



COLORADO

**Hazardous Materials
& Waste Management Division**

Department of Public Health & Environment

March 28, 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: **Approval with Comments: Groundwater Statistical Limits Update 2024**
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.

Response to Comments: Groundwater Statistical Limits Update February 2024 and MW-11 Background Milner Landfill (Response to Comments). Prepared by: Souder, Miller & Associates. Prepared for: Twin Enviro Services. Document dated: February 4, 2025. Document received: February 5, 2025.

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).



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The 2024 Statistical Update and the MW-11 Proposed Background 2024 provided proposed updated prediction limits for MW-1, MW-3, MW-4, MW-6, MW-8 and MW-9 and established initial proposed limits for MW-11, MW-12 and MW-13 which have a shorter period of record. In response to Division comments (January 9, 2025), the Facility made the following modifications to the proposed limits:

- The limits for some constituents in MW-4, MW-8, MW-9, MW-11 and MW-12 were revised to remove the influence of elevated reporting limits for some non-detected values. The SAP states that when the detection frequency is less than or equal to 25%, a non-parametric prediction limit will be the highest detected value or the highest detection limit, whichever is greater. However, the Division prefers 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. The reporting limits for data sets where all results are non-detect should be evaluated to ensure that isolated occurrences of elevated reporting limits that do not appear to be representative of the typical laboratory report limit for each well-constituent pair do not inappropriately result in elevated prediction limits.
- The limits for MW-13 were recalculated to include the December 2018 sample event, to use the results from 9 sample events in the background period.

Based on our review, the Division believes that the statistical limits update has been performed in accordance with the approved SAP and the Division's January 9, 2025 comments. The Division **approves** the updated statistical limits provided in the February 4, 2025 Response to Comments.

Compliance Assistance:

- At the request of the Division, the Facility has held the 2024 semi-annual groundwater reports, pending approval of the updated statistical limits. The Division requests that the approved updated limits be used for evaluation of the 2024 monitoring data and future monitoring data until the next update.
- The SAP states that background data/statistical limits should be updated after every 4-8 sampling events or approximately every three years with semi-annual sampling. The 2024 Statistical Limits Update (as modified in the February 4, 2025 Response to Comments) generally uses a background period through 2022. Therefore, the next update is expected to be performed in 2026, using data through 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>.



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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

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

