



COLORADO

Hazardous Materials & Waste Management Division

Department of Public Health & Environment

Electronic Document Submittal

lcoupe@twinenviro.com

April 23, 2024

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

RE: CDPHE Comments on the Compost & Seed Application Report
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 October 2023:

“Ref: Milner Landfill Compost & Seed Application - 2023” (hereafter referred to as the “Compost Application Report”); prepared by Twin Landfill Corporation (Twin); dated October 30, 2023.

The Division reviewed the Compost Application Report to determine its compliance with 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 site’s approved Engineering Design & Operations Plan (EDOP). Based on its review, the Division has the following comments on the document. Please address the comments, incorporate them into a revised version of the Compost Application Report, and resubmit the document to the Division for review and approval.

1. The Division approved the *Agronomic Application Rate Determination and Request to Apply Stockpiled Compost Within the CD Boundary at the Milner Landfill* (hereafter referred to as the Agronomic Application Rate Determination) on May 15, 2023. The second-to-last paragraph of the letter included in the Agronomic Application Rate Determination indicated that Twin would *“prepare a report that summarizes the project and the amount of compost used. The report will include photos and a map showing the areas the compost material and seed were applied.”* Please include the following in the Compost Application Report:
 - a) An estimate of the amount of compost that was applied (in tons).
 - b) A figure showing the compost application area.
 - c) The total acreage of the application area.
 - d) A demonstration that the compost was applied at the agronomic application rate presented in the Agronomic Application Rate Determination.
2. In an email dated May 11, 2023, Twin indicated that compost would not be applied in steep areas and drainage features, the CD boundary, and monitoring wells would have a 100-foot setback. Discuss these constraints in the Compost Application Report.



Please note that the Division's response to the above-referenced document does not preclude separate review action by Routt County.

The Division is authorized to bill for its review of technical submittals at \$125 per hour pursuant to the Act and Regulations. An invoice for the Division's review of the above-referenced document will be sent to Twin under separate cover.

Please contact me by phone at (303) 692-3316 or by email at sarah.foreman@state.co.us should you have any questions or comments concerning this letter.

Sincerely,

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

ec: Scott Cowman, Director - Routt County Environmental Health Department
Alan Goldich - Routt County Planning Department
Brian Long - CDPHE, Solid Waste Compliance Assurance Unit
Jill Parisi, PE - CDPHE Solid Waste Permitting-Engineering Design Unit

