

June 20, 2024
File No. 27224173.01

Mr. Mick Leat
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue
Des Moines, IA 50312

**Re: Response to DNR Comments – Annual Water Quality Report (AWQR, Doc #108351),
Leachate Control Plan Status Report (LCS Status Report, Doc #108441), Spring
2024 Semi-Annual Engineering Report (SAER, Doc #109956)
Anderson Excavating C&D Landfill
Permit #78-SDP-04-89**

Dear Mr. Leat:

SCS Engineers, on behalf of Anderson Excavating, is submitting this letter response to the May 13, 2024 Water Quality Review Letter (Doc #110039). The comments below are in response to the November 30, 2023 Annual Water Quality Report (Doc # 108351), the December 13, 2023 Leachate Control Plan Status Report (Doc # 108441), and the April 30, 2024 Spring 2024 Semi-Annual Engineering Report (Doc # 109956) for the Anderson Excavating C&D Landfill, permit number 78-SDP-04-89.

“Please explain the fluctuations in leachate tank volumes reported on Table F1, and in particular, why volumes decreased multiple times in 2023 (and previous years) despite no leachate being hauled off site. The data suggests that the tank is leaking or the measurement method is flawed.”

- The fluctuations in leachate tank volume are likely the result of measurement variability. With a large opening to the tank as the measuring point for depth to leachate, no designated measuring point has been created on the casing to establish a consistent measurement. Between April 2021 and October 2023, depth to leachate measurements were on average 12.44 feet with variations in measurements from the average of 0.1 to 0.6 foot, see Attachment A. The assumption that leachate levels in the tank are not changing and any changes are likely the result of measurement variability warrants additional investigation into the tank and the status of the leachate control system. Designating a consistent measuring point for the leachate tank as well as further investigation and maintenance of the leachate control system, are currently scheduled to be completed by SCS Engineers in June 2024. Methods to test the integrity of the tank are being explored, and a suitable method is expected to be identified and implemented no later than Fall 2024.

“Please also clarify the actual leachate storage tank capacity, as it has been reported as 12,000 gallons (2017 and 2018 LCSPERs [docs #88314 and #94252]), 48,000 gallons (2019 and 2020 LCSPERs [docs #69486 and #99014]), and 40,000 gallons (November 19, 1996 construction documentation report doc #35461).”

- The leachate storage tank installed in 1996 was reportedly an aboveground storage tank having a capacity of approximately 40,000 gallons that was buried. The construction material



of the tank was not reported. The leachate storage tank was first reported as having a 12,000-gallon capacity in the 2000 LCSPER (Doc #35530). Documentation between the November 19, 1996 Construction Documentation Report (Doc # 35461) and the November 28, 2000 LCSPER (Doc #35530) indicating a tank replacement could not be found and no other information to explain the change in volume was located. In 2019, approximate surface measurements of the tank appurtenances visible at the ground surface and minor excavations around the tank were completed on-site by Evora Consulting. The excavations identified a large fiberglass tank (Doc #96486.) Preliminary measurements and observations, when compared to underground storage tank industry standards, indicate the likely capacity of the in-place storage tank was significantly greater than 12,000 gallons. In future reports, SCS Engineers will use the 40,000-gallon tank capacity from the original tank installation in future reporting as documentation to indicate a different tank volume should be used was not found.

"Attachment A of this submittal incorrectly notes that the Leachate Management and Control system for the site is currently compliant. DNR detailed in our March 28, 2023 NOV (doc #106164) numerous violations of the closure permit and Iowa Administrative Code exist which have not yet been corrected. Please correct and resubmit this report."

- Acknowledged. Please see Attachment B for the corrected Spring 2024 Semi-Annual Engineering Report.

