



April 2, 2025

Alan Goldich
Routt County Planning Department
Transmitted electronically

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

Dear Alan,

Twin Landfill, LLC dba Apex Twin Enviro (Twin) is transmitting these responses to comments from Routt County on the Engineering Design & Operations Plan for the Milner landfill. Comments received from Routt County on March 21, 2025 are listed followed by our responses in italics. An updated "clean" version of the EDOP with appendices will be provided when Twin replies to the CDPHE comments.

1. The current description describes three separate pieces of land. Please include a single legal description that encompasses the full CD area.

> Consolidated legal description is included in Section 1.3 of the EDOP, and attached to this letter for reference.

2. Section 4.6.4.2, 4th paragraph still references RC Regulations.

> Reference has been removed.

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.

> The requested edit has been made.

4. Other than biosolids, is the landfill currently subject to any PFAS monitoring requirements?

> The current industrial stormwater permit requires quarterly sampling of stormwater for PFAS from Outfall 003, which is located in the drainage to Well #1.

5. Section 4.3, 2nd paragraph, 2nd 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.

Text has been updated, including the design volume for the north borrow area, to read:

For the remaining construction of Phase 1, approximately 148,300 cubic yards of soil are available (east and north borrow). The total fill requirement for the remaining Phase 1 construction (Module 8 construction only), plus Phase 1 operations and closure, if Phase 1 is closed as a stand-alone facility, is estimated to be 523,921 cubic yards. This volume includes approximately 223,913 cubic yards of daily and intermediate cover (12% of the 1,865,939 cubic yards of Phase 1 available airspace), plus approximately 15,650 cubic yards of clay liner, approximately 14,650 cubic yards of operations layer, and approximately 269,708 cubic yards of final cover. Therefore, an estimated 375,421 cubic yards of soil will be required in addition to the 148,300 cubic yards of on-site borrow soils.

A breakdown of the soil availability and requirements is presented in Table 2. The full calculations are provided in Appendix S.

Table 2: Soil Balance Phase 1 and 2 for Milner Landfill, Routt County, Colorado

Soil Requirements	Volume (cu yds)
Soil available from east and active north borrow area	148,300
Soil available from excavation of Phase 2	1,037,687
Soil available from east and active north borrow areas and excavation of Phase 2, suitable for soil liner construction	348,800

Table 2 continues, lines shown above includes lines 1 and 3 that were edited.

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?

The east borrow area estimate remains unchanged at 125,300 CY, while the north borrow area design volume is now 23,000 CY. The text in Section 4.3 has been updated to reflect a total of 148,300 CY of soil available from the north and east borrow areas.

7. How much soil is needed for the construction of Mod 8?

Mod 8 soil requirements:

6,800 CY subgrade fill

15,600 CY clay liner

14,650 CY operational layer

1,000 CY granular drainage

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.

>>Yes, there is sufficient soil onsite for construction and operation of Mod 8. For full capping and closure of all of Phase 1 (since Mod 8 is not stand-alone), we anticipate a soil deficit. However, note that calculations do not account for compost material that will be mixed with onsite soils to meet the soil quality and characteristics for the ET cap. Once soil to compost ratios are determined, the total deficit for closure of Phase 1 will be adjusted.

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.”*

>> Twin has added the parenthetical “Phase 1” to the first cited sentence. As for the 1,762,490 CY – it is a consumed or placed value. Text has been clarified that” ...yards of airspace has been consumed over the life of Phase 1.” Additional notes below explain historic landfilling estimates.

10. Have there been any changes to the air permit?

>> No.

Please reach out with any questions or additional comments. We look forward to moving ahead with the SUP process.

Sincerely,

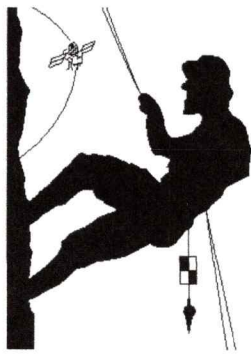


Lacie Coupe, General Manager
Twin Apex

cc: Rebecca Lindeman, PE – Jardon Engineering & Inspections
Mike Pretti – SMA
Sarah Foreman, PE – CDPHE
Scoutt Cowman, Routt CO Dept of Env Health



NOTICE: "According to Colorado law you must commence any legal action based upon any defect in this survey within three years after you first discover such defect. In no event, may any action based upon any defect in this survey be commenced more than ten years from the date of the certification shown hereon."			
		CALCD	JBA
		DRAWN	JBA
		SURVEYED	JBA
		B'Y:	
TITLE: BOUNDARY PLAN			
TWIN LANDFILL CORPORATION			
SECTIONS 16 & 21, T6N, R86W			
ROUTT COUNTY, COLORADO			
PREPARED BY: EMERALD MOUNTAIN SURVEYS, INC.			
MOUNTAIN SURVEYS, INC.			
P.O. BOX 774812			
STEAMBOAT SPRINGS, COLORADO 80477			
970-879-8998			
www.emeraldmtsn.net			
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PREPARED FOR: TWIN LANDFILL CORPORATION			
BOX 774362			
STEAMBOAT SPRINGS			
COLORADO			
80477			
SCALE: 1" = 400'	DATE: 4-1-2025		
PROJECT NO. 764-3	SHEET NO. 1 of 1		



Emerald Mountain Surveys, Inc.

