## ENVIRONMENTAL CLEAN UP COST

The entries illustrated in this case study are to address environmental clean up cost as promulgated by the FASAB Statements of Federal Financial Accounting Standard Numbers Five and Six, Accounting for Liabilities of the Federal Government and Accounting for Property, Plant, and Equipment. This is not authoritative guidance but an illustration of clean up cost transactions using US Standard General Ledger accounts. This case study does not include all situations.

Clean up cost is defined in the FASAB Statement of Federal Financial Accounting Standards, Number 6, Accounting for Property, Plant and Equipment, paragraph 85 as "costs of removing, containing, and/or disposing of 1) hazardous waste from property, or 2) material and/or property that consists of hazardous waste at permanent or temporary closure or shutdown of associated PPE".

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#### **Liability attributes:**

- NC Not Covered by Budgetary Resources
- C Covered by Budgetary Resources

Please note that Funded liabilities and Unfunded liabilities are not the same as Liabilities Covered by Budgetary Resources and Liabilities Not Covered by Budgetary Resources (Statement of Financing vs. Balance Sheet). For more information on the Liabilities Covered/Not Covered by Budgetary Resources, refer to OMB 97-01 and AAPC draft definition of Liabilities Covered by Budgetary Resources.

## I - DEFERRED CLEAN UP COST

This section illustrates clean up cost that is deferred until the end of the useful life of PPE. It is divided into two categories of PPE, general PPE and stewardship PPE. The clean up cost associated with general PPE should be recognized over its useful life, similar to how the depreciation expense is recorded. The clean up cost associated with stewardship PPE is expensed in the period the stewardship PPE is placed in service, similar to how the acquisition cost is recorded.

In addition, if the PPE was used to produce goods and service, the associated clean up cost should be recognized as production cost. Otherwise, the cost is recorded as non-production.

Please **NOTE** that in some agencies' systems, the Estimated Cleanup cost Liability is recorded at the end of the year and reversed in the beginning of the subsequent year. The net financial impact of reversing the cleanup liability will be the same as what is presented on the Deferred Cleanup Cost case study.

EVENT DESCRIPTION	Y R	GENERAL PPE	REF <sup>1</sup>	STEWARDSHIP PPE	REF
1) Assume a PPE with a useful life of 3 years is acquired and it is known to produce hazardous waste. The estimated clean up cost is \$120,000. Assume clean up will start when PPE cease its operation.	1	Proprietary 6800 Future funded cost 40,000 2995 Est cleanup cost liab- NC 40,000  Budgetary None	VI ¶97	Proprietary 6800 Future funded cost 120,000 2995 Est cleanup cost liab - NC 120,000  Budgetary None	VI ¶101
2) Reestimate of the cleanup cost indicated that the cost will be more that what was originally estimated by \$60,000. \$60,000/3=20,000x2=40,000 40,000 + 40,000 = 80,000	2	Proprietary 6800 Future funded cost 80,000 2995 Est cleanup cost liab - NC 80,000  Budgetary None	VI ¶99	Proprietary 6800 Future funded cost 60,000 2995 Est cleanup cost liab - NC 60,000  Budgetary None	VI ¶102
3) To record estimated clean up cost.	3	Proprietary 6800 Future funded cost 60,000 2995 Est cleanup cost liab - NC 60,000  Budgetary None		Proprietary None  Budgetary None	

<sup>&</sup>lt;sup>1</sup> REF - Represents reference from FASAB Standad. The Roman numerals represents the standard numbers

4) Assume the agency receives funding for the clean up cost in year 4.	4	Proprietary         1010         FBWT         50,000         1010         FBWT         50,000           3100         Unexp appropriation         50,000         3100         Unexp appropriation           2995         Est cleanup cost liab - NC 50,000         2995         Est cleanup cost liab - NC 50,000	50,000	
		2995 Est cleanup cost liab - C         Budgetary         4119 Approp Realized       50,000         4450 Unapportioned auth       50,000         4450 Unapportioned auth       50,000         4510 Apportionments       50,000         4510 Apportionments       50,000         4610 Allotment       50,000            2995 Est cleanup cost liab - C         Budgetary         4119 Approp Realized       50,000         4450 Unapportioned auth       50,000         4510 Apportionments       50,000         4510 Apportionments       50,000         4610 Allotment       4610 Allotment	50,000 50,000 50,000	
5) Contractor A started and completed his portion of the clean up and billed the agency for \$20,000.	4	Proprietary 2995 Est cleanup cost liab - C 20,000 2110 Accounts payable 20,000 6800 Future funded cost 20,000 5700 Appropriation used 20,000  Budgetary 4610 Allotment 20,000 4901 Expended auth - unpd 20,000  Proprietary 2995 Est cleanup cost liab - C 20,000 2110 Accounts payable  6900 Nonproduction cost 20,000 6800 Future funded cost  3100 Unexp appropriation 20,000 5700 Appropriation used  Budgetary 4610 Allotment 20,000 4901 Expended auth - unpd	20,000 20,000 20,000	VI ¶103

