



February 29, 2024

Alan Goldich  
Scott Cowman  
Routt County Planning & Environmental Health  
Transmitted via email

RE: Response to Comments: Planning Review Comments, Twin Milner SUP and CD Amendment 2023 at 20650  
County Road 205, Routt, CO 80487

Dear Scott,

Twin Enviro Services (Twin) is transmitting these responses to comments for the Special Use Permit amendment related to the addition of Modula8 to the facility Engineering Design and Operations Plan (EDOP, draft 2023) at the Milner landfill. Comments were received from the County on January 23 and a follow up meeting was held on February 14, 2024. Twin has prepared this RTC document based on our discussions during and outcomes from our meeting. City comments are presented first, followed by our responses in *italics*.

**Planning & Environmental Health Review** (Reviewed By: Alan Goldich and Scott Cowman)

1. There are several reports that Routt County does not have a record of. These include the annual compost report, the semi-annual groundwater monitoring reports for 2023, report of measures taken to control weeds, the semi-annual leachate management report for the second half of 2023, and the annual liquid waste transfer unit report for 2024. The County understands that the deadline to submit the leachate report is January 30, 2024 and the liquid waste transfer unit report is due February 28, 2024. Please submit all of the outstanding reports and be sure to submit the upcoming reports on time.  
*The requested documents have been provided within the regulatory deadlines.*
2. The submitted Appendices A or X did not have any tracked changes. Is this accurate?  
*The CQAP in Appendix A is a new document, therefore a redline was not provided as the previous version was not utilized. Appendix X is the facility HASP, which remains unchanged. Contract(s) performing cell construction or capping activities will provide their own HASP specific to those activities.*
3. In the past there have been issues with the amount of room necessary to effectively manage the compost operation. This was evident when compost that had not met testing requirements had been moved off site and material on the compost pad had been pushed over the containment berm as noted in the Compliance Advisory dated September 28, 2023. The revised Appendix H states that there will be a 50% increase in the amount of in process material on the pad (from 10,000 cubic yards to 15,000 cubic yards). With the space issues that have occurred in the past, how does the landfill justify being able to

increase the amount stored on the pad by 50%?

*The total volume of biosolids received and the volume of compost generated remains unchanged for Twin moving forward. The updated volume reflects in-process material only, which is stored on the designated compost pad. The cited compliance advisory was satisfactorily resolved with CDPHE, with the incident related to snowplowing as opposed to pad storage capacity.*

*During our meeting, Twin described that the volume listed in the updated EDOP was an estimate, based on visual evaluation of the operations, not based on throughput. Staff requested that Twin provide capacity of the pad for in-process materials. Using conservative estimates for pile dimensions and spacing, the pad capacity appears to be closer to 13,000 CY for in-process materials. Twin will modify the EDOP to reflect 10,000-13,000 CY of in process material. Note that Twin only processes in total approximately 400 to 500 dry metric tons of biosolids per year. The pad capacity is sufficient to manage proper processing and sampling of in process materials.*

4. Appendix S contains a summary of the drainage calculations. The EDOP mentions changes to some of those calculations. Do these changes warrant a revision to the calculations contained in Appendix S?

*Appendix S contains the miscellaneous calculations, including airspace, which were updated with the 2023 EDOP. Appendix E contains the stormwater calculations, which were also updated for Mod 8. The additional calculations for Mod 8 start on page 361 of the EDOP pdf document.*

5. In section 4.3 (Soil Requirements and Availability) there is a statement that "Mr. Liman has granted permission for soil on this parcel to be used for site operations." This is not an approved use. Either this statement needs to be removed from the EDOP, or a statement needs to be added that soil on this parcel is only available after all required permits have been applied for and obtained.

*This language has been stricken from the referenced EDOP section.*

6. Section 4.7.9 (Visual Impact Control) is woefully inadequate and not accurate. A full revision to this section that explains the visual impacts that the current and proposed operations have must be completed.

*Twin did not intend to be remiss relative to the carry-over wording from the 2020 EDOP. Since the visual assessment was provided to the county concurrent with the revised EDOP, Twin was awaiting comments from the County on visual impact. See response to #7 below.*

7. Staff does not have concerns with the visual impact that the lateral and vertical expansion will create as long as it is operated in a specific manner. The County will require that once the elevation of Mod 8 reaches a point that it is visible from Highway 40 and/or Milner that deposition of trash start at the northern end and proceed south. A condition of approval has previously been placed on the landfill that addresses this specific issue (although it has been removed because it was no longer warranted. This condition reads, "Landfill dumping area/working face and associated equipment shall be substantially screened from Highway 40. Screening berms will be constructed by placing a narrow, 10- to 12-foot high refuse lift at the north end of a given waste lift and perpendicular to the line of sight being screened. Interim cover will be placed on the berm as the berm is constructed so that the exposed refuse is minimal. The refuse lift will then be constructed behind the berm with the working face typically facing south away from visual corridors. Screening berms, interim slopes, and final slopes visible from Highway 40 shall be revegetated as soon as possible. If revegetation does not adequately mitigate visual impacts after six months, the Planning Director may require additional seeding and/or the use of temporary irrigation." Staff would like to discuss the specific wording of this condition so that agreeable language can be sent to the decision makers.

*Twin will operate in a manner with the intent to mitigate visual impact of Mod 8 as much as feasibly and*

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*operationally possible. Beginning in 2023 Twin implemented a tarp system as an alternative daily cover. The tarp and the condition of a minimum of 6-inches of soil applied around the outside areas has proven to eliminate visibility of refuse on the active working landfill area outside of operating hours. Twin plans to continue using the effective system. Once the elevation reaches a point that is visible from Highway 40, deposition of refuse will operate beginning from the northern end and proceed south. Interim cover will be placed on external slopes as soon as practicable to limit exposed refuse on the northern slopes facing Highway 40. Twin will seed and revegetate areas of northern, visible interim cover that are left unused for an extended period of time when reasonably possible. Revegetation of northern, visible slopes may include but is not limited to the incorporation or addition of a growth medium or amended soil into the interim cover.*

8. Please provide a timeline for when the different borrow areas will be developed to satisfy the soil needs for liner construction and ongoing operations. Please provide an estimate on the amount of soil and/or gravel that will need to be imported and a timeline for when that will occur. Also, there are conflicting references to the northern borrow area. Some references state that it is active and others say it is closed. Please clarify the status and use of the northern borrow area.

*Mod 8 is the next phase of work that will require mining of the onsite borrow area(s). Twin has previously completed extensive borrow area studies onsite of the east and north borrow areas as well as the current borrow area just south of the Horseshoe (Doug's Drainage). It is Twin's intent to borrow clay from onsite sources for construction of the Mod 8 liner system. The attached Figure provides approximate clay soil availability from the East and North borrow areas. Calculations of available clay are based off of Golder's borrow studies and test pits completed by NWCC. There should be no additional truck traffic to the landfill for the clay material.*

9. It appears that the east borrow area will be developed soon. Please provide plans for how that area will be mined, including plans to mitigate views and how the stormwater will be managed. *Grading plans with stormwater controls are prepared with construction drawings. The Permit Drawings are design drawings and do not contain the stormwater control nor borrow area development. Mod 8 will be the next set of construction drawings; Twin will provide the county with a copy of the borrow area grading and stormwater plan once developed.*

Respectfully,



Lacie Coupe  
CEO, Twin Enviro

cc:

Sarah Foreman, CDPHE  
Rebecca Lindeman, PE, Jardon E&I  
Mike Pretti, PE, SMA



