



April 2, 2024

TIM MEEKER
BREMER COUNTY SANITARY LANDFILL
2049 200TH STREET
WAVERLY IA 50677

RE: Bremer County Sanitary Landfill
Permit No. 9-SDP-1-75C
2023 Annual Water Quality Report ([Document No. 108993](#))
Response to IDNR Comments in Doc #10761 ([Document No. 108992](#))

Dear Mr. Meeker:

The Iowa Department of Natural Resources (DNR) has reviewed the 2023 Annual Water Quality Report, dated January 19, 2024, and the Response to IDNR Comments in Doc #10761, dated January 18, 2024, both as submitted by HLW Engineering Group (HLW). Our comments are below.

Annual Water Quality Report

1. Report Priority Items

- a. No priority items were requested in the report. However, it was noted that “modification to the HMSP will be forwarded under separate cover” (i.e. HLW’s Response to IDNR Comments in Doc #10761).

2. Groundwater Monitoring

- a. MW-108A and MW-110A are in corrective action. No trends are noted at MW-108A for arsenic, an increasing trend for arsenic and a decreasing trend for cobalt were noted at MW-110A. However, Attenuation Zone Point of Compliance wells MW-3 and MW-4 do not indicate the progression of groundwater impact and thus natural attenuation of the compounds of concern appears to be occurring.

3. Methane Monitoring

- a. Please continue to provide static water level measurements and whether or not the screen is submerged for each gas probe.
- b. Please continue to monitor and report in accordance with the permit, approved documents, and this correspondence.

Response to IDNR Comments

1. Water Sampling

- a. Considering the above-noted groundwater conditions, the DNR concurs with the proposed annual sampling in alternating seasons for all wells in the current HMSP. This includes the background wells as well as the AZPOC wells since the applicable rules do not allow a waiver from less frequent sampling than annual, and sampling of AZPOC wells must continue as part of the ongoing corrective action.

2. Gas Monitoring

- a. Considering the historical data for the gas monitoring, the DNR concurs with reducing the monitoring frequency to annual.

3. Engineer's Inspections with Report

- a. Last spring, the DNR's field office noted considerable improvement in the landfill cap condition compared to previous inspections. Considering this the DNR concurs with reducing the engineer's inspection and reporting frequency to annual.

4. Water Quality Reporting

- a. Please submit an annual comprehensive report that includes groundwater monitoring and analysis, gas monitoring results, and the engineer's annual inspection on or before the end of January.

5. Other

- a. A permit amendment to change the frequencies noted above will be issued under separate cover.

If you have any questions, please contact me at [\(515\) 537-4051](tel:5155374051) or brian.rath@dnr.iowa.gov.

Sincerely,

Brian L. Rath, P.E.
Environmental Engineer Senior
Land Quality Bureau

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Ken Kammeyer, Chairman
Bremer County Board of Supervisors

DNR Field Office #1 – Manchester