



April 18, 2024

MICHAEL MCCOY  
METRO WASTE AUTHORITY  
METRO PARK EAST LANDFILL  
12181 12TH AVENUE NE  
MITCHELLVILLE IA 50169-9802

**Re: Metro Park West Landfill  
Boone and Greene County Municipal Solid Waste Landfill Units  
Permit #08-SDP-03-84  
2023 Annual Water Quality Report, Leachate Control System Performance Evaluation Report,  
and Landfill Gas Report ([Document No. 109105](#))**

Dear Mr. McCoy:

The Iowa Department of Natural Resources (DNR) reviewed the 2023 Annual Water Quality Report, Leachate Control System Performance Evaluation Report, and Landfill Gas Report, dated January 31, 2024, as submitted by HDR. The DNR has the following comments:

**Report Priority**

No request was made.

**Sampling Summary**

Hydrologic monitoring at the site shall be conducted in accordance with the Hydrologic Monitoring System Plan in Appendix 4 of the 2021 Permit Renewal Application, dated June 14, 2021, and the Proposed Monitoring Network Updates, dated October 18, 2022, both as submitted by HDR. The DNR has the following comments:

1. Background monitoring points are MW-5AR (Boone County MSWLF Unit), and MW-6A and MW-28 (Greene County MSWLF Unit).
2. Detection monitoring points are MW-1, MW-2AR, MW-9B, MW-12, MW-17, MW-18 and MW-26. In addition, the permit requires monitoring of the Raccoon River twice per year for arsenic.
3. Monitoring well MW-6A has historically had "J-flagged" detections of volatile organic compounds and the DNR comment letter dated February 13, 2023 ([Document No. 105838](#)), recommended checking for the presence of methane in the well and if present consider installing another background well. HDR responded in a letter dated March 1, 2023 ([Document No. 105984](#)), that MWA will conduct methane monitoring at monitoring well MW-6A during the quarterly methane monitoring events in 2023." However, the results were not included in the report. Please provide the results.

4. Clarify the location of sampling point MPWRAC0004 as the table in Appendix H indicates "STAKED" and "LOST GPS."

**Monitoring Well Maintenance and Performance Reevaluation**

No comments.

**Leachate Control System Performance Evaluation Report**

Table 12 Leachate Management Summary indicates that leachate head data was not collected during portions of the year. Further, it was noted that leachate recirculation occurred in August, September, and October 2023. This appears to not comply with permit special provision X.5.h. and the Iowa Administrative Code [567 113.7\(5\)b.\(3&14\)](#). Please provide the results or a schedule to resume leachate head monitoring. Meanwhile, recirculation is not allowed until this issue is resolved.

**Landfill Gas Annual Report**

No comments.

Please respond as noted above **on or before May 18, 2024**. If you have any questions, please contact me at [\(515\) 229-8356](tel:5152298356) or [mike.smith@dnr.iowa.gov](mailto:mike.smith@dnr.iowa.gov).

Sincerely,

Michael W. Smith, P.E.  
Environmental Engineer Senior  
Land Quality Bureau

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