



COLORADO

Hazardous Materials & Waste Management Division

Department of Public Health & Environment

December 31, 2021

Mr. Randy
Tourville Front
Range Landfill
P.O. Box 320
Erie, Colorado 80516

RE: **Approval with Conditions** One-Time Waiver to Accept Debris from the
2021 Boulder County Grass Fires
Front Range Landfill
SW/WLD/FRL 2.2

Dear Mr. Tourville,

In response to the wildfires commonly known as the Boulder County Grass Fires, the Colorado Department of Public Health and Environment Hazardous Materials and Waste Management Division has been asked to provide disposal options for debris from structures damaged or destroyed by fire. Fire debris associated with burned structures may contain friable asbestos. 6 CCR 1007-2, Part 1, the Regulations Pertaining to Solid Waste Sites and Facilities (the "Regulations") prohibits solid waste sites and facilities, including landfills, from accepting friable asbestos waste unless expressly authorized in the facilities approved design and operations plan. The Front Range Landfill's (Facility) approved Engineering Design and Operations Plan (EDOP) prohibits the acceptance of friable asbestos waste. Because some of the debris and ash from this wildfire may contain friable asbestos, the Facility is asking the division for a one-time waiver to accept this waste stream to facilitate disposal needs of the County's citizens affected by the fire.

The department is providing this Waiver to allow the Facility to accept fire debris from the Boulder County Grass Fires that began in late December of 2021.

While this Waiver eliminates the administrative requirement to amend the Facility's approved EDOP prior to accepting friable asbestos waste, disposal activities at the Facility shall be conducted pursuant to the requirements set forth in Section 5 of the Regulations. The Facility must comply, as practicable, with substantive provisions of Subsection 5.3 of the Regulations. The following conditions shall be implemented:

Condition 1. All activities involved in the disposal of the debris, including placement in the waste disposal area, covering the waste, and compacting the overlying fill shall be conducted in a manner that minimizes the potential for emission of asbestos fibers to the air.

Condition 2. Misting or fine spraying shall be provided at the debris disposal area to minimize emissions in the case of waste loads received in a non-wetted condition or with packaging that does not remain intact during placement.

Condition 3. All unrelated landfill activities shall cease, and no non-essential persons shall be allowed, within one hundred (100') feet in all directions from the debris disposal during placement, covering and compaction of the debris and overlying fill.



This will entail setting up a debris disposal area separate from the main working face used by the public.

Condition 4. At no time shall compaction equipment come into contact with debris, containers, or packaging.

Condition 5. Although warning signs are not required, temporary fencing or some other means of demarcating the debris disposal area shall be provided while disposal is occurring.

Condition 6. Following placement in the landfill, the debris shall be covered immediately with nine inches (9”) of soil or eighteen inches (18”) of non-asbestos cover material, including MSW.

Condition 7. Disposal and compaction of the debris shall only occur when wind speeds are below 20 mph sustained and below 30 mph gusts.

Condition 8. The disposal location shall be surveyed and depicted on a site map, to be placed in the operating record at the end of the event and within sixty calendar days of last receipt of fire debris.

In accordance with the waiver provisions defined in Section 1.5.2 of the Regulations the division grants the Facility a one-time waiver for acceptance and disposal of asbestos containing material from the Boulder County Grass Fires. This Waiver will remain in effect for 60 days.

Should you have any additional questions or concerns, please contact me by email at david.snapp@state.co.us or by phone at 303-726-6836.

Sincerely,

David Snapp
Program Manager
Solid Waste and Materials Management Program
Hazardous Materials and Waste Management Division

cc: Todd Fessenden, Town of Erie
Ben Frissell, Weld County Department of Health and Environment
Doug Ikenberry, CDPHE Solid Waste
Andy Todd, CDPHE Solid Waste

