



75 Talamine Ct.
Colorado Springs, Co. 80907
Phone: 719-634-0611

February 3, 2016

Hannah Van Nimwegen
City of Colorado Springs
Land Use Review Division
30 S. Nevada Ave., Suite 105
Colorado Springs, CO 80901

RE: Iron Mountain Transfer Station – 1st Review
CPC CU 15-00132

Dear Ms. Van Nimwegen,
Iron Mountain Roll-off has reviewed the initial review letter from the City of Colorado Springs and have the following comments.

Broad Project Input:

Staff finds that the application is acceptable; however, the following technical modifications must be completed and neighborhood concerns must be addressed.

Public Notice and Involvement: All public comments have been addressed and are contained herein.

Land Use Review: (Hannah Van Nimwegen, 719-385-5365)

1. *Due to concerns from neighboring property owners, staff recommends placing the operation indoors to contain the dust, or consider installing a fabric sail (as an example) attached to the improved walls to help contain the debris.*
 - a. Iron Mountain is interested in doing what it takes to minimize or eliminate the dust generated from this operation. We feel it is important to understand where the dust is coming from. After many hours of observing these operations we feel the majority of the dust that is referenced is coming from the driving surface. The driving surface used to be crushed concrete bought from a local recycling yard. The material seems to degrade rapidly causing fine material to go airborne when agitated by vehicle traffic. We performed a test run using asphalt millings to notice that the asphalt compound held together and in hot temperatures binds itself together. We noticed a substantial reduction in airborne dust. Since then we have “paved” our yard area with asphalt millings and have observed minimal airborne dust from vehicles.
 - b. We understand the following activities also generate dust:
 - i. Dumping the contents into the pit for processing
 - ii. Processing materials on the pit floor
 - iii. Loading materials into the transfer trailer
 - iv. High wind events
 1. – We have added sprinkler systems to reduce the size of the water droplets sent to capture the dust particles. This too has greatly reduced the amount of airborne debris from each of the above mentioned activities. Our desire is to add a misting system to reduce the amount of water used and the make the water

droplets even smaller to capture more of the particles making the system more efficient. These misters can be mounted to the “high screens” that will be mentioned later in this report.

2. We have also implemented a policy to shut-down operations in high wind conditions. This threshold is currently set at 20mph as measured from our building.
2. *Operation must be fully screened from all sides.*
 - a. We feel we have satisfied this requirement.
3. *Reroute truck traffic down Nevada to Commerce Street when possible.*
 - a. We feel we have satisfied this requirement.
4. *Address the procedure for testing suspicious material for asbestos and other potentially harmful particles in the project narrative. Will the contractors who also utilize the transfer facility be held to the same procedure?*
 - a. Since we only handle construction debris and are only receiving materials from contractors (not the everyday homeowner), we feel we are managing this issue better than any other facility in the area! Contractors are responsible for securing a permit prior to starting most construction work. In order to obtain a permit for a renovation, contractors must satisfy prerequisites including surveys by a state licensed inspector. This inspector will indicate where, if any, asbestos or contaminated material exists. The property owner is responsible for properly disposing this material and getting an “all clear” report from the same inspector prior to getting the Demolition Application Notification Form signed and sent to the State Health Department for approval. Once this is approved and a “State Permit” is issued, the individual or contractor can then go to the local permitting office to obtain the local permit. At this level, every suspect material should have been tested by the inspector to confirm it is not contaminated.
 - b. All of our staff that is associated with the Transfer Station operations has their Asbestos Containing Materials Awareness Training. This educates them on “suspect materials” and what to look for.
 - c. We also have on staff two former “CDPHE certified management planners/ inspectors/ supervisors”. These individuals have over 20 years of experience with Regulation 8 of the Colorado Department of Health Air Quality and Solid Waste Guidelines. They continue to observe materials delivered on a daily basis including sending suspect materials off for lab analysis. All materials have returned non-detect.
 - d. We had an unannounced inspection by the State Health Department on 10/21/2015. This was just after we had started operations. Brian Long noted no violations in his report.
5. *Address strategies or steps to help reduce dust in the project narrative.*
 - a. Please see Line 1 for the methods for managing dust.
6. *There is a 20’ utility and drainage easement along the southern property line, and a 10’ drainage easement along the western property line. Ensure there are no structures interfering with this easement. If there are structures within the easement, a partial easement vacation or encroachment permit may be required.*
 - a. We feel we have satisfied this requirement.
7. *Staff is considering a Condition of Approval to be attached to the Conditional Use. This condition would describe City Land Use Review staff would return to the application for additional review one or two years from the approval date to address any continuing nuisances.*
 - a. We would welcome this kind of follow-up. Again, we want to be a responsible member of the neighborhood and address any issues our neighbors may have.

Engineering Development Review and Traffic Review (Lydia Maring, 719-385-5546)

1. *All curb, gutter, pedestrian ramps and sidewalk posing a safety hazard or exhibiting excessive deterioration along Talamine Ct. and N. Cascade Ave. Adjacent to the site will need to be removed and*

replaced. An onsite meeting can be set up with the City Engineering Inspector, Frank Helme, to determine what, if any improvements are required. The inspector can be reached at 385-5068.

- a. We are discussing the scheduled construction work at the Cascade/Talamine intersection.
 - b. We will repair sidewalks, curb, gutter, and pedestrian ramps as required.
2. Please provide a drainage letter and address how the wash water from the discarded materials is collected, treated and disposed.
- a. The water used to manage the dust on site is predominantly collected by the material that is loaded up. We refer to that as optimum moisture content of the materials. We should not be oversaturating the materials. Water is not used for washing in this operation.
 - b. The terrain naturally slopes from North to South in this area. We have installed a berm along the South fence to ensure water is substantially slowed for a period of time before moving down stream. This fence is located 15' north of our property line. Observations have confirmed that no water born debris has reached this berm to date.
 - c. We also use a 15' landscape buffer zone along the South property line.
3. Traffic Engineering has no comments.

Colorado Springs Utilities (Ann Werner, 719-668-8262)

1. None, approval is recommended.

Fire (Steven Smith, 719-385-7362)

Disapproved Comments:

1. Show areas on the plans that will be kept open/clear for fire lanes
 - a. Please see attached.
2. Plans suggest gates are located on the property. Provide a note on the plans that gates the proper Knox equipment will be provide for each gate.
 - a. We will comply with the Fire Department's request for a knox box for fast access in the event of an emergency.

Enumerations (Amy Vanderbeek, 719-327-2930)

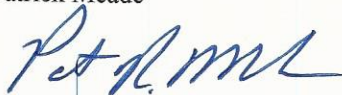
1. Figure 7 shows 1 lot. If this is to replat we would have more comments. As of now no comments.
 - a. We do not think these needs to replat.

Public Works- transit (Christoph Zurcher, 719-385-6524)

1. Transit is planning to start construction in the spring of 2016 on a street improvement project that will directly affect this property. With this conditional use request, will there be any other improvements made or required to the property? We will be installing a new ADA pedestrian ramp at the corner of Cascade and Talamine and replacing a driveway along Cascade to bring it into ADA compliance. Please pass this information on to the applicant and let us know if you or the applicant has any questions.

Sincerely,

Patrick Meade



President

The Rocky Mountain Development Group, LLC
Iron Mountain Demolition
Iron Mountain Roll-Off