

March 21, 2025

TWIN LANDFILL CORPORATION  
PO BOX 774362  
STEAMBOAT SPRINGS, CO 80477-4362

**Re: Twin Landfill Special Use Permit and Certificate of Designation Amendment 2023 at 20650 COUNTY ROAD 205, ROUTT, CO 80487**

Dear Applicant,

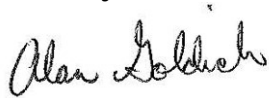
Following are the comments regarding the Routt County's plan review for the above referenced project. We have noted several issues that need to be addressed regarding the application. These items must be addressed through revised drawings and/or addendum in order for us to complete the project review for the above referenced project.

1. The current description describes three separate pieces of land. Please include a single legal description that encompasses the full CD area.
2. Section 4.6.4.2, 4<sup>th</sup> paragraph still references RC Regulations.
3. Appendix H, Composting – The in process material in Table 3 was not revised from 15k cubic yards to 10k-13k cubic yards as indicated in Twin's response dated 2/29/24.
4. Other than biosolids, is the landfill currently subject to any PFAS monitoring requirements?
5. Section 4.3, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: It says that 419,422 cubic yards of soil is needed if Phase 1 is closed as a stand-alone facility. The next sentence goes onto to detail how much soil, and for what, is needed. These volumes add up to 523,307 cubic yards. The volume mentioned in the second sentence needs to be modified from 419,422 cubic yards to 523,307 cubic yards.
6. Section 4.3, second paragraph – States that the soil availability in the north and east borrow areas is 85,000 cubic yards. In the response provided to the County correction notice, it says that 143,300 cubic yards are available. Which is correct and please revise so they match?
7. How much soil is needed for the construction of Mod 8?
8. In the meeting with CDPHE on March 10, 2025, it was indicated that there is not enough soil onsite for operations. Please provide clarity on available soil reserves and whether there is enough suitable soil onsite to satisfy the requirements for Mod 8.

9. Section 4.2, first paragraph – This paragraph is confusing. The County would recommend the following additions (in bold) to provide more clarity. *“Since April 2019 and through May 2023, approximately 226,500 tons of waste have been disposed of in the landfill **(Phase 1)**. Based on the assumption noted below of the refuse compaction ratio being 2 cubic yards to 1 ton, approximately 453,000 cubic yards of airspace has been consumed **during that timeframe**; therefore, approximately 1,762,490 cubic yards of airspace **in Phase 1 and Phase 2** has been consumed.”*
10. Have there been any changes to the air permit?

Once you have uploaded answers to these questions in portal, please let me know that you have done so. If I can provide any further information to you, please feel free to contact me at (970) 879-2704 or by email at [agoldich@co.routt.co.us](mailto:agoldich@co.routt.co.us).

Sincerely,



Alan Goldich, Senior Planner  
Routt County Planning Department