Sincerely,



Benjamin Madson
Staff Professional
SCS Engineers



Timothy C. Buelow, P.E.
Senior Project Advisor
SCS Engineers

Enclosure

copy: Mr. Mick Leat, Iowa DNR
Ms. Becky Jolly, Iowa DNR
Ms. Virginia Anderson, Anderson Excavating
Electronic File

Attachment A

HISTORICAL LEACHATE COLUMN THICKNESSES AND ELEVATIONS
COUNCIL BLUFFS C & D LANDFILL
Permit No. 78-SDP-04-89C

Date	Depth to Leachate	Total Depth	Head (ft)
4/28/2021	12.47	17.36	5.08
5/27/2021	12.47	17.36	4.81
6/17/2021	12.44	17.36	4.83
7/21/2021	12.44	17.36	4.85
8/3/2021	12.44	17.36	4.81
9/1/2021	12.48	17.36	4.78
10/26/2021	12.45	17.36	4.82
11/22/2021	12.44	17.36	4.92
12/22/2021	12.43	17.36	4.93
1/30/2022	12.44	17.36	4.92
2/23/2022	12.43	17.36	4.93
3/8/2022	12.42	17.36	4.94
4/6/2022	12.42	17.36	4.94
5/24/2022	12.53	17.36	4.83
6/29/2022	12.40	17.36	4.96
7/19/2022	12.45	17.36	4.91
8/18/2022	12.46	17.36	4.90
9/7/2022	12.45	17.36	4.91
10/19/2022	12.45	17.36	4.91
11/8/2022	12.46	17.36	4.90
12/12/2022	12.46	17.36	4.90
1/26/2023	12.50	17.36	4.86
2/21/2023	12.48	17.36	4.88
3/30/2023	12.44	17.36	4.92
4/18/2023	11.91	17.36	5.45
5/21/2023	12.45	17.36	4.91
6/27/2023	12.45	17.36	4.91
7/25/2023	12.50	17.36	4.86
8/30/2023	12.45	17.36	4.91
9/11/2023	12.44	17.36	4.92
10/27/2023	12.56	17.36	4.80

Attachment B

June 20, 2024
File No. 27224173.01

Mr. Mick Leat
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue
Des Moines, Iowa 50321

Subject: Spring 2024 Semi-Annual Inspection Report (Revised)
Anderson Excavating Council Bluffs C&D Landfill (Closed)
Permit No. 78-SDP-04-89C

Dear Mick,

This brief report documents the semi-annual inspection required by the facility's Iowa Department of Natural Resources (DNR) Sanitary Disposal Project Permit and the Iowa Administrative Code. The inspection was made to evaluate the site's general conformance with the permit and the approved plans and specifications. A site map is attached for reference (Figure 1). A copy of the observation checklist used during the inspection is included in Attachment A. The following was noted during the semiannual inspection:

Summary of Inspection Observations

- Work was completed on the Leachate Control System since the Fall 2023 inspection as detailed in the December 13, 2023 summary by SCS (DocDNA ID # 108441). Response has not been received by the DNR on this submittal. Future action items noted in Table 1 of the mentioned summary with a due date of June 30, 2024 are in progress.
- The previously noted bare areas, significant erosion, and saplings/brush were still present.
- No areas of ponding were observed at the time of the inspection.
- No leachate seeps were observed.

Summary of Non-Conformance with Permit Conditions

The following items of non-conformance were noted during the inspection:

- Remove and spray sapling/brush throughout the cap area.
- Repair and reseed the cap once Action Plan items (see DocDNA ID #108441) are completed in 2024.

Monthly Inspections

Monthly inspections commenced in September 2018. Documentation of the inspections since the Fall 2023 inspection are included in Attachment B.



