February 8, 2024

Mr. Brian Rath, P.E., Environmental Engineer Senior IDNR – Land Quality Bureau Wallace State Office Building 502 East 9th Street Des Moines, Iowa 50319-0034



RE: Well Fate & Well Plugging Method Request Chickasaw County Sanitary Landfill Permit # 19-SDP-01-72C

Mr. Rath:

As required by Iowa Administrative Code (IAC) 567, Chapter 39 and Chapter 135, the following monitoring wells associated with the referenced facility will be plugged and abandoned upon completion of the Environmental Covenant process; MW-1, MW-2, MW-3, MW-4; MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, PZ-2, PZ-3, PZ-4, PZ-5, PZ-6, PZ-7, PZ-9, and PZ-10. A map is attached for reference.

Proposed Well Plugging Method (All wells Except PZ-4)

The referenced monitoring wells are located outside of the landfill development footprint and there are no future landfill development areas that remain. Since the wells planned for plugging are situated outside the landfill liner footprint, we propose that the wells be plugged by placing a tremie tube to the bottom of the well casing and that high-solids bentonite grout slurry be pumped to the bottom of the well. This will force the bentonite grout slurry to fill the well screen and well casing from the bottom upwards and will force all water from the casing during grouting.

The proposed method does not involve over-drilling the well and does not conform to Iowa Administrative Code (IAC) 567, Chapter 113.10(2)"d"(2), which is interpreted to no longer apply to the site. However, the proposed well plugging method does conform to IAC 567, Chapter 39.8(3) (attached). The primary difference between the proposed IAC 567-39.8(3) well plugging method and the IAC 567-113.10(2)"d"(2) method is that the PVC well casing and screen would remain in place under IAC 567-39.8(3).

Proposed Well Plugging Method (PZ-4)

PZ-4 appears to be located within the landfill footprint. We proposed that PZ-4 be plugged and abandoned in accordance with Iowa Administrative Code (IAC) 567, Chapter 113.10(2)"d"(2), which requires over-drilling and removal of the well casing and well materials.

Applies to All Wells

The well plugging will be performed by a well driller certified under IAC 567, Chapter 82 (as required by both IAC 567-113 and IAC 567-39).

All well heads will be removed to 4 feet below grade. The ground surface will then be repaired and graded to drain away from the former well head. The IDNR Form 542-1226 will be submitted upon completion, as required by rule.

Please consider whether the proposed well plugging methods are acceptable to the Department. We would like to plug the wells upon filing of the Environmental Covenant and rescission of the Permit (presumably in 2024). Feel free to contact our office at (515)733-4144 with any questions that you may have.

Sincerely,

HLW Engineering Group

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Todd Whipple, CPG Project Manager

cc: Chad Humpal, Director, Chickasaw County Conservation Board

