



April 4, 2024

DIANE YODER
REIC/IOWA COUNTY LANDFILL
3369 HWY 6 TRAIL
HOMESTEAD IA 52236

**RE: Iowa County Sanitary Landfill
Permit No. 48-SDP-02-79P
2023 Annual Water Quality Report ([Document No. 109007](#))**

Dear Ms. Yoder:

The Iowa Department of Natural Resources (DNR) has reviewed the 2023 Annual Water Quality Report (AWQR), dated January 30, 2024, as submitted on your behalf by HLW Engineering Group. The Iowa Department of Natural Resources (DNR) has the following comments:

Report Priority

The permit holder has not requested a priority DNR review of this report.

Sampling Summary

1. Monitoring is ongoing for background monitoring points MW-11, MW-13, MW-27, MW-28 and MW-29 (historic data from 2019 and prior).
2. Monitoring is ongoing for detection monitoring points MW-7, MW-15, MW-16, MW-18, MW20-2, MW20-6, MW22-2, MW-23, MW-29D, MW-38, MW-39, MW-40; leachate lagoon monitoring point MW-41; MW-42 (replaced MW-7) and groundwater underdrain monitoring points GU-2, GU-4, and GU-5.
3. The approved request to build Phase B-1 Expansion, dated August 10, 2023, included a statement that a new monitoring well, MW-43, will be installed east of the Phase B-1 Expansion area prior to waste disposal in Phase B-1. Also, the request stated that the to-be-constructed underdrain in Phase B-1 (GU-6) will be added to the HMSP. Table 2 in the AWQR does not include MW-43 and GU-6 in the schedule for monitoring in calendar year 2024. Please ensure these are added to the monitoring schedule following completion of construction.
4. MW-23, MW-41, and MW-42 are in assessment monitoring. The permit holder, in Permit Amendment No. 3, dated February 25, 2013, is allowed to use a five-year frequency for full Appendix II analysis at monitoring points that are in assessment monitoring and have had at least two (2) rounds of analysis using the entire Appendix II list. If monitoring points exit assessment monitoring and later return to assessment monitoring an additional two (2) rounds of analysis using the entire Appendix II list is required. The dates of the last two full Appendix II sampling events are provided in the table below.

Appendix II Sampling History:

Monitoring Point	Dates of Last Two Full Appendix II Sampling Events
MW-23	First Sample 06/22/17, Second Sample 6/8/22
MW-41	First Sample 6/8/22, Second Sample 6/6/23
MW-42	First Sample 6/6/23, Second Sample Scheduled for 6/24

5. The DNR comment letter, dated February 27, 2023 stated that “damage was noted for Groundwater Underdrain GU-5 during the June 2022 sampling event and again in the November sampling event. Provide a schedule for repair **by April 24, 2023.**” A schedule was provided in a letter from HLW Engineering Group, dated March 2, 2023. However, the 2023 AWQR reports that the underdrain still requires repair. Please clarify, **on or before June 1, 2024.**

Monitoring Well Maintenance and Performance Reevaluation

No comments.

Data Evaluation Recommendations and Proposed Schedule

The recommendations in the AWQR are approved.

Leachate Control System Performance Evaluation Report

No comments.

Gas Monitoring Report

With the addition of the Phase B-1 cell, the gas monitoring plan will need updated to include areas north and west of the Phase B-1 area. Please provide an action plan, including a schedule for implementation, for the installation of additional monitoring probe(s), if any, **on or before June 1, 2024.**

If you have any questions or comments, please contact me at (515) 229-8356 or email mike.smith@dnr.iowa.gov.

Sincerely,

Michael W. Smith, P.E.
Environmental Engineer Senior

cc: Todd Whipple, CPG
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