



ADAMS COUNTY
HEALTH DEPARTMENT

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Adams County Health Department
Environmental Health
7190 Colorado Blvd.
Commerce City, CO 80022
303.288.6816
adamscountyhealthdepartment.org

June 27, 2024

Ms. Rosemarie Russo
City of Commerce City
Energy, Equity and Environmental Division
7887 East 60th Avenue
Commerce City, CO 80022

RE: June 2024 Full Scope Site Inspection at Tower Landfill, Commerce City, Colorado

Dear Ms. Russo,

On June 24, 2024, Larry Bruskin, P.E. and Mike Weakley from the Adams County Health Department (ACHD) conducted a full scope site inspection at the Tower Landfill, located at 8480 Tower Road in Commerce City, Colorado. The inspection was performed in accordance with the *Intergovernmental Agreement for Oversight Services at Republic Services Tower Landfill* (the "Intergovernmental Agreement") between ACHD and the City of Commerce City, executed on May 9, 2023.

Results of the inspection indicate that the facility's operations were in general compliance with the facility's approved operational procedures at the time of the inspection. The inspection is more fully described in the attached inspection report.

Should you have any questions or concerns regarding the attached report, I can be contacted by email at lbruskin@adcogov.org or by phone at 720-200-1481.

Sincerely,

Larry Bruskin

Larry Bruskin, P.E.
Adams County Health Department
Environmental Health Division

ec: Steve Derus, Republic Services
Vittoria Zucchelli, Republic Services
Emily Herrmann, Republic Services
Daniel Bargmann, Republic Services
Jennifer Reynolds, CDPHE/HMWMD
Mike Weakley, ACHD

INSPECTION REPORT

Agency: Adams County Health Department
Environmental Health Division

Date: June 24, 2024

Site: Tower Landfill
8480 Tower Road
Commerce City, CO 80022

Operator: Republic Services

Site Representatives: Steve Derus, General Manager
Vittoria Zucchelli, Environmental Manager
Emily Herrmann, Environmental Specialist
Daniel Bargmann, Operations Manager

Weather: Sunny, calm, seasonably hot, 90° F

Introduction

On June 24, 2024, Larry Bruskin and Mike Weakley from the ACHD, Environmental Health Division, conducted an announced full scope inspection at the Tower Landfill located in Commerce City, Colorado. The purpose of the inspection, as discussed in the Intergovernmental Agreement, is to evaluate Republic Services' *"...operational procedures related to litter control, dust control, bird hazard control, and other daily operations."*

Site Background

The Facility consists of an approximately 643-acre municipal solid waste landfill located at 8480 Tower Road, Commerce City, Colorado. The original Certificate of Designation (CD) was executed on April 20, 1981, and subsequently transferred on November 1, 1982. The Facility is approved for receipt of municipal solid waste along with non-hazardous industrial and construction demolition (C&D) debris waste including asbestos. Additionally, the Facility operates a liquid solidification basin that accepts, among other materials, exploration and production (E&P) wastes. The Facility does not accept hazardous waste, radioactive waste, explosive waste, polychlorinated biphenyl (PCB) waste, waste tires, or any other waste streams not approved by the CD and the Facility's Engineering Design and Operations Plan (EDOP). Composting is not conducted at the Facility. Free appliance recycling is available for residents of local municipalities during their free disposal days.

Site Discussion

Upon arriving at the Facility's office and signing the visitor log at about 9:00 AM, Mr. Bruskin and Mr. Weakley were met by Republic Services representatives Steve Derus, General Manager, Vittoria Zucchelli, Environmental Manager, and Emily Herrmann, Environmental Specialist. We proceeded upstairs to the office conference room for an overall site discussion and review of some of the operational documentation.

Using aerial photos and design drawings, Steve Derus explained the current site configuration and conditions. He discussed the impending subdivision development directly north of 88th Avenue, and how that ties into Republic Service's desire to annex and purchase about 110 acres of land east of the existing property and relocate site facilities to this area. Steve explained that when the site gets busy, trucks are sometimes backed up and are lined up on 88th Avenue. This will create difficulties once the subdivision north of 88th Avenue is completed, and homes are occupied. Steve briefly discussed other aspects of the landfill, such as groundwater, leachate and methane monitoring, liner and cover configurations, and the new cell construction planned for this summer and fall.

Operational Records Review

After the general site discussion was concluded, we reviewed the facility's operational documentation. Prior to arriving at the site, the following documents were reviewed by ACHD:

- Summary of the Certificate of Designation (CD) and CD Modifications.
- Waste Characterization Plan, Revision 3
- Liquid Waste Solidification Plan, Modification No. 1
- Engineering Design and Operations Plan Training Plan
- Recent groundwater monitoring, methane monitoring, and leachate monitoring reports.

