



March 15, 2023

VIRGINIA ANDERSON
ANDERSON EXCAVATING
2520 KANESVILLE BOULEVARD
COUNCIL BLUFFS IA 51503

**Re: Anderson Excavating C&D Landfill
Permit #78-SDP-04-89
Annual Water Quality Report (AWQR, [doc #104667](#))**

Dear Ms. Anderson:

The Iowa Department of Natural Resources (DNR) has completed review of the 2022 AWQR, dated November 23, 2022, as submitted on your behalf by Evora Consulting. Our comments on the submittal are presented in the following paragraphs.

1. Historic high chemical oxygen demand and total organic halogens concentrations, above the calculated background control limits, were measured in downgradient well MW-12 in 2022. Increasing contaminant concentration trends exist for 60% of the monitored constituents at that well, and for total organic halogens at MW-13, with the increasing contaminant concentrations initially appearing in recent sampling events. These data indicate that a contaminant release to groundwater is occurring at the site.
2. During our review of the 2022 Leachate Collection System Performance Evaluation, DNR identified several rule violations and proceeded to issue a Notice of Violation (NOV) to the permit holder on March 8, 2023 ([doc #106031](#)).
3. It is the DNR's current position that the groundwater contamination noted in comment #1 above is likely due or exacerbated by the violations described in the March 8 NOV ([doc #106031](#)). Therefore, the DNR's position that the most successful response to the groundwater contamination would be performing the required maintenance and repairs to the leachate collection system and final cover as described in that letter. However, if the permit holder does not perform these maintenance and repairs, the DNR is prepared to require the permit holder to prepare and implement a groundwater quality assessment plan in accordance with rule 567 IAC 114.26(9), and carry out any remedial action or mitigation activities as needed.

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

Virginia Anderson
Anderson Excavating C&D Landfill

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Sincerely,

Michael B. "Mick" Leat
Land Quality Bureau

cc: Benjamin Madson
Evora Consulting
1801 Industrial Circle
West Des Moines, Iowa 50265

Iowa DNR Field Office #4