater than 1% of Package Volume:

By Request

". Surcharge for Non-routine Non-Sen Exposure idue to design or physical defect of container or shield):

S 13.75 per man millirem

001554

2. Decontamination Services (if required)

\$ 50.00 per man hour plus supplies at cost plus 15%

9. Container Volumes:

55 Gallon Drums - 7.50 cu.ft. 30 Gallon Erums - 4.01 cu.ft.

Ballevuel# 4 CCITT G3-

: 5-21-92 : 1:53PM :

US Ecology, inc. 3700 Shelbyline Road, Julio 126 P O. Box 7246 Lawisville, Kentucky 40297 502 426-7160

#### US ECOLOGY NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

54.

- 1. DISPOSAL CHARGES
  - A. SOLID MATERIAL

Steel Drums, Wood Boxes:

RIHR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 15.85
6.201 - 1.00	17.20
1.01 - 2.00	19.35
2.01 - 5.00	23.60
5.01 - 16.00	27.90
10.01 - 20.00	36.15
20.01 - 40.00	44.85
40.01 - 60.00	58.70
60.01 - 80.00	82.50
80.01 - 100.00	91.00
Cver 103.00	By Request

Disposable Liners Removed from Shield:

E/HR AT CONT	TAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.	
0.00	- 0.20	No Charge	\$ 15.85	
0.201	- 1.00	\$ 216.CC	15.85	
1.01	- 2.00	531.00	15.65	
2.01	- 5.00	748_OC	15.85	
5.01	- 10.00	1,081.00	15.85	
10.01	- 20.00	1,379.60	15.65	
25.01	- 40.00	1,714.00	15.85	
40.01	- 60.00	2,032.00	15.85	
60.01	- 80.00	2,345.00	15.85	
80.01	- 100.00	2,663.00	15.85	
Over	100.00	By Request	By Request	

E. Liquid Scintillation Vials

\$20.90/cu. ft.

C. Biological Waste, Animal Carcasses \$17.20/cu. ft.

2. EURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,001 pounds to Capacity of Site Equipment

: 5-21-92 : 1:53PM :

No Charge \$165.00 plus \$.08 per ib. above

10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

\_\_ Zess than 100 curies \_ 101 = 300 curies 301 - License Limits

No Charge \$1,200.00 plus 150/Ci above 100 Ci By Request

4. MINIMUM CHARGE PER SHIPMENT:

\$370.00

5. CASK MANDLING FEE:

\$610.00 minimum each

6. KASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1% OF FACKAGE VOLUME:

By Request

7. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CCNTAINER OR SHIELD):

\$22.55 per man millirem

8. DECONTAMINATION SERVICES (If required)

\$82.00 per man hour plus supplies at cost plus \$15%

9. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cc. ft. 20 Gallon Drums - 4.01 cu. ft.

5 Gallon Drums - 0.67 cu. ft.

- 10. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State, and Local laws, rules and regulations and shall be in compliance with all limense requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- 11. This Schedule of Charges is subject to change solely upon notice by US Ecology.

Effective January 17, 1983

US Ecology Inc. 9200 Shalbyville Road, Suite 300 D.O Box 7246 Louizville, Kentucky 40207 302 426-7160

#### US ECOLOGY NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

EFFECTIVE: January 16, 1984

- 1. DISPOSAL CHARGES
  - A. SOLID MATERIAL

Steel Drume, Wood Boxce:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT	
0.00 - 0.20	\$ 17.85	
0.201 - 1.00	19.37	
1.01 - 2.00	21.79	
2.01 - 5.00	26.58	
5.01 - 10.00	31.42	
10.01 - 20.00	40.71	
20.01 - 40.00	50.51	
40.01 - 60.00	7/.37	
60_01 - 80.00	92.91	
80.01 - 100.00	102.48	
Over 100.00	By Racuest	

Disposal Liners Removed from Shield: (Greater than 12.0 cu.ft. cach)

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PAR CU. FT.
0.00 - C.20	No Charge	\$ 17 85
0.201 - 1.00	\$ 243.00	17.85
1.01 - 2.00	598.00	17.85
2.01 - 5.00	842.00	17.85
5.01 - 10.00	1,217.00	17.85
10.01 - 20.00	1,553.00	17.85
20.01 - 40.00	1.930.00	17.85
40.01 - 50.00	2,288,00	17.65
60.01 - 90.00	2,641.00	17.25
80.01 - 100.00	2,999.00	17.85
Over 100.00	By Request	By Request

- B. Liquid Scintillation Vials
- \$23.55/cu.ft.
- C. Biological Waste, Animal Carcasses \$19.40/cu.ft.

2. SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,001 pounds to Capacity of Site Equipment No Charge \$186.00 plus \$.09 per 1b. above 10.000 1bs.

3. SURCHARGE FOR CURIES (Per Load):

Less than 100 ouries 101 - 300 ouries 301 - License Limits No Charge \$1,351.00 plus 17r/Ci above 100 Ci By Request

4. MINIMUM CHARGE PER SHIPMENT

\$420.00

5. CASK HANDLING FEE:

\$690.00 minimum each

6. WASTE CONTRINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1% OF PACKAGE VOLUME:

By Request

7. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD):

\$25.40 per man millirem

8. DECONTAMINATION SERVICES (If required)

\$92.35 per man hour plus supplies at cost plus \$15%

9. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu. ft.

30 Gallen Drums - 4.01 cu. ft.

5 Gallon Drums - 0.67 cu. ft.

- 10. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal. State, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty. Nevada disposal facility.
- 11. This Schedule of Charges is subject to change solely upon notice by US Ecology.

US Ecology Inc \$200 Shalbyville Reed, Suite 626 P.O. Son 7246 Louisville, Keniucay 40207 508 426-7160

#### DS ECOLOGY NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

EFFECTIVE: December 9, 1985

BB . JVU9 I# 0

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Dryms, Wood Boxes:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 20.61
0.201 - 1.00	22.34
1.01 - 2.00	25.09
2.01 - 5.00	30.02
5.01 - 10.00	35.43
10.01 - 20.00	45.82
20.01 - 40.00	56.7?
49.01 - 60.00	86.29
60.01 - 80.00	103.55
80.01 - 100.00	114.19
Over 100.00	By Request

Disposal Liners Removed from Shield: (Greater than 12.0 cu.ft. each)

R/HR AT C	ONTAIN	ER SURFACE	BURCHARGE PER LINER	PRICE PER CU. FT.
0.0	0 -	C.20	No Charge	\$ 20.61
D.3	01 -	1.00	8 271.72	20.61
1.0	1 -	2.00	668.54	20.61
2.0	1 -	5.00	940.98	20.61
5.0	1 -	10.00	1,360.17	20.61
10.0	1 -	20.00	1,735.76	20.51
20.0	1 -	40.00	2,156.95	20.E1
40.0	1 -	60.00	2,557.19	20.61
60.5		90.00	2,951.50	20.61
80.0	<b>.</b> ~	100.00	3,351.84	20.51
C1	ver 10	0.00	By Request	by Request

Biological Waste, Animal Carcasses \$22.37/cm.ft.

#### (CONTINUED PROM PREVIOUS PAGE)

2. EURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,001 pounds to Capacity of Site Equipment No Charge \$214.00 plus \$.10 per 1b. above 10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

Less than 100 curies 101 - 300 curies

301 - License Limits

\$1,554.GO plus 20c/ci above 10C Ci.

By Request

No Charge

4. MINIMUM CHARGE PER SHIPMENT

\$483.00

5. CASK HANDLING FEE:

\$794.00 minimum each

5. WASTE CONTAINING CHELATING AGENTS IN PACKAGES
AMOUNT GREATER THAN 1% BY WEIGHT: :

By Request

7. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD):

\$29.21 per man millirem

3. DECONTAMINATION SERVICES (If Required)

\$106.20 per man hour plus supplies at cost plus 15%

9. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu. ft. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

- 10. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- 11. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective December 9, 1985 | Nevada Nuclear Center US Ecology, Inc.
\$200 Shelbyville Rosc, Susa 300
P.C. Box 7245
Lausville, Kermucky 40207
502 426-7160

# US ECOLOGY MEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

.....

EFFECTIVE: August 17, 1987

an American Ecology company

#### 1. DISPOSAL CHARGES

- A. SOLID MATERIAL
  - i. Packages 12.0 cu.fc. each or less

R/RR AT CONTAINER SURFAC	PRICE PER CU.PT
0.00 - 0.20	\$ 25.61
0.201 - 1.00	27.35
1.01 - 2.00	28.85
2.01 - 5.00	29.75
5.91 - 10.00	34.25
10.G1 - 20.00	42.10
20.01 - 40.00	49.50
Over 40.00	By Request

ii. Disposal Liners Removed from Shield: (Greater than 12.0 ou.fr. each)

R/BR AT CONT	AINER SURFACE	SURCHARGE PER LINER	PRICE PER CU.PT.	
0.00	- 0.20	No Charge	\$ 26.61	
0.201	- 1.00	\$ 125.00	26.61	
1.01	- 2.00	201.60	26.61	
2.01	- 5.00	282.60	28.61	
5.01	- 10.00	687.60	26.61	
18.81	- 20.00	1,394.10	26.51	
20.01	- 40.00	2,060.10	26.61	
Qvar	40.00	By Request	By Request	

B. BIOLOGICAL WASTE, ANIMAL CARCASSES

\$28.37/cu.ft.

(Continued)

#### (Continued from previous page)

2. SURCEARGE FOR SEAVY OBJECTS:

10,001 pounds to capacity of site equipment

No Charge \$214.00 plus \$.10 per lb. above 10,000 lbs.

3. SURCHARGE POR CURIES (Per Load):

Less than 100 curies 101 - 300 curies

\$1,554.00 plus 20¢/Ci above-100 Ci. By Request

301 - License Limits

5. CASK MANELING PEE:

\$483.00

No Charge

4. MINIMUM CHARGE PER SEIPMENT

\$550.00 minimum each

6. WASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 18 BY WEIGHT

By Request

7. SURCHARGE POR HONROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD):

\$29.21 per man millirem

8. DECONTAMINATION SERVICES (If Required)

\$106.20 per man hour plus supplies at cost plus 15%

9. CONTAINER VOLUMES:

55-Gallon Drums - 7.50 cu.ft. 30-Gallon Drums - 4.01 cu.ft. 5-Gallon Drums - 0.67 cu.ft.

- 10. All waste material shall be properly classified, described, packaged, marked, labeled and certified in accordance with all applicable federal, state and local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at Beatty, Nevada disposal facility.
- 11. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

US Ecology, Inc. \$200 Shebyville Pland, Salte 300 P.D. Box 7245 Lexieville. Kentucky 40207 502/428-7150

#### US ECOLOGY NEVADA NUCLEAR CENTER ECHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

an American Ecology company

EPFECTIVE: January 18, 1988

#### 1. DISPOSAL CHARGES

- A. SOLID MATERIAL
  - i. All Disposal Packages (except those in item A(ii) below):

R/HR AT CO	YTAINER SURFACE	PRICE PER CU. FT.
0.00	- 0.20	\$28.36
0,201	- 1.00	29.10
1.01	- 2.00	30,60
2.01	- 5.00	31.50
5.01	- 10.00	36.00
10.01	- 20.90	43.85
20.01	- 40.00	51.25
Over	40.00	By Request

ii. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Pt. Each)

R/HR AT CO	NIATN	ER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00	_	0.20	No Charge	\$28.36
0.201	<b>.</b> -	1.00	125,00	28.36
1.01	_	2.00	201.60	25,36
2.01	_	5.00	282.60	28.36
5.01	_	10,00	637.60	28.36
10.01	_	20.00	1,394.10	28.36
20.01	_	40.00	2,060.10	28.36
	/er 40	.00	By Request	By Request

B. BIOLOGICAL WASTE, ANIMAL CARCASSES

\$30.12/cu.ft.

C. ABSORBED AQUEOUS LICUIDS

\$28.36/cu.ft.

D. ABSCREED AQUECUS VIALS

\$28.36/cu.ft.

as erue:#13

#### (CONTINUED FROM PREVIOUS PAGE)

SURCHARGE FOR HEAVY OBJECTS: 2.

> Less than 10,000 pounds TO,000 pounds to capacity of Site Equipment

No Charge \$214.00 plus \$.10 per 1b. above 10,000 lbs.

SURCHARGE FOR CURIES (Per Load) 3.

> Less than 100 curies 100 - 300 caries 301 - License Limits

No Charge \$1,554.00 blus 20£/61 above 100 Ci By Request

MINIMUM CHARGE PEP SHIPMENT 4.

\$485.00

CASE HANDLING FEE: 5.

£550.00 minimum each

WASTE CONTAINING CHELATING AGENTS IN PACKAGES é. AMOUNT GREATER THAN 1% BY WEIGHT:

By Request

SURCHARGE POR NON-ROUTINE MAN-REM EXPOSURE 7. (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$29.50 per man milliren

DECONTAMINATION SERVICES (If Required)

\$106.20 per man hour plus supplies at cost plus 15%

CONTAINER VOLUMES: 9.

> 55 Gallon Drums - 7.50 cu. ft. 38 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

- All waste material shall be properly classified, described, packaged, marked. 10. labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- This Schedule of Charges does not constitute an offer of contract Which 11. is espable of being accepted by any party and is subject to change sciely upon notice by US Ecology.

Effective January 18, 1986 Nevada Nuclear Center

US Ecology, Inc. 8800 Shelpyville Read, Suite 300 P.O. Box 7246 Louisville, Kantucky 40207 502/496-7160

#### US ECOLOGY NEVADA NUCLEAR CENTER SCREDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

EFFECTIVE: August 1, 1989

- 1. DISPOSAL CHARGES
- A. SOLID MATERIAL
  - i. All Disposal Packages (except those in item A(ii) below):

R/BR AT CO	TAIN	ER SUMPACE	PRICE PER CU. PT.
0.00	-	0.20	<b>\$30.11</b>
0.201		1.00	30.85
1.01	-	2.09	\$2.35
2.01		5.00	33.25
5.01	-	10.00	37.75
10.01	-	20.00	45.60
20.01	_	49.00	53.00
Over	40.0	10	By Request

11. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

	P/HR AT CON	TAIN	ER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
	0.00	-	9.20	No Charge	\$30.11
	0,201	-	1.00	125.00	30.11
	1.01	-	2.00	201.60	30.11
	2.01	_	5.00	282,60	30.11
	5.01	-	10.00	687.60	30.11
	10.01		20.00	1,394.10	30.11
	20.01	_	40.00	2,060.18	30.11
	Ove	£ 40	.00	By Request	By Request
в.	BIOLOGICAL WAST	e, A	HIMAL CARCA	SSES	\$31.87/cu.ft.
c.	C. ABSORBED AQUEOUS LIQUIDS				\$30.11/cu.ft.
D.	D. ABSORBED AQUEOUS VIALS				\$30.11/eu.ft.