6) The agency makes a partial payment of \$10,000 to contractor A.	4	Proprietary         2110 Accounts payable 10,000           1010 FBWT 10,000           Budgetary           4901 Expended auth - unpd 4902 Expended auth - pd 10,000	VI ¶100	Proprietary         2110 Accounts payable 10,000           1010 FBWT 10,000           Budgetary           4901 Expended auth - unpd 10,000           4902 Expended auth - pd 10,000	VI ¶103
7) Contractor B was hired to perform additional clean up for \$5,000.	4	Proprietary None		Proprietary None	
		Budgetary 4610 Allotment 5,000 4801 Unexpended oblig - unpd 5,000		Budgetary 4610 Allotment 5,000 4801 Unexpended oblig - unpd 5,000	

## STATEMENTS FOR YEAR 4

financi operat	Note: GENERAL PPE and Stewardship PPE will have same financial information in year 4, except for an account 6100 - operating cost, Stewardship PPE will have a debit balance of 6900 - Nonproduction cost.			STATEMENT OF FINANCING	
Propri	etary pre-closing trial balance Fund balance with Treasury	40,000		Line 1 Obligation incurred 4801 E-B	5,000
2110	Accounts payable		10,000	4901 E-B	10,000
2995	Est cleanup cost liab - NC		130,000	4902 E-B	<u>10,000</u>
2995	Est cleanup cost liab - C		30,0		25,000
			00		
3100	Unexpended appropriation		30,000	Line 2A	
3310	Cumulative results	180,000		4801 E-B	(5,000)
5700	Appropriations used		20,000		
6100	Operating cost	20,000		Line 2D	
6800	Future funded expense		20,000	2995E-B*, (160,000-180,000) "OR"	(20,000)
Budge	tary pre-closing trial balance			6800, credit account balance	
4119	Other appropriation realized	50,000		Net Cost	- 0 -
4610	Allotments - realized resources		25,000		
4801	Unexpended obligations - unpd		5,000		
4901	Expended authority - unpd		10,000		
4902	Expended authority - pd		10,000		
STATI	EMENT OF NET COST				
6100	Operating cost	20,000			
6800	Future funded expense	(20,000)			
Net Co	_	- 0 -			

CLOS	ING ENTRIES		BALANCE SHEET	
Propri	etary		Assets:	
5700	Appropriations used 20,000		1010 Fund balance with Treasury 40,000	
6800	Future funded expense 20,000			
	3310 Cumulative results	40,000	Liabilities:	
			2110 Accounts payable	10,000
3310	Cumulative results 20,000		2995 Est cleanup cost liab	160,000
	6100 Operating cost	20,000		
Budger	tary		Net Position:	
4201	Total actual resources collected	50,000	3100 Unexpended appropriations	30,000
	4119 Other appropriation realized	50,000	3310 Cumulative results 160,000	
4902	Expended authority - pd	10,000		
	4201 Total actual resources collected	10,000		
4610	Allotments - realized resources	25,000		
	4450 Unapportioned authority	25,000		

#### II. CLEAN UP ASSOCIATED WITH PURCHASING A STORAGE FACILITY.

This section illustrates the recognition of clean up cost related to purchasing a storage facility for hazardous waste from past operations. The guidance from Financial Accounting Standards Board (FASB) Emerging Issues Task Force Issue 90-8, Capitalization of Costs to treat Environmental Contamination was used as generally accepted accounting principles since the FASAB and OMB did not address this specific issue. The FASB Emerging Issues Task Force Issue 90-8 requires the expensing of facilities that treat, store, or dispose of existing waste generated by past operations. Agencies may elect to record these facilities at a net book value of zero (fully depreciated) for purposes of tracking their historical cost.

