

# Technical Memo



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

**From:** Brad Sullivan, P.E., Wenck Associates, Inc.

**Date:** January 11, 2019

**Subject:** SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc.  
2018 Annual CCR Fugitive Dust Control Report  
Wenck Project # B3053-137

## Purpose

This memorandum fulfills the requirements of 40 CFR § 257.80(c) Annual CCR Fugitive Dust Control Report. The annual 2018 CCR site inspection was performed by Geoff Strack, P.E. from Waste Connections and Brad Sullivan, P.E. from Wenck, on November 5, 2018, which included the review of the CCR fugitive dust operations pursuant to the above referenced Rule.

## Background and Applicability

SKB Environmental Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc. owns and operates the Shamrock Landfill which is a secure landfill permitted to accept industrial waste, including CCR waste. The facility is situated 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. Currently, 17.8 acres of lined landfill are constructed of the permitted 41.5-acre footprint. Construction of Phase 5A & 6A was substantially complete in July 2018.

Prior to the completion of Phase 5A & 6A, filling operations were primarily in Phases 3 and 4, though some waste was disposed in Phases 1 & 2. Following their completion, filling operations were primarily in 5A & 6A, although Phases 1 through 4 remained operational and received some waste. The Facility is operated under the MPCA Solid Waste Permit SW-399.

## Fugitive Dust Control Measures

The Facility's CCR Fugitive Dust Control Plan identifies dust suppression by the following means:

- ▲ 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; and
- ▲ 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 2018 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 November 5, 2018, inspection, the above described operational practices were being employed and there was no noticeable fugitive dust.

### **Citizen Complaint Log**

No citizen complaints regarding CCR fugitive dust were received by the Facility in 2018.

### **Notification Requirements**

Per § 257.80(d), the Shamrock Landfill is in compliance with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).

### **Conclusions and Recommendations**

No corrective measures were identified in the previous Annual CCR Fugitive Dust Control Report or in the weekly facility inspections. The measures described in the Facility's CCR Fugitive Dust Control Plan are effective for controlling CCR fugitive dusts. Thus, there are no recommendations for additional or revised CCR dust management operations at this time.