CleanHarbors
ENVIRONMENTAL SERVICES, INC.

108555 East Highway 36
Deer Trail, CO 80105
970.386.2293
www.cleanharbors.com

RECEIVED
SEP 12 2011
HAZARDOUS MATERIALS
AND WASTE MANAGEMENT

Sent via FED EX and Electronic Mail

September 8, 2011

Ms. Jennifer Opila. MPA
Unit Leader, Radiation Management Unit
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

**RE: Clean Harbors Deer Trail, LLC. , Radioactive Materials License Colo. 1102-01**
**Annual Financial Warranties Report**

Dear Ms. Opila:

Enclosed please find the latest Decommissioning (Closure) and Long Term Care (Post Closure) insurance certifications for the Clean Harbors Deer Trail, LLC facility. This report is submitted pursuant to House Bill 10-1348, Section 3.25-11-110 (5), Colorado Revised Statutes.

An evaluation of the costs concluded that the only rationale for adjustment required was based upon annual inflation as described below.

The inflated closure and post-closure were calculated by multiplying the current cost estimate by the annual inflation factor 1.00953. This inflation factor was calculated by dividing the annual Implicit Price Deflator (IPD) for Gross National Product (GNP) for 2010 (110.654) by the annual IPD for GNP for 2009 (109.609). These IPDs were obtained from the U.S. Department of Commerce's Bureau of Economic Analysis and were the values that existed on July 13, 2011.

$5,168,206.83 x 1.00953 = $5,217,514.36

$5,347,737.49 x 1.00953 = $5,398,701.43

# CERTIFICATE OF LIABILITY INSURANCE



DATE (MM/DD/YYYY) 08/18/2011

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies)must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER

Zurich North America
60 State Street
Boston, MA 02109

CONTACT NAME:
PHONE (A/C, NO, EXT): 877-945-7378 FAX (A/C, NO): 888-467-2378
E-MAIL ADDRESS: certificates@willis.com

| INSURER(S)AFFORDING COVERAGE | NAIC # |
|---|---|
| INSURER A: Steadfast Insurance Company | 26387 |
| INSURER B: | |
| INSURER C: | |
| INSURER D: | |
| INSURER E: | |
| INSURER F: | |

INSURED

Clean Harbors Deer Trail, LLC
EPA ID No. COD991300484
108555 East Highway 36
Deer Trail, CO 80105

## COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

| INSR LTR | TYPE OF INSURANCE | ADD'L INSRD | SUBR WVD | POLICY NUMBER | POLICY EFF (MM/DD/YYYY) | POLICY EXP (MM/DD/YYYY) | LIMITS | |
|---|---|---|---|---|---|---|---|---|
| | GENERAL LIABILITY | | | | | | EACH OCCURRENCE | $ |
| | COMMERCIAL GENERAL LIABILITY | | | | | | DAMAGE TO RENTED PREMISES (Ea occurence) | $ |
| | CLAIMS-MADE / OCCUR | | | | | | MED EXP (Any one person) | $ |
| | | | | | | | PERSONAL & ADV INJURY | $ |
| | | | | | | | GENERAL AGGREGATE | $ |
| | GEN'L AGGREGATE LIMIT APPLIES PER: POLICY / PRO-JECT / LOC | | | | | | PRODUCTS - COMP/OP AGG | $ |
| | | | | | | | | $ |
| | AUTOMOBILE LIABILITY | | | | | | COMBINED SINGLE LIMIT (Ea accident) | $ |
| | ANY AUTO | | | | | | BODILY INJURY(Per person) | $ |
| | ALL OWNED AUTOS / SCHEDULED AUTOS | | | | | | BODILY INJURY(Per accident) | $ |
| | HIRED AUTOS / NON-OWNED AUTOS | | | | | | PROPERTY DAMAGE (Per accident) | $ |
| | | | | | | | | $ |
| | UMBRELLA LIAB / OCCUR | | | | | | EACH OCCURRENCE | $ |
| | EXCESS LIAB / CLAIMS-MADE | | | | | | AGGREGATE | $ |
| | DED / RETENTION $ | | | | | | | $ |
| | WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y/N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below | N/A | | | | | X WC STATUTORY LIMITS / OTHER | |
| | | | | | | | E.L. EACH ACCIDENT | $ |
| | | | | | | | E.L. DISEASE - EA EMPLOYEE | $ |
| | | | | | | | E.L. DISEASE - POLICY LIMIT | $ |
| A | Closure<br>Post-Closure | | | ENC5254333-02 | 09/06/06 | 09/06/13 | $5,217,514.36<br>$5,398,701.43 | |

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach Acord 101, Additional Remarks Schedule, if more space is required)

This certificate certifies that the policy to which this Certificate applies, provides Closure and Post-Closure Care coverage in connection with the insured's obligation to demonstrate financial responsibility under section 266.14 of the Colorado Hazardous Waste Regulations.