EVENT DESCRIPTION	YR		
1) To record estimated cleanup cost for the hazardous waste that was accumulated from a past operation. A special container will be purchased to store the waste.	1	Proprietary 6800 Future funded cost 100,000 2995 Est cleanup cost liab - NC 100,000  Budgetary None	VI ¶85
2) To record the appropriation received to purchase a storage tank	1	Proprietary           1010         FBWT         70,000           3100         Unexp appropriation         70,000           2995         Est cleanup cost liab - NC         70,000           2995         Est cleanup cost liab - C         70,000	
		Budgetary           4119         Approp Realized         70,000           4450         Unapportioned auth         70,000           4450         Unapportioned auth         70,000           4510         Apportionments         70,000           4510         Apportionments         70,000           4610         Allotment         70,000	

3) A storage tank was purchased and <b>expensed</b> <sup>2</sup> immediately	2	2110 Accounts payable 70,000 I	FASB EITSI #90-8
		6900 Nonproduction cost 70,000 6800 Future Funded cost 70,000	, 0
		2995 Est cleanup cost liab - C 70,000 1740 Other structures and facilities 70,000 1749 Accumulated Dep - Othr Struc and facilities	
		3100 Unexpended appropriation 70,000 5700 Appropriation used 70,000	
		Budgetary       70,000         4610       Allotment       70,000         4901       Exp4ended authority - pd       70,000	
4) The agency made the payment for the PPE it purchased	2	Proprietary 2110 Accounts payable 70,000 1010 FBWT 70,000	
		Budgetary 4901 Expended auth - unpd 70,000 4902 Expended auth - pd 70,000	

<sup>&</sup>lt;sup>2</sup> The Financial Accounting Standards Board (FASB) Emerging Issues Task Force Issue 90-8, Capitalization of costs to treat environmental contamination, requires the expensing of facilities that treat, store or dispose of exiting wastes generated by past operations. Agencies may elect to record these facilities at a net book value of zero (fully depreciated) for purposes of tracking their historical cost.

## YEAR 2

PRE-CLOSING TRIAL BALANCE		CLOSING ENTRIES
Proprietary 2995 Est cleanup cost liab - C 3310 Cumulative result 5700 Appropriations used 6800 Future funded cost 6900 Nonproduction cost	30,000 100,000 70,000 70,000 70,000	Proprietary           5700         Appropriations used         70,000           6800         Future funded cost         70,000           3310         Cumulative result         140,000           3310         Cumulative results         70,000           6900         Nonproduction cost         70,000
Budgetary 4119 Appropriations realized 4902 Expended Authority - pd  STATEMENT OF FINANCING	70,000 70,000	Budgetary 4201 Total actual resources collected 4119 Appropriations realized 70,000  NET COST
Line 1 Obligations incurred 4902	70,000	6800 Future funded cost (70,000) 6900 Nonproduction cost <u>70,000</u> <b>Net Cost</b> - 0 -
Line 2D 2995E-B*, 30,000-100,000 "OR" 6800, credit account balance <b>Net Cost</b>	(70,000)	
BALANCE SHEET	- 0 -	
Liabilities: 2995 Est cleanup cost liab  Net Position:	30,000	
3310 Cumulative results	30,000	

## **IIII. GOVERNMENT RELATED EVENT - ACCIDENTS**

This section illustrates how to record and recognize cleanup cost that is caused by federal government operations. The cleanup of hazardous material can be caused by accidents from federal operations or from natural disasters on Federal property. (See FASAB Liability Standard)

EVENT DESCRIPTION	YEAR	ALL OTHER ENVIRONMENTAL CLEANUP COST	REF
1) An accident involving hazardous material has occurred which is caused by the government operations. The estimated clean up cost was determined to be \$100,000. However, the funding is not available until the following year.	1	Proprietary 6800 Future funded cost 100,000 2995 Est cleanup cost liab - NC 100,000  Budgetary None	V ¶27, ¶28, ¶29 VI ¶93
2) the agency receives funding to clean up in year 2	2	Proprietary           1010         FBWT         50,000           3100         Unexp appropriation         50,000           2995         Est cleanup cost liab - NC         50,000           2995         Est cleanup cost liab - C         50,000           Budgetary         4119         Approp Realized         50,000           4450         Unapportioned auth         50,000           4450         Unapportioned auth         50,000           4510         Apportionments         50,000           4510         Apportionments         50,000           4610         Allotment         50,000	

