

November 29, 2022

Ms. Libby Tart, AICP  
**Senior Planner/ Planner III**  
**City of Commerce City**  
7887 E. 60<sup>th</sup> Ave,  
Commerce City, CO 80022



**RE: 4150 E. 60<sup>th</sup> Ave Waste Connections**  
**Description of Uses and Statement of Operations**

Dear Ms. Tart:

This revised letter is attached to an application for a Site Development Plan (SDP), Conditional Use Permit (CUP) and Final Plat request with the Commerce City staff and City Council. This project is located south of 60<sup>th</sup> Avenue and I-270, east of Brighton Blvd., west of Clermont Street and north of Sand Creek. The property address is 4150 E. 60<sup>th</sup> Avenue in the City of Commerce City, Adams County, Colorado. The project owner is Waste Connections of Colorado Inc. This letter is written on behalf of the applicant and owner/ user of the property Waste Connections of Colorado Inc.

The property is zoned I-3 and is currently an abandoned office/ industrial brownfield site. The proposed uses for the property are office use in existing buildings, industrial uses in a new building including a Materials Handling Facility (MRF) for indoor recycling, truck docks, drive in truck doors, a future rail spur and a future vehicle maintenance shop within an existing building. We propose to create one industrial lot for the property. The Sand Creek floodplain area will be maintained by the property owner with easements granted to the City for drainage access and a trail easement for public use provided on the final plat. Existing security fencing consisting of a 6 foot high chain link fence with 3 strands of barbed wire above the chain link will be maintained and utilized for the re-developed site. An 8 foot high sheet metal screen fence exists along a portion of the Sand Creek trail. This screen fence will be maintained and utilized for the re-developed site. The screen fence will be extended consisting of similar materials to the existing as shown on the SDP site plan.

The site improvements involve re-development of a vacant blighted brownfield property. Three of the existing buildings are to remain as shown on the site plan. These buildings will be re-modeled in the future to serve office and maintenance shop uses. One new industrial building to serve as a Materials Handling Facility (MRF) for indoor recycling is proposed to be built as shown on the site plan. The building will include a state of the art automated fire suppression system. Outdoor truck scales and a small scale house are proposed to weigh incoming and outgoing product and shipping trucks.

Further discussion of this new building operation is included in the statement of operations below. The overall recycling process includes unloading, processing, separating into multiple product lines and shipping products to market via truck and/ or rail. All of these activities will occur inside the new building. The flexibility to ship by either rail or truck will maximize efficiencies for the operation. The operation is expected to process 350 to 400 tons of recycling materials per day for processing. This volume includes an accommodation for public recycling of pre-sorted materials.

The recycling process will begin near the northwest corner of the building with the unloading of recycling collections and transport vehicles that will unload the material inside the fully-enclosed building. Four drive-in doors are proposed for recycling trucks to enter the building. From there, front end loaders will

load the material into the material handler. The materials handler equipment to sort the recycling products includes an auger screen, optical sorter, eddy current separator and robotic arms programmed with artificial intelligence; all of which maximize material recovery rates and improve recycled product quality. All recycling activities will occur within the MRF building to mitigate any potential nuisance conditions and protect marketable materials from deterioration. Since this process is a mechanical process, chemical emissions are not expected. The facility will be accepting pre-sorted recyclable materials from the surrounding area including paper, plastic, metal, glass and cardboard. Product will be loaded onto semi-trucks and/ or rail located near the east end of the proposed building.

The MRF operation will process all materials inside of an enclosed building in order to mitigate undue noise, dust, odor, or other nuisances that could impact the surrounding area. Additionally the site will be continuously manned by trained personnel ensuring site conditions are inspected daily and to act as a point of contact to address any potential concerns from neighbors in the surrounding area.

Loaded and empty enclosed trailers may be staged at the loading dock as they prepare for loading and transportation.

As stated above the MRF operation will process all materials inside of the enclosed building. This method of operation will minimize any potential litter reaching the site and the surrounding area. Additionally the site will be continuously manned by trained personnel ensuring site conditions are inspected daily and any escaped litter will be addressed with prompt removal and disposal.

All facility haulers and personnel employed by Waste Connections will be trained on the recognition of unacceptable materials upon hire and on an annual basis. Generators will segregate recyclables from the waste at the source. Procedures for material screening will take place at the source, gatehouse, and during material unloading. If unacceptable materials are identified at the source or the scale, the materials will be refused and sent back with the customer. If any unacceptable materials are discovered at the time of unloading, the customer will be required to reload the unacceptable materials and remove them from the site. If the customer is no longer at the facility and cannot otherwise be identified, the material will be moved to a secure staging area pending a decision for appropriate ultimate safe disposal by a licensed company. The site manager is responsible for the appropriate characterization and disposal of the material, including the proper documentation and notification to regulatory agencies. The facility will have a list of contacts for proper notification and licensed third party disposal companies.

The MRF operated by Waste Connections will be regulated by the Colorado Department of Public Health and Environment (environmental), South Adams County Fire Department (fire prevention), and Colorado Department of Agriculture (scale certification). Waste Connections has established a strong compliance record and relationship with state and local regulators throughout its many operations in Colorado and this facility will be no exception. Additionally, Waste Connections has internal auditing and training programs that will ensure the facility meets or exceeds any regulatory requirement.

The facility will be registered as a recycling facility with the Colorado Department Health and Environment and will be subject to the initial registration and annual requirements of Section 8 of 6CCR 1007-2 Part 1.

Waste Connections is committed to providing the highest level of safety measures for its employees and the public. The mechanical systems used will significantly reduce labor involvement which enhances safety for the workers in the higher risk areas of the processing plant compared to other facilities.

The MRF operation is expected to employ one shift of employees initially expanding to two shifts over time as recycle volume increases. The MRF operation at expected capacity will include approximately 30

individuals. The first shift is expected to include approximately 25 employees. The second shift is expected to include approximately 5 employees. The office and maintenance shop operations are expected to employ approximately 60 individuals.

Hours of operation for the office staff is expected to be 7am to 6 pm. Recycle trucks are expected to enter and leave the property throughout the day with hours expected to be 8am to 7pm. Hours of operation for the MRF are expected to be from 6 am to 10 pm. The bulk of the activity with the first shift which will be from 8 am to 6 pm. The second shift will overlap the first shift by one hour. The facility is expected to operate Monday through Saturday. Saturday work is expected to occur between 7am and 2 pm.

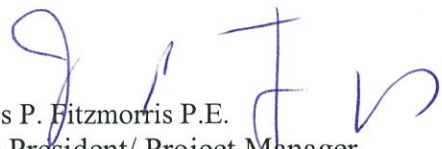
The operation of the site is expected to require approximately 105 parking spaces to allow for employees and visitors. 120 parking spaces are proposed. The existing site has approximately 42 parking spaces available and identified.

Based upon the traffic impact study prepared and submitted to the City for this project average daily trips generated by the site is expected to be approximately 452 weekday trips per day. We estimate that 85 of those trips will be truck traffic with the balance of the trips being car traffic. The expected truck traffic will be reduced when the planned rail spur is in operation.

The project is expected to begin construction in 2023 as soon as the planning and engineering approvals can be gained and permits can be applied for. Please advise of questions or additional information that we can provide.

Sincerely,

**JR ENGINEERING, LLC**



James P. Fitzmorris P.E.  
Vice President/ Project Manager