



September 27, 2017

Brad Callendar
City of Commerce City
Community Development Department
7887 East 60th Avenue
Commerce City, CO 80022

RE: Phillips 66 Pipeline Height Exception
AH-1746-16
TCHD Case No. 4591

Dear Mr. Callendar:

Thank you for the opportunity to review and comment on the proposed height exception to construct a 60-foot Vapor Combustion Unit (VCU) located at 396- E 56th Ave. landfill. Tri-County Health Department (TCHD) staff reviewed the application for compliance with applicable environmental and public health regulations and has the following comments.

Closed Landfill

There are two closed landfills located within 1,000 feet of the subject property. Flammable gas from decomposing organic matter in old landfills may travel up to 1,000 feet from the source. Because construction is planned on this property, we recommend the following:

1. A flammable gas investigation should be conducted to determine if flammable gas (methane) is present in the subsurface soils at the property. The plan for the investigation should be submitted to Tri-County Health Department (TCHD) for review and approval.
2. TCHD will review the results of the investigation. If the investigation indicates that methane is not present at or above 20% of the lower explosive limit for methane (1% by volume in air) in the soils, no further action is required.
3. In lieu of the investigation, a flammable gas control system shall be designed and constructed to protect buildings and subsurface access to utilities, i.e. vaults, manholes, etc. from flammable gas. Health and safety practices shall be followed during construction to protect site workers. A copy of TCHD guidelines for safe construction in areas on or near former landfills has been attached.

Please feel free to contact me at 720-200-1571 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Sheila Lynch".

Sheila Lynch
Land Use, Built Environment, and Health Program Manager

CC: Monte Deatrich, TCHD