Stantec

Memo

To:	Geoff Strack, PE, Waste Connections	From:	Brad Sullivan, PE, Stantec
File:	227704387	Date:	January 7, 2025

Reference: WCI Austin Landfill, LLC 2024 Annual CCR Inspection Report

Purpose

This memorandum fulfills the requirements of 40 CFR § 257.84 Inspection Requirements for CCR Surface Landfills, Part b, regarding an annual inspection by a qualified professional engineer.

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.

See Figure 1 which is a facility site plan, which also includes the locations the photographs were taken as part of this inspection.

CCR Landfill Inspection (40 CFR § 257.84)

On October 9, 2024, Brad Sullivan, 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:

- 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

In general, the facility's landfill cell embankments were constructed using on-site and imported borrow materials. A typical perimeter section, taken from the Cell 2, Phase 2 Construction Documentation Report, prepared by CRA in November, 2012 is shown below.

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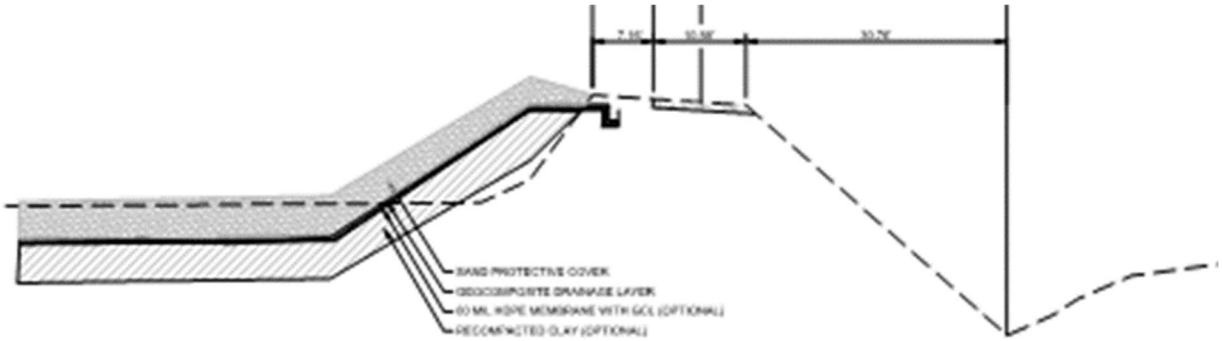

Typical Landfill Berm Detail

During the inspection there were no signs of landfill cell embankment distress, no signs of waste slope instability, or other CCR landfill issues observed. The landfill embankments and interim covered slopes were generally in good condition with a well-established vegetation cover and no signs of significant erosion.

Photos were taken during the inspection. Figure 2 presents the photo locations, and Attachment 1 contains a photo log and the photos taken.

CCR Landfill Inspection Report

40 CFR § 257.84, Subpart b.2 requires the following topics in italics be addressed within this report. The requirements are shown in italics with the response immediately afterwards for each item.

(i) Any changes in geometry of the impounding structure since the previous annual inspection;

No changes to the constructed landfill containment berms were observed during the 2024 inspection or noted by landfill operators on any of the weekly CCR inspection reports. As noted above, Phase 5 is the most recently constructed landfill cell, which was completed in 2021.

There were no apparent changes to the embankment geometry of Cells 1, 2, 3, 4, or 5 when compared to the design drawings or the past inspection reports. This year's annual aerial photogrammetry survey was performed on October 10, 2024, which the estimated in-place volume of total waste (including all accepted wastes) is based on. A comparison 2024 and 2023 aerial survey confirm that the embankment and slope topography is substantially unchanged. The 2024 aerial survey is shown on Figure 1.

(ii) The approximate volume of CCR contained in the unit at the time of the inspection;

The approximate volume of CCR material contained in the landfill at the time of the inspection is 125,847 cubic yards.

(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures; and

None of the following were observed that could indicate structural weakness;

- Signs of slumping or rotational movement;
- Lateral or vertical distortion of the embankment crest;
- Seepage on the outboard slopes; or
- Borrowing or damage due to vectors.

