

COLORADO

Department of Public Health & Environment

2016 Annual Report to the Colorado General Assembly:

Status of the Solid Waste Management Program
In Colorado

Submitted to the Colorado General Assembly by the Hazardous Materials and Waste Management Division Colorado Department of Public Health and Environment February 1, 2017



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Principal Author: Joe Schieffelin, Hazardous Materials and Waste

Management Division, Solid Waste Management Program

Manager

Contributing Authors/

Technical Assistance:

Hazardous Materials and Waste Management Division:

David Snapp, Materials Management Unit Leader

Ed Smith, Solid Waste Compliance Assurance Unit Leader Jerry Henderson, Solid Waste Permitting Unit Leader

Wolf Kray, Materials Management

Shana Baker, Waste Tires Team Leader

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For additional information or copies:

Joe Schieffelin, Solid Waste Management Program Manager Hazardous Materials and Waste Management Division Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, Colorado 80246-1530 joe.schieffelin@state.co.us (303) 692-3356

2016 Annual Report to the Colorado General Assembly: Status of the Solid Waste Management Program In Colorado

INTRODUCTION

Colorado's Solid Waste Management Program is responsible for ensuring compliance with laws and regulations pertaining to the management of solid waste. The authority for this program is in the Colorado Solid Waste Act, 30-20-100.5, et seq., C.R.S. The U.S. Environmental Protection Agency (EPA) has approved Colorado's solid waste management program, and by doing so, the authority to implement requirements for the management of hazardous waste in Colorado rests completely with the state.

Primary elements of the Solid Waste Management Program (the program) include compliance assistance, compliance monitoring and enforcement, permitting, and materials management and recycling. Each of these program elements is discussed in the following sections.

The Solid Waste Management Program currently regulates the following facilities:

Facility Type	Number of Facilities
Landfills	71
MSW Landfills	60
Construction and demolition Debris Landfills	5
Waste Tire Monofills	3
Other Landfills (special wastes, landfarms)	3
Closed Landfills in post-closure care	114
Composting Facilities	27
Recycling Facilities	161
Medical Waste Facilities	3
Transfer Stations	52
Solid Waste Impoundment Facilities	60
Commercial Exploration and Production Waste	12
Impoundments	
Waste Tire Facilities	2,179
Waste Grease Facilities	63

Colorado law, at 30-20-101.5(3) and 30-20-122, C.R.S., requires an annual report to the General Assembly be submitted on Feb. 1 of each year. This report must describe the status of the Solid Waste Management Program and the efforts of the Colorado Department of Public Health and Environment to carry out its statutory responsibilities at the lowest possible cost without jeopardizing the intent of the statute. This report is intended to satisfy that statutory requirement.

ACCOMPLISHMENTS

Compliance Assistance

A goal of the Solid Waste Management Program is for all regulated facilities to be in, and stay in, compliance with state law and the regulations. The traditional inspection and enforcement program serves as one primary mechanism for reaching that goal. However, compliance assistance is another important method for obtaining and maintaining compliance. The General Assembly recognized the value and importance of compliance assistance in that one of the expectations set out in Section 30-20-101.5(2)(f), C.R.S., is for the department to "establish a preference for compliance assistance with at least 10 percent of the annual budget amount being allocated to compliance assistance efforts." In FY 2016, the program met that requirement with 15 percent of staff time devoted to compliance assistance.

The program has developed and continues to invest in a broad range of compliance assistance services to help the regulated community manage hazardous waste appropriately. These compliance assistance services include the following activities:

- A part-time customer assistance and technical assistance phone line (303-692-3320): This telephone line is staffed four hours/day during business hours to provide information on common waste management questions and more complex or detailed regulatory guidance. Through this phone line, division technical assistance staff responded directly to 1,573 calls and 246 emails during FY 2016.
- A wide range of solid waste guidance documents and compliance bulletins and an extensive, useful and informative Website, which can be found at www.colorado.gov/pacific/cdphe/hm: The division maintains an extensive set of guidance information for regulated parties through both print and electronic media. During FY 2016, the Solid Waste Management webpage received 9,669 hits.
- Periodic solid waste management training sessions provided to industry by our staff and solid waste training requested by industry groups and others: In FY 2016, the division provided 18 compliance-assistance training sessions to industry around the state and reached 1,535 people. The training sessions focused on solid waste and related environmental regulations. These trainings included presentations by program and local agency staff.

