



**COLORADO**

**Hazardous Materials  
& Waste Management Division**

Department of Public Health & Environment

January 9, 2025

Electronic Document Submittal

[lcoupe@twinenviro.com](mailto: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:** Semi-Annual 2023 Groundwater Monitoring Reports  
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 groundwater monitoring reports for calendar year 2023 (2023 Reports) for the Milner Landfill (Facility) located at 1 County Road 205, Routt County, Colorado.

Twin Enviro Services, Milner Landfill, 1<sup>st</sup> Semi-Annual 2023 Groundwater Monitoring Report, May 2023. Prepared by: Souder, Miller & Associates. Prepared for: Twin Enviro Services. Document received: February 20, 2024.

Twin Enviro Services, Milner Landfill, 2<sup>nd</sup> Semi-Annual 2023 Groundwater Monitoring Report, November 2023. Prepared by: Souder, Miller & Associates. Prepared for: Twin Enviro Services Document received: February 20, 2024.

The Division reviewed the above-referenced 2023 Reports pursuant to 6 CCR 1007-2, Part 1, the Regulations Pertaining to Solid Waste Sites and Facilities (Regulations), the Facility's approved Groundwater Sampling and Analysis Plan dated May 5, 2020 (SAP), and the Division's August 1, 2023 Comments on the Spring and Fall Semi-Annual 2022 Groundwater Monitoring Reports (2022 Report Comments).

The Division met with the Facility by phone on December 4, 2024 to discuss the February 2024 Groundwater Statistical Limits Update and the 2023 groundwater reports. Based on this review, the Division has the following comments to be incorporated into future monitoring reports. A resubmittal of the 2023 Reports is not required.



**Comment 1.** Under the Solid Waste Program, statistical analysis is no longer required at Milner Landfill for specific anions (carbonate, bicarbonate, total alkalinity, chloride, and sulfate), for the identification of statistically significant increases over background (SSIs). However, please evaluate each of these constituents, in addition to the cations (magnesium, sodium, potassium, and calcium) and total organic carbon that were previously removed from requiring statistical analysis for the identification of SSIs, including trend charts and a discussion regarding results and trends. The Division will notify the Facility if at a future date statistical analysis of these parameters should be resumed. Of the Appendix IA General Indicator Parameters, please continue to conduct statistical analysis for the identification of (SSIs) on nitrate and nitrite.

**Comment 2.** Section 2 Groundwater Monitoring: Section 3.1.1 of the SAP describes the decontamination method to be followed for non-dedicated equipment. However, equipment decontamination during the semi-annual monitoring events is not discussed in the reports. In future reports, include discussion of equipment the decontamination methods employed during the sampling events. This comment was made on the 2022 reports and does not appear to have been addressed. Further, per Comment 3, qualifiers on lab results indicate that decontamination procedures continue to be insufficient. In Section 2.2, describe how and where purge water is disposed.

**Comment 3.** Section 2.3 Analytical Data Review: There were several exceptions noted in both the first and second semi-annual events. These include hold time exceedances, ineffective thermal preservation, and VOCs detected in equipment blank and trip blank indicating insufficient decontamination between sampling locations and potential cross contamination during sample handling or transport. The Division requests that the Facility review equipment decontamination, sampling and handling procedures to prevent these field errors in the future.

**Comment 4.** Section 3.4: Please add a sub-section discussing the increasing trends that can be observed in the time series graphs in Appendix D for all constituents. Based on visual observation of the graphs, it appears there are increasing trends for chloride at MW-3, MW-4, and MW-8, and MW-9 and for magnesium at MW-3. Revise as necessary in future monitoring reports.

**Comment 5.** Section 4.0 Summary and Recommendations: The Division agrees with the Facility's recommendation to continue detection monitoring for the 2024 monitoring events.

**Comment 6.** Figure 1 Potentiometric Surface:

- a. Please include and clearly label additional Facility components that are in the September 2023 Groundwater Sampling and Analysis Plan (Figure 1, Site Map) such as the liquids transfer facility, leachate holding pond, compost area, MRF, shop, and scale house.
- b. Please include locations of abandoned wells and piezometers including MW-5 and MW-10 and label as abandoned with the year.



**Comment 7. Table 10 Historical VOC Detections:**

- a. Table 10 presents only the maximum concentrations of a VOC at each well. Please include all historical VOC detected results and respective sample dates in the table and highlight the maximum value for each.
- b. The maximum detection for vinyl chloride in MW-8 is listed as 0.04 micrograms per liter ( $\mu\text{g/L}$ ) and it appears this concentration should be 0.045  $\mu\text{g/L}$ . Please ensure that the correct maximum detected values are included in the future, including 'J' flagged values.
- c. The standard used for comparing groundwater data should be the lowest listed value in the Regulation 41 Standard. For vinyl chloride, the standard is 0.023  $\text{ug/l}$ . Please remove the reference to 2  $\text{ug/l}$  and include only the 0.023  $\text{ug/l}$  standard. For toluene, the standard is 560  $\text{ug/l}$ . Please remove the reference to 1,000  $\text{ug/l}$  and include only the 560  $\text{ug/l}$  standard.

**Comment 8. Table 11 Analytical Results Comparison to Statistical Limits:**

- a. Include the detection limit for results that are non-detect (such as  $<0.01$ ) rather than 'ND' and the sample dates.
- b. For specific anions (bicarbonate, carbonate, chloride, and sulfate) that were previously removed from requiring statistical analysis for the identification of SSIs, remove the respective statistical limit for each well.

**Comment 9. Appendix D Time Series for Select VOCs:** Please include graphs for benzene at MW-3, bromomethane at MW-4, chloromethane at MW-6, dibromomethane at MW-12, and toluene at MW-1, MW-4 and MW-6 based on historical detections.

**Compliance Assistance:**

1. The Division has reviewed and provided separate written comments on the February 2024 Groundwater Statistical Limits Update, which may result in updated prediction limits that differ from those in the 2023 monitoring reports.
2. Please include discussion of the details of MW-5 abandonment in the 2024 monitoring report.
3. The Division agrees that the 1<sup>st</sup> Semi-Annual 2024 Groundwater Monitoring Report will be submitted concurrently with the 2<sup>nd</sup> Semi-Annual 2024 Groundwater Monitoring Report in early 2025. In the future, please submit the semi-annual reports within 90 days of receipt of validated laboratory results, per the SAP.
4. The current approved SAP is dated May 2020. However, the Division received a referral from Routt County to review the December 7, 2023 Engineering Design and Operations Plan, Milner Landfill Module 8 (2023 EDOP), which included a revised SAP (2023 SAP). On April 8, 2024, the Division provided comments on the 2023 EDOP, which included comments on the 2023 SAP (2024 Comments). Although a revised EDOP and SAP in response to those comments has not been received, beginning with the 2025 sampling events, the Facility should follow the 2023 SAP and reflect the 2024 Comments from the Division on the SAP.



Lacie Coupe  
Acceptance and Comments: Semi-Annual 2023 Groundwater Monitoring Reports  
January 9, 2025

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](mailto:Jennifer.mccarter@state.co.us).

Sincerely,

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