Please feel free to contact us if you have any questions regarding this report.
Sincerely,





Isaac Creech, E.I.T
Technical Associate
SCS Engineers



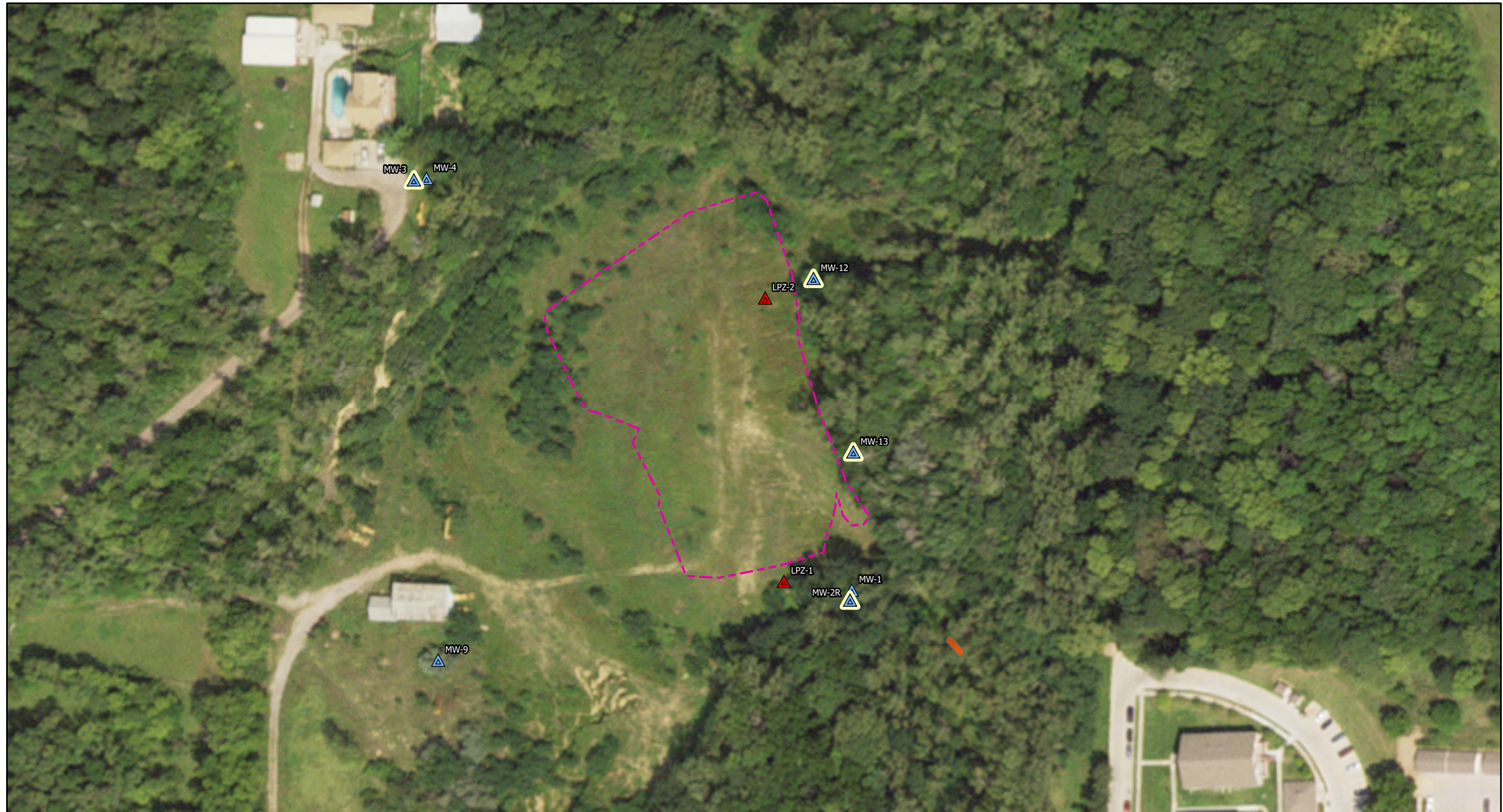
Christine L. Collier, P.E.
Senior Project Manager
SCS Engineers

cc: Ms. Virginia Anderson – Anderson Excavating

Engineer's Certification

	I hereby certify that this document was prepared by me or under my direct supervision and that I am a duly licensed Professional Engineer under the laws of the state of Iowa.	
		
