



Responsive partner.  
Exceptional outcomes.

March 31, 2017

**Geoff Strack**

Waste Connections  
251 Starkey Street  
Saint Paul, Minnesota 55107

Re: SKB Cloquet Landfill (Shamrock) SW-399, Cloquet, Minnesota  
Coal Ash Rule (40 CFR 257.90) Groundwater Detection Monitoring Program Review

**Dear Mr. Strack:**

Per your request Wenck Associates, Inc. (Wenck) has reviewed the existing groundwater monitoring system at the SKB Cloquet Landfill (SKB Cloquet) for compliance with the above referenced coal combustion residuals (CCR) rule. Our review concludes that the existing monitoring network at the Landfill exceeds the minimum requirement of the CCR rule for a detection monitoring program.

The minimum CCR rule requirement for a groundwater detection monitoring program specifies at least one upgradient and three downgradient monitoring wells. SKB Cloquet has in place an eight well monitoring network that includes one upgradient and seven downgradient monitoring wells. This existing monitoring system was established through the Minnesota Pollution Control Agency (MPCA) solid waste facility permitting process. That permitting process required a site specific hydrogeologic evaluation. The resultant monitoring network was installed following review and approval of the MPCA and exceeds the CCR requirements. Thus, the existing monitoring wells are adequately situated and can provide for the collection of background analytical data as required for the CCR detection monitoring program.

Consistent with MPCA solid waste permitting, modification of the groundwater monitoring network may be required if new disposal areas are developed or if significant groundwater flow regime changes are observed.

We appreciate the opportunity to assist you with this effort. If you have any questions, please contact me (763-479-4226) at your convenience.  
Sincerely,

WENCK ASSOCIATES, INC.

A handwritten signature in black ink that reads 'Tom Shustarich'.

Thomas Shustarich, PE  
Principal

t:\3053 waste connections\cloquet 0062 - hydro\ccr compliance hydro 3-31-17.docx