

# Technical Memo



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**To:** Geoff Strack, SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc.

**From:** Dave Parenteau, PE (MN), Wenck Associates, Inc.

**Date:** January 11, 2018

**Subject:** Annual Inspection SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc.- Fugitive Dust Plan 2018 Annual Report  
Wenck Project # B3053-104

I hereby certify that this engineering document was prepared by me or under my direct supervision and that I am a duly registered Professional Engineer under the laws of the State of Minnesota.

David M. Parenteau  
PE # 41243

A handwritten signature in blue ink, appearing to read 'David M. Parenteau', is written over a horizontal line.

Jan 11, 2018

## Purpose

This memorandum fulfills the requirements of 40 CFR § 257.84 Inspection Requirements for CCR Surface Landfills, Part b, regarding annual inspection by a qualified professional engineer.

## Background and Applicability

SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc. owns and operates the Shamrock Environmental Landfill. The site is an industrial waste landfill located on an approximately 59 acre parcel of land located at Section 25, Township 49 North, Range 17 West, Carlton County with a street address of 761 MN Highway 45 in Cloquet, Minnesota. Approximately 9.5 acres of a total permitted 41.5 acres of the site are currently being utilized for landfill activities, with 5.4 acres of new disposal area recently constructed (Phases 3 and 4).

The facility is operated under the MPCA Solid Waste Permit SW-399, issued on December 21, 2010.

## Fugitive Dust Control Measures

The site prepared a Fugitive Dust Control Plan identifying the following primary means of dust suppression

- ▲ Application of water by a water truck or spray hose, or by sprinklers.
- ▲ Burial of the CCR at the landfill working face.

- For CCR disposed at the working face that is susceptible to fugitive dust generation, the CCR will be maintained in a limited space, and covered with waste or soil in a timely manner
- ▲ Other suitable methods of dust suppression include the use of tarps, dust suppression agents, or temporary soil cover.

Based on a review of site operational records and discussions with site operators, the primary means of Fugitive Dust Control employed in 2017 was to bury the CCR materials at the landfill working face. Operational practices such as expedient placement of daily and operational soil cover limited the potential for generation of Fugitive Dust without the need for application of water or other conditioning agents. Fugitive Dust emissions are monitored weekly by the site operators as part of the weekly CCR inspection to determine if the current operational practices are effective and appropriate.

During my site visit on December 1, 2017, the above described operational practices were being employed and there was no noticeable Fugitive Dust, indicating the current plan is effective.

### **Citizen Complaint Log**

SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc received no citizen complaints in 2017.

### **Notification Requirements**

SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc will comply with the recordkeeping requirements specified in § 257.80(d).

### **Conclusions and Recommendations**

The current Fugitive Dust Control plan is effective in controlling Fugitive Dusts and amendment of the plan is not necessary at this time. This is based on the following:

- ▲ Weekly inspections conducted by the site indicating no issues.
- ▲ My observations during my December 2017 visit to the site.
- ▲ No citizen complaints.