Program inspectors routinely incorporate compliance assistance and pollution prevention into the compliance inspections performed each year. In the past year, program staff have delivered compliance assistance on 103 of the 287 inspection performed, or on 36% of inspections.

Compliance Monitoring and Enforcement

Table 1 presents the numbers and types of inspections performed by, and for, the program.

TABLE 1

Facility Type	Number of Inspections
Landfills	82
Composting Facilities	7
Medical Waste Facilities	5
Commercial Exploration and Production Waste	6
Impoundments	
Recycling Facilities	9
Complaints	35
Beneficial Use sites	4
Other Solid Waste Disposal Sites	17
Waste Tire Facilities	118
Waste Grease Facilities	4
Total	287
Waste Tire Facilities inspected by local governments	641
Waste Tire Compliance Assistance visits by local gov'ts	229

The 287 inspections performed by program staff is further presented on Figure 1 along with comparison to previous years. In 2014 and 2015, the program was understaffed, but it is clear that 2016 represents a significant increase in inspections from any previous years. The performance plans for each inspector define the number of completed inspections needed to achieve an outstanding, satisfactory or unsatisfactory performance rating. In 2016, each inspector performed about 41 inspections.

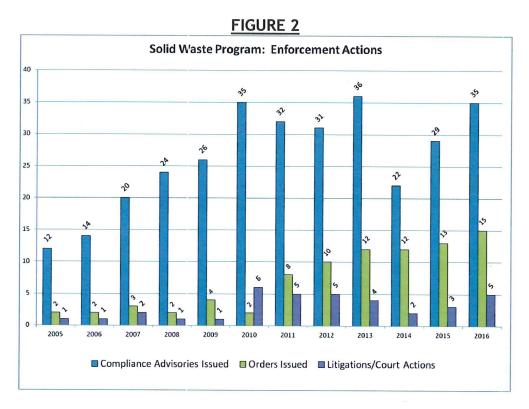




Every inspection carries administrative responsibilities, such as advance planning and preparation, inspection report preparation, tracking return-to-compliance activities at the facility, tracking and preparing needed enforcement documents, and data entry.

The program puts a high priority on complaints and spill reports. In FY 2016, the program received 60 complaints. Of those, 35 were investigated and/or inspected by our staff and 25 were referred to local governments or other agencies. In addition, 127 spill reports were received. We followed-up on 41 of those spills to ensure appropriate cleanup actions were completed, and 6 spills were referred to local governments or other agencies.

Inspections, complaints, and spill follow-up result in the issuance of formal and informal enforcement actions. Informal actions are called Compliance Advisories, and formal actions include Compliance Orders and civil actions filed in court. Figure 2 presents the number of formal and informal enforcement actions undertaken.



Referring to Figure 2 above, Compliance Advisories were issued within the Program's 90-day guideline 96% of the time, and 60% of Compliance Orders were issued within the Program's 300-day guideline.

HB07-1288 requires that the program's inspections "focus on major violations of regulations that pose an immediate and significant threat to human health and the environment." We will be able to demonstrate how we have accomplished this requirement in next year's report.

Permitting

In Colorado, all solid waste disposal sites and facilities need Certificates of Designation (CDs) issued by the local government. These are facilities at which the deposit and final treatment of solid waste occurs and includes landfills, incinerators, medical waste treatment facilities, and certain subsets of waste impoundments and composting facilities. However, it does not include recycling facilities, transfer stations, and any facility disposing of their own solid waste generated on their own site.

In order to get a CD, a facility must submit their application to the local government. The local government then refers the application to the program for a technical review to be sure that the facility can operate safely and in a manner that protects human health and the environment. If the division recommends approval of the application, the local government evaluates whether the proposed facility conforms to the local land use plan and zoning restrictions. The local government may approve or disapprove of the application at that point. However, if the division recommends disapproval, then the local government must disapprove the application.