(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 observed during the 2024 inspection or noted on the weekly CCR inspection reports by landfill operators that could potentially affect the stability or operation of the landfill berm. Observations in 2024 were consistent with those noted in the previous report.

Notification Requirements

The 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

The WCI Austin 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 related to CCR operations that were identified during the inspection.

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.

Brad Sullivan, PE # 56502
January 7, 2025

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GRAPHIC SCALE IN FEET

LEGEND

● PHOTO LOCATIONS

NOTE:
BASE MAPPING HAS BEEN UPDATED BY AERIAL SURVEY PROVIDED BY FIRMATEK MAPPING COMPLETED ON OCTOBER 10, 2024.

REV	REVISION DESCRIPTION	DWN	APP	REV DATE

SEAL

SUB CONSULTANT

PRIME CONSULTANT

Stantec

PROJECT TITLE
2024 CCR INSPECTION REPORT

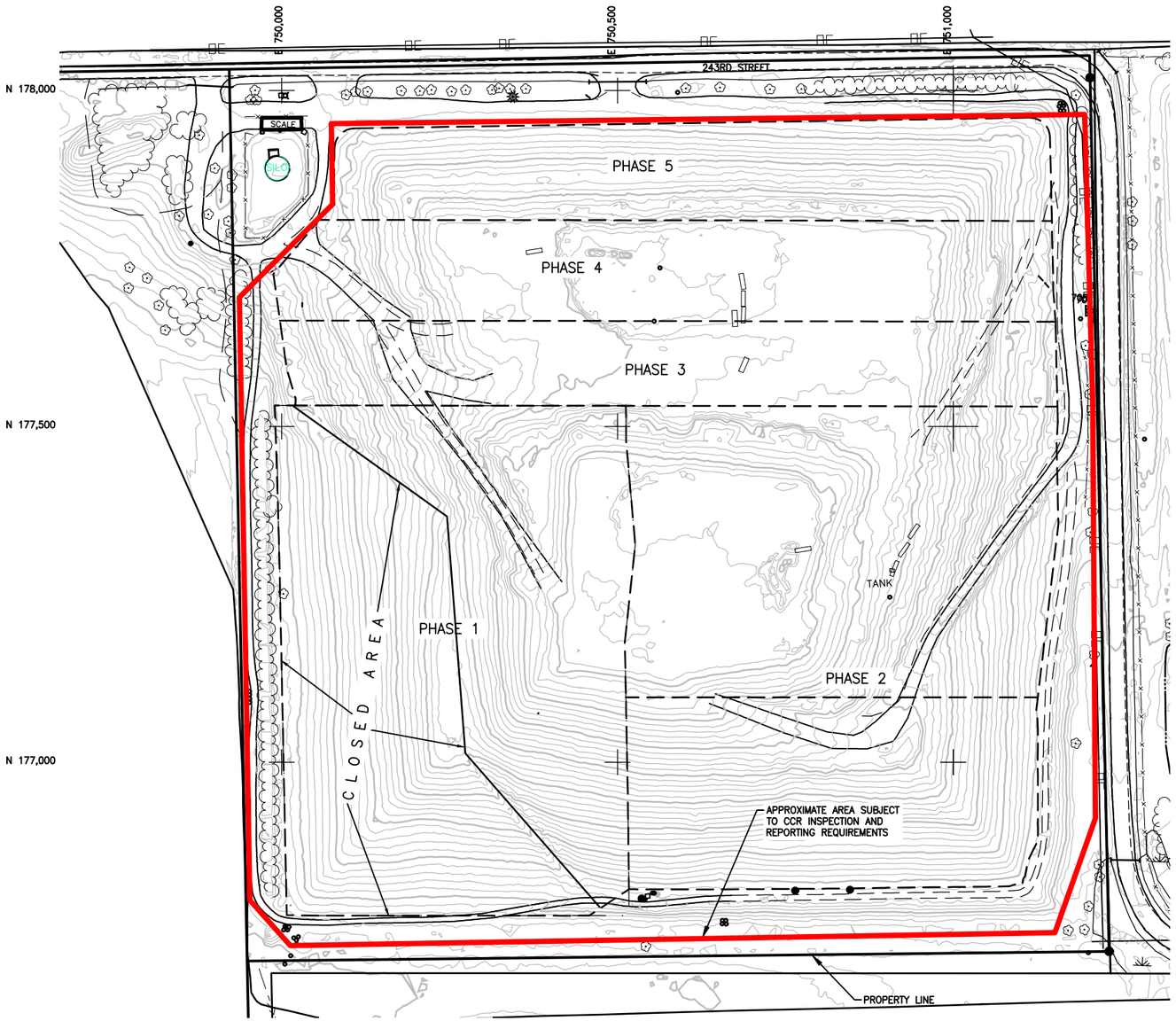
SKB (AUSTIN) ENVIRONMENTAL, LLC
AUSTIN, MINNESOTA

SHEET TITLE
PHOTO LOCATIONS

DWN BY	CHK'D	APP'D	DWG DATE
SKM	TJS	BWS	JAN. 2025

SCALE AS NOTED

PROJECT NO.	SHEET NO.	REV NO.
227704387	FIGURE 1	0



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PROJECT TITLE
2024 CCR INSPECTION REPORT

