Stantec

Memo

To:	Geoff Strack, P.E. Waste Connections	From:	Brad Sullivan, P.E., Stantec
File:	227704387	Date:	January 7, 2024

Reference: WCI Austin Landfill, LLC 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 Brad Sullivan, P.E. from Stantec, on October 9, 2024, which included the review of the CCR fugitive dust operations pursuant to the above referenced Rule.

Background and Applicability

WCI Austin Landfill, LLC owns and operates the SKB Lansing Landfill (the Facility) which operates under MPCA Solid Waste Permit SW-514 that was originally issued in 1996. The Facility is accessed via 52563 243rd St, Austin, MN, which is located off and State Highway 218, north of Austin, MN.

The Facility includes a Class III demolition waste landfill and Class II demolition waste landfill which are identified in SW-514 as DD001 and DD0022, respectively. DD001 is permitted to accept CCR and DD002 is not. This inspection report covers the DD001 disposal area which contains disposed CCR.

Landfill cells Phase 1 through 5 of DD001 are currently permitted and constructed. Phase 1 is unlined and has not received any CCR material. Phase 2 is composite lined with a portion constructed as an overlay liner on Cell 1's southern slope. Phases 3, 4, and 5 also have a composite liner. Most recently, Phase 5 was constructed in 2021 and became operational in late 2021. The site began receiving CCR material in June of 2015 and it has all been placed in the various Phases 2 through 5. Currently, operations are split between the upper lifts of Phase 2 and 3 and the initial lower lifts of Phase 4 and Phase 5.

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

Reference: **WCI Austin Landfill, LLC 2024 Annual CCR Fugitive Dust Control Report**

Citizen Complaint Log

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

Notification Requirements

Per § 257.80(d), WCI Austin 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 this reporting period's 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.