The portion of the application that the program reviews is called the Engineering Design and Operations Plan (EDOP). Certain facilities that do not require a CD must still get an approved EDOP. Therefore, the division's "permitted universe" includes all solid waste facilities with EDOPs. Table 2 summarizes this universe of facilities.

TABLE 2

Solid Waste Facilities with Engineering Design and Operations Plans (EDOPs)				
Facility Type	# with CDs	# with EDOPs	Total	
Landfills	71	71	71	
Composting Facilities	7 ⁽¹⁾	11 ⁽¹⁾	18 ⁽¹⁾	
Recycling Facilities	0	7 ⁽²⁾	7 ⁽²⁾	
Medical Waste Facilities	3	3	3	
Solid Waste Impoundments	15	75	75	
Other Facilities (waste-to-energy, animal disposal)	3	7	7	
Totals	99	174	181	

⁽¹⁾ Does not include 8 composting sites co-located at permitted landfills

This large universe of sites with EDOPs is not static. New facilities are being built and existing facilities are adding new solid waste management units, adding waste streams, and adding treatment capabilities - all of which needed EDOPs or EDOP modifications to be reviewed and approved. Figure 3 presents the large number of documents being submitted to our staff by this universe of facilities on an annual basis, from 2005 to 2016. This graph does not show the relative complexity of these documents - they range from relatively simple ground water monitoring reports to

⁽²⁾ Does not include 5 recycling sites co-located at permitted landfills

very complex engineering designs for new treatment technologies and new landfill cells with sophisticated liners and caps.

Solid Waste Program: Project Management Data

2014

CDs Started

2015

To begin to distinguish differences in submittal complexities, for FY 2016, we changed the way we will report data in hopes of establishing a baseline this year that can be used for comparison going forward. Documents submitted by our regulated entities for our review and approval are now being differentiated by three new categories: projects of major, medium and minor complexity. While the CD application category is by definition a major project, EDOP modifications, for example, can vary from major to moderate to even minor on the complexity scale. Table 2 shows some numbers for projects received during FY 2016 in the three new categories along with metrics presenting the average number of days a project waits before we begin our review, the average number of hours it takes our staff to complete a review, and the average number of days that elapse during the course of our review. In future years, as we refine our database to this new reporting paradigm, we will present additional metrics bringing more information to bear on our project review efficiency.

CDs and DO Mods Started

■ Projects Submitted

TABLE 3

Project Complexity	Number Received	Number Completed	Ave Days in Backlog	Ave Hours to Process	Ave Days to Process
Major	14	11	96	62	63
Moderate	232	183	56	10	52
Minor	279	269	85	3	11
Total	525	463	74	8	28

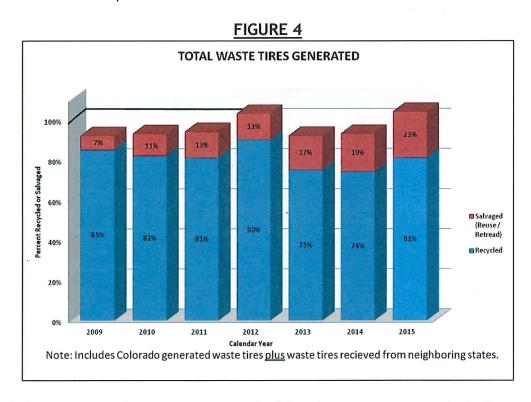
Materials Management & Recycling

Within the Solid Waste Program, there are several materials management and recycling programs that are implemented by the MMU:

- 1. Waste Tire Programs
- 2. Waste Grease Program
- 3. Review of beneficial use applications
- 4. Paint Stewardship
- 5. Track recycling and material diversion across Colorado