SKB (AUSTIN) ENVIRONMENTAL, LLC
AUSTIN, MINNESOTA

SHEET TITLE
SITE MAP

DWN BY	CHK'D	APP'D	DWG DATE
SKM	TJS	BWS	JAN. 2025

SCALE AS NOTED

PROJECT NO.	SHEET NO.	REV NO.
227704387	FIGURE 2	0

Location 1 – Looking Southwest, Phase 4 Anchor Trench

Location 2 – Looking Northeast, Phase 4 Anchor Trench

Location 2 – Looking South, Phase 3/1 Western Perimeter

Location 2 – Looking Northeast, Phase 4 West Perimeter

Location 3 – Looking South, Phase 1 Western Perimeter

Location 3 – Looking North, Phase 3 West Perimeter

Location 4 – Looking South, Toe of Phase 1 Western Slope

Location 4 – Looking North, Toe of Phase 1 Western Slope

Location 5 – Looking North, Toe of Phase 1 Western Slope

Location 5 – Looking East, Toe of Phase 1 Southern Slope

Location 6 – Looking West, Toe of Phase 1 Southern Slope

Location 6 – Looking East, Toe of Phase 1 Southern Slope

Location 7 – Looking West, Phase 1 Southern Slope

Location 7 – Looking West, Phase 1/2 Overlay Liner & Southern Slope

Location 7 – Looking East, Phase 2 Southern Slope

Photo 14: Location 7 – Looking East, Phase 2 Southern Berm

Location 8 – Looking West, Phase 2 Southern Perimeter Road and Slope

Location 8 – Looking West, Phase 2 Southern Berm

Location 8 – Looking East, Phase 2 Southern Perimeter Road and Slope

Location 8 – Looking East, Phase 2 Southern Berm

