

May 9, 2024

Mr. Geoffrey Spain
Environmental Engineer
IDNR – Land Quality Bureau
Wallace State Office Building
502 E. 9th Street
Des Moines, Iowa 50319



**RE: Response to the April 30, 2024 IDNR Letter (Doc #109981)
Page County Sanitary Landfill
IDNR Permit No. 73-SDP-01-75P**

Dear Mr. Spain:

IDNR has reviewed the 2023 Annual Water Quality Report (AWQR) (Doc #108894) and issued the April 30, 2024 Comment Letter (Doc #109981).

In Leachate Evaluation Report section of the April 30, 2024 IDNR Letter (Doc #109981) it states “ The DNR is open to considering reduced monitoring for the leachate piezometers in the unlined and non-subtitle D areas per the request in the AWQR”.

This information is therefore submitted in support of cessation of monitoring of leachate levels in the unlined and non-subtitle D areas.

Landfill Layout

The term “Original Landfill” is based on the terms used when the Landfill was conceptually laid-out during the original development of the site. This includes all landfill areas bounded by the green boundary on the attached figure.

Over time, this term “Original Landfill” has also been loosely applied to those portions of the site that are unlined and non-subtitle D compliant areas.

In this document, the terms “Unlined and Non-Subtitle D Areas” and Subtitle D Areas will be utilized to differentiate between the different portions of the site. A map is attached to help illustrate the referenced areas.

Unlined and Non-Subtitle D Areas

Piezometers that continue to be functional and are monitored semi-annually are LPZ-1, LPZ-24, LPZ-25, LPZ-29, LPZ-33, and LPZ-36. Note that LPZ-21 was destroyed over the course of time and that LPZ-38 has been removed during the current landfill expansion project along the west side of the Unlined and Non-Subtitle D Areas in the Phase W-1 Cell.

The reported level measurements in the piezometers monitoring the unlined and non-Subtitle D areas have stabilized and do not vary significantly over the course of the year. The retrofitted leachate collection system is functioning satisfactorily.

With completion of the RCRA Subtitle D landfill areas abutting to the west of the Unlined and Non-Subtitle D Areas, even more control of the leachate surface will be gained upon development of the West Expansion Area.

Based on the improving site conditions and the current expansion of the leachate collection system, it is requested that IDNR now approve cessation of leachate level monitoring in the piezometers located in the unlined and non-subtitle D areas and allow the abandonment of the same (LPZ-1, LPZ-24, LPZ-25, LPZ-29, LPZ-33, and LPZ-36).

Subtitle D Landfill Areas

LPZ-39 and LPZ-41 serve to monitor the leachate head on the lined Subtitle D cells in the east portions of the site.

The 2023 level measurements in LPZ-39 indicate minimal liquid thickness (normally less than 6 inches). The measurements in LPZ-41 also indicate a leachate thickness of less than 6 inches. Measurements did not exceed one foot of leachate thickness over the liner. The Subtitle D leachate systems are functioning and maintaining the leachate head below one foot.

Upon completion of construction of the Phase W-1 Expansion Area (2024), an additional leachate head monitoring point will exist and will supplement available leachate head data for the site.

No changes in the frequency of leachate head monitoring are requested in the lined Subtitle D Areas.

Recommendations

The cessation of leachate level monitoring in the piezometers located in the unlined and non-subtitle D areas is supported by site information. We request approval to remove LPZ-1, LPZ-24, LPZ-25, LPZ-29, LPZ-33, and LPZ-36.

We recommend the on-going monitoring of leachate head data in LPZ-39 and LPZ-41 (in the RCRA Subtitle D Landfill) in addition to the future leachate piezometer in RCRA Subtitle D Phase W-1 Expansion Cell downgradient and adjacent to the unlined and non-subtitle D areas.

Thank you in advance for your review of this request. Please let me know if you have any questions or require any additional information.