The Waste Tire Program

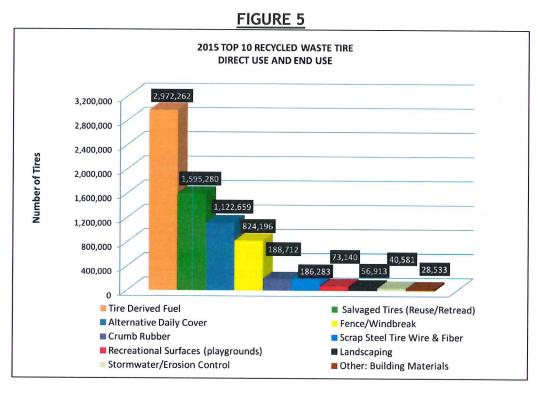
Over the past decade, the Waste Tire Program has expanded to become fully integrated from oversight of waste tire generators (commercial tire shops), of haulers, and of processors, collection facilities, end users, and monofills. Program staff inspects facilities, ensures collection of the waste tire fee on each newly purchased tire, and awards grants and rebates to entities that use tire-derived products. During calendar year 2015, program staff inspected 118 waste tire facilities and provided on-site compliance assistance to another 51 facilities. The program inspected an additional 564 facilities by contracting with local health agencies to perform waste tire inspections.

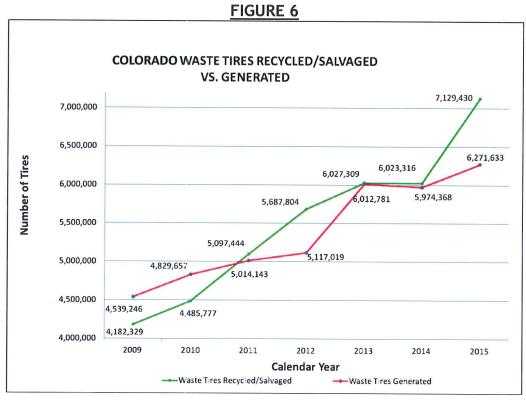


Some of the more significant metrics tracked for these programs include Figures 4, 5, and 6. Figure 4 shows that in 2015 (2016 data has not yet been tabulated), 104% of waste tires generated in, or imported into, Colorado were either recycled or re-used. Figure 5 illustrates the top 10 uses of waste tires with tire-derived fuel and salvaged tires being the top two uses. Figure 6 shows that, since 2011, Colorado has been

recycling or salvaging more than 100% of the waste tires generated in Colorado. For a complete explanation of the waste tire programs, please see the 2015 Annual Report to the Colorado legislature located at:

https://www.colorado.gov/pacific/sites/default/files/HM_sw-2015-waste-tire-rpt.pdf





Waste Grease Program

A total of 55 waste grease transporters and 15 waste grease facilities were registered with the division at the end of CY 2016. Waste grease program staff performed 4 waste grease transporter and facility compliance inspections in FY 2016. During these inspections, staff provided educational information, answered questions and concerns about the waste grease program and evaluated each operator's compliance status. Additionally, program staff met with Alamosa County staff to co-inspect a non-compliant facility.

Staff continues to process new waste grease registration applications and annual waste grease renewal applications and provide information about the waste grease program by answering and responding to waste grease phone calls and emails.

Beneficial Re-Use Applications

The materials management group reviewed 17 beneficial use applications in CY 2015, resulting in 596,312 tons of solid waste diverted from traditional disposal when combined with past beneficial use approvals.

Recycling and Materials Diversion Tracking

The program tracks many aspects of recycling and waste diversion. For instance, Figures 7 through 10 below show the overall waste generation and waste diversion metrics through 2015, the last year information is available. Figure 7 presents the overall generation, disposal and diversion of municipal solid waste, or MSW. This is waste that is disposed of in Colorado's landfills. Significantly, this does not include industrial waste recycled, cement and asphalt that are re-used, or waste tires utilized for energy recovery. It also does not include solid waste disposed in Colorado's construction and demolition and industrial waste landfills. As we recover from the Great Recession, Colorado's MSW generation continues to creep upward.

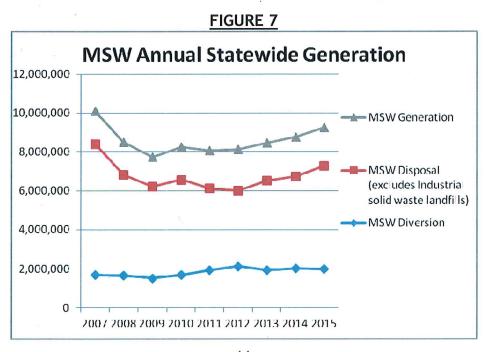


Figure 8 presents the diversion rate of MSW as a percent of the total waste generated. "Diversion" means that the waste was recycled or beneficially re-used, but not placed in to a landfill. A 23% diversion rate for Colorado puts us in the middle of the pack as compared to other states.

