



COLORADO

**Hazardous Materials
& Waste Management Division**

Department of Public Health & Environment

January 9, 2025

Electronic Document Submittal

lcoupe@twinenviro.com

Lacie Coupe
General Manager, Milner Landfill
Twin Enviro Services, Apex Waste Solutions
P.O. Box 774362
Steamboat Springs, CO 80477

Re: **Comments:** Groundwater Statistical Limits Update February 2024 and MW-11 Background
Milner Landfill, RTT16
CDPHERM HAZ SW - Monitoring

Dear Lacie Coupe,

The Colorado Department of Public Health and Environment (CDPHE) Hazardous Materials and Waste Management Division (Division) received the following documents with updated and proposed statistical limits for the Milner Landfill (Facility) located at 1 County Road 205, Routt County, Colorado.

Twin Enviro Services, Milner Landfill, Groundwater Statistical Limits Update (2024 Statistical Update). Prepared by: Souder, Miller & Associates. Prepared for: Twin Enviro Services. Document dated: February 20, 2024. Document received: February 20, 2024.

Milner Landfill Background for MW-11, December 11, 2024 email transmitting results of statistical analysis output files (outliers, trends and proposed prediction limits) for MW-11 (MW-11 Proposed Background 2024). Prepared by: Souder, Miller & Associates. Prepared for: Twin Enviro Services. Documents dated: December 10, 2024. Documents received: December 11, 2024.

The Division reviewed the above-referenced documents pursuant to 6 CCR 1007-2, Part 1, the Regulations Pertaining to Solid Waste Sites and Facilities (Regulations) and the Facility's approved Groundwater Sampling and Analysis Plan dated May 5, 2020 (SAP). The Division met with the Facility by phone on December 4, 2024 to discuss questions based upon its review of the 2024 Statistical Update. The Division subsequently revisited some of the data in question, and reviewed the MW-11 Proposed Background 2024 and based on this review, has the following comments.

Comment 1. The Division generally agrees with the updated background periods used for the individual wells. However, please use December 2018 as the start of background period for MW-13 or explain why it is excluded. Also, there appears to be



an error in Table 14, where the end of background date is May-2017 for As, Ba, Cr, Vn and Zn. Please correct/revise accordingly.

Comment 2. The proposed prediction limits for MW-12 for most of the Appendix IB inorganic constituents as well as other specific well-constituent pairs appear to be unrealistically high to be able to identify a statistically significant increase (SSI) above background, and are significantly higher than the Division's evaluation of the data. The Division requests that the Facility re-run the statistics for the following well-constituent pairs. The Division's evaluation of the data resulted in the following statistical limits:

- a. Lead in MW-1: 0.106 milligrams per liter (mg/L)
- b. Arsenic in MW-8: 0.0114 mg/L
- c. Arsenic in MW-12: 0.0551 mg/L
- d. Barium in MW-12: 1.954 mg/L
- e. Beryllium in MW-12: 0.00715 mg/L
- f. Cadmium in MW-12: 0.00521 mg/L
- g. Chromium in MW-12: 0.0855 mg/L
- h. Cobalt in MW-12: 0.0696 mg/L
- i. Copper in MW-12: 0.12 mg/L
- j. Lead in MW-12: 0.118 mg/L
- k. Nickel in MW-12: 0.144 mg/L
- l. Selenium in MW-12: 0.00595 mg/L
- m. Vanadium in MW-12: 0.298 mg/L
- n. Zinc in MW-12: 0.666 mg/L
- o. Arsenic in MW-13: 0.0487 mg/L

Comment 3. A number of proposed prediction limits are based upon elevated reporting limits even though there are lower detected values. This approach results in a prediction limit that may be inappropriately high and not representative of the data population. The Division requests that the maximum detected value be used as the prediction limit unless all results are non-detect. Where all results are non-detect, the Division requests that the prediction limit be based upon the reporting limit that is most representative of the data set, rather than the maximum reporting limit, which may be elevated for a sampling event.

- a. Zinc in MW-4: The maximum detected value of 0.04 mg/L is preferred
- b. Antimony in MW-8: The maximum detected value of 0.0004 mg/L is preferred.
- c. Thallium in MW-8: The maximum detected value of 0.0006 mg/L is preferred.
- d. Beryllium in MW-9: The maximum detected value of 0.0077 mg/L is preferred.
- e. Copper in MW-11: The reporting limit of 0.01 mg/L is preferred.
- f. Nickel in MW-11: The maximum detected value of 0.013 mg/L is preferred.
- g. Antimony in MW-12: The maximum detected value of 0.0004 mg/L is preferred.



Lacie Coupe

Comments: Groundwater Statistical Limits Update February 2024
January 9, 2025

Compliance Assistance: The Division would like to discuss a revision to the 2024 Statistical Update, after it has received and reviewed the re-run statistics for the well-constituent pairs listed in Comment 2. Once all updated limits have been approved, those limits should be used in evaluation of the 2024 monitoring data.

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

The CDPHE is authorized to bill for its review of technical submittals pursuant to Section 1.7 of the Regulations. An invoice for the Division's review of the above-referenced document will be transmitted under separate cover to the Facility. Our billing ceilings may be viewed online at <https://www.colorado.gov/pacific/cdphe/solid-waste-regulations>.

Should you have any questions regarding this letter, please contact Jennifer McCarter at 303-691-4983 or by email at Jennifer.mccarter@state.co.us.

Sincerely,

Jennifer McCarter
Solid Waste Permitting
Groundwater and Environmental Unit
Hazardous Materials and Waste Management Division

Jerry Henderson
Solid Waste Permitting
Groundwater and Environmental Unit
Hazardous Materials and Waste Management Division

ec: Scott Jenkins, COO - Apex Waste Solutions
Graham Cottle - Souder, Miller & Associates
Mike Pretti, PE - Souder, Miller & Associates
Rebecca Lindeman, PE - Jardon Engineering & Inspections LLC
Scott Cowman, Director - Routt County Environmental Health Department
Alan Goldich - Routt County Planning Department
Sarah Foreman, PE - CDPHE Solid Waste Permitting - Engineering Design Unit