CONTINUED

#### 'CONTINUED FROM PREVIOUS PAGE!

SURCEARGE FOR BEAVY CHIECES: 2.

> Less then 10,000 pounds 10,000 pounds to Capacity of Site Equipment

No Charge \$214.00 plus \$.10 per 15. above 10,000 lbs.

SURCEARUS POR CURIES (Per Load) 3.

> Less than 100 curies 100 - 300 curies 301 - License Limits

No Charge \$1,554,00 plus 202/01 above 100 Ci By Request

Be evue.#15

MINIMUM CHARGE PER SHIPMENT 4.

2485.00

\$. CASK BANDLING PET: 4550.00 minimum each

MASTE CONTAINING CHELATING AGENTS IN PACKAGES 5. AMOUNT GREATER TEAN 1% BY WEIGHT:

SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE ADDE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

By Request

8. DECONTAMINATION SERVICES (If Required)

\$29.50 per man millirem \$106.20 per man hour plus supplies at cost plus 15%

= .

CONTAINER VOLUMES:

55 Gallon brums - 7.50 cu. ft.

30 Gallon Drums - 4.01 cu. ft.

5 Gallon Drums - 0.67 cu. ft.

- All waste material shall be properly classified, described, packaged, marked, 10. labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- This Schedule of Charges does not constitute an offer of contract which 11. is capable of being accepted by any party and is subject to change solely upon notice by 75 Scology.

Effective August 1, 1989 Nevada Muclear Center

US Ecology, Inc. 9200 Sheibywile Road. Suite 300 P.O. Box 7240 Louisnite, Kentucky 40207 502/425-7180

# US ECOLOGY NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES FADIOACTIVE WASTE

# **USEcology**

EFFECTIVE: May 1, 1990

\$30.11/c2.ft.

\$30,11/cc.ft.

an American Ecompy company

C. ABSORBED AQUIOUS LIQUIDS

D. ABSCRBED AQUEOUS VIALS

#### 1. DISPOSAL CHARGES

- A. SOLID MATERIAL
  - i. All Disposal Packages (except those in item A(ii) below):

E/HR AT CO	NTAINEF SURFACE	PRICE PER CU. FT.
0.00	- 9.26	\$30.11
J.201	- 1.60	30.85
1.01	- 2.90	32,35
2.01	- 5.00	33.25
5.01	- 10.00	37.75
10.01	- 20.00	45.60
20.01	- 40.30	53.00
Over	40.00	By Request

ii. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

P/HP AT CO	TAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. PT.
0.00	- 0.20	No Charge	\$30.11
0.201	- 1.00	125.00	30,11
1.01	- 2,50	201.60	30,11
2.01	- 5.00	282.60	30.11
5.01	- 10.00	687.60	30.11
10.01	- 20.00	1,394.10	30.11
20.01	- 40.00	2,060.10	30.11
Ove	1 40,00	By Request	By Request
B. BICLOGICAL WAS	TE, ANIMAL CARCA	.33ES	\$31.87/cu.ft.

CONTINUED

#### (CONTINUED PROM PREVIOUS PAGE!

2. SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,000-pounds to Capacity of Site Equipment No Charge \$214.00 plus \$.10 per 1b. above 10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load)

Less than 100 curies 100 - 300 curies 301 - License Limits No Charge \$1,554.00 plus 20d/Ci above 100 Ci By Request

4. MINIMUM CHARGE PER SHIPMENT

#485,60

5. CASK HANDLING FEE:

\$550.00 minimum each

5. WASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1% BY WEIGHT:

By Request

RADIUM SEALED SOURCES

By Request

8. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OF PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$29.50 per man millirem

9. DECONTAMINATION SERVICES (If Required)

\$105.20 per man hour plus supplies at cost plus 15%

10. CONTAINER VOLUMES:

35 Gallon Drums - 7.53 cu. ft. 30 Gallon Drums - 4.61 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

- 11. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- 12. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective May 1, 1990 Nevada Nuclear Center

B9: evusi#18

US Scalogy, Inc. \$200 Singleyville Aced, Sure 200 PO Sex 7246 Equation Kern 502/426-7150

#### US ECOLOGY NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIDACTIVE WASTE

## **USEcology**

EFFECTIVE: August 1, 1990

## DISPOSAL CHARGES

#### A. SOLID MATERIAL

i. All Disposal Fackages (except those in item A(ii) below):

R/HR AT C	ONTAIN	IER SURFACE	PRICE PER CU. F
0.00	_	0.20	<b>\$</b> 32,11
0.20	1 -	1_00	32.85
1.01	_	2.00	34.35
2.01	-	5.00	35.25
5.01	**	10.60	39.75
10.01	-	20.00	47.60
20.01	-	40.00	55.00
Die	r 40.0	۵	By Request

11. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

	R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
	0.00 - 0.20	No Charge	\$32.11
	0.201 - 1.00	125.00	32.11
	1.01 - 2.00	201,60	32.11
	2.01 - 5.00	282.50	32.11
	5.01 - 10.00	687,60	32.11
	CO.O2 - FO.O1	1,394.10	32.11
	20.01 - 40.00	2.060.10	32.11
	Over 40.00	By Request	By Request
8.	BIOLOGICAL WASTE, ANIHAL CARCAS	SSES	\$33.87/cu.ft.
٤.	ABSORBED AQUEOUS LIQUIDS		\$32.17/cu.ft.
Đ.	ABSORGED AQUEDUS VIALS		\$32.11/cu.ft.

**CONTINUED** 

Rei eyuei#18

#### (CONTINUED FROM PREVIOUS PAGE)

SURCHARGE FOR HEAVY OBJECTS: Ż.

> Less than 10,000 pounds 19,000 pounds to Capacity of Site Equipment

No Charge \$214.00 plus \$.10 per 1b. above 10,000 1bs.

2. SURCHARGE FOR CURIES (Per Load)

> Less than 100 curies 100 - 300 curies 301 - License Limits

No Charge \$1,554.00 plus 204/C1 above 100 C1 By Request

4. MINIMUM CHARGE PER SHIPMENT \$485.00

5. CASK HANDLING FEE:

7.

\$550.00 minimum each

MASTE CONTAINING CHELATING AGENTS IN PACKAGES **5**.. AMOUNT GREATER THAN 12 BY WEIGHT:

By Request

RADIUM SEALED SOURCES

By Request

SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE 8. IDUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD!

\$29.50 per man m() lirem

9. DECONTAMINATION SERVICES (If Required) \$105.20 per man hour plus supplies at cost plus 15%

10. CONTAINER VOLUMES:

> 55 Gallon Drums - 7.50 cu. ft. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 3,57 cu. ft.

- 11. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Beatty, Nevada disposal facility.
- This Schedule of Charges does not constitute an offer of contract which 12. is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective August 1, 1990 Nevada Nuclear Center

US Ecology, Inc. 9200 Shelbynile Road. Sure 300 P. D. But 7246 Luxisville, Nattucky 40257-0245 502/425-7150

# US ECOLOGY MASHINGTON & NEVADA NUCLEAR CENTERS SCHEDULE OF CHARGES RADIOACTIVE WASTE DISPOSAL

## **USEcology**

an American Ecology company

EFFECTIVE: March 1, 1992

#### 1. DISPOSAL CHARGES

A. Packages (Except as noted in Section 8)

R/HR AT CONTAINE	R SURFACE	PRICE PER CU. FT
0.00 -	0.20	\$36.00
0.201 -	1.00	37.80
1.01 -	2.00	39.20
2.01 -	5.00	40.70
5.01 -	30.00	44.70
10.01 -	20.00	53.30
20.01 -	40.00	61.60
Over 40.		By Request

B. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

R/HR AT CONTAINER SURFACE			SURCHARGE PER LINER	PRICE PER CU. FT.
0.00		0.20	No Charge	\$36.00
0.201	-	1.00	\$ 240.Õ0	36.00
1.01	_	2.00	540.00	36.00
2.01	-	5.00	910.00	36,00
5.01	-	10.00	1,450.00	36.00
10.01	-	20.00	1.900.00	36.00
20.01	~	40.00	2,180.00	36.00
Ove	r 40	20.00	By Request	By Request

#### 2. SURCHARGE FOR HEAVY OBJECTS:

Less than 5,000 Pounds	No Charge
5,000 - 10,000 *-	\$500.00
10,001 - 15,000 "	1.000.00
15,007 - 20,000 *	z.500.03
20,001 - 25,000 "	5,000.00
0ver 25,000 *	By Request

CONTINUED



Be evue #Z

	(CONTINUED FROM PREVIOUS PA	(GE)
3.	SURCHARGE FOR CURIES (Per Load)	
	Less than 50 curies  50 - 100  101 - 300  301 - 500  501 - 1,000  1,001 - 5,000  5,001 - 10,000  10,001 - 15,000  Over 15,000	No Charge \$1,000.00 2,000.00 2,500.00 3,000.00 3,500.00 5,100.00 7,200.00 8y Request
4.	SURCHARGE FOR SPECIAL NUCLEAR WATERIAL (SNM) (Greater Than 5 Grams Per Shipment) Per Gram:	\$10.00
s.	MINIMUM CHARGE PER SHIPMENT	\$1,000.00
5.	CASK HANDLING FEE (Minimum per Cask):	\$1,000.00
7.	WASTE CONTAINING CHELATING AGENTS IN AMOUNTS GREATER THAN 0.12 BY WEIGHT AFTER TREATMENT:	By Request
8.	SOLIDIFIED DILY WASTES REQUIRING SEGREGATION:	By Request
9.	RADIUM SOURCES (NEVADA ONLY) 50 mCf per package or less: More than 50 mCi per package:	\$500.00 By Request
10.	DISPOSAL OF POLY HIC IN ENGINEERED BARRIER:	By Request
11.	SURCHARGE FOR NON-ROUTINE PERSONNEL EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD) Per Person-mrem:	\$1 00.00
12.	DECONTAMINATION SERVICES (If Required) Per Hour: Supplies:	\$150.00 Cost plus 25%
13.	PROCESS LICENSE VARIANCE REQUESTS:	\$200.00
14.	DRUM VOLUMES: 55-Gallon - 7.50 Cu.Ft.	·

All waste material shall be properly classified, described, packaged, marked, 15. labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and small be in compliance with all license requirements and amendments thereto applicable at the disposal facility.

30-Gallon - 4.01 Cu.Ft. 5-Gallon - 0.67 Cu.Ft.

This Schedule of Charges does not constitute an offer of contract which is 16. capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

----- Washington & Nevada Nuclear Centers: Effective March 1, 1932 -----

Response to Staff Data Request No. 17

Request: Provide annual volumes, in cubic feet, of LLRW received at US Ecology, Inc.'s Beatty, Nevada site since 1965, broken down by Class of waste (Class A, Class B, Class C).

#### Response:

Witness: Richard E. Sauer

The requirement to classify waste as either Class A, B or C was not effective until the first quarter of 1984. Data is therefore provided by waste classification only since 1984.

### BEATTY, NEVADA FACILITY

#### Volume (Cubic Feet)

YEAR 1991 1990 1989 1988 1987 1985 1985	CLASS A 154.799.12 55,776.12 113,697.11 92,496.23 331.700.43 94,081.80 48,995.25 27,507.06	CLASS B 3.972.13 1,312.10 1,496.35 688.13 676.98 105.00 915.00	CLASS 0 1,490.97 2,391.00 1,028.66 227.61 31.22 34,50 23.00 0.00
	Acstvi	ty (Millicuries)	
1991 1990 1989 1968 1987 1986 1985	5,310,182.558 2,966,414.597 4,358,273.039 2,548,683.919 2,354,588.431 91,682.361 191,294.207 164,312.140	20,300,787.807 5,473,082.966 34,011,558.831 3,589,555.547 8,589,882.153 75,453.879 0.000 374,321.707	3,762,0E2.020 2,884,225.422 4,416,820.966 2,553,015.320 156,371.250 504,942.000 260,410.000 0,000

Response to Staff Data Request No. 18

Request: Provide annual statistics on total radioactivity (in curies) of LLRW shipments received at US Ecology, Inc.'s Beatty, Nevada site since 1965.

#### Response:

Witness: Richard E. Sauer

As mentioned in Response No. 17, annual disposal data by class is available only from 1984. The requested activity information since that date is included.

-3-

Response to Staff Data Request No. 19

Request: Provide annual statistics on the number of radioactive materials site use permits issued to generators for US Ecology, Inc.'s Beatty, Nevada site since 1965.

#### Response:

Witness: Richard E. Sauer

Site use permits are issued by the Nevada Department of Human Resources. US Ecology does not have records of their issuance.

Response to Staff Data Request No. 20

Request: Provide information listing the state of origin for LLRW shipments received annually at US Ecology, Inc.'s Beatty, Nevada site since 1965.

#### Response:

Witness: Richard E. Sauer

Information summarizing the state of origin for LLRW annually disposed at Beatty is available only from 1988. This information on a volume basis is included.

PAGE 17 01/01/91 18/51/91

US ECOLOGIC MINULAR SEATTY - ANNIEL

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CORPACT REPURE OF VOLUNE

BIT STATE AND CREGINAL MERINATOR CLASSIFFICATION
FROFREETARY AND COMFIDENTIAL - NOT FOR PUBLIC DESCREAMMENTS

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no n		15.00
TOTAL 15,147.28 6,797.89 8,94	901.16 5,082.69	

0.00 0.00

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EC1 554	05/29/92
REPOST #0.	PLEN BAIL:

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CONDACT ALPUNK OF VOLUME
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PAGE 1 01/01/88 THRU 12/31/89

US ECFLORY BUCLEAR BEATTY - ANBUAL

REPORT NO: ECF854 ALM DATE: DS/20/92

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. \*\*\*\*\* STATES NOT REPORTED DID NOT SALP USALING THIS TIME PERICO \*\*\*\*\*

Response to Staff Data Request No. 21

Request: Provide capital investments in, and amortization schedules for US Ecology, Inc.'s Beatty, Nevada LLRW dump site, annually since it began operating as a LLRW dump site.

#### Response:

Witness: Richard E. Sauer

US Ecology does not have a schedule which details capital investment and amortization schedule for the Beatty facility.