Figure 8 presents a decrease in the amount of solid waste that is diverted and recycled from 2014 to 2015. This is true in Colorado and across the nation. According to industry analysts, as long as energy prices remain depressed, the recycling industry and recycled materials commodity prices will probably remain depressed as well. This is true because manufacturers primarily benefit from reduced energy consumption and, therefore, costs when creating products using recycled material instead of raw resources. The program believes the recycling market will continue to be depressed until energy prices increase and global demand for hard goods increases to pre-recession levels.

FIGURE 8

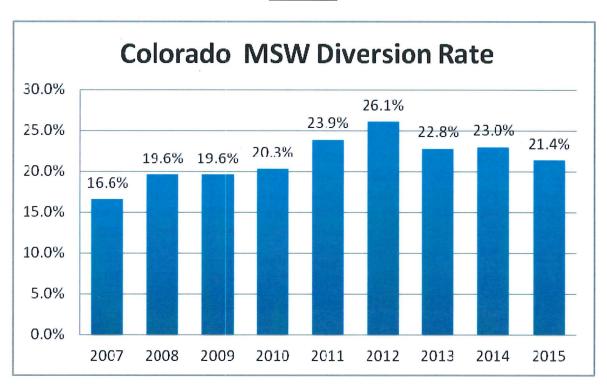


Figure 9 represents the average amount of waste generated in pounds per person per day. At more than 9 pounds/person/day, Colorado generates more than most states.

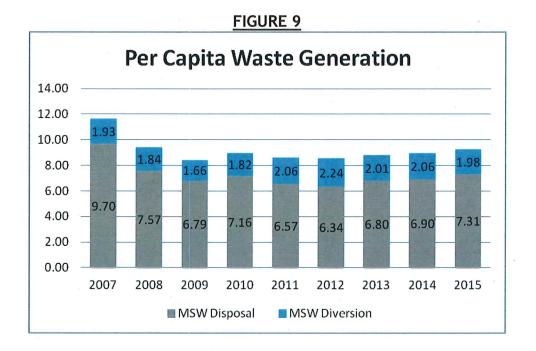


Figure 10 shows the overall content of diverted materials by weight for 2015. Clearly, paper, cardboard, and organic compostable materials ran well ahead of all other recyclables like aluminum, glass and plastic. Again, these figures do not include scrap metal, cement, asphalt, or waste tires.

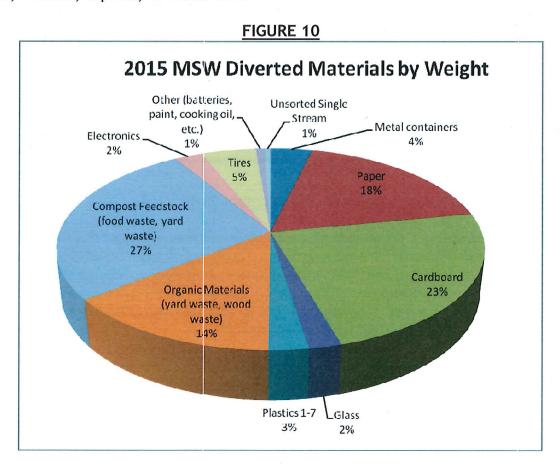


Figure 11 shows regional areas or "waste sheds" within which recyclable materials mostly go to the indicated recycling facilities. Recycling hubs are large facilities that sort, package, and transport recyclable commodities to end markets for remanufacturing while spokes consolidate recyclables and send them to hubs for further material separation and processing prior to conveyance to end markets.

