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To: Geoff Strack, P.E.  
Waste Connections

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

File: 227704387

Date: January 7, 2026

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**Reference: SKB Environmental Cloquet Landfill, Inc. 2025 Annual CCR Inspection Report**

## **Purpose**

This memorandum fulfills the requirements of 40 CFR § 257.84 Inspection Requirements for coal combustion residue (CCR) Surface Landfills, Part b, regarding an 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 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 2025 were primarily in Phases 5, 6, and 7, although Phases 1 through 4 remained operational and received some waste.

Refer to Figures 1 and 2 for the photo locations and current existing conditions plans, respectively.

## **CCR Landfill Inspection (40 CFR § 257.84)**

On October 14, 2025, Kyle Morberg, PE of Stantec conducted the on-site inspection of the CCR Landfill. As part of the inspection, the following operating and inspection records were reviewed:

- Review of weekly visual CCR inspections performed by landfill operators;
- Previous annual inspections performed by a licensed professional engineer;
- CCR unit design and construction information required by §257.73(c)(1) and §257.74(c)(1); and
- Previous periodic structural stability assessments required under § 257.73(d).

## **Landfill Cell Design**

Most of the facility's landfill cell embankments were constructed using on-site borrow material, which consisted of silty clay and clayey sand type soils. The fill was placed and compacted to 95% of Standard Proctor Dry Density in lift thicknesses ranging from 8 inches to 12 inches. The final subgrade surface was proof rolled prior to geosynthetics installation. A typical perimeter section taken from the Phase 7 Construction Documentation Report prepared by Stantec in September 2022 is shown below.



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Geoff Strack, PE

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*(iv) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.*

There were no changes noted that may could potentially affect the stability or operation of the impoundment. Observations were consistent with those noted in that report.

## Notification Requirements

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

All recommendations presented in the previous inspection report were implemented.

The SKB Environmental Cloquet Landfill facility has been constructed and operated in accordance with the facility permit and the CCR regulations. No embankment or waste slope stability issues were observed during the visual inspection.

40 CFR § 257.83, Subpart b.5 and 40 CFR § 257.84, Subpart b.5 each require that if a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.

There were no deficiencies or releases identified during the inspection that require remedy as soon as possible.

**Stantec Consulting Services Inc.**



**Kyle Morberg, PE**

Environmental Engineer

Cell: (218) 591-0790

Kyle.morberg@stantec.com

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.

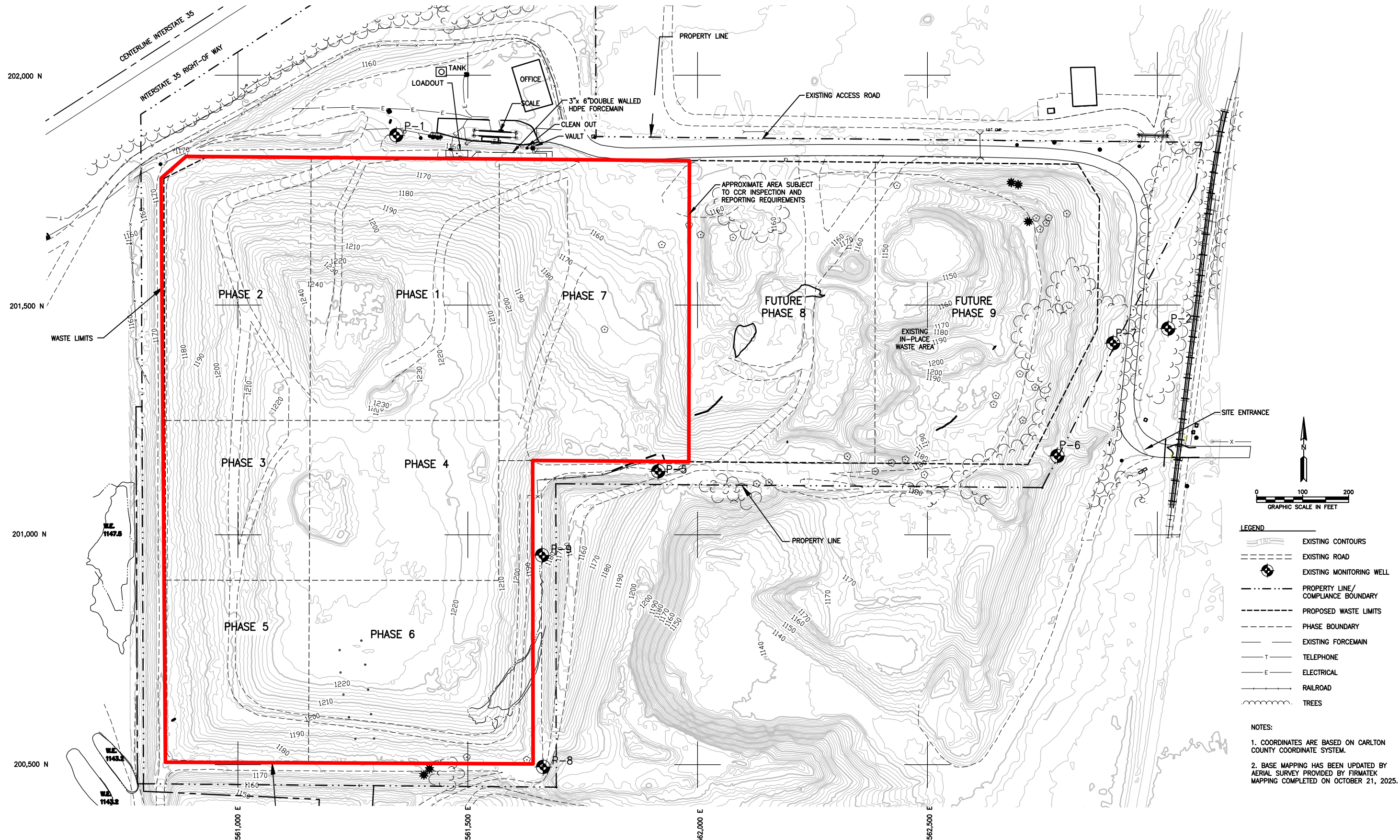


Kyle Morberg, P.E. # 60444

January 7, 2026



Plot Date & Time: 16 December 2023 1:05 AM  
U:\227704387\working\Cloquet\2021 CCR Report\cvi\cvi.dwg 2025 FIGURE 2 INSPECTION LOCATIONS.dwg



