



Response to email sent by Joan Kruplak with subject: Concern about potential hazardous waste handling by Iron Mountain Demolition— asbestos, chemical content of dust?

Ms. Kruplak,

Thank you for taking the time to share your concerns of Iron Mountain desiring to establish a transfer station for “demolition scrap”. I hope I can provide you with some information that will address your concerns.

I would like to address specifically you’re your concern relating to asbestos. You write, “My concern is that it is very likely that the dust generated contains asbestos (at the very least), contaminating both air and water (from the sprinkler runoff).”

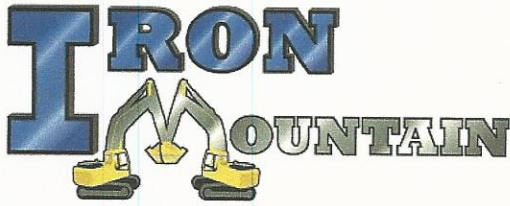
Asbestos has been used for several decades within the United States. The most popular use of asbestos in the United States were; automotive parts, such as brake pads, clutches, hood liners, and gaskets; floor and roof tiles as well as the adhesive; and construction products such as insulation, drywall taping and ductwork.

Throughout the 70’s and 80’s, legislation regulating the use of asbestos was implemented. The Clean Air Act of 1970 classified asbestos as a hazardous air pollutant and the Environmental Protection Agency (EPA) began regulating the use and disposal of asbestos. In 1986 the Asbestos Hazard Emergency Response Act (AHERA) forced the EPA to establish standards for inspecting and removing asbestos in schools.

Shortly after the AHERA of 1986, the Colorado Department of Public Health and Environmental (CDPHE) created a standard to identify, monitor and regulate removal and disposal of asbestos containing material know as Regulation 8, Part B: asbestos. Since the conception of the regulation, CDPHE has been active in fine tuning the removal and disposal process to protect the workers and the public of possible exposure.

The transfer station at 75 Talamine Ct, is NOT an approved site for disposal of asbestos. The material in the containers brought to the transfer station are filled with non-asbestos construction and demolition debris. Colorado state law requires that demolition projects have an asbestos survey performed before any demolition is permitted. Therefore, Iron Mountain Demolition has a reasonable assurance that the material being dropped DOES NOT contain asbestos. Service agreements with clients using the containers contain specific verbiage spelling out, “Waste Materials shall be NON-HAZARDOUS SOLID WASTE ONLY”. Waste dropped at the transfer station is monitored on a daily basis to assure the safety of the workers and public.

Water is used as needed to control the dust generated during operations. Debris is dropped on a concrete slab to control water runoff into neighboring properties as well as storm water drains. We are



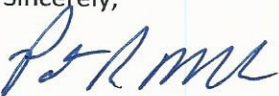
currently using a berm and a 15' buffer-zone to prevent water from leaving our property. Both are generally accepted BMPs.

In regards to the dust, most of the dust generated is from the driving surfaces. We have been controlling this with water as well as changing the driving surface to asphalt. As is common in this and most other industrial areas, stone is used as the driving surface and can generate airborne dust in windy conditions especially when agitated by vehicles. This is found thru-out this area and while not acceptable, we seem to be the only ones monitoring this and utilizing controls to minimize airborne dust.

In regards to the "odor in the dust" – our neighbor's exhaust fan introduces fumes from their operations 20' from our operations. The neighboring facility works with fiberglass and I believe it is the odor from the resin they use.

Not sure what "fecal" odor you are referring to. Nothing we have seen over the past few months has left any odor in our facility. There is a strong "skunk-ish" smell that we believe is marijuana. Not sure if there is a grow house or users in this area but I can assure you, we are not interested in smelling that stuff! Our pit really has no lingering odors. We are only handling construction materials.

Thank you for presenting your concerns. We have already implemented some corrective actions to manage most of the concerns that pertain to us and continue to analyze operations looking for opportunities to do even better. Please feel free to call or come by and discuss any of your concerns. We truly intend to be a responsible neighbor.

Sincerely,

Patrick Meade

President



Iron Mountain Demolition 75 Talamine Ct. Colorado Springs, Co. 80907 Phone: 719-634-0611 Date: 1/19/2016

Linda Welsh

Dear Ms. Welsh

I appreciate the concerns you raise in your letter to the city of Colorado Springs. Overall, I want to mention that this operation is still in its infancy, and we are continually learning and trying to improve our methodology. There will be missteps on this path, but our intent is to be good citizens in the town we have called home for over 60 years.

We would like to become better neighbors than we have been so far. I apologize for that. We planned on coming over to meet with you at the very beginning of our time here, but that plan fell through the cracks, due to the typical demands of managing a large scale construction and roll-off company. We will try to do better.