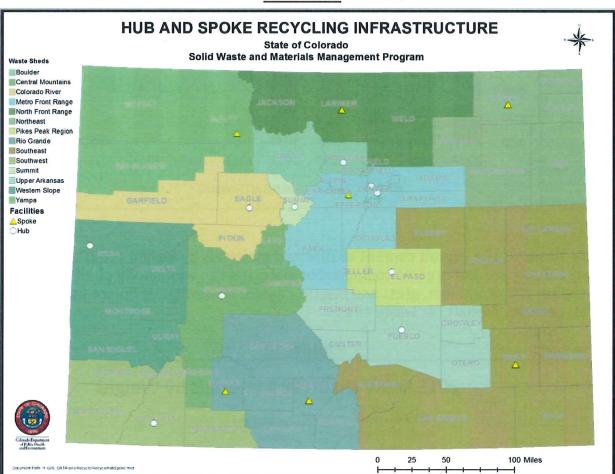


FIGURE 11

Integrated Solid Waste and Materials Management Plan

In FY 2016, a new Integrated Solid Waste and Materials Management Plan (ISWMMP) was developed for Colorado by a contractor to CDPHE. Colorado law (30-20-100.5, C.R.S.) requires integrated solid waste management planning as one element for optimal solid waste management in Colorado. However, the most recent plan was developed in 1992 and a new plan was needed to evaluate the solid waste and materials management planning needs of the State.

The new ISWMMP comprehensively evaluated the current state of Colorado's waste disposal, waste diversion, and materials management practices and incorporated an extensive stakeholder outreach process. On the waste disposal side, the Plan evaluated the compliance status of each landfill. The findings indicate that the big landfills are largely very compliant, but small landfills have significant compliance problems. Interestingly, most of the large landfills are operated by large corporate

waste management companies, and the smaller landfills tend to be operated by local governments. The following table illustrates these points.

TABLE 4

Municipal Solid Waste	# in	# with compliance		Public/Private	
Landfill Category	category	problems		Operator	
Small (< 7300 tons/year)	20	17	85%	19 Public	95%
				1 Private	5%
Medium (7300 < x < 140,000	28	4	14%	20 Public	71%
tons/year)			-	8 Private	29%
Large (> 140,000 tons/year)	12	0	0%	2 Public	17%
		٠		10 Private	83%
Total	60	21	35%	41 Public	68%
	4			19 Private	32%

The Plan also compiled extensive cost information for various components of compliant landfill operations. This information clearly shows that smaller landfills are very expensive to operate on a per-ton basis, whereas larger landfills enjoy significant economies of scale.

To address the compliance problems at the small landfills, which are all located in rural parts of the state, the program has started the Small Landfill Compliance Initiative. We are meeting with all communities operating small landfills and letting them know 1) the current compliance status of their landfill, 2) the approximate cost for getting their landfill into compliance, and 3) a deadline for making a decision on whether they will upgrade their landfill to a compliant status or close their landfill. If they close their landfill, they will need to transition their waste management to a transfer station-based or household pick-up scheme. We are also pursuing funding from the legislature to help these rural communities implement whichever choice they make for their landfill.

The ISWMMP also developed extensive information on waste diversion and recycling and contains many recommendations for how we can expand waste diversion in Colorado. Some of the more significant recommendations are:

- Adopt state-wide waste diversion goals. The Plan recommends that these goals be two-tiered with the first tier applying to the Front Range with waste diversion goals of 32% in 2021 increasing to 51% in 2036, and the second tier applying to the rest of the state with waste diversion goals of 10% in 2021 and 15% in 2036. This would be equivalent to state-wide diversion rates of 28% in 2021 and 45% in 2036. The current state-wide diversion rate is 23%.
- Making the waste diversion rates mentioned above enforceable through state law via a system where communities would be required to implement an increasing number of pre-defined waste diversion strategies if they do not reach the waste diversion goals.
- Fill current gaps in the availability of all citizens and commercial entities to recycling opportunities.

The new ISWMMP allows the program and communities to fully evaluate their options to improve their waste management practices.

