

To: Geoff Strack, P.E.
Waste Connections

From: Kyle Morberg, P.E.
Stantec Consulting Services Inc.

File: 227704387

Date: January 7, 2025

**Reference: SKB Environmental, Cloquet Landfill Inc., f/n/a Shamrock Landfill, Inc.
2024 Annual CCR Fugitive Dust Control Report**

Purpose

This memorandum fulfills the requirements of 40 CFR § 257.80(c) Annual CCR Fugitive Dust Control Report. The annual 2024 CCR site inspection was performed by Kyle Morberg, P.E. from Stantec Consulting Services, Inc. (Stantec), on October 14, 2024, 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 Environmental Landfill which is a secure landfill permitted to accept industrial waste, including CCR waste. The facility is located at Section 25, Township 49 North, Range 17 West, Carlton County with a street address of 761 MN Highway 45 in Cloquet, Minnesota. The Facility is operated under the MPCA Solid Waste Permit SW-399. Currently, 29.3 acres of lined landfill are constructed. Most recently, a portion of Phase 7 (Phase 7B-2) was constructed in 2024. All constructed phases, Phase 1 through 7B-2, are permitted to accept CCR. Filling operations in 2024 were primarily in Phases 5, 6 and 7, although Phases 1 through 4 remained operational and received some waste.

Fugitive Dust Control Measures

40 CFR § 257.84, Subpart b.2 requires the following topics in *italics* be addressed within this report. 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 2024 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. Site conditions with respect to dust control are monitored visually on a daily basis by the site operators and CCR dust observations are recorded as part of the weekly CCR inspection to determine if the current operational practices are effective and appropriate.

During the October 14, 2024 inspection, the above described operational practices were being employed and there was no noticeable fugitive dust.

Citizen Complaint Log

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No citizen complaints regarding CCR fugitive dust were received by the Facility in 2024.

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.

Stantec Consulting Services Inc.

A handwritten signature in black ink, appearing to read 'Kyle Morberg', is positioned above the printed name and title.

Kyle Morberg, PE

Environmental Engineer

Cell: (218) 591-0790

Kyle.morberg@stantec.com