3) Contractor C started and completed his portion of the clean up and billed the agency for \$30,000	2	Proprietary6100 Operating expense30,0006900 Nonproduction costxx,xxx6800 Future funded cost30,000
		2995 Est cleanup cost liab - C 30,000 2110 Accounts payable 30,000
		3100 Unexpended appropriation 30,000 5700 Appropriations used 30,000
		Budgetary 4610 Allotment 30,000 4901 Expended Authority - unpd 30,000
4) The agency makes a partial payment of \$20,000 to contractor C.	2	Proprietary 2110 Accounts payable 20,000 1010 Fund balance with Treasury 20,000
		Budgetary 4901 Expended Authority - pd 20,000 4902 Expended Authority - unpd 20,000

YEAR 2

CLOS	ING ENTRIES			TRIA	L BALANCE		
<i>propri</i> 5700 6800	Appropriations used Future funded expense 3310 Cumulative results	30,000 30,000	60,000	Propri 1010 2110 2995 2995	Fund balance with Treasury Accounts payable Est cleanup cost liab - NC Est cleanup cost liab - C	30,000	10,000 50,000 20,000
3310	Cumulative results 6100 Operating expense	30,000	30,000	3100 3310 5700	Unexpended appropriation Cumulative results Appropriations used	100,000	20,000
<u>budger</u> 4201	Total actual resources collected 4119 Other appropriations re	ealized	50,000	6100 6800	Operating expense Future funded expense	30,000	30,000
4902 4610	Expended authority - pd 4201 Total actual resources Allotments - realized resources 4450 Unapportioned authority	20,00	20,000	4119 4610 4901 4902	tary pre-closing trial balance Other appropriations realized Allotments - realized resources Expended authority - unpd Expended authority - pd	50,000	20,000 10,000 20,000
STAT	EMENT OF NET COST			STAT	EMENT OF FINANCING		
6100 6800 <b>Net co</b>	Operating expense Future funded expense est	30,000 (30,000) - 0 -		Line 1 4901E 4902	, Obligation incurred -B	10,000 <u>20,000</u> 30,000	
				"OR"	-B, 70,000-100,000 Credit account balance	(30,000)	

BALANCE SHEET						
Assets 1010	: Fund Balance with Treasury	30,000				
Liabili	Liabilities:					
2110	Accounts payable		10,000			
2995	Est cleanup cost liab		70,000			
Net Po	Net Position:					
3100	Unexpended appropriation		20,000			
3310	Cumulative results	70,000				

# IV. GOVERNMENT RELATED EVENTS - ON GOING PART OF OPERATIONS

This section illustrates how to record and recognize clean up cost that is related to on going federal government operations. The hazardous waste is cleaned up as soon as it is created. As a result, the estimated future cleanup liability will not be reported.

EVENT DESCRIPTION	YEAR	ALL OTHER ENVIRONMENTAL CLEAN UP COSTS	REF
1) The agency receives funding for \$60,000 for clean up cost that will be used for the year. Assume hazardous waste is cleaned up as it is created.	1	Proprietary 1010 FBWT 60,000 3100 Unexpended appropriation 60,000	
		budgetary         4119         Approp Realized         60,000           4450         Unapportioned auth         60,000           4450         Unapportioned auth         60,000           4510         Apportionments         60,000           4510         Apportionments         60,000           4610         Allotment         60,000	
2) The clean up is an on going part of the agency's operation and the cost incurred during the year was \$50,000 of which partial payment of \$40,000 was made to the contractor.	1	Proprietary           6100         Operating expense         50,000           1010         FBWT         40,000           2110         Accounts payable         10,000           3100         Unexpended appropriation         50,000           5700         Appropriation used         50,000	V ¶28
		Budgetary         50,000           4610         Allotment         50,000           4901         Expended authority - un pd         10,000           4902         Expended authority - pd         40,000	