Response to Staff Data Request No. 22

Request: Provide price lists for LLRW disposal services at US Ecology, Inc.'s Richland, Washington site covering the period 1965 to present.

#### Response:

Witness: Richard E. Sauer

See Response No. 16; similar price lists for the Richland facility are included.

Q-22

Richland, Washington Low-Level Radioactive Waste Disposal Facility

**Schedules of Charges** For the Period April 1, 1975 Through March 1, 1992

#### INCLUDED IN ITEM 1 ARE THE POLLOWING WASHINGTON STATE FEES:

A. PERPETUAL CARE AND MAINTENANCE

\$1.75 PER CU. FT.

8. SITE CLOSURE FUND

0.25 PER CU. FT.

C. MADIOACTIVE WASTE SURVEILLANCE BURCHARGE

0.27 PER CU. FT.

2. SUPCHARGE FOR HEAVY OBJECTS:

-Lass than 10,000 pounds

No Charge

\_\_\_10,000 pounds to Capacity of Site Equipment

\$172.70 plus 9¢ per 1b. above

10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

Less than 100 curies

100 - 300 curies

301 - License Limita

No Charge

\$1,257.30 plus 17¢/Ci above 100 Ci

By Request

4. SURCHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM)

🥕 \$2.27 per gram of Special Nuclear

Material by Isotope Weight

5. MINIMUM CHARGE FER SHIPMENT

\$387.00

By Request

6. CASK HANDLING FEE:

\$638.00 minimum each

7. WASTE CONTAINING CHELATING AGENTS IN PACKAGES

AMOUNT GREATER THAN 1% OF PACKAGE VOLUME:

E. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$23.71 per man millirem

9. DECONTAMINATION SERVICES (If required)

\$86.15 per man hour plus supplies at cost plus 21%

10. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu.ft.

30 Gallon Drums - 4.01 cu.ft.

5 Gallon Drums - 0.67 cu.ft.

- 11. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 10. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

US Ecology, Inc.
\$200 Shelbyville Roed, Buile 300 P.O. Box 7248 Leuteville, Kentucky 40207 502 425-71 50

#### US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

# **USEcology**

EFFECTIVE: August 1, 1985

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CONTAINER SUPFACE	PRICE PER CU. F
0.00 - 0.20	\$22.14
0.201 - 1.00	23.79
1.01 + 2.00	26.36
2.01 - 5.00	27.56
5.01 - 10.00	32.07
10.01 - 20.00	40.88
20.01 - 40.0ŭ	50.06
40.01 - 60.00	71.32
60.01 - 90.00	85.11
80.01 - 100.00	93.66

Disposal Liners Removed from Shield: (Greater than 12.0 cm ft. each)

*/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FI
0.00 - 0.20	No Charge	\$22.14
0.201 - 1.00	\$ 229.74	22.14
1.01 - 2.00	564.30	22.14
. 2.0 5.00	791.52	22.14
5.01 - 10.00	1,145.35	22.14
10.01 - 20.00	1,462.08	22.14
20.01 ~ 40.00	1,815.62	22.14
40.01 - 60.00	2,153.54	22.14
30.01 - 80.00	2,484.76	22.14
80.01 - 100.00	2,822.68	22.14

#### A. BAQUIL WASTES

	In vials, less than 50 ml. each Liquids ownraining organics, absorbed Equacus leguids, absorbed	\$28.20/cu.ft. 28.30/cu.ft. 22.14, bu.ft.
.210	DIUCICAL HASTE, ANIMAL CARCASSES	23.79/mm ft.

(Continued)

#### INCLUDED IN ITEM 1 ARE THE FOLLOWING WASHINGTON STATE FEES:

\$1.75 PER CU. IT. A. PERPETUAL CARE AND MAINTENANCE 0.25 PER CU. PT. B. SITE CLOSURE FUND

C. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE 0.65 PER CU. FT.

". SURCHARGE FOR MEAVY OBJECTS:

Less than 10,000 pounds No Charge \$172.70 plus 9¢ per lb. above 10,000 pounds to Capacity of Site Equipment 10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

Loss than 100 curies No Charge 100 - 300 curies \$1,257.30 plus 17¢/Ci above 100 Ci 301 - License Limits By Request

4. SURCHARGE FOR SPECIAL MUCLEAR MATERIAL (SNM) \$2.27 per gram of Special Nuclear Material by Isotope Weight

5. MINIMUM CHARGE PER SHIPMENT \$367.00

\$638.00 minimum each E. CAEK HANDLING FEE:

". WASTE CONTAINING CHELATING AGENTS IN PACKAGES By Request AMOUNT GREATER THAN 1% OF PACKAGE VOLUME:

8. SURCHARGE FOR NON-ROUTINE MAN-REM EXPCSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$23.71 per man millirem

\$85.15 per man hour plus 9. DECONTAMINATION SERVICES (If required) supplies at cost plus 21%

10. CONTAINER VOLUMES:

55 Gailon Drums - 7.50 cu.ft. 30 Gallon Drums - 4.01 cu.ft. 5 Callon Drums - 0.67 cu.ft.

- 11. 411 waste material shall be properly classified, described, packaged, marked. labeled, and certified in accordance with all applicable Federal, state, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 11. This ichedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Iffective August 1, 1985 Washington Nuclear Center US Ecology, inc. 9200 Shelbyville Roed, Suite 300 P.O. Box 7848 Louisville, Mentucky 40207 502 424-7160

# US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

EFFECTIVE: December 9, 1985

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FI.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00	\$ 24.90 26.76 29.66
2.01 ~ 5.00 5.01 - 10.00 10.01 ~ 20.00	31.00 36.08
20.01 - 40.00 40.01 - 60.00	45.99 56.34 80.24
60.01 - 80.00 80.01 - 100.00	95.75 105.37

Disposal Liners Removed from Shield: (Greater than 12.0 cu. ft. each)

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	<b>524.9</b> 0
0.201 - 1.00	\$ 258.46	24.90
1.01 - 2.00	634.84	24.90
2.01 - 5.00	890.80	24.90
5.01 - 10.00	1,288.52	24.90
10.01 - 20.00	1,644.84	24.90
20.01 - 40.00	2.042.57	24.90
40.01 - 60.00	2,422.73	24.90
60.01 - 90.00	2,795.35	24.90
60.01 - 100.00	3,175.52	24.90

#### B. LIQUID WASTES

- 1. Aqueous liquids in vials, less than 50 ml. each \$31.34/cu.ft.
- 2. Aqueous liquids, abscribed 24.90/cu.ft.
- 310LOGICAL WASTE, ANIMAL CARCASSES 26.76/cu.ft.

(CONTINUED)

#### (CONTINUED FROM PREVIOUS FAGE)

SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,000 pounds to Capacity of Site Equipment No Charge \$194.29 plus 100 per 1b. above 10,000 lbs.

3. \_BURCHARGE FOR CURIES (Per Load)

Less than 100 curies 100 - 300 curies 301 - License Limits No Charge \$1,414.45 plus 190/C: above 100 Ci By Request

surcharge for special nuclear material (SNM) \$2.55 per gram of Special Nuclear

S2.55 per gram of Special Nuclear Material by Isotope Weight

5. MINIMUM CHARGE PER SHIPMENT

\$435.00

a. CASK HANDLING FEE:

\$718.00 minimum each

WASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1% BY WEIGHT:

By Request

E. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$25.67 per man millirem

9. DECONTAMINATION SERVICES (If Required)

596.92 per man hour plus supplies at cost plus 21%

IF. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu. ft. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

- All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 12. Them Schodule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective December 9, 1985 Washington Huclear Center

2064587850;# 8



Nuclear Engineering Company, Inc. SZOD SHELBYVILLE ROAD, SUITE 826 . P. C. BOX 7246 EQUIEVILLE, KENTUCKY 40207 PHONE (502) 426-7160

April 1, 1975

#### Dear Customer:

Effective April 1, 1975, the following disposal charges will be in effect for the Nevada Nuclear Center and the Washington Nuclear Center. These prices are f.o.b. the respective site.

Radiation Levels	Charge
9 - 200 mr/nr	<b>\$1.</b> 75
201 - 999 mr/hr	2.25
1 R - 2 R/hr	3.00
2.001 - 5 R/hr	3.75
5.001 - 10 R/hr	4.50

Prices for higher radiation levels will be given upon request.

Attached for your files are License Limits and Requirements for both Nuclear Centers.

If you desire any additional service, please do not hesitate to call.

Yours very truly,

NUCLEAR ENGINEERING CUMPANY, INC.

B. V. Foberts Vice President - Corporate Sales

..VR/jf .nclosure

### MUCLEAR ENGINEERING COMPANY, INC. sichland, Washington Facility

; 5-21-92 ; 1:15PM ;

#### SCHEDULE OF CHARGES

1. Disposal Charges - Solid

\_\_a. By-product material:

R/HR at Container Surface	Price Per Cu. ft.
0.00 - 0.20	\$ 2.50
0.21 - 1.00	2.75
1.00 - 2.00	3.00

Prom 2 R/hr = 130 R/hr: \$3.00 per cubic foot plus \$0.20 per R/hr per cubic foot.

b. Transuranics:

R/HR at Container Surface	Surcharge Per Gram	Price Por Cu. Ft.
0.00 - 0.20	\$ 3.00	<b>\$ 3.75</b>
0.21 - 1.00	3.00	4.00
1.00 - 2.00	3,00	4.25
Yrom 2 R/hr to 150 R/ar: and \$3.00 per gram.	\$4.25 per cubic foot plus \$0.5	20 per R/hr per cubic foot

2. Disposal Charges - Liquids

Scintillation visls:

\$ 3.00/cu.ft.

3. Surcharge for heavy objects:

a. Crane: Less than 10,000 lbs: No Charge \$:50.00 plus \$0.01/1b. 10,001 lbs. and greater: \$100.00 per use M. Sling:

Biological Surcharge - on containers which are not mealed vapor tight:

\$ 0.50 per cubic foot

5. Minimum charge per shipment:

\$ 75.00

9. Cask Handling Fee:

\$200.00

Unirradiated Special Nuclear Materials, subject to license limits:

By Request

irradiated Special Fuclear Materials, subject to license limits:

By Request

9. Surcharge for man-Rem exposure because of design or physical container defect:

\$ 3,00/map/.millirem

Supt 1 1977 June 1 1978

#### NUCLEAR ENGINEERING COMPANY, INC.

#### Richland, Washington Facility

#### SCHEDULE OF CHARGES

- 1. Disposal Charges Non-Trausuranic Material
  - A. Solid Material
  - Steel Bruns, Wood Boxes, Liners:

ETHE AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 2.65
0.201- 1.00	3.00
1.01 - 2.00	3.50
2.01 - 5.00	4,55
5.01 - 10.00	5.60
19.01 - 20.00	7.60
20.01 - 46.00	10.05
40.01 - 60.00	15.50
60.61 - 80.00	19.10
60.01 - 100.00	21,00
Over 100.00	By Roquest

Disposable Liners Removed From Shield:

R HE AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
5.60 <b>- 0.20</b>	No Charge	<b>5 2.6</b> 5
0.201- 1.00	\$ 50,00	2.65
1.01 - 2.00	125.00	2,65
2.01 - 5.00	175.00	∋, <b>6</b> 5
5.01 - 10.00	250.00	≟.G5
12.01 - 20.00	325.00	2 65
2.9.01 - 40.00	400.00	2. 45
40.01 - 50.00	475,00	2.05
60.01 - 80.00	550.00	2.65
80.01 - 100.00	625.00	2.65
O/cr 1/0.00	By Request	

b. Liquid Material

(a) Scintillation Vials

\$ 3.15/cu. ft.

Disposal Charges - Transuranic Maternal

RIHR AT CONTAINER SURFACE	SURCHARGE DER GRAN	PRICE PER CU. ) T.
0.00 - 0.20	\$ 3.00	\$ 3.75
0.201- 1.00	3.00	4.00
1.01 - 2.00	3.00	4.25
Ove: 2.00	By Request	

1. Lurchargo for Hoavy Objects:

lume than 10,000 mounds No Charge 20,001 bounds to Capacity of Site Equipment \$50.00 plus \$.01/1b above 10,000 lbs.

Surcha go For Curies (Por Load):

Loss than 100 ouries 131 - 300 curies 301 - License Limits No Charge \$ 300.00 \$ 300.00 plus \$.05/curie

 Surcharno for Biological Waste on Containers which are not socied vapor tight;

\$ .50/cu. ft.

#### SCREDULE OF CHARGES

#### Page 2

d. Minimum Charge Per Shipment:

7. Cask Handling Foo.

8. Surcharge for Use of Slings:

9. Unirradiated Special Nuclear Materials, subject to license limits:

10. irradiated Special Nuclear Materials, subject to license limits:

 Surcharge for non-routine man-Ren exposure (due to design or physical defect of container or smidd);

12. Decontamination Services (if required)

13. Container Volumes:

55 Gallon Drums - 7.50 cu. It. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft. \$ 100.00

\$ 200.00 Minimum Each

\$ 100.00 'each use

By Request

By Request

\$ 3.00/man millirem

\$27,00 per :an hour plus supplies at cost plus 157

#### NUCLEAR ENGINEERING COMPANY, INC.

#### Richland, Washington Facility

#### SCHEDULE OF CHARGES RADIOACTIVE WASTE

- 1. Disposal Charges Non-Transuranic Material
  - A. Solid Material

Steel Drums, Wood Boxes, Liners:

-RAHR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00 5.01 - 10.00 10.01 - 20.00 20.01 - 40.00 40.01 - 60.00 60.01 - 80.00 80.01 - 100.00	\$ 4.75 5.20 5.80 7.10 8.40 10.85 13.85 20.60 24.85 27.30 By Request
Over 100.00	Dy Meddes.

Disposable Liners Removed From Shield:

RING AT CONTAINER SURFACE	SUNCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00 5.01 - 10.00 10.01 - 20.00 20.01 - 40.00 40.01 - 60.00 50.01 - 80.00	% Charge \$ 65.00 160.00 295.00 325.00 415.00 513.00 610.00	\$ 6.75 4.75 4.75 4.76 4.75 4.75 4.75 4.75
80.01 - 100.00 Over 100.00	<b>8</b> 00.00 <b>By Re</b> quest	By Request

\_. Liquid Material

Scancillation Vials

\$6.50/eu. ft.

- Dis ...sal Charges Transuranto Material
  - + dequest
- Surenarge For Heavy Objects:

Less than 10,000 pounds 10,.01 pounds to Capacity of Site Equipment

10,502 poetres de dapados, an anti-

Surcharge For Curies (Per Load):

Loss than 100 curies 101 - 200 curies 101 - License Limits

. But tharge For Biological Tissue Waste of Containers which are not sealed vapor tight:

No Charge \$ 50.00 plus \$.01 per 1b. muove 10.000 lbs.

