



August 9, 2021

RE: Twin Enviro Services, Milner Landfill  
Special Use Permit Application – Narrative

Dear Mr. Goldich;

Twin Enviro Services currently operates a municipal solid waste landfill facility located at 2650 Routt County Road 205 near Milner, Colorado in Routt County. In response to your request, Twin is submitting a Special Use Permit (SUP) Application as an update to the SUP executed in 2019. This SUP is intended to be a comprehensive summary of onsite uses, plans, permits, and general facility information and incorporates the updated CD boundary incorporating land purchases made in 2020. This letter contains the application narrative specifically addressing items from the Planning Application Checklist. Additional requested items are referenced at the end of this letter and either attached as exhibits, or have been provided in electronic format due to their size, as indicated in the Attachment List.

## Description of Site Use

Twin operates Milner Landfill as a non-hazardous solid waste disposal facility in Routt County. The site is located at 20650 Routt County Road 205 in Routt County, approximately 1.2 miles southwest of Milner, Colorado. The Milner Landfill is situated in abandoned strip pits resulting from unreclaimed coal mining operations. These mining operations probably concluded in the 1960s.

Per the EDOP, "In addition to operating the solid waste landfill, Twin manages the following operations at the site: 1) composting and wood recycling 2) liquid waste storage and off-site transfer, 3) leachate evaporation in a holding pond, 4) a 10,000-gallon leachate storage tank, 5) a tire storage area, 6) a material recovery facility (MRF), and 7) material recycling known as the Milner Mall. The liquid waste storage and transfer operation is located at the site of the former liquid waste solidification basin. Twin ceased operating the solidification basin on October 31, 2019."

Elaborating on the operations listed in the EDOP, the following operations are active and/or planned:

- Trucking operations;
- Mining of clay, gravel, and clay for onsite use;
- Composting operations use biosolids, ground wood recycled material, and potentially food waste;
- Leachate recycling (potential future);

*Mailing Address • P O BOX 774362 • Steamboat Springs, CO • 80477*

*Milner Landfill • 20650 RCR 205 • Steamboat Springs, CO • 80487*

*Voice 970-879-6985 • fax 815-377-2495 • [www.twinenviro.com](http://www.twinenviro.com) • [milner@twinenviro.com](mailto:milner@twinenviro.com)*

"At the time of the 2003 Plan, the landfill footprint was approximately 36 acres. A vertical and lateral expansion of the landfill was approved in 2004 over unused portions of the site and over the fill area that contains refuse placed by the County and Twin. The landfill expansion approved in 2004 covered an area of 86 acres, and added refuse volume of approximately 8.6 million cubic yards to the site.

"This landfill, as historically operated and as designed in this Plan, is located within Parcel 1. Parcels 2 and 4 are contiguous and represent areas of potential future landfill expansion. Twin requested as part of the 2020 EDOP update that Parcels 1, 2, and 4 be included under the landfill Certificate of Designation; however, landfill operations will not be conducted outside of Parcel 1 without CDPHE approval of design and operations plans for Parcels 2 and 4. Recently, Parcel 1A was sold, and Parcels 1B and 1C were added.

"The current landfill area is within Phase 1. A vertical and lateral expansion of the landfill was approved by the CDPHE in 2004. The approved landfill vertical expansion will place waste over the Old County Landfill, Pits 5 and 6, over the former sludge pond, and a portion of Phase 1. The approved lateral expansion will be into areas west of Pit 6 and south and west of Pit 5 to the south property line. Plates 4, 8, and 10 show the approved expansion. The Phase 1 lateral expansions are being constructed in approximately 2- to 5-acre modules in order to minimize surface water drainage control needs and the disturbed area of the landfill. The area fill method of landfilling is employed at the site.

"Phase 2 construction will be timed so that the first module of Phase 2 will be ready to accept waste as interim closure of Phase 1 begins. The Phase 2 base grading plan shown in Plate 8 and related calculations will be redesigned to account for the actual waste limits in Pits 5 and 6. The Phase 2 design revisions will be submitted to the CDPHE and Routt County for review and approval at least five years in advance of planned initiation of liner construction in Phase 2. The actual waste limits of Pits 5 and 6 will be investigated prior to preparation of Phase 2 design revision that will be submitted to the CDPHE and Routt County. A detailed landfill progression plan for Phase 2 will be included in the revised Phase 2 design. Management of leachate and stormwater will be an important aspect of the Phase 2 landfill progression plan.

"In addition to lateral expansion in the Phase 2 area, Phase 2 will accommodate vertical expansion over a portion of the Old County Landfill, Pit 5, Pit 6, the former Sludge Pond, and parts of Phase 1. Phase 2 will be lined in the areas of the lateral expansion (i.e., over previously unlandfilled ground).

The life for the site is estimated to be 26 years."

## Legal Description

The Twin-owned property is described in the EDOP, Section 1.5. The main parcel consists of 164.27 acres and comprises the current operations of the facility. This excerpt from the EDOP describes the property, "This landfill, as historically operated and as designed in this Plan, is located within Parcel 1. Parcels 2 and 4 are contiguous and represent areas of potential future landfill expansion. Twin requests that Parcels 1, 2, and 4 be included under the landfill Certificate of Designation; however, landfill operations will not be conducted outside of Parcel 1 without CDPHE approval of design and operations plans for Parcels 2 and 4. Parcel 3 is owned by Les Liman, owner of Twin Landfill Corporation. Parcel 3 is located to the west of Parcels 1, 2, and 4. However, Parcel 3 is not included in the CD, and no landfilling activity



is planned for the parcel. Recently, Parcel 1A was sold, and Parcels 1B and 1C were added. All three of these parcels are included in the Certificate of Designation boundary as shown on Plate 1."

