



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
P.O. Box 774362
Steamboat Springs, CO 80477

RE: CDPHE Conditional Approval of the Response to Compliance Advisory - Leachate Management Plan Addendum
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 letter in March 2024:

“Response to Compliance Advisory” (hereafter referred to as “Leachate Management Plan Addendum”); prepared by Twin Landfill Corporation (Twin); dated March 22, 2024.

On September 20, 2023, the Division issued a compliance advisory for information obtained during an inspection at Milner Landfill. Deficiency 4 in the compliance advisory identified regular exceedances of leachate depths in the Module 1 sump. The requested action associated with this deficiency was for Twin to provide an addendum to Appendix G (Leachate Management Plan) of the facility’s Engineering Design and Operations Plan (EDOP) indicating how Twin will manage leachate at the facility to maintain less than one (1) foot of head on the liner system at all times. Twin submitted the Leachate Management Plan Addendum to the Division to satisfy this requested action.

The Division has reviewed the Leachate Management Plan Addendum 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 and Operations Plan, dated December 2020 (EDOP). **Based on the Division’s review, the Division approves the Leachate Management Plan Addendum as submitted under the following conditions:**

Condition 1. The Division is initially approving this document on a trial basis. Twin must comply with all components of the Leachate Management Plan Addendum, regardless of weather conditions. This trial period is for the next 12 months (until April 23, 2024). Leachate management reports will be due by the end of each month and must include all relevant inspection forms for the month. If there are no leachate depth exceedances and all reports are submitted to the Division on time for the next 12 months, the Division will consider the Leachate Management Plan Addendum approved. If Twin fails to comply with any portion of the Leachate Management Plan Addendum or Appendix G of the approved EDOP for the next 12 months, the Division will reject the addendum



and will require Twin to submit a plan to manage leachate with additional engineering controls. If, after the 12 month period is complete and the Leachate Management Plan Addendum is approved, Twin does not continue comply with all requirements of the Leachate Management Plan Addendum and Appendix G of the approved EDOP, Twin may be subject to further compliance action.

Condition 2. Twin is required to continue to submit semi-annual leachate monitoring reports, including all of the information summarized in Section 6.0 of Appendix G of the approved EDOP, to the Division for review and approval. Semi-annual reports are due by March 1st and September 1st annually.

Please note that the Division's acceptance of the above-reference 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

Brian Long
Solid Waste Compliance Assurance 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
Rebecca Lindeman, PE - Jardon Engineering & Inspections LLC
Jill Parisi, PE - CPDHE Solid Waste Permitting - Engineering Design Unit Leader
Michael Pretti, PE - Souder, Miller & Associates
Ed Smith - CDPHE Solid Waste Compliance Assurance Unit Leader