No Charge \$ 375.00 \$ 375.00 plus \$.05 per curie

\$ 2.50 per cu. ft.

#### SCHEDULE OF CHARGES

#### Page 2

6. Minimum Charge for Shipmont:

7. Cask Mandling Fee:

B. Unitradiated Special Nuclear Materials, subject to license limits:

8. Isradiated Special Nuclear Materials, Subject to license limits:

 Surcharge for non-routine man-Rem exposure (due to design or physical defect of container or shield):

11. Decentamination Services (if required)

12. Container Volumes:

55 Gallon Drums - 7,50 cu. ft. 30 Gallon Drums - 4.01 cu. ft. 5 Gallon Drums - 0,67 cu. ft.

Prices Effective June 1, 1978

\$150.00

\$250.00 minimum each

By Request

By Request

\$ 7.50 per man millirem

\$27.00 per man hour plus supplies at cost plus 15%

#### NUCLEAR ENGINEERING COMPANY, INC.

#### WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER

#### SCHEDULE OF CHARGES RADIDACTIVE WASTE

- 1. Disposal Charges
  - A. Solid Material

Steel Drums, Wood Boxes, Liners:

- A/IIX		TAINER SURFACE	PRICE PER CU. FT.
•	0.00	- 0.20	<b>\$ 5.75</b>
	0.201	- 1.00	6.30
	1.01	- 2.00	7.05
	2.01	- 5.00	8.60
	5.01	- 10.00	10.15
	10.01	- 20.00	13.15
	20.01	- 40.00	16.75
	40.01	- 60,00	24.95
	60.01	- 80.00	30.10
	80.01	- 100.00	33.05
		100.00	by Request

Disposable Liners Removed From Shield:

B/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 5.75
0.201 - 1.00	3 78,65	5.73
1.01 - 2.00	193.60	5.75
2.01 - 5.CO	272.25	<b>5.</b> 75
5.01 - 10.00	393.25	5.75
10.01 - 20.CO	502.15	5.75
20.01 - 40.00	623.15	5.75
49.01 - 60.00	738.10	5.75
60.01 - 80.00	<b>853.05</b>	5.75
80.01 - 100.00	968.00	5.75
Over 100.00	By Request	By Request

- B. Scintillation Vials \$7.90/cu.žt.
- C. Biological Waste 86.50/cu.ft.
- 2. Disposal Charges Transuranic Material By Request (Washington Only)
- 2. Acroharge For Heavy Objects:

....

.ss than 10,000 pounds .,001 pounds to Capacity of Site Equipment

No Charge \$ 60.00 plus \$.01 per 1b. above 10,000 lbs

Surcharge For Curies (Per Load):

Less than 100 curies 101 - 300 curies 701 - License Limits

\$ 455.00 \$ 455.00 plus \$.06 per curic

5. Minimum Charge Per Shipment:

\$ 180.00

No Charge

"ask Randling Fee:

\$ 300.00 minimum each

: 5-21-\$2 : 1:17PM :

SCHEDULE OF CHARGES

Page 2

7. Unirradiated Special Muclear Materials, subject to license limits:

e. Irradiated Special Nuclear Materials, aubject to license limits:

9. Surcharge for non-routine man-Rem exposure (due to design or physical defect of container or shield):

0. Decontamination Services (if required)

1. Container Volumes:

55 Gailon Drume - 7.50 cu. ft. 30 Gailon Drums - 4.01 cu. ft. 5 Gallon Drums - 0.67 cu. ft.

Prices Effective October 15, 1979

By Request

By Request

\$ 8.50 per man millirem

\$30.00 per man hour plus supplies at cost plus 15%

2064537350:#10

#### NUCLEAR ENGINEERING COMPANY, INC.

### WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIDACTIVE WASTE

#### 1. Disposal Charges

#### A. Solid Material

Stral brums, Wood Boxes, Liners:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.50 - 0.20	\$ 7-75
0.201 - 1.00	8.50
T-14	9.50
1.01 + 2.00	11.65
2.51 - \$.88	13.70
5.01 - 10.00	
	17.75
	22.60
25.01 - 40.00	33.70
40.01 - 60.00	
60.01 - 50.00	40.65
*****	44.65
	By Request
Over 100.00	p)cquar

Disposable Liners Removed From Shield:

RAR AT CONTAINED SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.gc = 0.29	No Charge	\$ 7.75
0.201 - 1.00	\$ 106.00	7.75
1.01 - 2.00	261.00	7.75
1.01 - 5.00	367.00	7.75
	530.00	7.75
	677.00	7.75
	840.0C	7.75
11/11	996.00	7.75
		7.75
50.01 - 80.00	1,150.00	7.75
80.01 / 100.00	1,306.00	
Over 100.00	By Request	By Request

- B. Laquid Scintillation Vials
- \$10.25/cu. ft.
- C. siplogical Waste, Animal Carcasses \$ 6.45/cu. ft.
- 2. Burrherse for Heavy Objects:

Desmitted 10,000 pounds
(0.000 pounds to Capacity of Site Equipment

No Charge \$ 78.00 plus \$.02 per 1b. above 10,000 lbs.

-wachings For Curies (Per Load):

Two than 100 curies 101 + 30, curies 20, - Excense Lamate

tesk Bandling Fee:

easte Containing Thelating Agents in Packages amount Greater than 1% of Package Volume:

7. Surcharge for Non-routine Man-Rem Exposure (due to design or physical defect of conceiner or shieuc):

econtamination Se vices (if required)

\$11.00 per man millirem

\$ 300.00 minimum each

\$ 590.00 plus \$.08 per curie

No Charge \$ 590.00

\$ 200.00

By Request

\$40.00 per man hour plus supplies at cost plus 15%

A. Container Volumes:

55 Gelion Drume - 7.50 cu. ft. 30 Gelion Drume - 4.01 cu. ft. 5 Gelion Drume - 0.67 cu. ft.

Prices Effective March 1, 1980

# WASHINGTON NUCLEAR CENTER AND NEVADA NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

#### 1. Disposel Charges

#### A. Solid Material

Steel Drume, Wood Boxes, Liners:

THE THE PART SUPPLIES	FATOR FATOR
B/BR AT CONTAINER SURFACE	\$ B.70
- 0.00 - 0.20	9.50
0.20 1.00	10.65
1.01 - 2.00	13.00
2.01 - 5.00	15.35
5.01 - 10.00	19.90
10.01 - 20.00	24.65
20.01 - 40.00	37.75
49.01 - 60.00	45.35
60.01 - 80.00	50.00
80.01 - 100.00	By Request
Over 100.00	-1

### D\_sposable Liners Removed From Shield:

REAL OF CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CO. FI.
0.00 - 0.20 0.20 - 1.00 1.01 - 2.00 2.01 - 5.00 5.01 - 10.00 10.01 - 20.00 10.01 - 40.00 +0.01 - 60.00 60.01 - 80.00 80.00 - 100.00	MD Charge \$ 119.00 292.00 411.00 594.00 758.00 941.00 1,116.00 1,288.00 1,463.00	\$ 8.70 8.70 8.70 8.70 8.70 8.70 8.70 8.70
Over 100.00	By Request	<b>-2 1</b>

\$11.50/cu. ft.

- 3. ... and Scintallation Vials
- C. . Diogical Moste, Animal Carcasses \$ 9.90/cu. ft.
- Late of Washington Surcharge \$0.30/cu. ft.
- uccharge For Massy Objects:

Jes: Can 10,000 pounds 10,000 Journal Capacity of Site Equipment

No Charge 587.50 plus \$.02 per 15. ADOV- 10,000 lbs.

BOYCH PER CU. FT.

- 3 Su maige For maies (Per Load):
  - Liss than 100 carace
  - 1 30% curles Ul - License Limits
- Minimum Charga Per Shipments
- . Cask Hanuling Fee:

Waste Containing Chelating Agents in Packages Amount Greater than 1% of Package Volume:

- Suicharge for Non-Zoutine Nan-Rem Exposure (due to masign or physical defect of container or shaeld);
- 2. Decontamination Services (if required,
- 9. Containes Valumes

55 Gallon Drums - 7.50 cm.ft. 13 Gallon Drums - 4.01 cm.ft. 1 Sallon Drums - 0.67 cm.ft. No Charge \$ 660.00 \$ 660.00 plus \$.09 per curis

\$ 224.00

\$ 335.00 minimum each

By Request

- \$ 12.35 per man millirer
- \$ 45.00 per man hour plus supplies at cost plus 15%

Effective november 17, 1980

#### IS ECOLOGY

### WASHINGTON MUCLEAR CENTER SCHEDULE OF CHARGES

### RADIOACTIVE WASTE

#### 1. Dismosal Charges

- A. Solid Material
- Steel Grame, wood Boxes, Liners:

R/ER AT CONTAINER SURFACE	VEICE PER CO. PT.
e. oa – 0.20	\$11.70
0.201 - 1.00	12.55
V1101	13.85 .
1.04	16.45
	19.0\$
- 44	24.10
10.01 • 20.00	29.40
20.01 - 40.00	43.95
40.01 ~ 60.00	
60.01 - 80.00	52.35
an na - 199.00	\$7.55

Disposa: Liners semoved from Shield:

FORF AT CONTAI	NEE SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
5. <b>90</b> -	. U.20	. No Charge	. \$11.70
U. 201 4	1.00	£ 132.00	11.70
1.0:	2.00	324.00	11.70
7.01	. 2000	455.00	32.70
	10.00	658.00	11.70
	20.00	B40.0C	11.70
	40.00	1,043.00	11.70
	60.00	1,237.00	11.70
60.01	60.50	1,427.00	11.70
	100.00	1,521.00	. 11.70

- B aquie Veintil lation Viale
- \$14.80/eu.ft.
- A. tip. 0,108: Wash , Animal Carpesses
- \$12.55/eu.ft.

#### IN MED IN THE ABOVE ARE THE FOLLOWING HASHINGTON STATE FEES:

A. PERPETUAL CARE AND L'AINTENANCE FEE \$1.75 PER CU. FT. 0.25 PER CL. FT. 3. SITE CLOSURE FIND

TADIDACTIVE PLATE SURVEILLANCE SURCHARGE 0.30 PER CU. FT.

#### 3. Suttharge For Grane Utilization

No Charge Sees chan 10,000 pounds 10.00, pounds to Capacity of Site Equipment \$100.00 plus \$0.05 per 1b. above 10.00. lbs.

Successive for Airies (Fer soad):

5-8- than 300 succes 10. JOS GUILE 201 - Micense James

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7. Cit. Handlan, fee:

24 far é dontexning / politing Age to in Packages Ar one Greate than It of Package Volume:

Stromarye for con-couting Man-Sem Exposure can be descaped abordinal defect of catalogs of investor

b. Georgianus - on Nervices (if required)

No Charge \$730.00 plus 100/C1 above 100 Curies By Request

\$370.00 minimum each

By Request

\$13.75 per men millires

\$50.00 per man hour plus supplies at cost plus 15%

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GG1Ti da→ \_

\* Container Volumes: \*

5" Gallon D ums = 7.50 es. ft. 30 Gallon Druss = 4.01 cs. ft. 5 Gallon Druss = 0.67 es. ft.

- 10. All wastr material shall be properly classified, described, packaged, marked, labeled, and cartified in accordance with all applicable Federal, Statu, and Local laws, rules and regulations and shall be in compliance.
- with all license requirements and amendments thereto applicable at the Mich.une, Meanington disposal facility.
- 11. This Denedule of Charges is subject to change solely upon motice by US Ecology.

Effective Samuary .5, 1982

₽1.

US Ecology, Inc. 9300 Shelbyville Head, Eulie 526 P.O. Sox 7248 Louisville, Kentucky 40207 502 424-716.)

# US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes, Liners:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	<b>\$ 15.73</b>
0.201 - 1.00	16. <del>9</del> 4
1.01 - 2.00	18.80
2.01 - 5.00	22.51
5.01 - 10.00	26.23
10.01 - 20.00	33.44
20.01 - 40.00	41.01
40.01 - 60.00	61.80
60.01 - 80.00	73.80
80.01 - 100.00	81.23

Disposal Liners Removed from Shield:

2/H AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 15.73
0.201 - 1.00	\$ 188.57	15.73
1.01 - 2.00	462.86	15,73
2.61 - 5.00	650.00	15.73
5.01 - 10.00	940.00	15.73
10.01 - 20.00	1,200.00	15.73
20.01 - 40.00	1.490.00	15.73
40.01 - 60.00	1,767.14	15.73
60.01 - 80.00	2,038.57	15.73
80.01 - 100.00	2,315.71	15.73

#### E. ... WID WASTES:

In vials, less than 50 ml. each Scintillation liquids, absorbed Aqueous liquids absorbed		\$20.16/cm.f: \$20.16/cm.fr. \$15.73/cm.fr
315	CLOGICAL WASTE. ANIMAL CARCASSES	\$16.94/cu.:t.

2004567650:#16

#### INCLUDED IN ITIM I ARE THE FOLLOWING WASHINGTON STATE FEES:

A. PERPLTUAL CARE AND MAINTENANCE FEE \$1.75 PER CU. FT. 0.25 PER CU. FT. B. SITE GLOSURE FUND 0.30 PER CU. FT. C. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE

2. SURCHARGE WOR CRANE UTILIZATION

No Charge Less than 10,000 pounds 10.001 pounds to Capacity of Site Equipment \$143.00 plus 7¢ per 1b. above 10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

No Charge Less than 100 curies \$1,043.00 plus 14c/Ci above 100 Ci 101 - 300 curies By Request 301 - License Limits

\$321.43 4. MIMIMUM CHARGE PER SHIPMENT

\$529.00 minimum each I. LASE HANDLING FEE:

E. MASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1% OF PACKAGE VOLUME: By Request

A SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (HUE TO DESIGN OR PHYSICAL DEFECT OF \$19.64 per man milligem CONTAINER OR SHIELD)

8. DECONTAMINATION SERVICES (If required) \$71.43 per man hour plus supplies at cost plus 21%

#### 4. CONTAINER VOLUMES:

- 35 Gallon Drums 7.50 cm. ft.
- 0 Gallon Drums 4.01 cu. ft.
- 5 Gallon Drums 0.67 cu, ft.
- .0. All waste material shall be properly classified, described, packaged, marked, sabeled, and certified in accordance with all applicable Federal State, and wocal laws, rules and regulations and shall be in compliance with all livense requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- Il. This Schedule of Charges is subject to change solely upon notice by US Ecology.