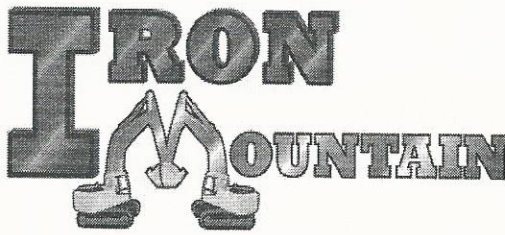
Your concerns are certainly valid, and we are taking steps to improve those things we can.

- 1) Included in that category is our intent to reduce exhaust fumes. While our trucks will be started the same way whether or not we have a transfer station, we are addressing the issue. Although all of our equipment has passed current emission testing, we hope to install an exhaust system at the south fence, specifically to decrease the truck fumes upon start-up. Until that has been accomplished, we have already modified our start up procedure. We have reduced the amount of idle time in the morning, and we have moved as many trucks away from our shared property line as we can. We would like to know if you have noticed this change. If it is still just as bad for you, we will try to come up with additional changes.
- 2) The debris blowing onto your property is unacceptable to us, as well. We have learned how to reduce blowing debris over the last month, and I sincerely hope that that fact is noticeable on your property. However, we want to take the next step, and request permission to come onto your property and clean up any trash. We will arrange to do this at your convenience.
- 3) I have smelled the sewer smells too, but I know it is not coming from our debris pile, which is just construction trash. I think we had a problem somewhere in the neighborhood, and I have not smelled it lately. Have you? We do smell a "skunk-ish" odor often. We are thinking it is a marijuana grow house or users in the area. I assure you, we are not interested in that smell either!!!
- 4) Mostly, we would like to meet with you and continue to work to reduce the infringement upon your life. We are sorry for this and will do what we can to reduce our impact.

Sincerely,

Patrick Meade,

President



Iron Mountain Demolition 75 Talamine Ct. Colorado Springs, Co. 80907 Phone: 719-634-0611 Date: 11-11-15

Patrick Bray, Manstone, LLC

Dear Mr. Bray:

I appreciate the concerns you raise in your letter of 2 December 2015. Allow me to address your concerns, and the mitigation steps we take for them.

Overall, I want to mention that this operation is still in its infancy, and we are continually learning and trying to improve our methodology. There will be missteps on this path, but our intent is to be good citizens in the town we have called home for over 60 years.

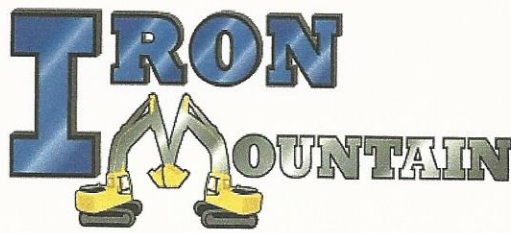
- 1) DUST: Dust is always an issue in construction debris and demolition. We do spray water to reduce this potential issue. We are still implementing a system of misting the debris. We have water going whenever we feel it is appropriate. We feel that we have dramatically reduced the amount of dust since we began in December. While we do everything we can to mitigate the problem, we also are aware that the wind blows from west to east almost all the time, and the amount of dust moving to the east has been minimal. I review the operation several times a day, and have never personally seen any dust migrate to the west. We also look at the reduction of truck-hours as the most beneficial aspect of reducing air pollutants. Our trucks have to travel, on average, an additional ½ hr. per load if they do not use our transfer station. We all know the true environmental cost of truck exhaust fumes.
 - a. We shut down the operation when the wind is gusting at 20 MPH or above. Today, (1-29-16) for instance, we did not even open up the operation. This is a new, standard operating guideline we have instituted.
- 2) On the impact to property values:
 - a. Since we purchased this property we cleaned up the mess of abandoned vehicles, trash, etc. that was an eyesore. We also installed wind and vision screen in a repaired fence along Cascade, to make the area look better. We have fully grade the yard, and placed recycled asphalt, which dramatically reduces the dust which would have naturally blown off the lot when it was bare dirt. We have also fully remodeled our office building, into a very nice construction office complex, far better than what we purchased. Over-all, we believe our efforts have improved the neighborhood, not vice-versa.
- 3) ODOR: A couple of the issues raised have had to do with "odor". Our construction debris tends to be odorless. However, there is a very powerful odor that emanates from Manstone's exhaust stack, which we believe must be the odor noted by others. Not only does this odor impact our yard, but we get it inside our offices, where several people, myself included, complain of headaches from it on days when the wind comes from the west-southwest. We appreciate the citation from City land use, but we think this pertains more to your operations than to ours.
- 4) Water: You did not raise concern about water-born debris, and we have none. But we understand that our drainage easement lies immediately to the south of our fence line, which coincides with the south face of your building. We are aware you utilize this easement for storage of drums of the material which you use for your production. We hope that the drums are empty and safe for this drainage easement.
- 5) Debris: We container 99% of the debris within our screened fence line. We have instituted a regular clean-up of the ENTIRE neighborhood, including your parking area, on a twice-weekly basis. We are removing debris from years ago, along with items blown from the other side of the creek. We feel that we have more than adequately addressed blowing debris issues.