PRE-CLOSING TRIAL BALANCE		CLOSING ENTRIES
Proprietary pre-closing trial balance 1010 Fund balance with Treasury 2110 Accounts payable 3100 Unexpended appropriation 5700 Appropriations used 6100 Operating expense	20,000 10,000 10,000 50,000	proprietary5700Appropriations used 331050,0003310Cumulative results50,0003310Cumulative results 610050,00050,00050,000
Budgetary pre-closing trial balance 4119 Other appropriations realized 4610 Allotments - realized resources 4901 Expended authority - unpd 4902 Expended authority - pd	60,000 10,000 10,000 40,000	budgetary4201Total actual resources collected 411960,0004902Expended authority - pd 420140,0004610Allotments - realized resources 445010,000Unapportioned authority10,000
STATEMENT OF NET COST		STATEMENT OF FINANCING
6100 Operating expense Net Cost	<u>50,000</u> 50,000	Line 1, Obligation incurred 4901 E-B 4902 Net cost 10,000 40,000 50,000

BALANCE SHEET		
Assets: 1010 Fund Balance with Treasury	20,000	
Liabilities: 2110 Accounts payable		10,000
Net Position: 3100 Unexpended appropriation		10,000

## V. GOVERNMENT ACKNOWLEDGED EVENTS

This section illustrates clean up cost due to government acknowledged events where hazardous waste was caused by a nonfederal entity or from a natural disaster but due to the federal government's responsibility to provide public welfare, the government assumes financial responsibility for cleaning up the waste.

The FASAB Liability Standard, paragraph 31, "... the federal entity should recognize the liability and expense when both of the following two criteria have been met (1) the Congress has appropriated or authorized (i.e. through authorization legislation) resources and (2) an exchange occurs (e.g. when a contractor performs repairs) or nonexchange amounts are unpaid as of the reporting date (e.g. direct payments to disaster victims), whichever applies."

EVENT DESCRIPTION	YEAR	ALL OTHER ENVIRONMENTAL CLEAN UP COSTS	REF
1) Toxic waste damage was caused by nonfederal entities (or from a natural disaster) and the federal government assumed the clean up responsibility		<pre>proprietary None  budgetary None</pre>	
2) The Congress appropriated money for the clean up cost.		Proprietary           1010         FBWT         40,000           3100         Unexpended appropriation         40,000           budgetary         4119         Approp Realized         40,000           4450         Unapportioned auth         40,000           4450         Unapportioned auth         40,000           4510         Apportionments         40,000           4510         Apportionments         40,000           4610         Allotment         40,000	V ¶31
3) The contractor started and completed the clean up and billed the agency for \$40,000		Proprietary           6100         Operating expense         40,000           6900         Nonproduction cost         xxxx           2110         Accounts payable         40,000           3100         Unexpended appropriation         40,000           5700         Appropriation used         40,000           Budgetary         4610         Allotment         40,000           4901         Expended authority -un pd         40,000	V ¶31

4) The agency made a partial payment of \$20,000	1	proprietary 2110 Accounts payable 20,000 1010 FBWT 20,000	00
		Budgetary4901Expended authority -un pd20,0004902Expended authority - pd20,00	00

PRE-CLOSING TRIAL BALANCE			CLOSING ENTRIES
Proprietary pre-closing trial balance 1010 Fund balance with Treasury 2110 Accounts payable 3100 Unexpended appropriation 5700 Appropriations used 6100 Operating expense	20,000	20,000 0 40,000	proprietary5700Appropriations used 331040,0003310Cumulative results 610040,00040,00040,000
Budgetary pre-closing trial balance 4119 Other appropriations realized 4610 Allotments - realized resources 4901 Expended authority - unpd 4902 Expended authority - pd	40,000	0 20,000 20,000	budgetary 4201 Total actual resources collected 40,000 4119 Other appropriations realized 40,000 4902 Expended authority - pd 20,000 4201 Total actual resources collected 20,000
STATEMENT OF NET COST			STATEMENT OF FINANCING
6100 Operating expense Net Cost	<u>40,000</u> 40,000		Line 1, Obligation incurred 4901 E-B 20,000 4902 20,000 Net cost 40,000
BALANCE SHEET			
Assets: 1010 Fund Balance with Treasury	20,000		
Liabilities: 2110 Accounts payable		20,000	

### **PROPOSED Changes to SGL Accounts and Definitions**

**Account Title:** Estimated Cleanup Cost Liability

**Account Number:** 2995 **Normal Balance:** Credit

**Definition:** The estimated liability for projected future cleanup costs (not yet due and payable) associated with the

removing, containing and/or disposing of 1) hazardous waste from property, or 2) material and /or property that

consists of hazardous waste at permanent or temporary closure or shut down of associated PPE.

**Justification:** To tighten up definition of accrued clean up cost.