Technical Memo



To: Geoff Strack, P.E., Waste Connections

From: Brad Sullivan, P.E., Wenck Associates, Inc.

Date: January 9, 2020

Subject: WCI Austin Landfill, LLC

2019 Annual CCR Inspection Report

Wenck Project #B3053-0180

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.

Bradley W Sullivan

January 9, 2020 PE # 56502

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 WCI Austin Landfill, which is a Class III landfill facility that 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.

Landfill cells Phase 1 through 5 are currently permitted. 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. Construction of Phase 4 was completed in 2018 and is immediately north of Phase 3. Currently operations are split between the upper lifts of Phase 2 and 3 and the initial lower lifts of Phase 4. The site began receiving CCR material in June of 2015 and it has all been placed in the various Phases 2 through 4.

See Figure 1 which is a facility site plan.

CCR Landfill Inspection (40 CFR § 257.84)

On November 6, 2019, Mr. Geoff Strack, P.E. of Waste Connections and Mr. Brad Sullivan, P.E., of Wenck and 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
- ▲ Previous periodic structural stability assessments required under § 257.73(d).

Geoff Strack, P.E., Waste Connections

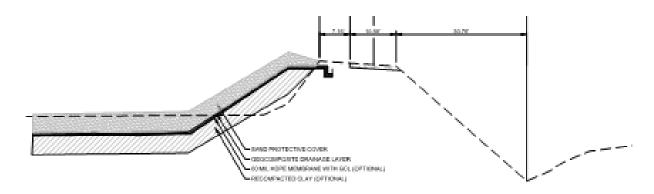
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It should be noted that §257.74 does not apply as the site is not new, nor is it a lateral expansion of an existing impoundment/landfill, therefore this is not addressed.

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.



Typical Landfill Berm Detail

During the inspection, no signs of landfill cell embankment distress, no signs of waste slope instability, or other CCR landfill issues were 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 1 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;

The Phase 4 landfill expansion construction was completed in 2018. The northern limit of the expansion is terminated with "rain flap" with the primary liner running out for future connection. The east and west embankments appeared per the Record Drawings.

There were no apparent changes to the embankment geometry of Cells 1, 2, 3, or 4 when compared to the permit drawings or the past inspection reports. The annual aerial photogrammetry survey was performed on November 12, which the estimated in-place volume is based on. A comparison 2019 and 2018 aerial survey confirm that the embankment and slope topography is substantially unchanged with no significant movement. The 2019 aerial survey is included as Figure 2.

Geoff Strack, P.E., Waste Connections

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

No CCR material was received during between the 2018 and 2019 annual survey. Therefore, the approximate volume of CCR material contained in the landfill at the time of the inspection is 51,900 cubic yards, which is the same volume as presented in the 2018 Annual CCR Inspection Report.

(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 slope; 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 noted that may could potentially affect the stability or operation of the impoundment. Observations were consistent with those noted in that 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 in 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.