Efrecaive August 1, 1982

US Ecology, Inc. -\$200 Shorbyvitie Road, Suite \$26 P.O. Box 7246 Louisville, Kentucky 40207 502 426-7160

#### US ECOLOGY WASHINGTON HUCLEAR CENTER SCHEDULZ OF CHARGES RADIOACTIVE WASTE

## **USEcology**

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 17.00
0.201 - 1.00	18.30
1.01 - 2.00	20.30
2.01 + 5.20	24.40
5.01 - 10.00	28.45
10.01 - 20.00	36.35
20.01 - 40.00	44.60
40.01 - 60.00	63.64
60.01 - 60.00	76.01
80.01 - 100.00	83.67

Disposable Liners Removed from Shield:

MATHER AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	no Charge	\$ 17.00
0.201 - 1.00	s 206.00	17.00
1.01 - 2.00	<b>506.0</b> 0	17.00
2.01 - 5.00	710.00	17.00
5.01 - 10.00	1,027.00	17.00
10.01 - 20.00	1,311.00	17.00
20.01 - 46.00	1,625.00	17.00
40.01 - 60.00	1,931.00	17.00
60.01 - 80.00	2.2 <b>28.0</b> 0	17.00
80.01 - 100.00	2.531.00	17.00

#### B. LIQUID WASTES:

In vials, less than 30 ml. each  Scintillation liquids, absorbed  Aqueous liquids absorbed		\$ 21.80/cu.ft. \$ 21.80/cu.ft. \$ 17.00/cu.ft.
	BIOLOGICAL WASTE, ANIMAL CARCASSES	\$ 18.30/cu.ft.

### INCLUDED IN ITEM 1 ARE THE FOLLOWING WASHINGTON STATE FEES:

A. PERPETUAL CARE AND MAINTENANCE

51.75 PER CU. 27.

B. SITE CLOSURE FUND

0.25 PER CU. FT.

C. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE

0.30 PER CU. FT.

### 2 SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds

10,001 pounds to Capacity of Site Equipment

No Charge

\$155.00 plus 8¢ per 15. above

10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

bess than 100 curies

101 - 300 curies

301 - License Limits

No Charce

\$1,127.00 plus 15¢/Ci above 100 Ci

By Request

By Request

INIMUM CHARGE PER SHIPMENT

\$347.00

J. CASK HANDLING FEE:

\$572.00 minimum each

J. WASTE CONTAINING CHELATING ACENTS IN PACKAGES

AMOUNT GREATER THAN 14 OF PACKAGE VOLUME:

. SURTHARGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$21.25 per man millirem

9. DECONTAMINATION SERVICES (If required)

\$77.20 per men hour plus supplies at cost plus 21%

". CONTAINER VOLUMES:

35 Gallon Drums - 7.50 cu. ft.

30 Gallon Drums - 4.01 cu. ft.

5 Gallon Drums - 0.67 cu. fc.

- 10. All waste material shall be properly classified, described, packaged, marked, wabeled, and certified in accordance with all applicable Federal, State, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- II This Schedule of Charges is subject to change solely upon notice by US Ecology.

Iffective January 17, 1983.

# US ECCLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

ROHE AT CONTAINER SURFACE	FRICE PER GU. FT.
0.00 - 0.20	s 17.00
0.201 - 1.00	16.30
1.01 + 2.00	2C.3G
2.01 - 5.00	24.40
5.01 - 10.00	28.45
10.01 - 20.00	36.35
20.01 - 40.00	44.50
40.01 - 60.00	63.64
63.01 - 80.00	76.01
90.01 - 100.00	a3.67

Distosable Liners Removed from Shield:

WIR AT CONTAINER SURFACE	SURCHARGE PER LINER	FRICE FER CO. FO.
0.00 - 0.20	No Charge	S 17 66
0.201 - 1.00	\$ 206. <u>0</u> 0	17.05
1.01 - 2.00	506.00	17.00
2.01 - 5.05	710.00	17.00
5.01 - 10.00	1,027,00	17.aa
10.01 - 20.00	1,311.00	17.0.
20.01 - 40.00	1,628.00	17.01
#0.01 - 60.00	1.931.00	17.0.
60.01 <b>- 80.0</b> 0	2,228.00	17.00
€0.01 - 100.00	2,531.00	17.0C

#### . . TITUGID WASTES:

In mials, less than 50 ml. each Schutilation liquids, absorbed Aqueous liquids absorbed	\$ 21.80, 50.1 . \$ 21.80/50.1 . \$ 17.00/60.ft.
BIOLOGICAL WASTE, ANIMAL CARCASSES	5 18.40/cm.fc.

#### INCLUDED IN ITEM 1 ARE THE FOLLOWING WASHINGTON STATE FEES:

A. PERPETUAL CARE AND MAINTENANCE

\$1.75 PER CU. FT.

B. SITE CLOSURE FUND

0.25 PER CU. FT.

U. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE

O.30 PER CU. FT.

#### 2. BURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds

No Charge

10,001 pounds to Capacity of Site Equipment

\$155.00 plus 8¢ per 1b. above

10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

Less than 100 curies

101 - 300 curiss

MSI - License Limits

No Charge

\$1,127.00 plus 150/Ci above 100 Ci

By Request

CRCHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM)

\$2.00 per gram of Special Nuclear

Material by Isotope Weight

5. MINIMUM CHAPGE PER SHIPMENT

\$347.00

By Recuest

6 CASK MANDLING FEE:

\$572.00 minimum each

7. WESTE CONTRIBUTED CHELATING AGENTS IN PACKAGES

AMOUNT GRUATUR THAN IN OF PACKAGE VOLUME:

WE SURCHARGE FOR NON-POUTINE MAN-REM EXPOSURE DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

9. DECONTAMINATION SERVICES (If required)

\$21.25 per man millirem

\$77,20 per man hour blus supplies at cost plus 21%

LU. CONTAINER VOLUMES:

55 Gallon Druss - 7.50 cu. ft.

30 Gallon Orums - 4.01 cu. ft.

3 Gallen Drums - 0.67 cu. ft.

- All waste deterial shall be properly classified, described, packaged, marked, Tabeled, and descrified in accordance with all applicable Federal, State, and LOTEL laws, Tiles and regulations and shall be in compliance with all license requirements and amendments thereto applicable an the Richland, Washington disposal facility.
- 11. This Jonephus of Charges is subject to change solely upon notice by US Joclogy.

Effective F bruary 8, 3983

US ECGIOGY, INC. 9200 Shelbyvine Road, Suite 520 P.O. Box 7246 Louisville Kentucky 40297 502 496-7-80

# US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

- 1. DISPOSAL CHARGES
  - A. SCLID MATERIAL

Steel Drums, Wood Boxes:

R/HF AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 18.97
0.201 - 1.00	20.44
1.01 - 2.00	22.71
2.01 - 5.00	27, 37
5.01 - 10.00	31.96
10.01 - 20.00	40.92
20.01 - 40.00	50.27
40.01 - 60.00	71.97
60.01 - \$0.00	85.89
80.01 - 100.00	94.58

Disposable Liners Removed from Shield:

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 18.97
0.201 - 1.00	£ 233.61	18.97
1.01 - 2.00	573.81	18.97
2.01 - 5.00	805.16	18.97
5.01 - 10.00	1,164.65	18.9"
10.01 - 20.00	1,486.71	18,97
20.01 - 40.00	1,846.20	i&.97
40.01 - 60.00	2,189.81	18.97
50 <b>.01 - 80.00</b>	2,526.62	16.9?
0.01 - 100.00	2,870.23	18.97

#### B. LIQUID WASTES:

j	In vials, less than 50 ml. each	\$ 24.41/cu.ft.
- •	Scintillation liquids, absorbed	24.47, cu.ft.
3.	Aquebus liquids absorbed	18.97/cu.ft.

C BIOLOGICAL WASTE, ANIMAL CARCASSES

\$ 20.44/cu.it.

2064537850;#20

### INCLUDED IN ITEM I ARE THE FOLLOWING WASHINGTON STATE FEES:

A. PERFETUAL CARE AND MAINTENANCE

\$1.75 PER CU. FT.

B. SITE CLOSURE FUND

0.25 PER CU. FT.

C. RADICACTIVE WASTE SURVEILLANCE SURCHARGE 0.30 PER CU. FT.

2- SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds

10,001 pounds to Capacity of Site Equipment \$176.00 plus 90 per lh. above

No Charge

10,000 lbs.

3. SURCHAPGE FOR CURIES (Per Load):

Less then 100 curies

100 - 300 curies

301 - Alcense Limits

No Charge

\$1,278.00 plus 170/Ci above 100 Ci

By Request

- STECHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM)

\$2.30 per gram of Special Nuclear

Material by Isotope Weight

5 HI LAUM CHARGE PER SHIFMENT

\$394,00

CASK MY WILING FEE:

\$649.00 minimum each

MASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT DREATER THAN IN OF PACKAGE VOLUME:

8. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE DUE TO DESIGN OR PHYSICAL DEFECT OF

CONTAINT OR SHIELD)

By Request

9. DECUMERATION SERVICES (If required)

\$37.60 per man hour plus supplies at cost plus 21%

524.10 per man millirem

1 % TONTAINER VOLUMES:

51 Gallon Drums - 7.50 cu. ft.

30 Gallon Drums - 4.01 cu. ft.

5 Gallon Drums - 0.67 cu. ft.

- 11. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State, and total laws rules and regulations and shall be in compliance with all license resulraments and amendments thereto applicable at the Richland, Washington di posal facility.
- 12. This Somewhee of charges includes all Washington State fees and taxes effective July 1, 1983 applicable to US Ecology. Effective July 1, 1983. The schadule of charges will be revised to reflect any reduction in the moan sevenue tax that may be provided by Washington State statutes.
- 3 Thus Subjecture of Charges does not constitute an offer of contract which It recause of being accepted by any party and is subject to change solely cor state by US Ecology.

Effactive March 1, 1983

US Ecology, Inc 9200 Shellayarka Road, Bulka 300 P.O. 802 7246 Louisvale, Kentecky 40207 507 426 7180

## US SCOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

#### . DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 17.20
0.201 - 1.00	18.31
1.01 - 2.00	20.54
2.01 - 5.00	24.71
5.01 - 10.00	28.81
10.01 - 20.00	36.82
20.01 - 40.00	45.18
40.01 - 60.00	64.49
50.01 - 80.00	77.03
30.01 - 100.00	84.80

Dispusable Liners Removed from Shield:

R/HP AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 17.20
9.201 - 1.00	\$ 208.85	17.20
1.01 - 2.00	513.00	17.20
2.01 - 5.00	719.34	17.20
5 <b>.01 - 10.</b> 00	1,041.23	17.20
10.01 - 20.00	1,329.16	17.20
20.01 - 40.00	1,650.56	17.20
40.01 - 60.00	1,957.76	17.20
60.01 - 80.00	2,258.87	17.20
80.01 - 100.00	2,566.07	17.20

#### 3. LIQUID WASTES:

In vials, less than 50 ml. each	\$ 22.07/eu.ft.
Liquide containing organice, absorbed	22.07/cu.ft.
Acueous liquids absorbed	17.20/eu.ft.

GIOLOGICAL WASTE, ANIMAL CARCASSES

\$ 18.51/cu.ft.

#### INCLUDED IN ITEM 1 ARE THE FOLLOWING WASHINGTON STATE FEES.

A. PERPETUAL CARE AND MAINTENANCE

\$1.75 PER CU. PT.

B. SITE CLOSURE FUND

0.25 PER CU. FT. 0.30 PER CU. PT.

Less than 10,000 pounds

10,001 pounds to Capacity of Site Equipment

C. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE

No Charge \$157.00 plus 8¢ per 1b. above

10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

Less than 100 curies

100 - 300 curies

301 - Ricense Limits

No Charge

\$1.143.00 plus 15¢/Ci above 100 Çi

By Request

4. SURCHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM)

\$2.06 per gram of Special Nuclear

Material by Isctope Weight

5. MINIMUM CHARGE PER SHIPMENT

\$352.00

6. CASK HANDLING FEE:

\$580.00 minimum each

7. WASTE CONTAINING CHELATING AGENTS IN FACKAGES AMOUNT CREATER THAN 1% OF PACKAGE VOLUME:

By Request

8. SURCHARCE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$21.55 per man millirem

9. DECONTAMINATION SERVICES (If required)

\$78.32 per man hour plus supplies at cost plus 21%

10. CUNTAINER VOLUMES:

55 Gallon Drums - 7.50 cu.ft.

30 Gallon Drums - 4.01 cu.ft.

5 Gallon Drums - 0.67 cu.ft.

- 11. All waste material shall be properly classified, described, packaged, marked, makeled, and certified in accordance with all applicable Federal, State, and makel laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 7. This Schedule of Charges does not constitute an offer of contract which is repable of being accepted by any party and is subject to charge solely apon notice by US Ecology.

Officurios July 1, 1983

US Ecology Inc 3200 Sheldyville Road. Suns 300 P O. Box 7246 Louisville, Kentucky 40207 502 426-7180

#### US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

EFFECTIVE: January 15, 1984

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CCNTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$ 18.92
0.201 - 1.00	20.36
1.01 - 2.00	22,59
2.01 ~ 5.00	27.18
5.01 - 10.00	31.69
10.01 - 20.00	40.50
20.01 - 40.00	49.70
40.G1 - 60.00	70.94
60.01 - 80.00	84.73
80.01 - 100.00	93.28
	23.40

Ousposal Liners Removed from Shield: (Greater than 12.0 cu. ft. each;

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	<b>S</b> 18.92
0.201 - 1.00	\$ 229.74	18.32
1.01 - 2.05	564.30	18.32
2.01 - 5.00	791.82	18.92
5.01 - 10.00	1,145.35	18.92
10.01 - 20.00	1,452.08	18.92
30.01 - 40.00	1.815.62	18.92
40.01 - 60.00	2,153.54	18.92
60.01 - 80.00	2,484.76	18.92
80.01 - 100.00	2,822.68	18.92
_		

#### B. LIQUID WASTES

<ol> <li>In vials, less than 50 ml. each</li> <li>Liquids containing organics, absorbed</li> <li>Aqueous liquids, absorbed</li> </ol>		\$24.28/cu.1t. \$24.28/cu.ft. \$18.52/cu.ft.
¢.	BIOLOGICAL WASTE, ANIMAL CARCASSES	\$20.36/cu.ft.

001612

\$20.36/cu.it.

