



August 26, 2024

#4D24381

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive south
Denver, CO 80246-1530
cdphe_apcdreports@state.co.us

RE: Milner Landfill Fall Semi-Annual Monitoring Report (February 1, 2024 through July 31, 2024)
Operating Permit No. 09OPRO329

On behalf of Milner Landfill (hereafter referred to as “the facility”), Souder, Miller & Associates (SMA) is pleased to submit the Semi-Annual Monitoring Report for the monitoring period February 1, 2024 through July 31, 2024.

For the February 1, 2024 through July 31, 2024 monitoring period, no operating permit deviations, upset or emergency conditions were observed or monitored at the facility.

Section II: E001 – Landfill Fugitive Particulate Matter Emissions

As stated in Section II – Specific Permit Terms, Condition 1.2 of Operating Permit 09OPRO329, the facility is required to certify semi-annually that all appropriate measures have been taken to minimize fugitive emissions onsite. During the monitoring period, Milner controlled particulate matter emissions from the facility by watering unpaved roads, scraping/sweeping paved roads and scales, and watering land in the process of being cleared or constructed on an as-needed basis. Please note that Section II, Permit Condition 1.1 (fugitive particulate matter emissions) is satisfied by the compliance of Section II, Permit Conditions 1.2 and 2.2.

Milner Landfill is in compliance with the monitoring requirements for E001: Landfill Fugitive Particulate Matter Emissions, for the reporting period, February 1, 2024 through July 31, 2024.

Section II: E002 – Landfill Gas Emissions

Landfill emission calculations are completed in accordance with the Operating Permit and the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division’s (APCD) PS Memo #12-01 – PCS Calculation Procedures dated July 3, 2012. Calculations are completed using the most recent version of the Environmental Protection Agency’s (EPA) “Landfill Gas Emissions Model” (LandGEM), version 3.03.

The calculations performed to determine the landfill emission rates for 2024, referred to in Section II, Permit Condition 2.1, will be submitted as an addendum to the annual compliance certification report, which is due September 1 of each year. However, this emission calculation was completed prior to March 1, 2024, as required by the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD).

Operating Permit condition 2.2 is met through the standard recordkeeping procedures of the facility. Acceptance of petroleum contaminated soils (PCS) is tracked monthly and compared yearly to the total solid waste acceptance. This calculation is used to determine the appropriate emissions calculation methodology as described in the Operating Permit. In 2023, the facility had a total solid waste acceptance of 59,604 tons, 11,269 tons of which was PCS. In 2023, PCS acceptance at the facility was 18.9% of the total waste acceptance. Therefore, Milner Landfill has been categorized as accepting considerable quantities of PCS and therefore VOCs are calculated as 85% of the NMOC value.

Operating Permit conditions 2.3 and 2.7 are met through the standard operating procedures of the facility by adhering to the control measures and operating procedures as outlined in the conditions.

Section II, Permit Condition 2.4 is met through standard recordkeeping procedures at the facility. The facility did not exceed the waste acceptance permitted level of 175,000 tons per year; Milner accepted 59,604 tons of waste into the facility in 2023.

The design capacity report for Milner Landfill, referenced in Section II, Permit Condition 2.5, has not been amended; the current design capacity of Milner Landfill is 4,430,967 megagrams.

Section II, Operating Permit Condition 2.6 is met through submittal of an annual Non-Methane Organic Compound (NMOC) Emissions Report; the report, dated February 21, 2024, was submitted to APCD by email (cdphe_apcdreports@state.co.us).

Section II, Operating Permit Conditions 2.8 and 2.9 discussing Tier 2 testing and determination of site-specific NMOC concentrations have been satisfied by submittal of the most recent tier 2 sampling report which was submitted on September 29, 2022 and accepted by APCD. The next tier 2 sampling report will be completed in 2027.

Milner Landfill is in compliance with the monitoring requirements for E002: Landfill Gas Emission, for the reporting period, February 1, 2024 through July 31, 2024.

Section II – 3. Gasoline Storage Tank, 250 gallon capacity

Milner maintains monthly records of gasoline processed through a gasoline storage tank as required by Permit Section II, Permit Condition 3.

