



STATE OF
COLORADO

- CDPHE, cdphe <cdphe.hmdrecordscenter@state.co.us>

Fwd: Comments

1 message

Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>
To: cdphe hmdrecordscenter <cdphe.hmdrecordscenter@state.co.us>

Mon, May 21, 2018 at 9:30 AM

Hello Kim:

Please file this email and the attached PDF as follows:

County: Routt

Site: Milner Landfill

Title: Routt County SUP Permit Enforcement

Code: SW / RTT / MIL 1.6

Document dated: 5/8/18

Document received: 5/8/18

Confidential (Y/N): N

Thanks,
Curt

----- Forwarded message -----

From: **Gina Cadrecha** <gcadrecha@co.routt.co.us>

Date: Tue, May 8, 2018 at 12:42 PM

Subject: Comments

To: "Curt Stovall (curtis.stovall@state.co.us)" <curtis.stovall@state.co.us>

Hi Curt,

These are comments from Mr. Lyman, from this morning's BCC meeting.

Thank you,

Gina Cadrecha

Administrative Assistant

Routt County Department of Environmental Health

136 6th St./P.O. Box 770087

Steamboat Springs, CO 80477

(970) 870-5400 fax (970) 870-5404

Disclaimer

The information contained in this communication is confidential and intended solely for use by the recipient(s). If you are not the recipient, understand that any disclosure or distribution of the contents is strictly prohibited and may be unlawful. This email has been scanned for viruses and malware, and may have been automatically archived.

--

Curt Stovall, P.E.
Environmental Protection Specialist
Solid Waste Permitting Unit
Solid Waste and Materials Management Program



P [303.692.2295](tel:303.692.2295) | F [303.759.5355](tel:303.759.5355)
4300 Cherry Creek Drive South, Denver, Colorado 80246-1530
curtis.stovall@state.co.us | www.colorado.gov/cdphe/hm

201805081224.pdf
171K

1. Twin Enviro received an April 13 letter from Alan Goldich informing Twin that the Enforcement hearing for Solid Basin that was tabled indefinitely by BOCC was now scheduled for Planning on May 17 and BOCC on June 12.
2. It said that the hope was that Revised Engineered Design and Operations Plan , EDOP, would be submitted to CDPHE and that would generate guidelines for the County Issued portion of its permit-the SUP
3. The revised EDOP was submitted to CDPHE on time, in April, with a \$200k cost from outside engineers, plus a huge amount of staff time.
4. Then a May 1 letter from CDPHE came detailing operations improvements that must be made—and they have all been made.
5. IN addition, upgrades to the liner system were required by CDPHE to be made by Oct 31, 2018. Twin request a 3 year extension for valid reasons. CDPHE said no extension. We agreed to complete the upgrade to the liner by Oct 31 2018. Very small amounts of E&P in last two years, because drillers are using a flocculent to solidify liquid waste at their drill sites before transporting the solids to disposals sites, but we do handle locally generated sandt and greasetrap liquids which will have no local place to go the basin were to close
6. The same May 1 letter detailed compliance and construction schedule was communicated to Twin by CDPHE. Twin agreed to this schedule.
7. Regs for liner design changed by CDPHE in 2008. 2015 review of our older liner system resulted in approval for continued use.
8. CDPHE and Routt County Environmental Health has claimed that some changes in the levels of some constituents in our monitor wells indicated that the liner was leaking. We emphatically disagree.
 - a. First it was Barium, a common constituent in drilling mud, was found in a well sample—but outside engineering investigation showed that Barium is naturally occurring in the soil of the Milner Landfill
 - b. Then It was fluctuating levels of Chloride, but that was found to be fluctuating in upgradient wells
 - c. Next it was elevated levels of Sulfate, but the engineers determined that historically, Sulfate was elevated in upgradient wells from 2009-12 and went back down.
 - d. In the last few days CDPHE has raised issued with Beryllium and Magnesium. We have not yet researched that issue.
9. Why are all these problems with detection and fears of environmental degradation from the landfill and the Solidification Basin. I am not going to get into a detailed discussion of technical issues now, nor does Twin want to do this in front of two lay bodies in the next few weeks---the Planning Commission this month and the BOCC in June.
 - a. Use of site as an underground coal mine starting in 1903 to 1947, an above ground coal mine from 1940's to 1970's.
 - b. Use of site as County operated Landfill from 1971 to 1990's, unlined and unmonitored
 - c. Use of Basin Site as dumping area for Septic waste by Routt County from 1971 to 1983, and Basin was built there because it had a monitor well had been installed there in 1983 to track the pollution from the septage.

10. Twin is doing everything CDPHE requires and Routt County Env Health has input on those requirements in accordance with the dual process. When EDOP is reviewed and adopted, and additional changes are incorporated for the operations of the Solidification Basin, all these requirements can be included in the SUP by reference.
11. Having these enforcement hearings now will require Twin to bring in Engineers to provide testimony and will be at great expense. When the SUP process comes before you, we will have to have these hearings all over again.
12. Over 20 small counties have lost their disposal sites due to costly compliance requirements. We have a less than 60,000 ton site annually. Front Range sites are over 1 million tons. I think you want to be sensitive to that reality and understand that we are doing all the things required to be protective of the environment.
13. When BOCC discussed having these hearings, Twin did not know it was to be discussed and have the opportunity to comment.