\$23.71 per man millirem

2004537350;#24

#### INCLUDED IN ITEM 1 ARE THE FOLLOWING WASHINGTON STATE FEES:

\$1.75 PER CU. FT. A. PERPETUAL CARE AND MAINTENANCE C.25 PER CU. FT. B. SITE CLOSURE FUND

C. RADIOACTIVE WASTE SURVEILLANCE SURCHARGE 0.27 PER CU. FT.

2. SURCHARGE FOR HEAVY CRIECTS:

No Charge Less than 10,000 pounds 10,001 pounds to Capacity of Site Equipment \$172.70 plus 94 per 15. above 10,000 lbs.

3. SURCHARGE FOR CURIES (Per Load):

No Charge Less than 100 curies \$1,257.30 plus 17¢/Ci above 100 Ci 100 - 300 curies By Request 301 - License Limits

4. SURCHARGE FOR SPECIAL MUCLEAR MATERIAL (SNM) \$2.27 per gram of Special Nuclear Material by Isotope Weight

\$387.00 . MINIMUM CHARGE FER SHIPMENT

\$638.00 minimum each n. CASK HANDLING FEE:

". WASTE CONTAINING CHELATING AGENTS IN PACKAGES AMOUNT GREATER THAN 1: OF PACKAGE VOLUME: By Request

. SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE

(DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

9. DECONTAMINATION SERVICES (If required) \$86.15 per man hour plus supplies at cost plus 21%

10. CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu.ft. 30 Gallon Drums - 4.01 cu.ft. 5 Gallon Drums - 0.67 cu.ft.

- 11. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable rederal, State, and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

US Seelogy, Inc. \$500 Shelbyrillis Read, Bullis 500 P.C. Box 7246 Louisville, Kentucky 40207 502 426-7160

#### US ECOLOGY WASHINGTON MUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

EFFECTIVE: December 10, 1984

#### 1. DISPOSAL CHARGES

#### A. SOLID MATERIAL

Steel Drums, Wood Boxes:

R/HR AT CONTAIN	ER SURFACE	PRICE PER CU. PT.
0.00 -	0.20	\$ 21.75
9.201 -	1.00	23.41
1.01 -	2.00	25.98
2.01 -	5.00	27.18
	19.00	31.69
	20.00	40.50
	40.00	49.70
	60.00	70.94
	30.00 4:	84.73
	00.00	93.28

Disposal Liners Removed from Shield: (Greater than 12.0 cu. ft. each)

R/HR AT CONTAINER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00 - 0.20	No Charge	\$ 21.76
0.201 - 1.00	\$ 229.74	21.76
1.01 - 2.00	564.30	21.76
2.01 - 5.00	791.82	21.76
5.01 - 10.00	1,145.35	21.76
10.01 - 20.00	1,462.08	21.76
20.01 - 40.00	1,815.62	21.76
40.01 - 60.00	2,153.54	21.76
60.01 - 80.00	2,484.76	21.76
80.01 - 100.00	2,822.60	21.76

#### B. BIQUID WASTES

In vials, less than 50 ml. each	5 27.92/cu.ft.
. Liquids containing organics, absorbed	\$ 27.32/cu.ft.
. Aqueous liquids, absorbed	5 21.76/cu.ft.
BICLOSICAL WASTE, ANIMAL CARCASSES	\$ 23.41/cu.ft.

-RGV SYTPERMINS COLE : 5-21-92 ; 1126PM ; CCITT G3→ 2004037350;#31

US Ecology, Mr. 8200 Shatbyville Hood, Suite 300 P.O. Box 7246 Louisville Konsucky 40207 502 428-7100

#### US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADICACTIVE WASTE

## **USEcology**

an American Ecology company

EFFECTIVE: August 1, 1986

- 1. DISPOSAL CHARGES
  - A. SOLID MATERIAL

Excel Drums, Wood Boxes:

SVER AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20 0.201 - 1.00 1.01 - 2.00 2.01 - 5.00 5.01 - 10.00 10.01 - 20.00 20.01 - 40.00 40.01 - 60.00 60.01 - 80.00 80.01 - 100.00	\$ 25.17 27.03 29.93 31.27 36.35 46.26 56.61 90.51 96.02

Disposal Liners Removed from Shield: (Greater than 12.0 cu. ft. mach)

CHO OT CONTAINER SURFAC	EURCHARGE POR LINER	PRICE PER CU. FT.
0.00 - 0.20	Ho Charge	\$25.17
0.201 - 1.00	\$ 258.46	25.17
1.01 - 2.00	634.84	25.17
2-01 - 5.00	890.80	25.17
5-01 - 10.00	1,288.52	25.17
10.01 - 20.00	1,644.84	25.17
10.01 - 40.00	2,042.57	25.17
40.01 - 60.00	2,422.73	25.17
60.01 - 80.00	2.795.36	25.1 7
80.01 - 100.00	3,175.52	25.17

CITTED WASTES

c.

. Ac seous liquids in vishs, less than 50	ml. each \$32.11/cm
. Aqueous liquids, absorbed	<b>25.1</b> 7/ou r.
TOLCCICAL WASTE, ANIMAL CARCASSES	27.03/e

2UC4557350;#32

#### (CONTINUED FROM FREVIOUS PAGE)

#### 2. SURCHARGE FOR HEAVY OBJECTS:

Less than 10,000 pounds 10,000 pounds to Capacity of Site Equipment

No Charge \$194.29 plus 10¢ per 1b. above 10,000 lbs.

#### SURCHARGE FOR URIES (Per Load)

Less than 100 curies 100 - 200 curies 302 - License Limits No Charge \$1,414.46 plus 19¢/Ci above 100 Ci By Request

GROWARGE FOR SPECIAL NUCLEAR MATERIAL (SNM) \$2.55 per gram of Special Nuclear

Material by Isotope Weight

MINIMUM CHARGE PER SHIPMENT

\$435.00

LASK HANDIENC FELL

\$718.00 minimum each

WASTE CONTAINING CHILATING ACENTS IN PACKAGES AMOUNT GREATER THAN 1% BY WEIGHT:

By Request

SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE DUE TO DESIGN OF PHYSICAL DEFECT OF CONTAINER OR SHIELD!

\$25.67 per man millirem

3. DECONTAM NATION SERVICES (If Required)

\$96.92 per man hour plus supplies at cost plus 21%

#### A ... CONTAINER VOLUMES:

55 Jallon Druns - 7.50 cu. ft. 30 Gallon Srums - 4.01 cu. ft. F Gallian prime - 9.67 cu. ft.

- All waste saterial shall be properly classified, described, packaged, marked, 11. tabeled, and certified in accordance with all applicable Federal, State and Lotal laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal famility.
- This Schedule of Charges does not constitute an offer of contract which in capable or being accepted by any party and is subject to change solely upon notice by DS Ecology.

Affective Suguet 1, 1986 Washington we sleet Center

CCITT G3→

US Ecology, inc. 9200 Sneroyville Roes, Suite 300 RO. Ben 7246 Louitville, Kentucky 40707 502 426-7160

#### US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## USEcology

an American Ecology company

EFFECTIVE: March 5, 1987

- DISPOSAL CHARGES
  - SOLID MATERIAL

Steel Drums, Wood Boxes:

P/HR AT CONT	AINER SURFACE	PRICE PER CU. PT.
0.00	- 8.20	\$27.92
0.201	- 1.00	29.76
1.01	- 2.00	32.68
2.01	- 5.00	34.02
5.01	- 10.00	39,10
10.01	- 20.00	49.01
20.01	- 40.00	59.36
40.01	- 60.00	B3.26
60.01	- 89.00	98.77
90.01	- 100.00	108.39

Diaposal Liners Removed from Shield: (Greater than 12.0 cu. ft. each)

HAHR AT CONTAINER BURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.	
0.00 - 0.20	No Charge		
0.201 - 1.00	286.70	\$27.92	
1.01 - 2.00	704.20	27.92	
2.01 - 5.00	988.13	27.92	
5.01 - 10.00	1,429.30	27.92	
10.01 - 20.00	1,824.55	27.92	
20.01 - 40.00	2,265.74	27.92	
40.01 - 60.00	2,687.43	27.92	
80. <b>01 - 80.0</b> 0	3,100.77	27.92	
80.01 - 100.00	3,522.47	27.92	

#### 3. LIQUID WASTES

4	Aqueous	liquids	in vials,	Less	then	50	ml.	each	\$34.86/20.11
---	---------	---------	-----------	------	------	----	-----	------	---------------

3. Aqueous liquids, absorbed 27.92/cu.ft.

Ç. HOLOGICAL WASTE, ANIMAL CARCAGGES 29.78/cu.it.

- [

#### (CONTINUED FROM PREVIOUS PAGE)

#### SURCHARGE FOR HEAVY CAJECTS:

Less than 10,000 pounds 10,000 pounds to Caperity of Site Equipment

No Charge \$215.52 plus 10¢ per 1b. above 10.000 lbs. per package

#### 3. - SURCHARGE FOR CURIES (Per Load)

Less than 100 curies 100 - 300 curies 301 - License Limits

No Charge \$1.569.00 plus 210/Ci above 100 Ci By Request

EURCHARGE FOR SPECIAL MUCLEAR MATERIAL (ENM) \$2.83 per gram of Special Nuclear (Creater Than 5 Grams Per Shipment)

Material by Isotope Weight

MINIMUM CHARGE PER SHIPMENT

\$485.30

CASK HANDLING PEE:

\$800.00 minimum each

WASTE CONTAINING CHELATING ACENTS IN PACKAGES AMOUNT GREATER THAN 10 BY WEIGHT:

By Request

ř

SURCHARGE FOR HON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$29.50 per man millirem

DECONTAMINATION SERVICES (If Required)

\$96.92 per men hour plus supplies at cost plus 21%

#### IC. CONTAINER VOLUMES:

\$\$ Gallon Drums - 7.50 cu. ft. 30 Gallon Drums - 4.01 cu. fft. 5 Galion Drums - 0.67 en. 11.

- All waste amterial shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 2.2 . This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective March 5, 1987 Washington Nuclear Center

EFFECTIVE: MARCH 5, 1937

US Eculapy, Inc. 9200 Shelmyvilly Rosu. Suits 300 P.O. Box 7246 Edula vite, Kemuchy 4./207 502 426-7160

FEBRUARY 11, 1987
AMENDED EDITION
SEE ITEMS #7 AND #8

# US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CHARGES RADIOACTIVE WASTE

## **USEcology**

an American Ecology company

1. SISPOSAL CHARGES

A. SOLID MATERIAL

Steel Drums, Wood Boxes:

RAHE AT CONTAINER SURFACE	PRICE PER CU. FT.
0.00 - 0.20	\$27.92
8.201 - 1.00	29.78
1.01 - 2.00	32.68
2.01 - 5.00	34.02
5.01 - 10.00	39.10
10.01 - 20.00	49.01
20.01 - 40.00	59.36
40.01 - 60.00	83.26
60.01 - 80.00	98.77
<b>80.01 - 10</b> 0.00	108.39

Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

R. HR AT CO	HATH	NER SUFFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
(,00	-	0.20	No Charge	\$27.92
Ŀ.20 <u>1</u>	_	1.00	286.70	27.92
01		2.00	784.20	27.92
2.01	-	5.00	988.13	27.92
3.01	-	10.00	1,429.30	27.92
10.01	-	20.00	1.824.55	27.92
20.01	•	40.00	2,265.74	27.92
40.01	-	60.00	2,687.43	27.92
60.01	-	30.00	3,100.77	27.92
80.01	-	100.00	3,522.47	27.92

#### B. LIQUID WASTES

1. Aqueous liquids in vials, less than 50 ml. each

\$34.86/cu.ft.

2. Aqueous liquids, absorbed

\$27.92,'cu.ft.

T. BIGLOGICAL WASTE, ANIMAL CARCASSES

\$29.78/cu.ft.

#### (AMENDED EDITION (2/11/87)

#### (CONTINUED FROM PREVIOUS PAGE)

2. SURCHARGE FOR HEAVY OBJECTS:

- bess than 10,000 pounds
10,000 pounds to Capacity of Site Equipment

No Charge \$215.52 plus 10g per 1b. above 10,000 lbs. per package

3. SUPCHARGE FOR CURIES (Per Load)

Less than 100 curies 180 - 300 curies 301 - License Limits

No Charge \$1,569.00 plus 21g/C1 above 100 Ci By Request

4. SURCHARGE FOR SPECIAL NUCLEAR MATERIAL (SHM) (Greater Than 5 Grams Per Shipment)

\$2.83 per gram of Special Nuclear Material by Isotope Weight

5. MINIMUM CHARGE PER SHIPMENT

\$485.00

6. TASK HANDLING FEE:

\$800.00 minimum each

7. WASTE CONTAINING CHELATING AGENTS IN AMOUNTS GREATER THAN 0.1% BY WEIGHT AFTER TREATMENT:

By Request

8. SOLIDIFIED CILY WASTES REQUIRING SEGREGATION:

By Request

9. SURNHAPGE FOR NON-ROUTINE MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD)

\$29.50 per man millirem

10. PECONTAMINATION SERVICES (If Required)

\$96.92 per man hour plus supplies at cost plus 21%

... CONTAINER VOLUMES:

35 Gallon prums - 7.50 cu. ft.
30 Gallon prums - 4.01 cu. ft.
5 Gallon prums - 0.67 cu. ft.

- All waste material shall be properly classified, described, packaged, marked, libeled, and certified in accordance with all applicable Federal, State and Lical laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective March 5, 1987 Washington Nuclear Center US Ecology, Inc. 6200 Sheltryville Road, Suite 300 P.O. Box 7246 Jaurenike, Herntusky 40307 502/425-7180

# US ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CEARGES RADIOACTIVE WASTE

### **USEcology**

an American Ecology company

EPPECTIVE: August 17, 1987

#### 1. DISPOSAL CHARGES

- A. SOLID MATERIAL
  - 1. Packages 12.0 cu.ft. each or less

R/HR AT CONTAINER SURFACE	PRICE PER CU.PT.		
0.00 - 0.20	\$ 29.60		
0.201 - 1.00	31.10		
1.01 - 2.00	32.25		
2.01 - 5.00	33.50		
5.01 - 10.00	36.75		
10.01 - 20.00	40.00		
29.01 - 40.00	45.00		
Over 40.00	By Request		

ii. Disposal Liners Removed from Shield: (Greater than 12.0 cu.ft. each)

R/HR AT CONT	AIN	ER SURPACE	SURCHARGE PER LINER	PRIC	E PER CU.PI.
0.00	_	9.20	No Charge	į	29.60
0.201	-	1.00	\$ 193.50	•	29,60
1.01	-	2.00	441.00		29,60
2.01	-	5.00	747.08		29.60
5.01	-	10.00	1,192.50		29.60
10.01	•	20.00	1,566.00		29.60
20.01	•	40.00	1,791.00		29.60
Over	40	.00	by Request	ву	Request

- B. LIQUID WASTES
  - 1. Aqueous liquids in vials, less than 50 ml. each

\$36.54/cu.ft.

