



## COLORADO

**Hazardous Materials  
& Waste Management Division**

Department of Public Health & Environment

Electronic Document Submittal

[lcoupe@apexwasteco.com](mailto:lcoupe@apexwasteco.com)

March 31, 2025

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

RE: **CDPHE Acceptance with Comment: 2023 and 2024 Leachate Management Reports**  
Milner Landfill, Routt County, Colorado  
CDPHERM HAZ SW / Permitting / 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 reports in 2025:

*“2023 Second Semi-Annual Leachate Management Report;”* prepared by Twin Landfill LLC (Twin); dated February 27, 2024; revised January 1, 2025; received by the Division on January 28, 2025.

*“2024 First Semi-Annual Leachate Management Report;”* prepared by Twin; dated August 27, 2024; revised January 28, 2025.

*“2024 Second Semi-Annual Leachate Management Report;”* prepared by Twin; dated February 24, 2025.

The Division reviewed these 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 and Operations Plan (EDOP). **Based on the Division’s review, leachate management appears to have been conducted in general accordance with the Act, Regulations, and EDOP. Therefore, the Division accepts the above-referenced reports as submitted.**

The Division offers the following comment for consideration in future leachate management reports:

1. Section 2 of the 2024 Second Semi-Annual Leachate Management Report indicates that 182,500 gallons of leachate was removed from the Module 1 sump and 16,500 gallons of water was removed from the Pit 5 & 6 tank. However, the color-coded manifests in Appendix A present a total of 172,000 gallons from the Module 1 sump and 15,000 gallons from the Pit 5 & 6 tank. It is unclear if the remainder of this water was stored in the leachate holding pond or if the manifests are incorrect. In the future, please indicate if some of the leachate was stored in the leachate pond and ensure that all leachate is accounted for in the report.



Please note that the Division's acceptance of the above-referenced reports 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 reports 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](mailto: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  
Scott Jenkins - Apex Waste Solutions