Location 9 – Looking West, Phase 2 Southern Perimeter Road and Slope

Location 9 – Looking West, Phase 2 Southern Berm

Location 9 – Looking North, Phase 2 Eastern Slope

Location 9 – Looking North, Phase Eastern Berm

Location 10 – Looking South, Phase 2 Eastern Perimeter Road & Slope

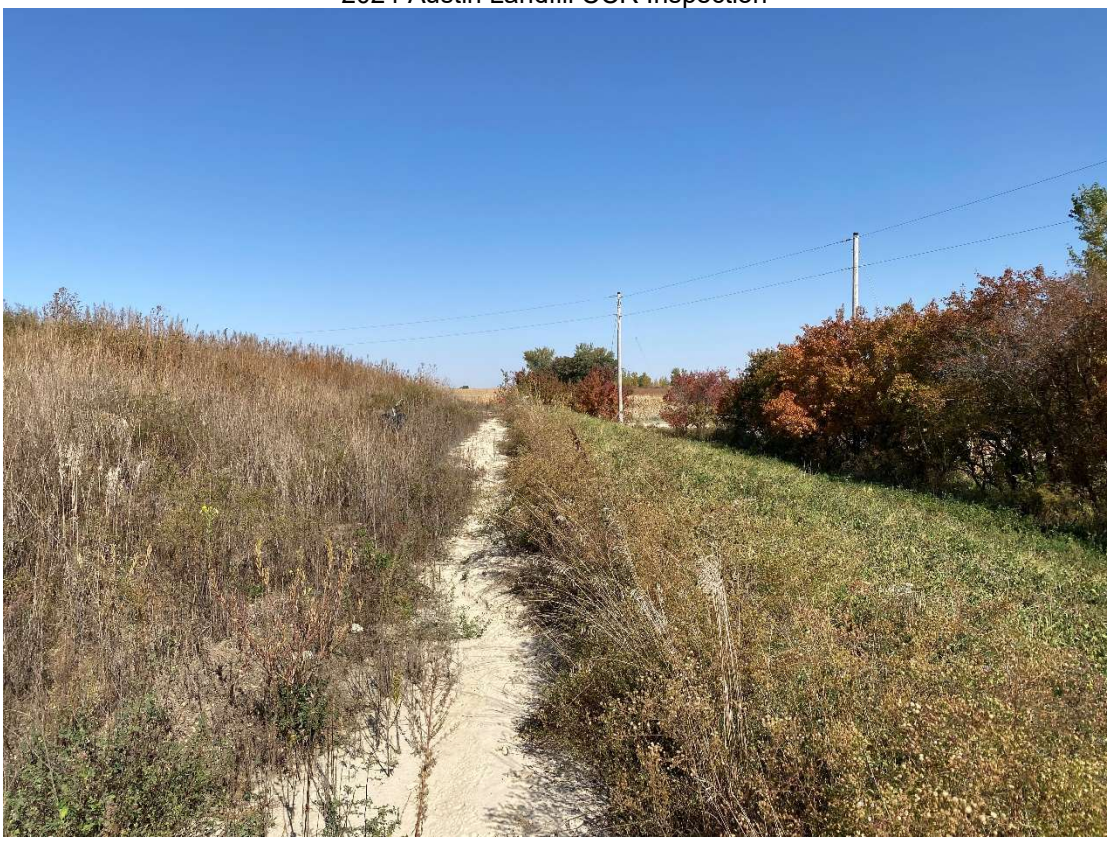
Location 10 – Looking South, Phase 2 Eastern Berm

Location 10 – Looking North, Phase 2 Eastern Perimeter Road & Slope

Location 10 – Looking North, Phase 2 Eastern Berm

Location 11 – Looking North, Eastern Perimeter Road

Location 11 – Looking South, Phase 2 Eastern Slope and Interior Access Road Entrance



Location 12 – Looking North, Phase 4 Eastern Anchor Trench

Location 12 – Looking South, Phase 4 Eastern Anchor Trench

Location 13 – Looking South, Phase 4 Eastern Anchor Trench & Phase 3 Eastern Waste Slope

Location 13 – Looking North, Phase 5 east anchor trench

Location 14 – Looking South, Phase 5 Western Cell Limit

Location 14 – Looking South, Phase 5 Toe of Berm

Location 14 – Looking West, Phase 5 Cell Limit

Location 14 – Looking West, Phase 5 Toe of Berm

Location 15 – Looking East, Phase 5 Toe of Berm

Location 15 – Looking East, Phase 5 Cell Limit

Location 15 – Looking West, Phase 5 Cell Limit

Location 15 – Looking West, Cell 5 Landfill Berm

Location 16 – Looking East, Phase 5 Cell Limit

Location 16 – Looking South, Phase 5 Cell Limit