



## COLORADO

### Hazardous Materials & Waste Management Division

Department of Public Health & Environment

Electronic Document Submittal

[lcoupe@twinenviro.com](mailto:lcoupe@twinenviro.com)

April 11, 2024

Ms. Lacie Coupe  
Chief Executive Officer  
Twin Landfill Corporation  
Twin Enviro Services  
P.O. Box 774362  
Steamboat Springs, CO 80477

**Re: CDPHE Approval of the Revised 5-Year Financial Assurance Cost Estimate**  
Milner Landfill, Routt County, Colorado  
CDPHERM HAZ SW / Permitting / RTT16

Dear Ms. Coupe:

The Colorado Department of Public Health and Environment ("CDPHE" or "Department") Hazardous Materials and Waste Management Division (Division) received the following document in January 2024:

*"Resubmittal of the 5-Year Financial Assurance Cost Estimate"* (referred to hereafter as the "RCE") prepared for Twin Landfill Corporation (Twin); prepared by Souder, Miller & Associates (SMA); dated January 17, 2024.

The first version of the RCE was submitted to the Division on September 28, 2022. The Division provided comments on October 19, 2022. Twin submitted the next revision of the RCE on October 13, 2023 and the Division provided additional comments on November 2, 2023. The January 17, 2024 version of the RCE addressed the Division's November 2, 2023 comment letter.

The Division reviewed the RCE to determine its compliance with the requirements of the Solid Waste Disposal Sites and Facilities Act, CRS 30-20-100.5 *et. seq* (Act), the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 (Regulations), and the approved Engineering Design and Operations Plan (EDOP). **Based on its review, the Division has determined that the RCE meets the requirements of the Act, Regulations, and EDOP.**

Therefore, the RCE is approved as follows:

Closure Cost:	\$2,339,399.55
Post-Closure Cost:	<u>\$1,971,320.58</u>
Total:	\$4,310,720.13

The RCE should be incorporated into the financial assurance funding submittal and submitted to the financial assurance email box ([cdphe\\_haz\\_financialassurance@state.co.us](mailto:cdphe_haz_financialassurance@state.co.us)) as soon as possible. Annual inflation updates are also required by April 15<sup>th</sup> of each year and should also be submitted to [cdphe\\_haz\\_financialassurance@state.co.us](mailto:cdphe_haz_financialassurance@state.co.us). The next revised cost estimate is due by April 15, 2029 unless design changes to the facility necessitate a new RCE before 2029.



The Division is authorized to bill for its review of technical submittals at a rate of \$125 per hour pursuant to Section 1.7 of the Regulations. An invoice for the Division's review of the above-referenced document will be transmitted under separate cover.

Should you have any questions about this letter please call me at (303) 692-3316 or email me at [sarah.foreman@state.co.us](mailto:sarah.foreman@state.co.us).

Sincerely,

Sarah Foreman, PE  
Solid Waste Permitting  
Engineering Design Unit  
Solid Waste and Materials Management Program  
Hazardous Materials and Waste Management Division

Jill Parisi, PE  
Solid Waste Permitting  
Engineering Design Unit Leader  
Solid Waste and Materials Management Program  
Hazardous Materials and Waste Management Division

cc: Scott Cowman, Director - Routt County Environmental Health Department  
Alan Goldich - Routt County Planning Department  
Brian Long - CDPHE Solid Waste Compliance Assurance Unit  
Graham Cottle, PE - Souder, Miller & Associates  
Michael Pretti, PE - Souder, Miller & Associates