2. Aqueous liquids, absorbed

\$29.60/cu.#t.

2. BIOLOGICAL WASTE, ANIMAL CARCASSES

\$31.45/cu.ft.

(Continued)

#### (Continued from previous page)

#### 2. SUPCHARGE FOR BEAVY OBJECTS:

Less than 10,000 pounds
10,001 pounds to capacity of site equipment

No Charge \$215.52 plus 10s per 15. above 10,000 lbs. per package

? SURCHARGE FOR CURIES (Per Load):

Less than 100 curies 101 - 300 curies

301 - License Limits

No Charge \$1,569.00 plus 21£/Ci above 100 Ci by request By Request

4. SURCHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM) (Greater than S grams per shipment)

\$2.83 per gram of Special Nuclear daterial by isotope weight

5. MINIMUM CHARGE PER SHIPMENT

\$485.00

6. CASE MANDLING PEE:

\$550.00 minimum each

7. WASTE CONTAINING CHELATING AGENTS IN AMOUNTS GREATER THAN 0.1% BY WEIGHT APTER TREATMENT:

By Request

8. SOLIDIPIED OILY WASTES REQUIRING SEGREGATION:

By Request

9. SURCHARGE FOR HONROUTING MAN-REM EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SEIELD):

\$29.50 per man millirem

10. DECONTAMINATION SERVICES (If Required)

\$96.92 per man hour plus supplies at cost plus 214

#### 11. CONTAINER VOLUMES:

55-Gallon Drums - 7.50 cu.ft. 30-Gallon Drums - 4.61 cu.ft. 5-Gallon Drums - 9.67 cu.ft.

- 12. All waste material shall be properly classified, described, packaged, marked, labeled and certified in accordance with all applicable federal, state and local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 13. This Schodula of Charges does not constitute an offer of contract which is capable Of being accepted by any party and is subject to change solely upon notice by US Roology.

Effective August 17, 1987 Washington Nuclear Center

USEcology, Inc. 6500 Shelayville Road, Suire 300 P.D. Box 7246 Lauisvite, Kentumy 40257-0348 502/426-7160

#### DE ECOLOGY WASHINGTON NUCLEAR CENTER SCHEDULE OF CRANCES RADIOACTIVE WASTE

EPFECTIVE: July 1, 1990

an Attendan Espiron somethy

#### DISPOSAL CHARGES

- A. SOLID MATERIAL
  - 1. Packages 12.0 cu.ft. each or less:

5/HR P	T CO	NTAIN	ER SURPACE	PRICE PER CU. FI.
Ü.	.00	_	0.20	\$32.11
<b>5</b> .	201	-	1.00	33.74
1	.01	-	2.00	34.99
2.	.01		5.00	36.35
3.	.01	-	10.00	39.87
16.	.01	-	20.00	43.40
20.	.01	-	40.00	48.83
(	Dver	40.0	0	By Request

i. isposal Liners Removed From Shield (Greater Than 12.0 Cu.ft. Each)

HOD TA SELE	TAIN	ER SURPACE	SURCHARGE PER LINER	PRICE PER CU. FT.
۵.00	_	0.20	No Charge	\$32.11
0.201	-	1.00	210.00	32.11
1.01	_	2,00	478.00	32.11
2.31	٠	5.00	811.00	32,11
5.01		10.00	1,294.00	<b>32.1</b> 2
19.01	_	20,00	1,700.00	32.11
70.01	_	40.00	1,943.00	32.11
244	er 40	.00	By Pequest	By Request

#### . LIQUID WARTES

Acueous liquide in Viale, less than 50 ml. each

\$39.65/cu.£t.

2. squebus liquids, shaorbed

\$32.11/cu.#t.

J. HOMIGICAL WANTE, ANIMAL CARCASSES

\$34.13/cd.6 .

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#### (CONTINUED FROM PREVIOUS PAGE)

2. SUBCHARGE FOR STAVY OBJECTS:

> Less than 10,000 pounds 10,000 pounds to Capacity of Site Squipment

No Charge \$235.00 plus 10¢ per 1b. above 10,000 lbs. per package

З, SURCHARGE FOR CURIES (Per Load)

> Less than 100 curies 100 - 300 euries

> 301 - License Limits

Mo Charge \$1,700.00 plus 23d/c1 above 100 Ci by request By Request

SCRCEARGE FOR SPECIAL MUCLEAR MATERIAL (SMR) (Greater Than 5 Grams Per Shipment)

\$3.10 per gram of Special Nuclear Material by Isotope Weight

٤, MINIMUM CHARGE PER SHIPMENT

É. CASK HANDLING FEE:

\$600.00 minimum each

WASTE CONTAINING CHELATING AGENTS IN AMOUNTS GREATER TEAN U.12 BY WEIGHT AFTER TREATMENT:

By Request

\$525.00

SOLIDIFIED OILY WASTES REQUIRING SEGREGATION: 13

By Request

SURCHARGE FOR NON-ROUTINE MAN-REM EXPOSURE IDUE TO DESIGN OR PRYSICAL DEFECT OF CONTAINER OR SHIELD)

\$32.00 per man millirem

12. DECONTAMINATION SERVICES (If Required) \$100.00 per man hour plus supplies at cost plus 21%

CONTAINER VOLUMES:

55 Gallon Drums - 7.50 cu. ft.

20 Gallon Drums - 4.01 cu. ft.

5 Gellon Drums - 0.67 cu. ft.

- 12. All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal, State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the Richland, Washington disposal facility.
- 13. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

Effective July 1, 1990 Washington Nuclear Center

CCITT 33-

EFFECTIVE: March 1, 1992

LiS Ecology, Inc., 9200 She, bywile Road, Suite 300 © D. Ban 7246 Louisville, Kentucky 40257-0246 602/426-7160

#### US ECOLOGY MASHINGTON & NEVADA NUCLEAR CENTERS SCHEDULE OF CHARGES RADIOACTIVE WASTE DISPOSAL

## **US Ecology**

1.

an American Ecology company

DISPOSAL CHARGES

3. Packages (Except as noted in Section B)

R/HR AT CO	NTAL	ER SURFACE	PRICE PER CU. FT.
0.00	-	0.20	\$36.00
0.201	•	1.00	37.80
1.01	-	2.00	39.20
2.01	•	<b>5.0</b> 0	40.70
5.01	-	10.00	44.70
10.01	-	20.00	53.30
20.01	_	40.00	61.60
0 v	er 40	.00	By Request

B. Disposal Liners Removed From Shield (Greater Than 12.0 Cu.Ft. Each)

R/4R AT CON	ITAI	NER SURFACE	SURCHARGE PER LINER	PRICE PER CU. FT.
0.00	-	0.20	No Charge	\$36.0G
0.201	-	1.00	\$ 240.00	36.00
1.01	-	2.00	540.00	36.00
2.01	-	5.00	00.016	36.00
5.01	-	10.00	1.450.00	36.00
10:01	•	20.00	7.900.00	36.00
20.01	-	40.00	2,180.00	36.00
Over 40.00			By Request	By Request

Z. SUICHARGE FOR HEAVY OBJECTS:

_ess than 5,000 Pounds	No Charge
5,000 - 10,000 H	\$500.00
:0,001 - 15,000 *	1.000.00
15.001 - 20.000 *	2,500.00
20 001 - 25 000 "	5,000.00
Over 25,000 "	By Request

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(CONTINUED FROM PREVIOUS P	AGE)
SURCHARGE FOR CURIES (Per Load)	
Less than 50 curies  50 - 100 "  101 - 300 "  301 - 500 "  501 - 1,000 "  1,001 - 5,000 "  5,001 - 10,000 "  10,001 - 75,000 "  Over 15,000 "	No Charge \$1,000.00 2,000.00 2,600.00 3,000.00 3,500.00 5,100.00 7,200.00 By Request
SURCHARGE FOR SPECIAL NUCLEAR MATERIAL (SNM) (Greater Than 6 Grams Per Shipment) Per Gram:	<b>\$10.0</b> 0
NINIMUM CHARGE PER SHIPMENT	\$1,006.00
CASK HANDLING FEE (Minimum per Cask):	\$1,000.00
WASTE CONTAINING CHELATING AGENTS IN AMOUNTS GREATER THAN 0.7% BY WEIGHT AFTER TREATMENT:	By Request
SCLIDIFIED CILY WASTES REQUIRING SEGREGATION:	By Request
RADIUM SOURCES (NEVADA ONLY) 50 mC1 per package or less: "More than 50 mC1 per package:	\$500.00 By Request
DISPOSAL OF POLY HIC IN ENGINEERED BARRIER:	By Request
SURCHARGE FOR NON-ROUTINE PERSONNEL EXPOSURE (DUE TO DESIGN OR PHYSICAL DEFECT OF CONTAINER OR SHIELD) Per Person-mrem:	\$100.00
DECONTAMINATION SERVICES (If Required) Per Hour:	\$150.00

12.

Per Hour: Supplies:

Cost plus 25%

13. PROCESS LICENSE VARIANCE REQUESTS:

\$200.00

14. DRUM VOLUMES: 55-Gallon - 7.50 Cu.Ft.

30-Gallon - 4.01 Cu.Ft.

5-Gallon - 0.67 Cu.Ft.

- All waste material shall be properly classified, described, packaged, marked, labeled, and certified in accordance with all applicable Federal. State and Local laws, rules and regulations and shall be in compliance with all license requirements and amendments thereto applicable at the disposal facility. 15.
- 15. This Schedule of Charges does not constitute an offer of contract which is capable of being accepted by any party and is subject to change solely upon notice by US Ecology.

----- Washington & Nevada Nuclear Centers: Effective March 1, 1992 -----

Response to Staff Data Request No. 23

Request: Provide annual volumes (in cubic feet) of LLRW received at US Ecology, Inc.'s Richland, Washington site since 1965, broken down by Class of waste (Class A, Class B, Class C).

#### Response:

Witness: Richard E. Sauer

See Response No. 17; similar data is provided for the Richland facility.

1E22A	RICHL	AND, WASHINGTON FAC	ILITY	
	Volum	e (Cubic Feet)		
YEAR 1991 1990 1989 1988 1987 1986 1985 1985	CLASS A 411,531.36 292,431.97 400,738.33 396.750.82 547,840.65 650,403.31 1,369,327.83 1,333,933.93	CLASS B 4,011.73 2,058.33 4,305.94 4,245.42 7.224.99 6,775.57 13,61C.46 7,930.36	CLASS C 3,664.90 808.50 3,246.85 2,402.50 1,583.94 7,886.91 14,316.13 6,804.40	UNCLASSED*
	Activi	ty (Millicuries)		
1991 1990 1989 1986 1987 1986 1985	5,527,677.865 4,257,038.549 6,502,569.685 4,449.707.756 4.186,731.724 5.035,326.478 9,090,536.964 5.664,730.088	50,863,987.890 87,974,165.720 59,803,866.199 22,990,351.579 30,226,976.093 50,921,091.313 152,360,710,710 19,111,333,270	102,373,429.356 653,722.662 32,755,330.985 4,627,629.945 13,070,283.809 61,003.412.674 126,548.030.487 190,208,356.075	301 ,401 .728

 $<sup>^{*}</sup>$  UNCLASSED waste at WA was entered into the database prior to the effective date of classification regulations.

Response to Staff Data Request No. 24

Request: Provide annual statistics on total radioactivity (in curies) of LLRW shipments received at US Ecology, Inc.'s Richland, Washington site since 1965.

#### Response:

Witness: Richard E. Sauer

See Response No. 18; similar data is provided for the Richland facility.

Response to Staff Data Request No. 25

Request: Provide annual statistics stating the number of radioactive materials site use permits issued for US Ecology, Inc.'s Richland, Washington site since 1965.

#### Response:

Witness: Richard E. Sauer

The Radioactive Materials Site Use permits are issued by the Washington Department of Ecology. US Ecology does not have records of their issuance.

Response to Staff Data Request No. 26

Request: Provide organizational structure chart showing all affiliated interests of US Ecology, Inc. where the term "affiliated interest" means:

Every corporation and person owning or holding directly or indirectly five percent or more of the voting securities of US Ecology, Inc.;

Every corporation and person, other than those above specified, in any chain of successive ownership of five percent or more of voting securities, the chain beginning with the holder of the voting securities of US Ecology, Inc.;

Every corporation five percent or more of whose voting securities are owned by any person or corporation owning five percent or more of the voting securities of US Ecology, Inc. or by any person or corporation in any such chain of successive ownership of five percent or more of voting securities;

Every corporation or person with which US Ecology, Inc. has a management or service contract; and

Every person who is an officer or director of US Ecology, Inc. or of any corporation in any chain of successive ownership of five percent or more of voting securities.

#### Response:

Witness: Richard E. Sauer

US Ecology is wholly owned by American Ecology Corporation. A copy of the list of officers and directors of both American Ecology and US Ecology is attached.

#### US ECOLOGY, INC. BOARD OF DIRECTORS ANNUAL MEETING

May 8, 1991

The Annual Meeting of the Board of Directors of US Ecology, Inc. was held on Wednesday, May 8, 1991 at 30423 Canwood Street, Suite 201, Agours Hills, California.

The following Directors, constituting a quorum, were present and participated throughout the meeting:

William E. Prachar Karl J. Eimer R. Lee Armbruster Ronald K. Gaynor

Mr. Prachar acted as Chairman and Mr. Eimer acted as Secretary.

The following officers were elected for the ensuing year or until their successors shall be elected and qualify:

William E. Prachar Chairman of the Board R. Lee Armbruster President \* Dr. Thomas S. Baer Senior Vice President \* Oscar P. Wong Senior Vice President Karl J. Eimer Senior Vice President Finance and Administration, Assistant Secretary Ronald K. Gavnor Senior Vice President Richard Saucr Vice President Larry G. Butler Vice President Richard F. Paton Vice President Stephen A. Romano Vice President Robert L. Ash Chief Financial Officer, Treasurer Secretary & Controller Harries A Lloyd Assistant Treasurer Alan L. Harrington Assistant Secretary

Assistant Secretary

There being no further business to come before the meeting, upon motion duly made, seconder, and unanimously carried, it was adjourned.

