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Robert D. Coney  
DIRECTOR



**ADAMS COUNTY**  
COLORADO

Planning and  
Development Department  
12200 Pecos Street  
Westminster, CO 80234  
PHONE 303.453.8800  
FAX 303.453.8829  
www.co.adams.co.us

**Via Overnight Mail**

February 14, 2007

Clean Harbors Deer Trail, LLC  
108555 East Highway 36  
Deer Trail, CO 80105  
Attention: John Kehoe, General Manager

Clean Harbors Environmental Services, Inc.  
200 Arbor Lake Drive, Suite 300  
Columbia, SC 29223  
Attention: Phil Retallick, Senior Vice President—Regulatory Affairs

**Re: Notice of Violation  
Deer Trail Facility  
Certificate of Designation/Conditional Use Permit**

Gentlemen:

You are hereby given this **Notice of Violation** pursuant to Section 1-05-07 of Adams County's Development Standards and Regulations ("DS&R") of your unlawful use of the lands and facilities located at 108555 East Highway 36, Deer Trail, Colorado 80105 ("Deer Trail") as set forth below. You are hereby directed to take such remedial action as will result in full compliance with Adams County's DS&Rs, Deer Trail's 2004 Certificate of Designation and the June 14, 2004 adopting Resolution of the Board of County Commissioners within 10 days from the date of this **Notice of Violation**.

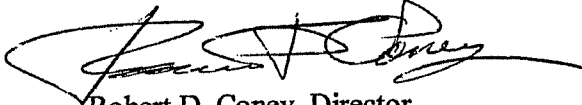
On January 16, 2007, this Department conducted an inspection of Deer Trail pursuant to DS&R Section 1-05-02. Prior to and during the inspection, representatives of Clean Harbors Deer Trail, LLC ("Clean Harbors") admitted that Clean Harbors had accepted for disposal at Deer Trail Denver Radium Street Project waste and that such wastes were presently stored in metal containers on the premises.

The Department's inspectors obtained copies of a Uniform Low-level Radioactive Waste Manifest that confirmed the existence of six metal containers each containing 2.72 cubic meters of soil and asphalt contaminated with varying amounts of the radioactive isotopes of Thorium 230 and Radium 226 ("Radioactive Wastes").

The acceptance and storage in containers of these Radioactive Wastes at Deer Trail are unlawful and constitute a violation of Deer Trail's 2004 Certificate of Designation and the June 14, 2004 adopting Resolution of the Board of County Commissioners. Acceptance for disposal and storage of these Radioactive Wastes on the premises without seeking Adams County's approval of an amendment to the Certificate of Designation and Conditional Use permit

constitute violations of Adams County's DS&R Sections 2-02-03-01 through 08, Colorado Revised Statutes sections 25-15-201 and 204 and other statutory and regulatory requirements.

Failure to take timely the remedial action demanded herein will subject Clean Harbors to further proceedings provided by law and Adams County's DS&Rs including, proceedings to revoke or suspend Deer Trail's 2004 Certificate of Designation, to impose civil fines and penalties and to obtain injunctive relief. This Department may, in addition, refer this matter to the County Attorney for prosecution pursuant to DS&R Section 1-05-06.

A handwritten signature in black ink, appearing to read "Robert D. Coney", with a long horizontal flourish extending to the right.

Robert D. Coney, Director  
Planning and Development