

# Technical Memo



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**To:** Geoff Strack, SKB (Austin) Environmental, LLC.  
**From:** Dave Parenteau, PE (MN), Wenck Associates, Inc.  
**Date:** January 11, 2018  
**Subject:** Report SKB Lansing CCR Fugitive Dust Plan 2018 Annual Report  
Wenck Project # B3053-0105

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.

David M. Parenteau  
PE # 41243

A handwritten signature in blue ink, appearing to read 'David M. Parenteau', is written over a horizontal line.

Jan 11, 2018

## Purpose

This memorandum fulfills the requirements of 40 CFR § 257.80(c) Annual Fugitive Dust Control Report for CCR regulated facilities.

## Background and Applicability

SKB (Austin) Environmental, LLC owns and operates the SKB Lansing Landfill, a Class III facility operating under MPCA Solid Waste Permit SW-514, originally issued in 1996.

The site is located off of 243<sup>rd</sup> Street and State Highway 218, north of Austin Minnesota. The attached Figure 1 presents an overview of the site.

There are 4 permitted disposal cells in the Landfill. Cell 1 is unlined and has not received any CCR material. Cell 2 is composite lined and has a portion of the liner that overlies the south slope of Cell 1. Phase 3 of Cell 2 was recently constructed and is immediately north of Cell 2 Phases 1, and 2. The active area is within Cell 2. The site began receiving CCR material in June of 2015 and it has all been placed in the various phases of Cell 2.

## Fugitive Dust Control Measures

The site prepared a Fugitive Dust Control Plan identifying the following primary means of dust suppression

- ▲ 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

- ▲ 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 2017 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 my site visit on November 16, 2017, the above described operational practices were being employed and there was no noticeable Fugitive Dust, indicating the current plan is effective.

### **Citizen Complaint Log**

SKB (Austin) Environmental LLC received no citizen complaints in 2017.

### **Notification Requirements**

SKB (Austin) Environmental LLC will comply with the recordkeeping requirements specified in § 257.80(d).

### **Conclusions and Recommendations**

The current Fugitive Dust Control plan is effective in controlling Fugitive Dusts and amendment of the plan is not necessary at this time. This is based on the following:

- ▲ Weekly inspections conducted by the site indicating no issues.
- ▲ My observations during my November 2017 visit to the site.
- ▲ No citizen complaints.