



April 1, 2025

Sarah Foreman  
Colorado Department of Public Health and Environment (CDPHE)  
Transmitted via email

**RE** CDPHE Comments on the Module 8 Construction Drawings  
Milner Landfill, Routt County, Colorado CDPHERM HAZ SW / Monitoring / RTT16

Dear Sarah,

Twin Landfill, LLC dba Apex Twin Enviro (Twin) is transmitting these responses to comments CDPHE Comments on the Module 8 Construction Drawings (CDs), dated March 2025, for the Milner landfill. Comments received from CDPHE on March 26, 2025 are listed followed by our responses in italics.

The Division's comments are as follows:

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.

*>> The CDs include constructing/extending the drainage channel at the south end of Mod 8. Milner has already built the run-on ditch along the east side of Mod 8 as part of the regrading and removal of the cattle pond in 2023. Our team is rerunning the drainage calculations with the additional area/basin discussed during our EDOP meeting. If the constructed run-on channel needs to be modified based on the results of this recalculation, we will advise CDPHE and modify the channel as needed and certify the as-built channel as part of Mod 8 final survey.*

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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.

*>> This gas probe will not be installed in a drainage channel. The scale of the symbol is difficult to depict on the drawings however, the actual location of the GMP will be finalized in the field but again, will not be in the drainage channel. The drawing has been updated to include a note stating that GMP-5 will be constructed between the road and drainage channel.*

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.

*>> The drawings have been updated to include grid points along the Mod 8 boundary on the north, east, and south sides. As-built points for Mods 6 and 7 are already shown on the drawings.*

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.

*>> As modeled in the updated Appendix T (HELP model), a 0.7-foot-thick granular drainage layer will be placed in all of Module 8. The drainage layer will be placed to accommodate the worst-case scenario of initial waste placement in Module 8. Details 1, 4 and 5 on Sheet No. 7 have been revised to show a 0.7-foot-thick drainage layer in Module 8 as modeled. Revised drawings are attached herein.*

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.

*>> The dewatering sump is related to Phase 2 construction. This sump won't actually discharge until Twin obtains the necessary permits to discharge, as well as the appropriate monitoring plans. A note has been added to the plans that the drainage line is to remain plugged until appropriately permitted and approved for discharge. Further, we will make sure the EDOP contains the appropriate design and monitoring details are in the future version of the EDOP specific to Phase 2.*

Twin appreciates the Division's quick review of the initial CDs submitted. Please reach out with any questions or discuss these replies further. We look forward to your approval of the CDs for construction in 2025.

Respectfully,

A handwritten signature in cursive script that reads "Lacie Coupe".

Lacie Coupe  
General Manager, Apex Twin Enviro

cc: Scott Cowman, Director – Routt County Environmental Health  
Alan Goldich – Routt County Planning  
Brian Long – CDPHE Solid Waste Compliance Assurance Unit  
Jill Parisi, PE – CDPHE Solid Waste Permitting – Engineering Design Unit  
Michael Pretti, PE – Souder, Miller & Associates  
Rebecca Lindeman, PE – Jardon Engineering & Inspections