	Christine L. Collier	Date
	My license renewal date is: December 31, 2025	
	Pages or sheets covered by this seal: All	

- Encl. Figure 1 – Site Map
Attachment A – Sanitary Landfill Inspection Checklist
Attachment B – Monthly Inspection Documentation



Site Map

Legend

- ▲ Monitoring Well
- ▲ HMSP Monitoring Well
- ▲ Leachate Monitoring Point
- Approximate Location of Leachate Storage Tank
- - - Approximate Waste Boundary

Anderson Excavating Council
Bluffs Landfill
Council Bluffs, Iowa
Project No: 27224173.01
Drawing Date: April 2024

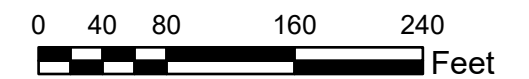


Figure 1

SCS
ENGINEERS

environmental consultants and contractors

ATTACHMENT A
SANITARY LANDFILL INSPECTION CHECKLIST

SCS Engineers
1690 All-State Court, Suite 100
Sanitary Landfill Inspection Checklist

Permit #: 78-SDP-04-89C

Facility Name: Anderson Excavating Council Bluffs C&D Landfill **Responsible Official:** Virginia Anderson
County: Pottawattamie **Address:** 2520 Kanesville Blvd., Council Bluffs, IA
Facility Operator: Virginia Anderson **Phone:** (402) 345-8800
Address: 2520 Kanesville Blvd., Council Bluffs, IA **Date Last Inspection:** September 26, 2023
Phone: (402) 345-8800 **Date This Inspection:** April 9, 2024

At the Time of this Inspection:

- **Facility personnel present:** None
- **Surface conditions:** Dry
- **Wind direction and speed:** 10 mph from the SW
- **Ambient temperature:** 51° F

Yes – compliance was being achieved; **No** – compliance was not being achieved,
N/A – not applicable or not observed; **PND** – previously noted deficiency (PND).

Observations

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1. Fill Cover: final	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Special Waste Handling
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2. Control of Face	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11. Recycling Activities
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Compaction	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Operator Certification
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4. Cover erosion; Ponding	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. Staffing
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Drainage into fill	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	14. Equipment Backup/Maintenance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Leachate Mgmt. & Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Interior Roads
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7. Litter	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16. Perimeter fence, gate, signs, wells
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Wet Weather Area	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	17. Photos taken
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9. Construction & Demolition Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Follow-up needed? (Yes/No)

Comments: The comments below correspond to the numbered observation items listed above.

1. Reseed bare areas and monitor and maintain seedings until vegetation is sufficiently established.
4. Removal of saplings/brush throughout the cap as noted in the Fall 2023 Inspection. No areas of ponding were observed.
5. No seeps were observed.
15. Access roads leading to the site and within the site were in good condition.
16. The perimeter fence, gate, and signs were in good condition. The latch on the protective casing for MW-4 was broken and the well could not be locked. This is not currently an HMSP well. However, repair of this point will be discussed with Landfill staff.
18. See items 1 and 4. The landfill cap requires repairs and reseeded. This work should not be completed until the Action Plan items have been completed that will disrupt the cover. It is anticipated this work will be completed in 2024.

AUTHENTICATION

INSPECTOR	Isaac Creech	Date: 4/9/2024
REVIEWER	Christine L. Collier, P.E.	Date: 4/29/2024

ATTACHMENT B
MONTHLY INSPECTION DOCUMENTATION

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION

Facility:	Anderson Excavating C&D Landfill	Permit No.:	78-SDP-04-89C
Location:	Council Bluffs, Iowa	Permit Issued:	April 1, 2016
Type:	C&D Landfill (Closed)	Permit Expires:	April 11, 2046

INSPECTION INFORMATION

Inspector:	Konner	Date and Time:	10/26/23 18:15
Other:			

WEATHER CONDITIONS

Wind:	10-15mph	Temperature:	65 °F.
Other:			

