



August 8, 2022

BILL SLOOP
SOUTHEAST IOWA MULTI-COUNTY SOLID WASTE AGENCY
29997 HIGHWAY 78
RICHLAND IA 52585

RE: Southeast Iowa Multi-County Sanitary Landfill
Permit No. 54-SDP-01-75P
2021 Annual Water Quality Report (AWQR, doc #102455)

Dear Mr. Sloop:

The Iowa Department of Natural Resources (DNR) has reviewed the 2021 AWQR, dated February 28, 2022, as submitted on your behalf by Evora Consulting. Our comments are presented below.

1. Please include in future reports the former point-of-compliance well MW-24 data on Table 10 – Historical SSI and SSL. DNR understands that the associated SSIs and SSLs from this point were no longer considered as such upon approval of the Corrective Action Monitoring Program. In addition, only SSIs and/or SSLs that have been confirmed by retesting need to be shown on this table.
2. DNR approved data from downgradient well MW-28 to be used to augment the background dataset in 2010 because the background dataset was relatively small at that time and not representative of natural variability in the till aquifer, and MW-28 was unlikely impacted due to the recent construction of the Phase 2 cell.

Now, the background dataset is sufficiently large, natural variability concerns may be served by sampling existing background wells that are not downgradient compliance wells, and sufficient time has passed where impacts from the Phase 2 cell could theoretically have reached MW-28. Therefore, we prefer that this well be strictly used as a downgradient compliance point going forward, but existing data from this well should remain in the background dataset. We would appreciate your commentary on this.

3. Please continue groundwater monitoring in accordance with the permit and DNR guidance.
4. **Leachate Control System Performance Reevaluation Report.** Please continue operation of the leachate collection system in accordance with the rules and permit.

5. **Gas Monitoring Report.** Please define the northern extent of the methane exceedance measured at MW-32 (gas monitoring point #22), as LFGW-E1 and LFGW-E2 do not appear to fully bracket that exceedance.

If you have any questions please contact me at mick.lead@dnr.iowa.gov or (515) 689-6548.

Sincerely,

Michael B. "Mick" Lead
Land Quality Bureau

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