Program Funding

Funding for the Colorado Solid Waste Management Program comes entirely from fees. The program receives <u>no</u> Colorado General Fund money. The program's fee support has three components: 1) the Solid Waste User Fee (SWUF) which is a fee based on the weight or volume of waste disposed of at a landfill, also known as a "tipping fee," 2) the Hourly Activity Fee assessed for prescribed services rendered to facilities, and 3) the Annual Facility Fee which is an annual fee remitted by facilities that are not required to pay the SWUF. In FY 2016, the SWUF provided about 81% of the program's funding needs with the other fees covering the remaining 19%.

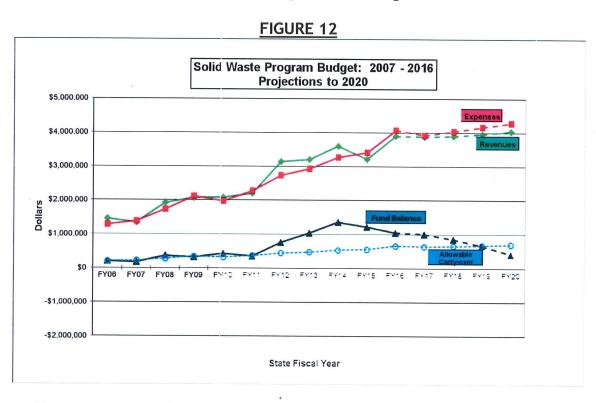


Figure 12, above, tracks the revenue, expenditures and fund balance for the Solid Waste Program. This graph shows that, if our projections are correct, we will have adequate revenues to fund the program through FY 2020 at the current fee levels. Figure 12 also shows that the program is striving to balance revenues and expenditures and bring the fund balance to allowable levels as Colorado emerges from an unpredictable economic period that has made revenue and cost projections very difficult.

It is important to note that staff salaries are the biggest single expense item for the program. Therefore, managing staffing levels is an important part of managing the program's budget. Even though it has been around for a long time, the Solid Waste Program is <u>not</u> a mature program. Over the past 8 years, we have seen a lot of program growth, both in terms of the programs we administer and the staff needed to implement those programs. Some of this is the result of a growing, changing and demanding solid waste industry. Other growth can be directly attributed to

legislative action that added to our responsibilities. This growth can be seen on Figure 12 starting in FY 2008 and continuing through FY 2016, where expenses began increasing significantly as staffing was added to meet workload demands. We believe we are now fully staffed. Therefore, projections out to FY 2020 show more modest, inflation-related expense increases.

HB 07-1288 Summary of Requirements

The division's successes in maintaining efficiency are clearly presented in this report. Significant improvement has occurred and is continuing to occur in an effort to further improve efficiency and reduce costs.

The following table presents a summary of the requirements of HB 07-1288 and the program's efforts and activities to comply with each requirement. This table is intended to augment, but not replace, the presentation of information earlier in this report.

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
30-20-101.5(1)(a) Promote community ethic to reduce or eliminate waste problems.	The program has worked hard on three fronts to accomplish this requirement: 1) our staff make working with, and cooperating with, local governments a high priority; 2) the program places a high priority on investigating citizen complaints; and 3) the program makes itself available through the technical assistance telephone line and technical trainings provided around the state.
30-20-101.5(1)(b) Is credible and accountable to industry and the public	The program endeavors to maintain credibility and accountability through 1) a high-volume, high-efficiency prioritized inspection program that maintains compliance and a level playing field; and 2) a high-efficiency permitting program that meets or exceeds its commitments to the regulated community.
30-20-101.5(1)(c) Is innovative and cost-effective	This report presents the program's progress and accomplishments in becoming cost-effective and efficient. It also presents our commitment to, and implementation of, innovative approaches.
30-20-101.5(1)(d) Protects the environmental quality of life for impacted residents per the regulations	Our success in this requirement can be ascertained by considering our success in all of the other aspects of the program.
30-20-101.5(2) Develop, implement and continuously improve policies and procedures for statutory responsibilities at lowest possible costs. 30-20-101.5(2)(a)Establish cost-effective level-ofeffort guidelines for reviewing submittals, including permit applications and design and operations plans, considering the degree of risk addressed and the complexity of the issues raised.	After HB07-1288 passed, the program set up numerous performance goals. This report presents our success in meeting those goals. The program is actively developing these level-ofeffort guidelines and will have them in place and functioning by FY 2017.
30-20-101.5(2)(b) Establish cost-effective level-of- effort guidelines for performing inspections that focus on major violations of regulatory requirements that pose immediate and significant threat to human health and the environment.	The program has included goals in each inspector's performance plan for the number of inspections expected and for the timeliness of administrative duties associated with each inspection. In addition, the program is developing