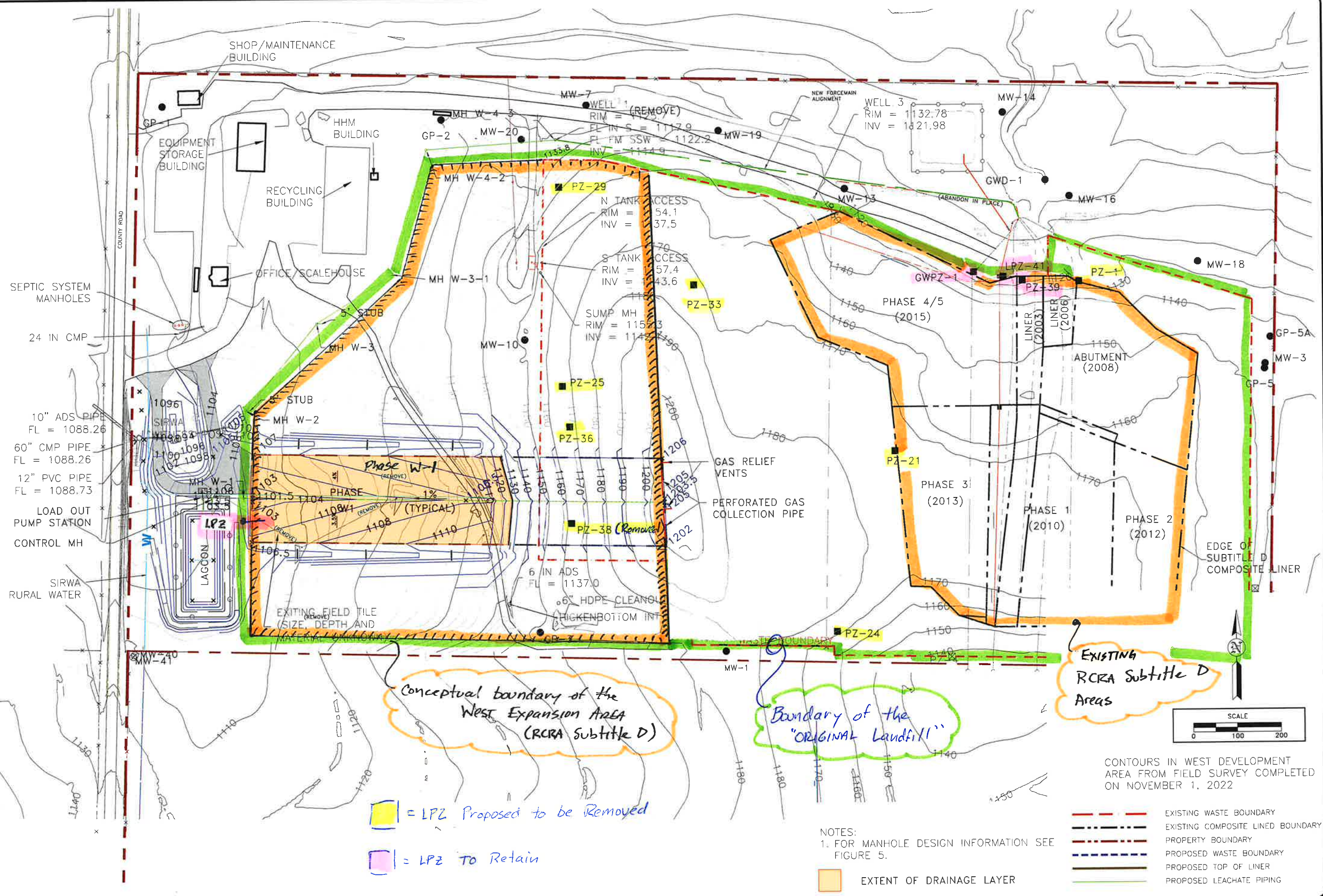
Respectfully Submitted,
HLW Engineering Group



Todd Whipple, CPG.
Project Manager

cc: Brian Ward, Manager, Page County SLF (electronic copy)

HLW Engineering Group, 204 West Broad Street, P.O. Box 314, Story City, Iowa 50248
(515) 733-4144  **(515) 733-4146 Fax**



REVISION	NO.	DATE
DRAWN	JGH	PROJECT NO. 6047-22A
		DATE 4/25/23

FIGURE: 3

OVERALL SITE PLAN

PHASE W-1 EXPANSION

PAGE COUNTY SANITARY LANDFILL
PAGE COUNTY, IOWA

HLW Engineering Group
204 West Broad Street, P.O. Box 314
Story City, Iowa 50248
Phone: (515) 733-4144
FAX: (515) 733-4146