- 6) Safety: There is no hazard due to heavy equipment to personnel of structures off our lot. We would also be operating and moving equipment with or without the transfer station. We have built a wall out of concrete 10' from your building to ensure the safety of your structure. Obviously, you have no personnel who work on our side of your building, since you are built on the property line.

Sincerely,

A handwritten signature in blue ink that reads "Patrick Meade". The signature is written in a cursive style with a large initial "P".

Patrick Meade, Iron Mountain Demolition and Roll-off



Iron Mountain Demolition 75 Talamine Ct. Colorado Springs, Co. 80907 Phone: 719-634-0611 Date: 11-11-15

Russ Palmer, Alexander Properties.

Dear Mr. Palmer:

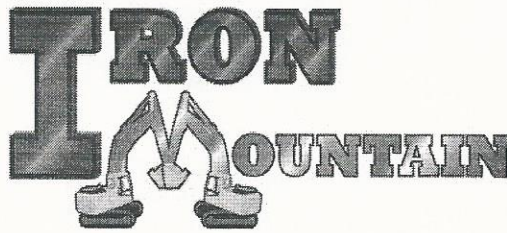
I appreciate the concerns you raise in your letter of 6 December 2015. I honestly appreciate the concerns raised, and the tone in which you raise them. I think you do a great job of trying to make this a win-win situation, and not a contentious one. Allow me to address your concerns, and the mitigation steps we take for them.

Overall, I want to mention that this operation is still in its infancy, and we are continually learning and trying to improve our methodology. There will be missteps on this path, but our intent is to be good citizens in the town we have called home for over 60 years.

- 1) DUST: Dust is always an issue in construction debris and demolition activities. None of the particulate that is generated should be considered 'contamination' in the sense of hazardous materials. It is not a pollutant in the sense of air-borne gases, such as the exhaust of vehicles or manufacturing facilities in the area (including the stack from next door). It is, however, a legitimate concern and a potential source of fugitive dust migration. We do spray water to reduce this potential issue. We are still implementing a system of misting the debris. We have water going whenever we feel it is appropriate. We look at the reduction of truck-hours as the most beneficial aspect of reducing air pollutants. Our trucks have to travel, on average, an additional ½ hr. per load if they do not use our transfer station. We all know the true environmental cost of truck exhaust fumes.
- 2) Water: Again, the nature of the material carried by the water is not contaminated with hazardous materials. We contain the water run-off on our property. There is no inlet to the storm water system in our yard, and no water runs off towards any ditch or inlet. No water-borne material has made it past the earth buffer / berm between us and our downhill neighbor. We are currently quite confident in our containment solutions.
- 3) RAIN: As in the information presented above, there is no run-off into neighboring property.
- 4) WIND: We have recognized wind as an issue. Following the practices of the landfills which serve Colorado Springs, we shut totally down operations when wind becomes problematic. We have a huge tarp to cover the entire debris pile, which is pulled over the pile when wind is an issue, or if any debris remains at the end of our daily operation. We have established a habit of bringing in labor to 'police' our yard and the surrounding areas anytime we feel that the wind has created an issue. We also installed wind screens in our perimeter fence to help reduce this. So far, I can say that we are not contributing to additional wind-strewn debris any more than any other construction yard in the area. However, we will continue to monitor our operations and improve what we find to be deficient.
- 5) RECYCLING: we recycled roughly 38 tons of metals in November. Concrete is also recycled, but not in an easily trackable manner. It is moved aside and added to other truck loads from our other projects. Many other items are pulled out of the pile for re-purposing. However, the entire recycling aspect is still in development, and we may be able to add to it in the future, after we have achieved a satisfactory and economically viable system for the basic activities. Further steps for re-use/re-purposing will be taken as we continue to master the basics.

Sincerely,

Patrick Meade,



Iron Mountain Demolition 75 Talamine Ct. Colorado Springs, Co. 80907 Phone: 719-634-0611 Date: 11-11-15

Phil Kiemel, Bestway Disposal

Dear Mr. Kiemel:

I appreciate the concerns you raise in your letter of 10 December 2015. Allow me to address your concerns, and the mitigation steps we take for them.

