

Technical Memo



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To: Geoff Strack, P.E., SKB Environmental
From: Brad Sullivan, P.E., Wenck Associates, Inc.
Date: January 11, 2019
Subject: SKB Rosemount Industrial Waste Facility
2018 Annual CCR Fugitive Dust Control Report
Wenck Project # B3053-106

Purpose

This memorandum fulfills the requirements of 40 CFR § 257.80(c) Annual CCR Fugitive Dust Control Report. The annual 2018 CCR site inspection was performed by Geoff Strack, P.E. from Waste Connections and Brad Sullivan, P.E. from Wenck, on November 6, 2018, which included the review of the CCR fugitive dust operations pursuant to the above referenced Rule.

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 (aka Courthouse Boulevard) and Dakota County Road 38, and is accessed via 13425 Courthouse Boulevard, Rosemount, MN 55068.

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

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 2018 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 November 6, 2018, inspection, the above described operational practices were being employed and there was no noticeable fugitive dust.

Citizen Complaint Log

No citizen complaints regarding CCR fugitive dust were received by the Facility in 2018.

Notification Requirements

Per § 257.80(d), the SKB Rosemount Industrial Waste Facility 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 the 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.