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
	reporting capabilities for focusing on major violations and requirements that pose a threat to human health and the environment.
30-20-101.5(2)(c) Establish cost-effective level-of-effort guidelines for enforcement activities.	The program has significantly improved the efficiency and cost-effectiveness of enforcement activities over the last several years and we operate under timeliness guidelines established in the program's Enforcement Response Policy. However, because of the importance of quality workmanship in enforcement actions, and because each action is very site- and violation-dependent, the program has not established firm level-of-effort guidelines. To meet our timeliness goals, though, the level of staff effort on any given enforcement action must remain at or below certain metrics.
30-20-101.5(2)(d) Establish schedules for timely completion of department activities including submittal reviews, inspections, and inspection reports.	The program has established timeliness guidelines for these activities and other activities.
30-20-101.5(2)(e) Establish a prioritization methodology for completing activities that focuses on actual risk to human health and the environment.	The body of this report explains how priority schemes are used in setting inspection schedules.
30-20-101.5(2)(f) Establish a preference for compliance assistance with at least 10 percent of the annual budget amount being allocated to compliance assistance efforts.	Earlier in this report, we present the percentage of staff time and budget that is spent on compliance assistance activities (15 percent in FY 2016).
30-20-101.5(2)(g) Establish a preference for alternative dispute resolution mechanisms.	The department already has established this preference. In recent years, the program has not had many disputes.
30-20-101.5(2)(h) Establish a mechanism that continually assesses and provides incentives for further improvements in the program's policies and procedures.	The department and division have vital rewards and recognition programs whereby process improvements or innovative ideas can be, and will be, rewarded.
30-20-101.5(3) Submit an annual report to the General Assembly by February 1 st of each year.	This report is the 9th annual installment of the program's efforts to meet this requirement.
30-20-122(1)(a)(I) Collect information and data on recycling, solid waste, and solid waste diversion including: (I) statewide and regional solid waste stream components including types of materials, quantities of materials, and flow of each material. 30-20-122(1)(a)(II) The proportion of solid waste	This report includes information and data on recycling and waste diversion including: statewide and regional waste stream components including material flow, the proportion of solid waste diverted to calculate a recycling rate, reutilized materials amounts and rates, technical and innovates solid waste management developments, and an inventory of sites performing recycling activities. See Figure 8.
generated in the state that has been diverted to other uses. 30-20-122(1)(a)(III) Reutilized materials, amounts,	See Figure 10
and rates	See Figure 10.
30-20-122(1)(a)(IV) Technical and innovative solid waste management developments	This report presents how the program has implemented improved technical developments and innovative approaches. The program will continue and expand those efforts.

HB07-1288 Statutory Requirement - Referenced section of the Colorado Revised Statutes (CRS)	Solid Waste Management Program Response
30-20-122(1)(a)(V)A statewide inventory of sites and facilities performing recycling or other solid waste processing or diversion	These inventories are presented on our website.
30-20-122(1)(a)(VI)The number of jobs created and any other economic impacts resulting from the awarding of recycling resources economic opportunity grants made available pursuant to 25-16.5-106.7, C.R.S.	This information is independently reported to the Colorado Legislature in the Recycling Resources Economic Opportunities Program Annual Report prepared by the Sustainability Program within the Environmental Health and Sustainability Division at CDPHE.
30-20-122(1)(a)(VII) Other data as necessary to further the purposes of Part 1.	This report presents a lot of information that goes beyond the statutory requirements.

CONCLUSION

As discussed in this report, the Hazardous Materials and Waste Management Division has implemented an effective and efficient Solid Waste Management Program satisfying the expectations set out in HB07-1288 (Section 30-20-101.5, C.R.S). Further efforts will continue in order to improve the Solid Waste Management Program.