Secretary

w longer employed by US Ecology

Bradley E. Dillon

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## AMERICAN ECOLOGY CORPORATION BOARD OF DIRECTORS ANNUAL MEETING

May 8, 1991

The annual meeting of the Board of Directors of American Ecology Corporation was held at its offices, 30423 Canwood Street, Suite 201, Agoura Hills, California, on Wednesday, May 8, 1990 at 9:00 a.m.

The following directors, constituting a quorum, were present and participated throughout the meeting:

W. E. Prachar
J. J. Scoville
C. A. Simms
R. L. Armbruster
J. T. Lurcott (via telephone)

Mr. Prachar acted as Chairman of the meeting and Karl J. Eimer acted as Secretary. Also in attendance were Mr. Bradley E. Dillon, General Counsel and Ms. Judy Bardugo, Irell & Manella.

The Board reviewed and approved the minutes of the last three meetings of the Directors.

The Chairman stated that it would be appropriate to elect the following officers of the Company, effective May 8, 1991. After discussion, upon motion duly made and unanimously carried, the following officers were elected:

William E. Prachar	Chairman of the Board and Chief Executive Officer
R. Lee Armbruster Karl J. Eimer Harries A. Lloyd Bradley E. Dillon Robert L. Ash Alan Harrington	President and Chief Operating Officer Chief Financial Officer & Secretary Treasurer & Assistant Secretary General Counsel & Assistant Secretary Assistant Treasurer Assistant Secretary

Mr. Eimer presented the financial results of the Company for the first quarter of 1991.

Messrs. Bob Eecker and Brent Bickett, Bear, Stearns & Co. Inc., and Ron Gaynor, US Ecology, Inc., described the progress being made on obtaining financing for the California project. A letter of interest was received by the Company from Bank of America on May 7, 1991 with at least one other letter of interest expected within the next few days.

Mr. Dillon reported on the business insurance.

Mr. Dision described the current status of the Sheffield litigation and other actions in progress.

of Caynor described the status of the California and Nebraska projects.

No longer employed by US Ecology

Response to Staff Data Request No. 27

Request: Provide historical description of all LLRW disposal surcharges required by all governing agencies at the federal, interstate, state, county and municipal levels at:

- A. US Ecology, Inc.'s Beatty, Nevada site during the period 1965 to present; and
- B. US Ecology, Inc.'s Richland, Washington site during the period 1965 to present.

#### Response:

#### Witness: Richard E. Sauer

While the facilities have been subject to a number of fees, e.g., perpetual care and maintenance and closure fees, the only fees which have been considered as surcharges are those fees which were imposed under the Low-Level Radioactive Waste Policy Act Amendments of 1985. A copy of the statute imposing those surcharges is attached.

Response to Staff Data Request No. 28

#### Request:

- A. What is the basis for witness Sauer's testimony in Exhibit No. T-l (RES-1), at page 2, lines 9 12, that US Ecology, Inc. expects to receive the first two licenses issued for new LLRW facilities in California and Nebraska?
- B. Provide copies of source documents supporting response to Staff Request No. 28, A.

#### Response:

#### Witness: Richard E. Sauer

- A. The license application for California and Nebraska were the first two submitted to their respective state agencies for the siting of new LLRW disposal facilities under the LLRWPAA. The two applications were also the first two to be deemed complete.
- B. Copies of the letters from the States of California and Nebraska which indicate that the two applications are complete are included.

Q-28B (1 of 4 pgs)

# STATE OF NEBRASKA





DEPARTMENT OF MEALTH
Park 8. Horton, M.B., M.S.P.H.
Birector
301 Centennial Wall South
P.O. Box 95907
Lincoln, Mabraska 68589-95687

DEPARTMENT OF ENVIRONMENTAL CONTROL
Randolph Wood
Director
301 Centennial Mail South
P.O. Box 98922
Lincoln. Nabraska 68509-8922
Phone (402) 471-2186

December 24, 1991

Richard F. Paten vice President US Ecology, Inc. p.o. Box 7245 Louisville, KY 40257-0246

RE: Application for Boyd County Low-Level Radioactive Waste Facility Received July 27, 1991

Dear Mr. Paton:

we thank you for your responses to our Completeness letter dated August 22, 1990, and after review have determined your application to be complete as of the date of this letter. Full technical review can now proceed. As a matter of procedure, the State will be announcing the availability of the complete license application.

It is important to note that a distinction needs to be drawn between a determination that an application is administratively complete and whether the application is technically adequate or approvable. As a matter of course, we have examined the application as amended and supplemented to determine if all of the required areas of examination are addressed. We have now made a positive decision on that question.

We have not, however, determined or implied that the information submitted is technically adequate or sufficient. In fact, the application cannot be approved as it now stands, as areas of inadequacy have already been identified. We reference our letter to you dated December 11, 1991 where we identify a number of concerns, and propose that meetings be arranged to address the various issues. Your prompt attention to these concerns will facilitate the remainder of the technical review.

It is characteristic of the technical review process that additional future requests for data/information will be generated. Although we have datermined your application to be acceptable for detailed technical review, this does not imply technical adequacy or preclude requests for additional investigation, data and/or technical justification.

A decision has been made to include all of your responses received during October, November and December, 1991 in our forthcoming round of technical review. It should be noted and understood that inclusion of these

Pichard F. Paton December 24, 1991 Page 2

late submittals will result in delay of completion of our review and next transmittal of comments.

We have noted that some of your responses have been formal revisions to the SAR, while others provide discussion/data/information related to a specific technical comment. Please verify that your Final Safety Analysis Report will include all accepted responses to our completeness letter and all accepted responses from all rounds of our technical review.

A Completeness Response Evaluation for the last eight completeness items is enclosed.

Sincerely.

Randolph Wood

Director

Nebraska Department of Environmental Control Mark B. Horton, M.D., MSPH

Director

Nebraska Department of Health

cc: John DeOld, Project Manager US Ecology

Eugene Crump, Acting Executive Director Central Interstate LLRW Compact

Cheryl Rogers Nebraska Department of Heslth

Jay Ringenberg MBEC-LLRW Program

LLRW Program Review Managers

SAR Controlled Copy Holders

Boyd County Local Monitoring Committee

# State of Nebraska

# COMPLETENESS RESPONSE EVALUATION

Low-Level Radioactive Waste Disposel Facility

1 tem Number	Date Received	Response Status	Remarks
12	16/31/91	Acceptable	Conformance or nonconformance with regulatory guidance listed in NUREG 1199 references provided. Technical review will proceed.
5	16/60/81	Acceptable	Provided in SAR Ravision No. 4. Technical review will proceed.
136 136	16/69/91	Acceptable	SAR Revision No. 4 received October 9, 1991. SAR Revision No. 5 received Movember 4, 1991. The applicant has not provided the requested information/data, but has provided rationale for an alternate approach. This rationale and approach will be forwarded for technical review. Outcome of the technical review may ultimately require that a detailed geochemical characterization and modeling of soil and rock units to be
181	19/31/91	Acceptable	Discussion provided. Forwarded for technical review.
117	18/31/91	Acceptable	Discussion provided. Technical review will proceed.
<b>15</b> 00	16/31/91	Acceptable	Standards Manual received and forwarded for tachnical review.
in the	16/11/91	Acceptable	Fiduciary guarantee received and forwarded for technical review.
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Page 1 of 1

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## STATE OF CALPONIAL-MEALTH AND WELFARE ADDREST

DEPARTMENT OF HEALTH SERVICES

PIN/THE P STREET P.O. BOX 148722 - "NAMORICA, CA. MISSA-7530

(-46) 445-0498

DEC 08 1989

mr. Staphen A. Rosent Project Manager US Monlogy, Inc. 1600 Date Street, Sta. 408 Namourt Beach, CA 92660

Deer Mr. Romanos

LICES APPLICATION CONFIRMENCES

This acknowledges receipt of the additional license application information requested in our earlier letter dated becamber 4, 1989. After reviseing the submitted material, the Deputaent deems the current application for a low-level radioactive wasts (HEM) disposal facility to be complete. This determination is consistent with our January 9, 1989 letter wherein we stated that mixed wasts disposal will not be included in UE Eurlogy's 1989 application for a license to dispose of LEM.

The submitted material will be forwarded to Roy P. Weston, Irs., so that detailed review can commonos.

Sincerely,

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(4 of

Don J. Monadicart, Chief Savingmental Management Branch

BIVILGEBRICAL SANSAGE

oc: Pat Seria Roy F. Weston, Inc.

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PAGE. 002

TOTAL P.82

DEC 11 '99 13:85 MMY 21 '92 13:20

Response to Staff Data Request No. 29

### Request:

- A. Provide annual data about the types of waste received at US Ecology, Inc.'s Richland, Washington site paralleling that which is discussed in witness Sauer's testimony in Exhibit No. T-1 (RES-1) at page 3, lines 7 19, and covering the time period 1965 to present.
- B. Provide annual data about the types of waste received at US Ecology, Inc.'s Beatty, Nevada site paralleling that which is discussed in witness Sauer's testimony in Exhibit No. T-1 (RES-1) at page 3, lines 7 19, and covering the time period 1965 to present.
- C. Describe the type of waste shipped by Western Zirconium, referenced in witness Sauer's testimony in Exhibit No. T-l (RES-l) at page 5, line 7.
- D. Define the term "clean-ups" as used in witness Sauer's testimony in Exhibit No. T-1 (RES-1) at page 5, line 9.
- E. In Exhibit No. T-1 (RES-1), at page 4, line 23, witness Sauer describes six dominant customers, and, still in Exhibit No. T-1 (RES-1), at page 5, line 7, witness Sauer says that those six dominant customers generated 90% of the volume that is unrelated to clean-ups. What percent of the volume was generated by those six dominant customers when the total includes volumes related to clean-ups?

### Response:

### Witness: Richard E. Sauer

- A. The general category of waste received from hospitals, laboratories, universities, industry and nuclear power facilities is provided from 1988 through 1991. Annual data earlier than 1988 is not available with the Company's electronic data base.
- B. See Response for 29A.

- C. Western Zirconium produces a low activity waste that is a by product from the separation of zirconium from the ore.
- D. In general "clean ups" are wastes generated from a one-time site remediation project required as a result of past operations or waste disposal involving radioactive materials. Production waste or waste generated during maintenance would not be considered "clean up" waste.
- E. As stated, the six dominant customers disposed of 90% of the LLRW waste disposed by Northwest Compact generators. During 1991, there were no "clean up" wastes shipped for disposal from Northwest Compact generators. Thus, the percent remains at 90.

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REPORT NO. ECF654 AUR DATE: D5/20/92

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Response to Staff Data Request No. 30

Request: With regard to Exhibit No. T-1 (RES-1), at page 5, line 9, what is the total radioactivity (in curies) of the shipments generated by the six dominant customers that is:

- A. Unrelated to clean-ups; and
- B. The total radioactivity (in curies) including clean-ups.

### Response:

### Witness: Richard E. Sauer

- A. The activity (in curies), for the six dominant customers, corresponding to the approximate 92% figure is 1,563.3.
- B. See Response No. 29E.

Response to Staff Data Request No. 31

Request: Provide the source for the disposal statistics cited in Exhibit No. 5 (RES-5), at page 3, first new paragraph.

### Response:

Witness: Richard E. Sauer

The information provided was generated from information stored in the Company's electronic data base for waste disposed at both Beatty and Richland, supplemented by information supplied by Chem-Nuclear.

Response to Staff Data Request No. 32

### Request:

- A. With regard to Exhibit No. T-19 (CEO-I), at page 4, lines 22-24, what is the basis for statement that US Ecology, Inc.'s LLRW operation in Richland is not characterized by economics of scale?
- B. Define the term "economics of scale" as it is used in that statement.

### Response:

### Witness: Dr. Charles Olson

- 32A. The basis is that long-run costs do not decrease as volume increases.
- 32B. Economies of scale represent the decrease in unit costs as volume increases. The concept is a long-run one; that is unit costs decrease in response to increases in all factors of production. Economies of scale do not refer to the reduction in unit costs that takes place with more intensive utilization of existing plant.

Response to Staff Data Request No. 33

### Request:

- A. With regard to Exhibit No. T-19 (CEO-I) please define the term "incremental costs" within the meaning used at page 5, line 15;
- B. With regard to Exhibit No. T-19 (CEO-I) please define the term "long-run marginal costs" within the meaning used at page 5, line 22;
- C. With regard to Exhibit No. T-19 (CEO-I) please define term "marginal cost" within the meaning used at page 6, line 17.

### Response:

### Witness: Dr. Charles Olson

- 33A. Incremental cost is the cost of handling additional shipments. It includes all costs that would be incurred, either currently or in the future.
- 33B. Long-run marginal cost is the cost of producing another unit of output when all factors of production are variable.
- 33C. Marginal cost is defined at page 5, line 24 and following.

Response to Staff Data Request No. 34

### Request:

- A. Provide historical evidence of US Ecology, Inc. pricing below "marginal cost" as the term is defined in response to Staff Request No. 33, C.
- B. As the term "marginal cost" is defined in response to Staff Request No. 33, C, what was the marginal cost of service related to the base rates and volumes presented in Tables 1 and 2 of Exhibit No. 4 (RES-4) during the time period 1974 to 1991?

### Response:

### Witness: Dr. Charles Olson

- 34A. Dr. Olson does not have the requested information.
- 34B. Dr. Olson does not have this information. Pricing during the period referred to was based on market considerations.

Response to Staff Data Request No. 35

### Request:

- A. What are the fundamental similarities in the production and cost functions between the operation of US Ecology, Inc.'s Richland LLRW dump site and Electric Corporations such as those governed by NY PSC Case 26806 cited at footnote no. 1 on page six of Exhibit No. T-19 (CEO-I)?
- B. In Exhibit No. T-19 (CEO-I) Dr. Olson defines the long run as the concept of being able to vary <u>all</u> factors of production, page 9, line 4.
  - (i) Define the term "long run" as it is used within the meaning of Dr. Olson's testimony cited above.
  - (ii) What are the factors of production at US Ecology, Inc.'s LLRW dump site at Richland, Washington, and how will US Ecology, Inc. vary production inputs in the long run?

### Response:

### Witness: Dr. Charles Olson

- 35A. The fundamentals are different in at least two respects. First, electric operations are characterized by economies of scale while LLRW operations are not. Second, LLRW operations have greater long-term liabilities associated with them than do electric operations.
- 35B. i. The long-run is the length of time required for all factors of production to be variable.
- 35B. ii. The factors are land, labor and capital. US Ecology will vary these factors depending on their respective costs, volumes tendered and expected changes in technology.