(Continued on next page)

CERTIFICATE HOLDER

Director, Haz Mat, Waste Management Division
Attn: Mira Neumiller
Colo. Department of Public Health and Environment
4300 Cherry Creek Dr. South
Mail Code: HMWMD-CP-B2
Denver, CO 80246

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

8/18/2011

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# ADDITIONAL REMARKS SCHEDULE



| AGENCY | | NAMED INSURED |
|---|---|---|
| Zurich North America | | Clean Harbors Deer Trail, LLC<br>EPA ID No. COD991300484<br>108555 East Highway 36<br>Deer Trail, CO 80105 |
| POLICY NUMBER<br>See First Page | | |
| CARRIER<br>See First Page | NAIC CODE | EFFECTIVE DATE: See First Page |

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 FORM TITLE: CERTIFICATE OF LIABILITY INSURANCE

This Certificate demonstrates financial responsibility for the insured's obligation to demonstrate financial responsibility for radioactive materials under section 6 CCR 1007-1, specifically 3.9.5.5.2 and 3.9.5.10.1 of Part 3 - Licensing of Radioactive Material, (last amended May 18, 2005, effective July 31, 2005), and as amended. Such financial responsibility coverage will only be provided by the policy to which this certificate applies and in the same manner as set forth under sections 266.14(h) of the Colorado Hazardous Waste Regulations.

We shall only disburse the funds from this policy that the Regulatory Body approves in writing subject to the terms of the policy and this certificate.

Cancellation of this policy, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of 60 days after a written notice of cancellation is received by the Regulatory Body.

Whenever requested by the Regulatory Body, the Insurer agrees to furnish to the Regulatory Body a duplicate original of the policy listed above, including all endorsements thereon.



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Willis

August 19, 2011

Jack Kehoe
Clean Harbors Deer Trail, LLC
108555 East Highway 36
Deer Trail, CO 80105

**RE: Closure Insurance Increases for Deer Trail, CO**

Dear Jack,

Enclosed please find the original copies of the increased Closure Certificates issued by Steadfast Insurance Company for the Deer Trail, CO facility.

If you have any further questions, please do not hesitate to contact me at 617-351-7541.

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Best Regards,

Chely LoMonaco
Client Manager

Cc: Louis Pransky, Clean Harbors
Wallace M. Bell, Clean Harbors

**COLORADO CERTIFICATE OF INSURANCE**
**FOR CLOSURE OR POST-CLOSURE CARE**

| | |
|---|---|
| Name and Address of Insurer (herein called the "Insurer"): | Steadfast Insurance Company<br>1400 American Lane<br>Schaumburg, Illinois 60196 |
| Name and Address of Insured (herein called the "Insured"): | Clean Harbors, Inc.<br>42 Longwater Drive<br>Norwell, Massachusetts 02061 |
| Facilities Covered: | EPA Identification No. COD 991-300-484<br>Clean Harbors Deer Trail, LLC<br>108555 East Highway 36<br>Deer Trail, CO 80105<br>Closure Costs: $5,217,514.36<br>Post Closure Costs: $5,398,701.43 |
| Face Amount: | $10,616,215.79 |
| Policy Number: | ENC 5254333-02 |
| Effective Date: | September 6, 2006 |

This certificate certifies that the policy to which this Certificate applies, provided Closure and Post-Closure Care coverage in connection with the insured's obligation to demonstrate financial responsibility under section 266.14 of the Colorado Hazardous Waste Regulations C.R.S. 973, as amended.

Cancellation of this policy, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a written notice of cancellation is received by the Department.

Whenever requested by the Department, the Insurer agrees to furnish to the Department a duplicate original of the policy listed above, including all endorsements thereon.

Mark Brazell
Senior Underwriter

Authorized Representative of:

Steadfast Insurance Company
Administrative Officer
1400 American Lane
Schaumburg, IL 60196-1056

Signature of witness or notary:

Date: 8/3/11