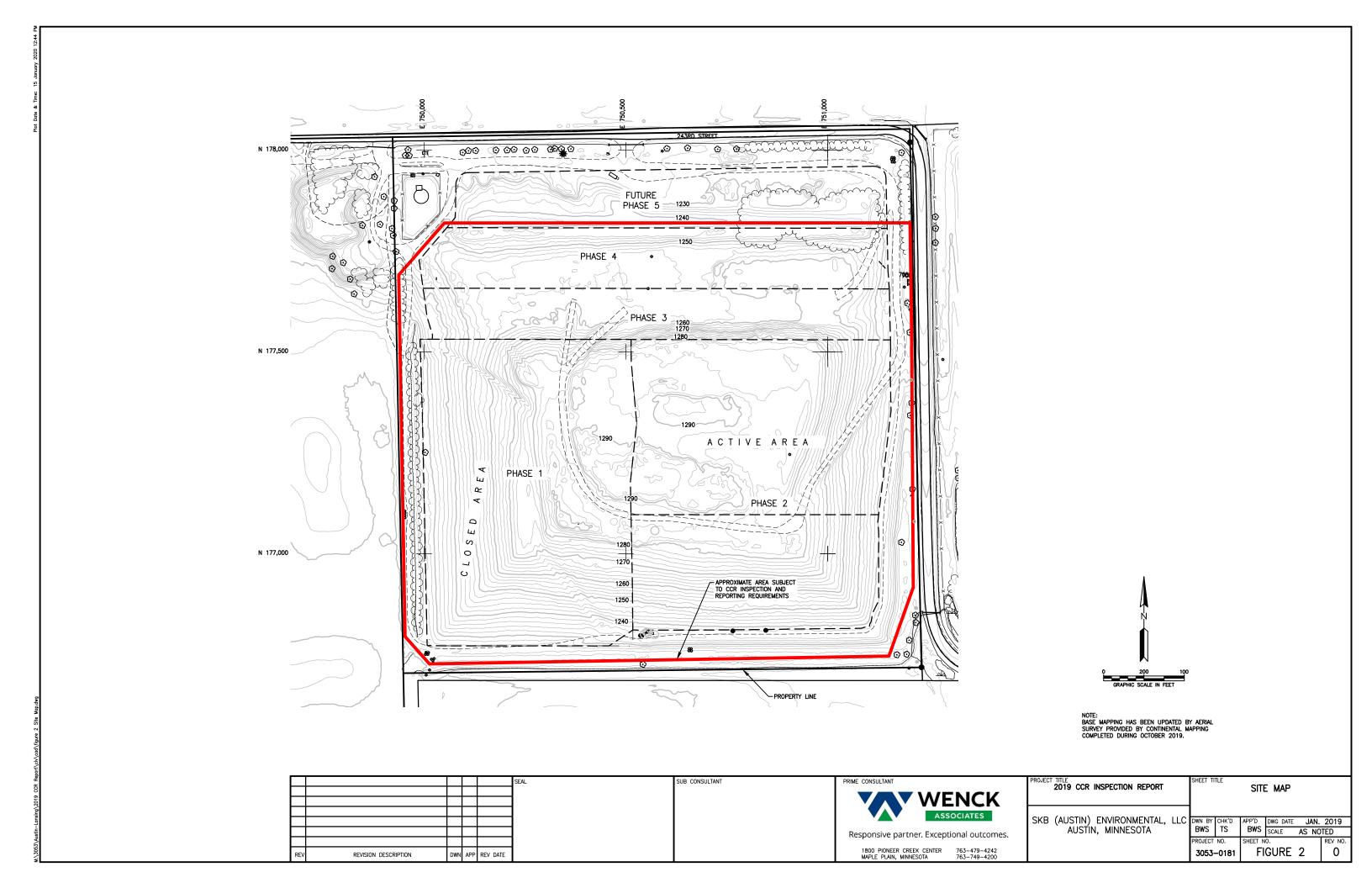




Photo 1: Location 1 – Looking East, Phase 4 Northern Rain Flap



Photo 2: Location 1 – Looking Southeast, New Phase 4 Cell & Phase 3 Waste Slope





Photo 3: Location 1 – Looking Southwest, Phase 4 Anchor Trench



Photo 4: Location 2 – Looking Northeast, Phase 4 Anchor Trench





Photo 5: Location 2 – Looking South, Phase 3/1 Western Perimeter



Photo 6: Location 3 – Looking South, Toe of Phase 1 Western Slope





Photo 7: Location 3 – Looking North, Toe of Phase 1 Western Slope



Photo 8: Location 4 – Looking North, Toe of Phase 1 Western Slope





Photo 9: Location 4 – Looking East, Toe of Phase 1 Southern Slope



Photo 10: Location 5 – Looking West, Toe of Phase 1 Southern Slope





Photo 11: Location 5 – Looking East, Toe of Phase 1 Southern Slope



Photo 12: Location 6 – Looking West, Phase 1 Southern Slope





Photo 13: Location 6 – Looking West, Phase 1/2 Overlay Liner & Southern Slope



Photo 14: Location 6 – Looking East, Phase 2 Southern Slope





Photo 15: Location 6 – Looking East, Phase 2 Southern Berm



Photo 16: Location 7 – Looking West, Phase 2 Southern Perimeter Road and Slope



Photo 17: Location 7 – Looking West, Phase 2 Southern Berm



Photo 18: Location 7 – Looking East, Phase 2 Southern Perimeter Road and Slope





Photo 19: Location 7 – Looking East, Phase 2 Southern Berm

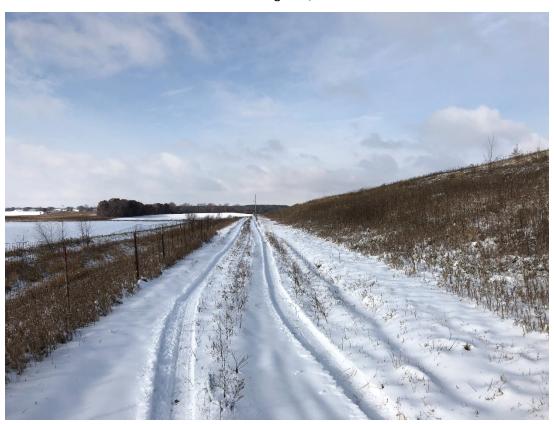


Photo 20: Location 8 – Looking West, Phase 2 Southern Perimeter Road and Slope



Photo 21: Location 8 – Looking West, Phase 2 Southern Berm



Photo 22: Location 8 – Looking North, Phase 2 Eastern Slope





Photo 23: Location 8 – Looking North, Phase Eastern Berm



Photo 24: Location 9 – Looking South, Phase 2 Eastern Perimeter Road & Slope





Photo 25: Location 9 – Looking North, Phase 2 Eastern Perimeter Road & Slope



Photo 26: Location 9 – Looking South, Phase 2 Eastern Berm





Photo 27: Location 9 – Looking North, Phase 2 Eastern Berm



Photo 28: Location 10 – Looking North, Eastern Perimeter Road





Photo 29: Location 10 – Looking South, Phase 2 Eastern Slope and Interior Access Road Entrance



Photo 30: Location 11 – Looking West, Phase 3/4 Connection, Phase 3 Norther Interior Waste Slope



Photo 31: Location 11 – Looking North, Phase 4 Eastern Anchor Trench



Photo 32: Location 12 – Looking South, Phase 4 Eastern Anchor Trench & Phase 3 Eastern Waste Slope



Photo 33: Location 12 – Looking West, Phase 4 Northern Rain Flap



Photo 34: Location 13 – Looking East, Phase 4 Northern Rain Flap





Photo 35: Location 13 – Looking West, Phase 4 Northern Rain Flap