Section 1.5 of the EDOP also provides the legal descriptions of the landfill parcels.

Copies of available Deeds are included as Attachment G.

## Hours of Operation & Property Access

Security is provided at the facility during operational hours via a scale house attendant. The landfill is open Monday through Friday 8am to 4pm and Saturday from 8am until noon. The facility is currently operational 6-days a week; operational hours are subject to change. All visitors must check in at the scale house upon arrival. Outside of working hours the facility maintains a 6-foot high, 2x4 welded wire mesh fence surrounding the landfill facility to deter unauthorized access.

## Anticipated Traffic

In 2020, Twin had 21,134 vehicle trips to the facility, for an average of 1,761 trips per month. Through July of 2021, Twin has seen 12,436 vehicle trips for an average of 1,776 trips per month.

Using the waste escalation planned for in the EDOP of 1.5% increase in waste acceptance per year, trips to the landfill could increase by 30% in 20 years (year 2041).

## Staffing and Equipment Spread

The number of personnel employed at the site at any given time will vary depending on the incoming waste volume, litter pick-up requirements, and scheduled construction activities such as liner construction or cell excavation. Typically, the landfill employs 30 to 40 staff plus an additional 10 at the Material Recycling Facility.

The current personnel employed at Milner Landfill hold these positions:

- 1) Compliance officer
- 2) Landfill manager
- 3) Equipment Operators
- 4) Fleet Management and drivers
- 5) Equipment maintenance manager and staff
- 6) Scale operator
- 7) Support and office staff

Employees may be trained to fill more than one of these positions.

The equipment used at the disposal facility includes, but is not limited to, bulldozers, trash trucks, haul trucks, excavators, skid steers, service trucks, pickups, and water trucks.

## Site Buildings & Sanitation

There are no current plans for addition of buildings to the operations at the site, so additional information regarding proposed building is not applicable.

Three flush toilets exist at the property: one at the scale house main office and two at the equipment maintenance shops. Two are connected to a vault system that is equipped with a level indicator guiding regular pumping activities and one is connected to a drain field.

Roto Rooter conducted an inspection of the vault at the shop on 5/6/21 and 5/25/21 and it was found in good condition. The line from the shop was jetted as part of routine maintenance.

Potable water is provided via bottled water service.

## Site Plans

The EDOP (Attachment B) includes a number of site plans that illustrate the following items as required in the Routt County submittal checklist:

- existing conditions,
- Phasing Plans,
- approved expansions,
- Operational and CD boundaries
- Property lines
- locations of site buildings and structures,
- the site water bodies, stormwater drainage plan, and sample locations
- Perimeter fencing,
- Access roads and onsite roads
- Final closure plan

## Operating Permits

The facility holds many permits for operation through the State and County. The Engineering Design and Operations Plan (Golder, 2020) includes description of operational permits, and provides inspection and reporting requirements for each. The EDOP is attached as attachment B.

The SPCC plan was updated in 2021 and is included as Attachment E.

The following plans and permits were specifically requested by Routt County, and can be found in the attached EDOP, as part of the main text and many as appendices with permit specifics:

- NPDES Industrial Stormwater Permit
- Air quality (Title 5)
- SWMP
- Asbestos Operational Plan

## Wetlands & Floodplain

Two areas of the site were delineated and include a 1.08 acre wetlands and 0.83 acre pond, both within the horseshoe area of the site. US Army Corps of Engineers completed a jurisdictional determination in December 2020 and found both resources not to be covered by the Clean Water Act/ 404, and both were deemed to be isolated and non-connected. Twin subsequently submitted a letter proposal for draining and source determination (e.g., spring fed or stormwater) to CDPHE and Routt County on June 28, 2021.

CDPHE replied on July 20, 2021, with their concurrence of Twin's plan to dewater the area, with conditions. The County was copied on both letters, and they are also included as Attachment B.

## Noxious Weed Program

The EDOP specifies that if noxious weeds are identified, they will be managed per the Plan, as stipulated in Section 7.6 of the EDOP.

## Changes to the Conditions of Approval

A red-line, strike-out version of the pervious Conditions of Approval is attached for your review with suggested edits and deletions based on current operation.

## Requested Attachments

The following requested attachments are all included in the attached EDOP:

- Vicinity Map
- Facility Map
- CD, SUP and Operational Boundaries
- Phasing Plan
- Excavation, Grading & Drainage Plan
- Final Reclamation Plan
- Site Buildings

## Attached Documents

The following requested attachments are included on the enclosed thumb drive:

- A. Redline Conditions of Approval
- B. EDOP
- C. Wetlands Letters
- D. Title IV 2020 renewal
- E. SPCC
- F. 2020 Financial Assurance
- G. Property Deeds

We look forward to working with Routt County on this SUP renewal. Please feel free to reach out with question or to discuss this application further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mullet', with a large, sweeping initial 'M'.

Marlin Mullet, CEO