

THOMPSON & SIMMONS, PLLC.

1225 19th Street, N.W., Suite 300
Washington, D. C. 20036
202.496.0780/202.496.9111
Fax: 202.496.0783

440 Meadow Street,
Waterbury, Connecticut 06702

ANTHONY J. THOMPSON
ajthompson@athompsonlaw.com
Admitted in D.C. and Virginia

CHARLES T. SIMMONS
csimmons@athompsonlaw.com
Admitted in CT and D.C.

CHRISTOPHER S. PUGSLEY
cpugsley@athompsonlaw.com
Admitted in MD

August 22, 2006

American Ecology Corporation
Attn: Mr. Steve Romano, President and Chief Executive Officer
300 East Mallard Drive
Suite 300
Boise, Idaho 83706

Dear Mr. Romano:

Please find enclosed a copy of our memorandum in response to your request for a legal analysis of the recent actions taken by the Rocky Mountain Low-Level Radioactive Waste Compact Board with respect to the proposed designation of the Clean Harbors Deer Trail facility as a "regional facility" for low-level radioactive waste (LLRW) in the form of naturally occurring radioactive material (NORM) and technologically enhanced NORM (TENORM) and the Board's decision to deny the City of Denver's request to export radium-production wastes to a facility outside the Compact.

Thompson & Simmons, PLLC is one of the nation's preeminent law firms focusing on the legal, policy, and regulatory issues related to radioactive and hazardous substances and materials that arise under U.S. federal, state and international laws. Based in Washington, D.C., Thompson & Simmons, PLLC's law practice covers a full range of regulatory, transactional, corporate, litigation, legislative and general advocacy services. The firm counsels clients on strategic and tactical navigation of the complex and changing regulatory landscape attendant to their businesses, involving the licensing of Atomic Energy Act (AEA) facilities and materials by the Nuclear Regulatory Commission (NRC) and its Agreement States, permitting of, compliance at, and decommissioning and remediation of facilities regulated under various federal regulatory programs, including the AEA, the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Clean Air Act (CAA), and the Clean Water Act (CWA). The firm's legal and technical expertise also includes an in-depth understanding of State regulation of NORM/TENORM generated by the mining, industrial metals and minerals, ceramics, pigment, and specialty chemical industries.

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If you have any questions regarding the legal analysis or conclusions presented in this memorandum of law, please do not hesitate to contact us at (202) 496-0780.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be "Chris Pugsley", written over a horizontal line.

Anthony J. Thompson, Esq.
Christopher S. Pugsley, Esq.
Thompson & Simmons, PLLC

Enclosures