



May 17, 2024

Mr. Michael Smith
Land Quality Bureau
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319

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

Dear Mr. Smith,

On behalf of Metro Waste Authority (MWA), HDR Engineering, Inc. (HDR) has prepared this letter to respond to the Iowa Department of Natural Resources (IDNR) comments (provided to MWA in the letter dated April 18, 2024), pertaining to the 2023 Annual Water Quality Report (AWQR) for the Metro Park West (MPW) Boone County and Greene County municipal solid waste landfill (MSWLF) units. This response acknowledges comments listed in IDNR's letter and provides responses on behalf of MWA. Please see the responses in bold to the comments in italics as follows:

Sampling Summary

- 1. 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.*

Response: Based on a review of available correspondence and discussions with personnel, the task of monitoring methane concentrations in monitoring well MW-6A was inadvertently not relayed to personnel conducting the field monitoring services. Methane concentrations were not measured in the headspace at monitoring well MW-6A on a quarterly basis following the March 1, 2023, response letter.

This task has been corrected and monitoring of methane concentrations will be conducted on a quarterly basis at monitoring well MW-6A in conjunction with the methane monitoring at the other permit required locations. Field documentation has been updated to note that MW-6A needs to be monitored for methane. Field staff conducting the monitoring have been informed to collect the measurements during quarterly events.

On April 24, 2024, MWA personnel conducted methane monitoring at monitoring well MW-6A during the second quarter 2024 methane monitoring event. This was the initial measurement of percent methane by volume recorded at monitoring well MW-6A. The percent methane by volume recorded at monitoring well MW-6A during the April 24th monitoring event was 0%.



2. Clarify the location of sampling point MPWRAC0004 as the table in Appendix H indicates “STAKED” and “LOST GPS.”

Response: MWA personnel have recorded the location of the Raccoon River sampling point MPWRAC0004. Coordinates have been updated in the Raccoon River database and will be included in future correspondence. The coordinates of the MPWRAC0004 sampling location are the following.

Sampling Point ID	Latitude	Longitude	Northing ¹	Easting ¹
MPWRAC0004	41°51'40.0"N	94°09'54.9"W	678781.57	1459195.13

¹State Plane zone number 1402 (Iowa South). Coordinate measurements in US Survey Feet.

Leachate Control System Performance Evaluation Report

3. 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.

Response: MWA personnel are in the process of fixing their SCADA system at MPW. MWA is working with EPG Companies, Inc. to get their SCADA system back online at MPW and add improvements to the system such as a cloud-based, remote monitoring system which will allow for instantaneous leachate level measurements. These improvements will allow MWA to respond and resolve issues more quickly than the current monthly, manual measurements.

As noted in the 2023 Leachate Control System Performance Evaluation Report (LCSPER), leachate levels had to be measured manually once the telemetry system was no longer operational. Monitoring locations L-3 and LHR-B, located in Cell B of the Boone County MSWLF unit, were unable to be manually measured with an electronic water level indicator since these monitoring locations are in side slope risers. Upon review of the equipment design, MWA personnel were able to manually measure amperages from the pressure transducers located in the L-3 and LHR-B side slope risers. The amperages can be converted to liquid level measurements based on conversion factors for each transducer. This process for monthly, manual recording of measurements at L-3 and LHR-B has been incorporated into site staff’s workflow and will be consistently conducted. Monthly leachate level measurements at side slope risers L-3 and LHR-B will be recorded via this approach until the SCADA system is operational and telemetry is reestablished for these locations.

Since leachate head elevations can be manually monitored at L-3 and LHR-B, recirculation, if needed, will be conducted in Boone County Cell’s B, C, and D. In accordance with permit special provision X.5.h, recirculation will cease if one foot of leachate head is recorded accumulating on the landfill unit’s liner. Recirculation will not initiate again until leachate head levels on the landfill unit’s liner are below the one foot threshold based on the L-3 and LHR-B monitoring point measurements.



This response is provided as an electronic copy. Hard copies will be furnished to IDNR upon request. If there are any questions regarding this submittal, please do not hesitate to contact Richard Wilson at (402) 392-6714.

Sincerely,
HDR Engineering, Inc.

A handwritten signature in black ink, appearing to read 'Richard Wilson'.

Richard Wilson
Environmental Project Manager (Solid Waste)

A handwritten signature in blue ink, appearing to read 'Dan Bacehowski'.

Dan Bacehowski
Environmental Practice Lead (Solid Waste)

cc: Mr. Andrew Phillips, Metro Waste Authority
Mr. Matt Morris, Metro Waste Authority
Mr. Brian Wambold, Metro Waste Authority