Prior to the inspection, the facility was provided with the list of operational records that we requested to be reviewed. This included the most recent documentation of Special Waste Profiles, Random Load Inspections, Rejected Loads, Unacceptable Waste Training, Health and Safety Employee Training, and Facility Self-Inspections. The requested facility documents were all available, well organized, and complete. There were no issues encountered during the review of the operational records.

Site Inspection

After the records review was completed, the inspection team went to the garage and loaded into a Republic Services pickup truck. The pickup was driven by Daniel Bargmann with passengers Vittoria Zucchelli, Steve Derus, Mike Weakley and Larry Bruskin. The first stop was the gas flare (Picture 1), located just east of the office building inside the fence line. Located between the gas flare and the office building is a shed containing blowers (Picture 2) and other equipment necessary to operate the

gas flare properly. The entire system is automated such that it will shut down if an upset condition occurs rather than venting gas directly to the atmosphere.

The truck left the gas flare area and traveled north on Tower Road then east on E 88th Avenue and turned south into the main entrance for the landfill. We bypassed the scale and gatehouse and drove towards the solidification basin (Picture 3), which was in operation at the time of the inspection. As shown in Pictures 3, a tanker truck was unloading liquid waste material into the basin while an excavator mixed the liquid with solidifying agents, including clay soil, auto shredder fluff, and wood chips. Once the mix is solidified and able to pass the paint filter test it will be disposed in the landfill.

The truck then drove towards the main road ascending the landfill, passing the “white goods” storage area (Picture 4). As shown in Picture 4, the appliances requiring freon to be removed, such as refrigerators and freezers, are segregated from the other appliances and kept in the left storage bin until a licensed technician removes the freon. The truck ascended the main landfill access road and reached the top deck, passing the construction and demolition (C&D) debris area (Picture 5), the asbestos disposal area, and the working face for non-commercial waste disposal (Picture 6).

An occasional tire was observed during traveling on the top deck, even though tires are prohibited from disposal. Republic Services stated that tires are sometimes inadvertently brought to the landfill, usually from a transfer truck. Republic Services said they try to utilize those tires around well heads and light poles, creating a barrier that is particularly useful at night.

The inspection traveled to the municipal solid waste (MSW) working face where commercial haulers and transfer trucks unload their waste (Pictures 7 and 8). Heavy compactors are then used to spread and compact the waste before the next waste lift is placed. Close to the working face was a well with riser pipe and soil mound protection (Picture 9). Riser pipes are added to wells to account for increasing elevation of the surrounding waste. Treated medical waste (Picture 10) is disposed in a separate area near the MSW working face after it has been autoclaved, profiled, and manifested.

The truck drove south passing a vantage point to view the retention basin (Picture 11). The retention basin is currently totally dry. The dry basin contrasts with a year ago (Picture 12), when the area received almost daily rainstorms and the retention basin was nearly full with up to 8-feet of water depth. The final stop prior to heading back to the office was to view the location of the proposed new cell to be constructed this summer and fall (Picture 13). The approximate 15-acre cell is located along the southern and eastern sides of the current landfill footprint.

Findings

Based on observations during the site visit and informal discussions with Republic Services personnel, ACHD had no concerns with the Facility operations. Republic Services said they currently inspect for waste tires but would be more vigilant. During the site visit the winds were calm, so no visible dust or blowing waste were observed. Birds or other vectors were not observed at the time of the inspection.

Closeout

There was no formal closeout after the records review and site inspection was completed, about 11:00 AM.

Attachment

Attachment A: Inspection Picture Log June 24, 2024

ATTACHMENT A

Inspection Picture Log June 24, 2024



Picture 1: Gas Flare Looking Southeast



Picture 2: Blowers for Gas Flare Inside Shed



Picture 3: Solidification Basin In Use Looking North



Picture 4: White Goods Storage Looking South



Picture 5: Construction and Demolition Debris Disposal Area Looking Southwest



Picture 6: Non-Commercial (Public) Working Face Looking Southeast



Picture 7: MSW Working Face Looking Northeast



Picture 8: MSW Working Face Looking Northeast



Picture 9: Well with Riser and Soil Barrier Looking North



Picture 10: Treated Medical Waste Disposal Area Looking North



Picture 11: Retention Pond Totally Dry Looking Southwest



Picture 12: June 21, 2023



Picture 13: Location of Proposed New Cell Looking East