

Technical Memo



Responsive partner.
Exceptional outcomes.

To: Geoff Strack, SKB Environmental
From: Dave Parenteau, PE (MN), Wenck Associates, Inc.
Date: January 11, 2018
Subject: Annual Inspection SKB Rosemount Industrial Waste Facility- Fugitive Dust Plan
2018 Annual Report
Wenck Project # B3053-106

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 § 257.84 Inspection Requirements for CCR Surface Landfills, Part b, regarding annual inspection by a qualified professional engineer.

Background and Applicability

SKB Environmental, Inc. owns and operates the SKB Rosemount Industrial Waste Facility, an industrial waste disposal facility operating under MPCA Solid Waste Permit SW-383, originally issued in January of 1992.

The site is located on a 236 acre parcel in Sections 19, 20 and 25 of Township 115 North, Range 18 West, in the city of Rosemount Minnesota, which is in Dakota County. The site is located between Minnesota State Highway 55 and Dakota County Road 38. The attached Figure 1 presents an overview of the site.

There are 6 permitted disposal cells in the Landfill. Past operating records indicate that CCR Material is contained in Cells 1, 2 and 3.

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 13, 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 Environmental, Inc received no citizen complaints in 2017.

Notification Requirements

SKB Environmental, Inc 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.