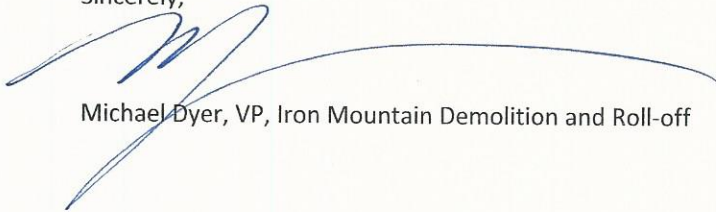
Overall, I want to mention that this operation is still in its infancy, and we are continually learning and trying to improve our methodology. There will be missteps on this path, but our intent is to be good citizens in the town we have called home for over 60 years.

I will try to address each bullet point in your letter:

1. No Enclosed Building: We do not have a full enclosure, but we are dealing with a totally different material than Waste Management and BestWay. We merely collect construction debris. We do not have the type of household waste of regular waste disposal companies.
2. Asbestos: We DO have provisions to test for asbestos, we have already sampled several suspect materials, and we are VERY familiar with mitigation. We contract asbestos abatement projects on a regular basis. I, personally, was formerly a CDPHE certified Management-Planner, Supervisor and Inspector for asbestos. We now have certified workers on the crew, all the crew undergoes awareness training, and along with me, we have another former CDPHE inspector/Management Planner on staff. Unlike many in our field, we know precisely how to deal with asbestos, and how to recognize suspect material. The representative of CDPHE who visited the site found NO issues during his visit, and he saw the sample results of suspect materials which we had taken before his visit.
3. Hazardous Materials: Like most material transport companies, such as yours, we are not equipped to mitigate a hazardous materials spill. We are, however, capable and knowledgeable enough to recognize the potential issues involved.
4. Operation on Dirt: We actually have a concrete pad upon which we do all the transfer operations, and has been in place from the first day of full scale operations.
5. Storm Water: We have provisions for storm water runoff, including: Trench, berm and concrete walls.
 - a. Again, the very nature of the material we handle poses an entirely and much less significant threat than companies that haul household waste.
6. Dust, Blowing Debris: We took steps within the first couple of days of testing to mitigate dust and blowing debris. We have both under control now via water, screen fencing, pile tarps, and total shut-down of operations when wind poses a threat to blow debris.
7. Overnight storage: We have loaded 100% OF debris before the end of business nearly every day. Our practice is to not tip containers later in the day. We leave the containers loaded n the trucks until morning. If we close down for wind, we do have to leave some debris on the concrete in the transfer pit. The same fire hazard exists when loads are left on the truck, but that is common practice for roll-off companies.
8. Too Close to residences: There is ONLY one residence in the neighborhood. While we wish to take all her concerns to heart, the rest of our neighborhood is zoned for this nature of operation.
9. Valid Zoning: We discussed this with the CDPHE solid waste division and the city, and have been granted to continue until the hearing.

10. Tire Dump: We have NOTHING to do with any illegal tire dump!!! This is totally outside our ethical approach to our community. Furthermore, there is nothing for us to "Fill-up" and then walk away from. This is primarily a construction yard, with a large shop for truck repair, and a large office space. We are not here for the short haul. And we reject the aspersion on our character.
11. Building Size: You suggest that a building of 25,000 -35,000 SF would be inadequate for what we "have on the ground" now. This is simply false. Our pad holds everything we generate in a day with room to spare, and it is 2500 SF, less than 1/10th of this recommendation. We do see a possibility of increasing it to 4500 SF for convenience and efficiency, but we still do not have a need for anything as large as 70,000 SF, as implied.
12. Finally, in response to your point about hazardous materials and our "track record": You are correct: My track record speaks for itself. I have been in demolition in Colorado Springs for many, many years. I have always followed all regulations. I have had NO violations, and no haz-mat spills. Much to the chagrin of homeowners, I will NEVER flex the regulation of Colorado Reg. 8 to hold the costs of their demolition project down, as I am often requested to do. I am more than happy to lose the work to another company who is not as strict as I am. I advise clients and potential clients of possible hazardous issues with their demolition project on a daily basis. I have asbestos inspectors and abatement companies on speed-dial. I am often used as a resource for general contractors and developers in Colorado Springs for questions of how to deal with haz-mat, including Kratt Commercial Properties, Equity Management, Griffis Blessing and recently, Norwood Development. When USOC needed a demolition that would have no problems or bad press, I was the first call from their project manager. I appreciate you allowing me to comment on my record. I know of no demolition contractor who can show a better history.

Sincerely,

A handwritten signature in blue ink, appearing to be 'M. Dyer', with a long horizontal flourish extending to the right.

Michael Dyer, VP, Iron Mountain Demolition and Roll-off