



March 1, 2022

Mr. Jeffrey Attig
Terracon Consultant, Inc.
10625 W. I-70 Frontage Rd. N. Ste 3
Wheat Ridge, CO 80033

RE: Voluntary Cleanup Plan Comments for 6800 Kilmer St., Arvada, CO

Dear Mr. Attig:

We have reviewed the Voluntary Cleanup Application for the proposed storage development at the former Kilmer landfill. Our comments are as follows:

- 1) Section 6.1 of the VCUP application text states that *“The majority of the remainder of the property will be streetscaped and landscaped areas, with packed gravel or compacted asphalt millings as surface materials.”* The selected pavement section for the parking area should be designed so that landfill gases will not adversely affect pavement performance. If an impermeable pavement section, such as asphalt, is selected, a passive venting system for landfill gas will be required. The VCUP application text should be revised to discuss a proposed venting system option.
- 2) Section 7.2 of the VCUP application text states that *“The stormwater basin area may require over-excavation of the bottom and sidewalls to allow adequate placement of clean fill and/or clay liner type material to prevent direct exposure of landfill waste to the surface or detained stormwater.”* The stormwater detention basin should be lined with a clay or composite liner system with a hydraulic conductivity less than or equal to 1×10^{-7} cm/sec to prevent infiltration into the waste mass. Engineered clean fill will not be considered an adequate barrier layer.
- 3) Section 7.0 of the Materials Management Plan (MMP) discusses proper stockpiling methods for excavated materials. However, the MMP should also state that *“excavated materials where waste material has been exposed but has not been removed will be covered with at least six inches of earthen material or suitable cover at the end of each day.”*
- 4) The VCUP application should state that an Operations and Maintenance (O&M) plan will be developed detailing the operational and maintenance requirements for the pavement area, stormwater controls, and vapor mitigation system.



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If you have any questions, please contact me at Fonda.Apostolopoulos@state.co.us (303) 692-3411.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fonda', with a large, stylized circular flourish to the right.

Fonda Apostolopoulos
Voluntary Cleanup Program

File: RV220125-1