

June 13, 2022

Mr. Mick Leat
Land Quality Bureau
Iowa Department of Natural Resources
502 East 9th Street
Des Moines, Iowa 50319-0034



**RE: Response to June 6, 2022 Comment Letter (Doc #103331)
South Central Iowa Landfill Agency (SCILA) 61-SDP-1-78P**

Dear Mr. Leat:

I am writing in response to the June 6, 2022 IDNR comment letter (Doc # 103331) pertaining to the 2021 Annual Water Quality Report and the Alternate Source Demonstration (ASD) at MW-28. My responses are presented in the same numbered format as the referenced letter.

1. Tile 1 and Tile 2 are designated as Attenuation Zone Point of Compliance (AZPOC) monitoring points utilized to gauge the effectiveness of the Monitored Natural Attenuation (MNA) and landfill gas venting remedy installed to address cobalt, cis-1,2-dichloroethene, and vinyl chloride impacts at MW-9AR.

Monitoring points Tile 1 and Tile 2 are considered to be active points of compliance for groundwater in the approved Hydrologic Monitoring System Plan (HMSP). There are no 95% Lower Confidence Limits (LCL) at Tile 1 that exceed a Groundwater Protection Standard (GWPS). Only the vinyl chloride 95% LCL at Tile 2 exceeds the GWPS.

It is also acknowledged that Tile 1 and Tile 2 are the discharge points from an active groundwater collection and cut-off trench installed in order to control and diminish the attenuation zone along the west side of the site near MW-9AR.

Monitoring points Tile 1 and Tile 2 will both be included in the corrective action monitoring system (regardless of water quality findings) based on the fact that the discharges from Tile 1 and Tile 2 are from an active corrective action that is in place at the site (groundwater cut-off tiles).

Table 1 and the report text will be corrected to establish that Tile 1 and Tile 2 are in the corrective action monitoring system.

It is agreed that no new Assessment of Corrective Measures (ACM) Report and no amendment(s) to the Corrective Action Plan are warranted. The Passive Engineered Conveyance System (PECS) is an effective and complete VOC treatment for the discharges from Tile 1 and Tile 2. Vinyl chloride concentrations at Tile 1 and Tile 2 indicate a downward trend. It indeed seems appropriate to continue to statistically assess water quality data from Tile 1 and Tile 2 for remedy completion in accordance with IAC 567, Chapter 113.10(9)"e".

2. *The ASD will be reconfirmed annually based on field measured indicators (ORP, dissolved oxygen, etc).*
3. No comment.
4. No comment.



Please feel free to contact our office at (515) 733-4144 with any questions you may have.

Sincerely,

HLW Engineering Group



Todd Whipple, CPG
Project Manager

cc: Marcia Beeler, Manager