



COLORADO

**Hazardous Materials
& Waste Management Division**

Department of Public Health & Environment

Electronic Document Submittal

lcoupe@apexwasteco.com

March 26, 2025

Ms. Lacie Coupe
General Manager
Twin Landfill LLC
Apex Waste Solutions
P.O. Box 775810
Steamboat Springs, CO 80477

RE: CDPHE Comments on the Module 8 Construction Drawings
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 document in March 2025:

“Milner Landfill - Module 8 Construction Drawings” (hereafter referred to as the “Construction Drawings”); prepared by Souder, Miller & Associates (SMA); prepared for Twin Landfill LLC (Twin); dated March 21, 2025.

The Division reviewed the Construction Drawings 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 Engineering Design & Operations Plan (EDOP). Based on its review, the Division has the following comments on the Construction Drawings. Please address the comments, incorporate them into a revised version of the document, and resubmit the document to the Division for review and approval.

1. The Construction Drawings currently have no plans to construct stormwater controls except for Detail 3/7 on Sheet 7. The EDOP, which is currently under Division review, includes plans for the East Run-on Channel and Perimeter Channel 1. Please add grading plans and accurate details for these channels and ensure that they will be compatible the proposed access road. Additionally, as discussed in Comment 8(b) of the Division’s March 17, 2025 EDOP comment letter, please ensure that the East Run-On Channel has the capacity to handle discharge from the entire run-on basin.
2. Gas Probe GP-5 is shown in the same location as the previous version of the EDOP, which is in the centerline of Perimeter Channel 1. As discussed in Comment 10(b)(ii) of the Division’s March 17, 2025 EDOP comment letter, please move GP-5 to a new location.
3. Sheet 5 Design Clay Liner Plan 50-ft Grid: In accordance with Section 2.4 of the Construction Quality Assurance/Quality Control Plan, modify the survey grid so the boundary of Module 8 will be surveyed at a spacing of 50 feet or less and at turning points.



4. Sheet 7 Details: As discussed in Comment 17(b) of the Division's March 17, 2025 comment letter, Appendix T of the EDOP has been updated to model a drainage layer for Module 8. However, the details on this sheet don't include a drainage layer. Please revise.
5. On November 9, 2023, the Division approved the Phase 2 Dewatering Calculations and Design Figures, which included the final three sheets of the Construction Drawings. The final condition of the approval letter required Twin to add the underdrain sump monitoring plan to the EDOP. Please ensure that the design and monitoring details for the underdrain and sump are included in the next revision of the EDOP.

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
Mike Pretti, PE - SMA
Scott Jenkins - Apex Waste Solutions