Professional Land Surveying

PO BOX 774812 · 2851 Riverside Plaza #7D

Steamboat Springs, Colorado 80477

(970) 879-8998 · Fax (970) 871-8009

<http://www.emeraldmtn.net>

TWIN LANDFILL TOTAL BOUNDARY 4-2-2025

Legal Description of the Twin Landfill Property located in S1/2, Section 16, N1/2 Section 21, Township 6 North, Range 86 West, of the 6th, PM, Routt County, Colorado, and more particularly described as follows,

Beginning at a point on the north line of said Section 21 from which the southwest corner of said Section 16 bears N 89°52'23" W 2266.80 feet,

thence N 00°20'28" W a distance of 31.33 feet;

thence South 61 ° 34'19" West a distance of 33.58 feet;

thence South 36 ° 06'24" West a distance of 18.88 feet;

thence North 89 ° 52'23" West a distance of 37.07 feet;

thence South 36 ° 06'24" West a distance of 80.48 feet;

thence South 13 ° 31'09" West a distance of 167.78 feet;

thence North 31 ° 25'01" West a distance of 273.43 feet;

thence North 39 ° 48'14" East a distance of 476.26 feet;

thence North 00 ° 20'28" West a distance of 1757.41 feet;

thence along the south line of a parcel of land which is described in Book 282 at page 546 of the Routt County Clerk and Recorder's Records

North 88 ° 26'13" East a distance of 908.57 feet;

thence continuing along the south line of a parcel of land which is described in Book 282 at page 546 of the Routt County Clerk and Recorder's Records North 88 ° 04'55" East a distance of 930.93 feet to the southeasterly side of the existing access road;

thence along the said southeasterly side of the existing access road

South 21 ° 07'18" West a distance of 89.32 feet;

thence continuing along the said southeasterly side of the existing access road South 32 ° 04'20" West a distance of 53.87 feet;

thence continuing along the said southeasterly side of the existing access road South 40°17'55" West a distance of 110.82 feet;

thence continuing along the said southeasterly side of the existing access road South 53°59'42" West a distance of 126.76 feet;

thence continuing along the said southeasterly side of the existing access road South 66°22'43" West a distance of 152.13 feet;

thence S 00°22'09" E a distance of 157.95 feet;

thence N 89°37'51" E a distance of 200.00 feet;

thence S 00°24'31" E a distance of 335.98 feet;

thence N 89°42'24" E a distance of 668.62 feet;

thence S 00°28'56" E a distance of 1175.36 feet;

thence S 00°29'02" E a distance of 172.10 feet;

thence South 34 ° 31'54" West a distance of 340.90 feet;

thence South 29 ° 23'09" West a distance of 306.59 feet;

thence South 00 ° 51'21" West a distance of 132.82 feet;

thence South 89 ° 46' 58" West a distance of 82.38 feet;
thence South 41° 41'37" West a distance of 107.18 feet;
thence South 34 ° 07'59" West a distance of 161.33 feet;
thence South 31 ° 27'36" West a distance of 169.15 feet;
thence South 25 ° 58'59" West a distance of 151.17 feet;
thence South 00° 11'08" East a distance of 303.75 feet;
thence South 51 ° 11'07" West a distance of 366.82 feet;
thence S 89°22'42" W a distance of 333.97 feet;
thence S 89°22'42" W a distance of 667.94 feet;
thence S 89°25'00" W a distance of 326.71 feet;
thence N 00°46'09" E a distance of 1723.56 feet to the Point of Beginning;
containing 172.62 acres more or less.

Bearings are based west line of the southwest 1/4 Section 16 as being S00°54'26"E, being marked on the each end by a standard GLO Brass Cap. Assumed

SURVEYOR'S STATEMENT

I, James B. Ackerman, being a Professional Land Surveyor licensed by the State of Colorado, state that this Legal Description was prepared by me, or under my direct supervision, and that it is accurate to the best of my knowledge.

DATED: _____

4/2/2025



James B. Ackerman
Colorado R.L.S. #16394

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