



COLORADO

**Hazardous Materials
& Waste Management Division**

Department of Public Health & Environment

Electronic Document Submittal

lcoupe@twinenviro.com

January 6, 2025

Ms. Lacie Coupe
Twin Landfill Corporation
APEX Waste Solutions
P.O. Box 774362
Steamboat Springs, CO 80477

RE: CDPHE Acceptance of the 2024 Leachate Monitoring - Module 1 Sump
Milner Landfill, Routt County, Colorado
CDPHERM HAZ SW / Monitoring / 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 reports in 2024:

“Leachate Reporting January - March 2024;” prepared by Jardon Engineering & Inspections, LLC (Jardon); prepared for Twin; dated May 2, 2024.

“Twin Miler May Leachate Measurements;” prepared by Jardon; prepared for Twin; dated May 31, 2024.

“Twin Miler June Leachate Measurements;” prepared by Jardon; prepared for Twin; dated June 27, 2024.

“Twin Miler June [July] Measurements;” prepared by Jardon; prepared for Twin; dated August 2, 2024.

“Twin Miler June [August] Measurements;” prepared by Jardon; prepared for Twin; dated August 29, 2024.

“Twin Miler September Leachate Measurements;” prepared by Jardon; prepared for Twin; dated October 1, 2024.

“Twin Miler October Leachate Measurements;” prepared by Jardon; prepared for Twin; dated October 29, 2024.

“Twin Miler November Leachate Measurements;” prepared by Jardon; prepared for Twin; dated December 2, 2024.

“Apex Twin Miler December Leachate Measurements;” prepared by Jardon; prepared for Twin; dated January 2, 2024.



On September 20, 2023, the Division issued a Compliance Advisory to Twin for six deficiencies noted during a routine inspection of the facility. Deficiency 4 of the Compliance Advisory identified consistent violations of Section 3.2.5(D)(1) of the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 (Regulations), which requires facilities to maintain less than a 12-inch depth of leachate over the barrier layer. The exceedances were noted in the Module 1 Sump. The Division requested an addendum to the facility's Leachate Management Plan detailing how Twin would maintain compliance with the Regulations in the future. Twin submitted the requested addendum on March 22, 2024, and the Division approved the document on April 23, 2024. Twin submitted the above-referenced reports to satisfy the requirements of the March 22, 2024 addendum and subsequent Division approval letter.

The Division reviewed the above-referenced reports to determine their compliance with the Solid Waste Disposal Sites and Facilities Act, CRS 30-20-100.5 *et. seq.* (Act), the Regulations, and the site's approved Engineering Design and Operations Plan (EDOP). **Based on the Division's review, 2024 leachate monitoring in the Module 1 sump appears to have been conducted in general accordance with the Act, Regulations, and EDOP. Therefore, the Division hereby accepts the above-referenced reports as submitted.**

Please note that the Division's acceptance of the above-referenced reports 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 reports 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
Rebecca Lindeman, PE - Jardon Engineering & Inspections, LLC
David Keating - Twin Landfill Corporation