REV	REVISION DESCRIPTION	DWN	APP	REV DATE

SEAL

SUB CONSULTANT

PRIME CONSULTANT

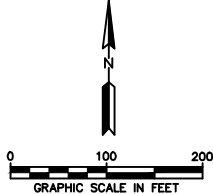


PROJECT TITLE	2025 CCR INSPECTION REPORT
SKB ENVIRONMENTAL CLOQUET LANDFILL, INC.	f/n/a SHAMROCK LANDFILL, INC.
PROJECT NO.	227704387
SHEET NO.	FIGURE 2
REV NO.	0

SHEET TITLE	SITE MAP
DWN BY	JKT
CHK'D	KM
APP'D	BS
DWG DATE	JAN. 2026
SCALE	AS NOTED



U:\227704387\working\Cloquet\2021 CCR Report\csl\csl.dwg 2025 FIGURE 1 PHOTO LOCATIONS 1.dwg Plot Date & Time: 16 December 2023 1:05 AM



- LEGEND**
- EXISTING CONTOURS
  - EXISTING ROAD
  - EXISTING MONITORING WELL
  - PROPERTY LINE/ COMPLIANCE BOUNDARY
  - PROPOSED WASTE LIMITS
  - PHASE BOUNDARY
  - EXISTING FORCEMAIN
  - TELEPHONE
  - ELECTRICAL
  - RAILROAD
  - TREES

- NOTES:**
- COORDINATES ARE BASED ON CARLTON COUNTY COORDINATE SYSTEM.
  - BASE MAPPING HAS BEEN UPDATED BY AERIAL SURVEY PROVIDED BY FIRMATEK MAPPING COMPLETED ON OCTOBER 21, 2025.

REV	REVISION DESCRIPTION	DWN	APP	REV DATE

SEAL

SUB CONSULTANT



PRIME CONSULTANT





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SKB ENVIRONMENTAL CLOQUET LANDFILL, INC.	f/n/a SHAMROCK LANDFILL, INC.
PROJECT NO.	227704387
CLOQUET, MINNESOTA	

SHEET TITLE	PHOTO LOCATIONS			
DWN BY	CHK'D	APP'D	DWG DATE	JAN. 2026
JJT	KM	BS	SCALE	AS NOTED
SHEET NO.	FIGURE 1	REV NO.	0	





<b>Client:</b>	<b>Waste Connections</b>	<b>Project:</b>	<b>227704387</b>
<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID: 1</b>			
<b>Photo Location:</b> Location 1			
<b>Direction:</b> Looking East			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> North Center of Phase 7			
<b>Photograph ID: 2</b>			
<b>Photo Location:</b> Location 2			
<b>Direction:</b> Looking East			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Northwest Corner of Phase 7			





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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID: 3</b>			
<b>Photo Location:</b> Location 3			
<b>Direction:</b> Looking West			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> North Center of Phase 1			
<b>Photograph ID: 4</b>			
<b>Photo Location:</b> Location 4			
<b>Direction:</b> Looking South			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Northwest Corner of Phase 2			





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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID: 5</b>			
<b>Photo Location:</b> Location 5			
<b>Direction:</b> Looking South			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southwest Corner of Phase 2			
<b>Photograph ID: 6</b>			
<b>Photo Location:</b> Location 6			
<b>Direction:</b> Looking North			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southwest Corner of Phase 3			





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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID: 7</b>			
<b>Photo Location:</b> Location 7			
<b>Direction:</b> Looking East			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southwest Corner of Phase 5			
<b>Photograph ID: 8</b>			
<b>Photo Location:</b> Location 8			
<b>Direction:</b> Looking West			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> South Center of Phase 6			





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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID:</b> 9			
<b>Photo Location:</b> Location 9			
<b>Direction:</b> Looking North			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southeast Corner of Phase 6			
<b>Photograph ID:</b> 10			
<b>Photo Location:</b> Location 10			
<b>Direction:</b> Looking South			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> East Center of Phase 6			



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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID: 11</b>			
<b>Photo Location:</b> Location 11			
<b>Direction:</b> Looking East			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southwest Corner of Phase 7			
<b>Photograph ID: 12</b>			
<b>Photo Location:</b> Location 12			
<b>Direction:</b> Looking West			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> South Center of Phase 7			



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<b>Site Name:</b>	<b>SKB Cloquet CCR 2025</b>	<b>Site Location:</b>	<b>Cloquet, MN</b>
<b>Photograph ID:</b> 13			
<b>Photo Location:</b> Location 13			
<b>Direction:</b> Looking North			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Southeast Corner of Phase 7			
<b>Photograph ID:</b> 14			
<b>Photo Location:</b> Location 14			
<b>Direction:</b> Looking South			
<b>Survey Date:</b> 10/14/2025			
<b>Comments:</b> Northeast Corner of Phase 7			