

**DOPHE 136**  
**HAZARDOUS MATERIALS**

SW\_1.6.\_1025



BOX#

232

## TWIN LANDFILL CORPORATION

June 24, 2003

Mr. Glenn Mallory  
Mr. Darrell Dearborn  
HMWMD-ADM-B2  
4300 Cherry Creek Dr. South  
Denver, CO 80222-1530

RE: Compliance Advisory, Milner Landfill, June 12, 2003

Gentlemen:

I have received the Compliance Advisory and it seems that there are three issues raised. We have dealt with the first two. We do not believe the third one is really an issue at all.

1. Size of the working face was noted to be too large. The working face was reduced in size to approximately 30' wide X 50' deep (front to back).
2. Daily soil cover has been applied. Several days had been missed. The tarp will be used as soon as some repairs are made to steel pipe that is used to pull it across the working face.
3. There was no lack of intermediate cover during the recent inspection so we don't know why this was raised as an issue.

Attached to the above referenced letter is a Solid Waste Inspection Worksheet upon which I would make the following comments.

1. I am not clear on what is meant by saying the working face was fifty feet in height and eighty feet in length. Does that mean vertical height or linear length of the face? The size of the working face as of today is a linear 30 feet wide and 50 feet from front to back. During certain times, the working face may appropriately be as large as 50' X 80'.
2. Scrap metal and debris noted near the former landfill office are actually recyclables or spare parts (no debris) with the former transported regularly to Craig when it is sorted and loaded.
3. The leachate sample gathering apparatus is being installed and when enough is gathered, we will bring a sample to ACZ Labs.
4. Petroleum contaminated soil has been used as daily cover consistently since January 1, 2003. It was only in the few days prior to this inspection that there was no daily cover. It is correct that the tarp has not been used during this calendar year.

**Milner Landfill/MIL**

7/24/2003

RTT

Solid Waste - Correspondence - Enforcement - Compliance  
Advisory, Milner Landfill, June 12, 2003 - Response

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**SW/1.6./946**

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5. Mr. Bell either did not say or did not mean to say that the size of the working face was not a priority. Rather, he said that the completion of the new access road was a priority so that daily cover and reduction of the size of the working face could more easily be accomplished.

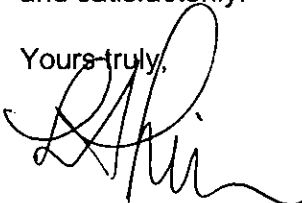
6. Whereas warmer weather sites can collect the inevitable windblown debris all year long, the Milner Landfill (and the Summit County Landfill, for example) mounts an extra, sustained effort when the snow melts to collect windblown debris that has been covered by snow during the winter. Further, it is not feasible to walk across the snow to collect windblown debris in the winter. The debris collection was completed before it became visible or a source of complaints this spring and every spring. There was no special problem.

7. We are unsure what is meant by the reference to intermediate cover. Daily cover was lacking for a few days during construction of a new access road. Intermediate cover was in place and remains in place.

Please note: To aid in the expeditious receipt of mail, please use the correct spelling of the name "Liman" and please use the proper mailing address, P.O. Box 774362, Steamboat Springs, CO 80477. Your letter was sent certified mail to Twin's street address, 1051 Crawford Ave, which is correct, but not the mailing address. This delayed the receipt of this important piece of mail by several days.

Enclosed are photographs that verify the appearance of the working face and the use of daily cover. We plan to keep working with the Division to resolve these issues quickly and satisfactorily.

Yours truly,

A handwritten signature in black ink, appearing to read "Les A. Liman", written over the "Yours truly," text.

Les A. Liman  
President