



COLORADO

Hazardous Materials & Waste Management Division

Department of Public Health & Environment

Electronic Document Submittal

lcoupe@twinenviro.com

January 8, 2025

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 Leachate Management Reports Received in 2024**
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 documents in 2024:

“2023 second Semi-Annual Leachate Management Report” (hereafter referred to as the “2nd 2023 Report”); prepared by Twin Landfill Corporation (Twin); dated February 28, 2024.

“2024 first Semi-Annual Leachate Management Report” (hereafter referred to as the “1st 2024 Report”); prepared by Twin; dated August 27, 2024.

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 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 documents. Please address the comments, incorporate them into revised versions of the 2nd 2023 Report and 1st 2024 Report, and resubmit the documents to the Division for review and approval.

1. Section 2. Leachate Volumes:

- a) For both reports, the total quantity of leachate discussed in Section 2 is not consistent with the leachate collection and discharge logs in Appendix A. The 2nd 2023 Report indicates that 117,000 gallons of leachate was discharged, while the logs present a total of 161,250 gallons. The 1st 2024 Report indicates that 771,250 gallons of leachate was discharged, while the logs present a total of 936,203 gallons. Revise these discrepancies accordingly.
- b) For both reports, revise the third and fourth paragraphs of this section to discuss where Twin disposed of leachate from the leachate tank and water from the compost pond.

2. Section 6. Leachate Tank Freeboard Measurements and Leachate Pond Freeboard Measurements:

- a) Please include the leachate pond freeboard measurements in both reports. Although water is only stored temporarily in the pond, freeboard must be maintained. In previous reports, photo evidence of freeboard was taken monthly.



- b) There were several instances noted in Appendix C (for both reports) that two feet of freeboard was not maintained in the leachate tank. Please discuss these deficiencies in this section of the report and Twin's plan for compliance moving forward. Additionally, please update Section 11 with this information.
- 3. Section 7. Leachate Seeps, Spills, Leaks or Other Unusual Incidents: This section of the 1st 2024 Report indicates that no seeps were identified during the monitoring period. However, the inspection forms included in Appendix B note that a seep was identified and managed during a June 28, 2024 inspection. Revise the text in Section 7.0 accordingly.
- 4. Section 9. Results of Laboratory Analysis from Leachate Sampling: Remove the statement from both reports that analytical results "were below the Colorado Water Quality Control Commission's Agricultural Standards". Analytical results must meet the standards in Table A and Table 3 of Regulation No. 41 - The Basic Standards for Ground Water to be considered safe for agricultural use.
- 5. Appendix A Leachate Collection and Discharge Logs: The first log included in Appendix A of both reports appears to be the same document. Please remove this duplicate log from the appropriate 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
Rebecca Lindeman, PE - Jardon Engineering & Inspections, LLC

