



September 26, 2023

Brian T. Long
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Compliance Assurance Unit
Solid Waste and Materials Management Program
CDPHE

RE: Compliance Advisory for the Milner Landfill

Brian.

This memo will address the subject and the 6 deficiencies noted therein in reference to the inspection on May 25, 2023. First, a brief update on current actions in the landfill.

We're preparing for winter and the forecast of another big snow year. All us skiers are filled with hope for another robust winter on the mountain and our landfill crew are dreading those early mornings getting roads cleared for customers and Twin drivers trying to get their trucks started. Current activities include:

- ✓ Stormwater ditches are being cleaned and pine bales placed;
- ✓ Berms around the perimeters are being restored where necessary;
- ✓ The compost pad is being prepared for grading to direct runoff to the pond;
- ✓ Internal roads and yards are being salted with gravel from recycled C&D concrete;
- ✓ Pine bales are placed on the re-graded areas of the Camilletti and Twin properties;
- ✓ Supplemental seeding placed on the Camilletti/Twin property due to the very dry summer and fall;
- ✓ Personnel will be advised regarding snow plowing to avoid pushing debris over the berms;

Now to the deficiencies:

Deficiency 1: Litter around MRF. Pictures of current conditions are attached and we believe it to be in good shape. Our glass recycling indicates very little contamination at the processor in Denver. The pictures attached were intended to match the perspective of the pictures included with the Compliance Advisory.



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Deficiency 2: Compost/wood chips/dirt pushed over perimeter berms. Twin cleaned this up last spring using an excavator to recover the contamination. Perimeter berms around the compost pad and other areas are being restored where necessary. Operators will be trained to avoid pushing snow over berms and not scraping the pads. The pictures attached were intended to match the perspective of the pictures included with the Compliance Advisory.

Deficiency 3. Unavailable records from compost processing. I am surprised at this deficiency and was not so advised by Greg Underwood. Twin has had two experienced operators in compost processing the last 18 months and those operators are aware of record keeping requirements. Our current operator, David Keaton, joined Twin with a background in compost processing and Twin is pleased with results to date. I question whether Greg was prepared for that element of the review.

I will have David submit his record keeping documents under separate cover within the time limits in the Compliance Advisory.

Deficiency 4. Leachate levels in Mod 1 sump. Quoting from Appendix G of our current EDOP: "The leachate level in the leachate sump will be maintained at an elevation of 6,627.00." Our engineers inform me that elevation equates to 4-feet in the sump which equates to a 1-foot head on the liner. Milner reports feet in the sump and your reference to "9 out of 12 measurements showed greater than five feet of leachate in the sump system" would indicate we were out of compliance by one foot or more.

Ten years ago we were hauling approximately 2,000,000 gallons of leachate/year. Applying interim cover and the vegetation that resulted greatly reduced our leachate production. The following are preliminary concepts for discussion with our engineers/CDPHE prior to the submission of our 90-day recommendations.

- A. An automatic pump triggered when leachate levels hit the 4-foot requirement pumping liquid into a lined pond for evaporation or hauling to a treatment plant. Milner's well #1 is adjacent to the sump and may provide a viable holding pond during all weather conditions. That well would have to be lined and dammed to prevent water from Camilletti's ponds from entering the holding pond. It has sufficient capacity for Milner's leachate.



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- B. We've explored pumping leachate to an evaporator at the top of Mods 1 – 5 and spraying it over the lined landfill, but pumps and evaporators are problematic and this system is only a warm weather solution. About 60% of what runs through the evaporator actually evaporates with the rest going back into the sump.
- C. A large holding tank placed in the old solidification basin (now secondary containment) would provide some immediate relief but may not be a sufficient solution.
- D. Contracted haulers or larger tank trucks with expanded capacity would have an impact but contractors would not react to immediate requirements and a fleet of tankers/drivers at Twin's disposal would create operational issues for Twin.
- E. A multifaceted approach:
 - 1. Completing the interim cover on the north, west, and south sides of Mods 1 – 5 would have a significant impact on the amount of leachate in the sump. Years ago we added interim cover to those slopes and that is the reason for the reduction in our annual leachate. Twin still has 50 – 70 feet of vertical on those slopes to complete that section of the landfill so it would be impractical to place final cover on those slopes.
 - 2. Hauling snow off the surfaces of Mods 1 – 7 to prevent leachate in the spring;
 - 3. Daily monitoring of sump level and available drivers to react immediately;

This would seem the most practical approach; placing intermediate cover on those slopes has proven very effective;

Deficiency # 5. The five-year cost estimate. SMA is aware of the situation and has been requested to cure this deficiency within 30 days of the receipt of this Compliance Advisory.



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Deficiency # 6. Liquid Waste transfer report. We apologize for the delinquent report: no excuse. The next report for 2023 is due February 28, 2024.

Twin will complete the actions requested in the Compliance Advisory within the required timeframes. Additionally, Twin will contact the Department prior to October 20, 2023 to schedule a compliance conference to accomplish the following:

- A. To discuss the Compliance Advisory and answer any questions;
- B. To develop a schedule for correcting the deficiencies noted above; or
- C. To submit information necessary to show the deficiencies are not a violation of Colorado's solid waste laws.

Other matters mentioned in the site inspection of the report:

Swamp area by old stock pond: Substantial snow melt in the spring from two different upgradient areas of the Camilletti property caused water accumulation and ground saturation near the old stock pond. As that area dried we regraded to create a swale capturing both spillways. Further, we built a significant runoff ditch diverting water away from the CD boundary. A portion of the runoff ditch is on the Camilletti property and the remainder is on Twin property. We're very optimistic this will solve the water accumulation and ground saturation issue. Twin can get an easement from Camilletti if necessary to maintain that portion of the ditch. Pine straw bales have been placed in the ditch (see pictures). There is still ground saturation seeping into the ditch from the snowmelt and we have two piezometers in that location indicating significant separation from groundwater (from 18 – 45 feet).

Windblown trash: Twin built a significant trash fence along the eastern CD boundary (see picture) and we purchased a mobile vacuum system (picture attached) aiding in the recovery of windblown trash off the working face. That vac system can be interchanged with weed spraying equipment and seeding equipment which makes Twin less reliant on contractors to perform work when necessary.



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Compliance Assistance items: Items 1 – 9 are duly noted and actions are being taken currently to address these issues before I start skiing.

Please respond with any questions, and we will be working on submitting the composting records and the leachate plan.

Respectfully;

Marlin Mullet, CEO Twin Enviro Services



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