

# STATE OF COLORADO

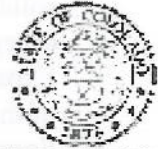
John W. Sandoz, Governor  
Larry Holk, MD, MSPH  
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S  
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[www.colorado.gov/doh](http://www.colorado.gov/doh)



Colorado Department  
of Public Health  
and Environment

March 20, 2014

Board of County Commissioners  
4430 South Adams County Parkway  
5th Floor, Suite C5000A  
Brighton, Colorado 80601-8204

RE: Completeness Review Determination: **Complete**  
Application for Certificate of Designation (CD)  
Conservation Services, Inc.  
Adams County, Colorado  
SW/ADM/CSI 2.1

Dear Commissioners:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (Division), received from Adams County, Colorado, a referral notification requesting the Division's review of a proposed revised engineering design and operations plan (EDOP) for a new Certificate of Designation (Application) for continued operation of the Conservation Services, Inc. (CSI) waste disposal facility in Adams County, Colorado. The Division received the Application as both a electronic document and hard copy. As described in the Application, CSI is an ongoing business and facility operating under the terms of its original CD, but the CD will expire on August 14, 2014.

The Division reviewed the Application to determine its compliance with the requirements set forth in the Solid Waste Disposal Sites and Facilities Act, Title 30, Article 20, Parts 1 and 10 (Solid Waste Act) of the Colorado Revised Statutes (CRS), as amended, and with the regulations promulgated there under: the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 (Solid Waste Regulations). In accordance with the Solid Waste Statute, CRS 30-20-103 (2), a "completeness review" of the Application is required.

In accordance with the Solid Waste Statute, CRS 30-20-103 (2), a "technical evaluation" of the Application is required after the completeness review has been conducted, and the Division has initiated the technical evaluation process. The Division may request additional information in order to clarify aspects of the Application before completing the technical evaluation. A formal recommendation of approval (or disapproval) of the Application per the Solid Waste Regulations will be made after the Division has completed its technical review.

The proposed revisions to the EDOP include:

- Addition of containment basin and equipment to separate oil and water (for recycling/re-use) and solids (for disposal) from energy exploration and production wastes that are already approved as acceptable for treatment and disposal.
- Expansion of operating hours to 24 hours per day, 7 days per week in order to service the needs of the oil and gas industry for waste delivery.
- Formalize the administrative process for acceptance of waste with NORM/TENORM and thereby eliminate the case-by-case review process for acceptance of these wastes, as is currently required.

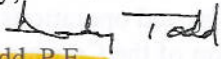
The Division is authorized to bill for its review of technical submittals at \$125 per hour, pursuant to Section 1.7 of the Solid Waste Regulations. The fee ceiling is \$35,000 for the review of your Application, and the review can include time for the completeness review, the technical evaluation, associated meetings, other communications, and any other related items. An invoice for the Division's review of the subject document will be sent under separate cover.

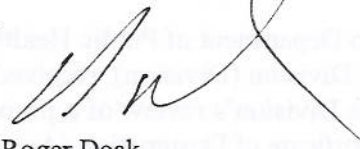
Enclosed is a 30-Hour Billable Time Notification Waiver/Cease-Work Notice. Please check the appropriate box on this notice and sign and date the waiver. This notice should be returned to Andy Todd at

HMWMD-B2  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

Should you have questions, please contact Andy Todd at 303-691-4049, [Andrew.Todd@state.co.us](mailto:Andrew.Todd@state.co.us), or Roger Doak at 303-692-3437, [Roger.Doak@state.co.us](mailto:Roger.Doak@state.co.us).

Sincerely,

  
Andy Todd, P.E.  
Environmental Protection Specialist  
Solid Waste Permitting Unit  
Solid Waste and Materials Management Program  
Hazardous Materials and Waste  
Management Division

  
Roger Doak  
Unit Leader  
Solid Waste Permitting Unit  
Solid Waste and Materials Management Program  
Hazardous Materials and Waste  
Management Division

cc: Alan Scheere – Conservation Services, Inc./Waste Management of Colorado, Inc.  
Tom Schweitzer – Waste Management of Colorado, Inc.  
Christopher La Rue – Adams County Planning and Development Department  
Craig Tessmer – Adams County Planning and Development Department  
Deanne Kelly – Tri-County Health Department  
Mark McMullen – AEC

cc: Dana Podell – Air Pollution Control Division  
Nathan Moore – Water Quality Control Division

SW/ADM/CSI 2.1