Milner operates the gasoline storage such that spills are minimized and cleaned as expeditiously as practicable. Milner covers all gasoline container fill pipes with a gasket seal when not used and sends no gasoline to open waste collection systems. The amount of gasoline processed during the reporting period was 4,676 gallons, which did not exceed the monthly throughput limit of 10,000 gallons established by Permit Section II, Permit Condition 3.3.1. Milner is in compliance with Permit Section II, Condition 3.3, and National Emission Standards for Hazardous Air Pollutant requirements of 40 CFR Part 63, Subpart CCCCCC. Compliance with Permit Section II, Condition 3.2 is presumed because only gasoline was processed through the storage tank, and Milner maintains the tank in good working order.

Milner Landfill is in compliance with the monitoring requirements for E004: Gasoline Storage Tank, for the reporting period, February 1, 2024 through July 31, 2024.

Section III - Permit Shield

There are no requirements within Permit Section III, Permit Shield, that apply to Milner Landfill.

Section IV - General Permit Conditions

The facility operates two air emissions units with active APENs. The original landfill permit was issued on December 14, 2015 and expired November 14, 2020. Milner submitted the required APEN renewal to the CDPHE along with the filing fees on November 11, 2020 with supplemental information submitted in December 2020. The second APEN authorizes composting activities, and the composting facility APEN update was submitted on November 2, 2022.

Permit Section IV, Condition 19(a) states that the permit term is valid for five years. The Colorado Department of Public Health and Environment ("CDPHE") issued the Permit on August 1, 2016, and was renewed on December 1, 2022; therefore, the permit is valid until 2027.

Milner Landfill is in compliance with the General Permit Conditions of the Permit for the reporting period February 1, 2024 through July 31, 2024.

Please feel free to contact Michael Pretti at 720.689.1382 should you have any questions concerning this report.

Sincerely,

MILLER ENGINEERS, INC. D/B/A
SOUDER, MILLER & ASSOCIATES



Michael J. Pretti, P.E.

Principal

mike.pretti@soudermiller.com

Enc: Monitoring and Deviation Report – Parts I and III

*XC: Lacie Coupe, TWIN Landfill Corporation
SMA file*

APPENDIX B: Monitoring and Permit Deviation Report - Part I

- Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Twin Landfill Corp. - Milner Landfill
 OPERATING PERMIT NO: 09OPRO329
 REPORTING PERIOD: **February 1, 2024 - July 31, 2024**

| Operating Permit Unit ID | Unit Description | Deviations noted During Period? ¹ | | Deviation Code ² | Malfunction/Emergency Condition Reported During Period? | |
|--------------------------|--------------------------------------|--|----|-----------------------------|---|----|
| | | YES | NO | | YES | NO |
| E001 | Landfill fugitive particulate matter | | X | | | X |
| E002 | Landfill gas emissions | | X | | | X |
| E004 | Gasoline storage tank | | X | | | X |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| General Conditions | | | X | | | X |
| Insignificant Activities | | | X | | | X |

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

² Use the following entries, as appropriate

- 1 = Standard:** When the requirement is an emission limit or standard
- 2 = Process:** When the requirement is a production/process limit
- 3 = Monitor:** When the requirement is monitoring
- 4 = Test:** When the requirement is testing
- 5 = Maintenance:** When required maintenance is not performed
- 6 = Record:** When the requirement is recordkeeping
- 7 = Report:** When the requirement is reporting
- 8 = CAM:** A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
- 9 = Other:** When the deviation is not covered by any of the above categories

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Twin Landfill Corp. - Milner Landfill

FACILITY IDENTIFICATION NUMBER: 1070057

PERMIT NUMBER: 09OPRO329

REPORTING PERIOD: **February 1, 2024 - July 31, 2024**

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

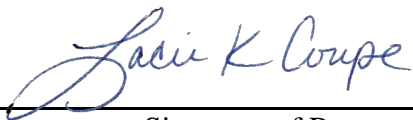
Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Lacie Coupe

Printed or Typed Name

General Manager

Title



Signature of Responsible Official

8/26/2024

Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.