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

B. FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
- 5) Is there evidence of sediment build-up in storm water structures on- or off-site?
- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION

Facility:	Anderson Excavating C&D Landfill	Permit No.:	78-SDP-04-89C
Location:	Council Bluffs, Iowa	Permit Issued:	April 1, 2016
Type:	C&D Landfill (Closed)	Permit Expires:	April 11, 2046

INSPECTION INFORMATION

Inspector:	Konner Roth	Date and Time:	11-20-23, 12:15pm
Other:			

WEATHER CONDITIONS

Wind:	S mph	Temperature:	°F. 45
Other:	Rainy		

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

B. FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
- 5) Is there evidence of sediment build-up in storm water structures on- or off-site?
- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION			
Facility:	Anderson Excavating C&D Landfill	Permit No.:	78-SDP-04-89C
Location:	Council Bluffs, Iowa	Permit Issued:	April 1, 2016
Type:	C&D Landfill (Closed)	Permit Expires:	April 11, 2046

INSPECTION INFORMATION	
Inspector: <u>SEAN MARCZEWSKI</u>	Date and Time: <u>12-12-23 13:30</u>
Other: _____	

WEATHER CONDITIONS	
Wind: <u>5 MPH NW</u>	Temperature: <u>35° F.</u>
Other: _____	

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>		

B FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
- 5) Is there evidence of sediment build-up in storm water structures on- or off-site?
- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>		
	<input checked="" type="checkbox"/>	
	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>		
	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>		<u>SEE COMMENT BOX</u>

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.

TREES OBSERVED GROWING IN THE NORTH CORNER AROUND C04, C05, & LPZ-2

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION

Facility: Anderson Excavating C&D Landfill
 Location: Council Bluffs, Iowa
 Type: C&D Landfill (Closed)

Permit No.: 78-SDP-04-89C
 Permit Issued: April 1, 2016
 Permit Expires: April 11, 2046

INSPECTION INFORMATION

Inspector: Konner
 Other: _____

Date and Time: 1-31-24, 11:30am

WEATHER CONDITIONS

Wind: 1-5 mph
 Other: Sunny

Temperature: 50 °F

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

B. FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
- 5) Is there evidence of sediment build-up in storm water structures on- or off-site?
- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION

Facility:	Anderson Excavating C&D Landfill	Permit No.:	78-SDP-04-89C
Location:	Council Bluffs, Iowa	Permit Issued:	April 1, 2016
Type:	C&D Landfill (Closed)	Permit Expires:	April 11, 2046

INSPECTION INFORMATION

Inspector:	Korner	Date and Time:	2/29/24 12:40pm
Other:			

WEATHER CONDITIONS

Wind:	15-25 mph wind	Temperature:	51 °F.
Other:			

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

B. FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
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- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.

LANDFILL POST-CLOSURE MONTHLY OBSERVATION CHECKLIST

FACILITY INFORMATION

Facility:	Anderson Excavating C&D Landfill	Permit No.:	78-SDP-04-89C
Location:	Council Bluffs, Iowa	Permit Issued:	April 1, 2016
Type:	C&D Landfill (Closed)	Permit Expires:	April 11, 2046

INSPECTION INFORMATION

Inspector:	Caleb	Date and Time:	3/19/24, 13:00
Other:			

WEATHER CONDITIONS

Wind:	ESE 4mph	Temperature:	65° F.
Other:	Sunny		

A. GENERAL CRITERIA

- 1) Are storm water control structures (sedimentation basins, terraces, letdowns, culverts) in good condition?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

B. FINAL COVER

- 1) Is there adequate growth of grass on the final cover?
- 2) Is there evidence of settlement or depressions in the final cover?
- 3) Is there evidence of ponding water on the final cover?
- 4) Is there evidence of erosion of the final cover?
- 5) Is there evidence of sediment build-up in storm water structures on- or off-site?
- 6) Are there trees, shrubs, or other unwanted plants growing on the final cover?

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

C. MISCELLANEOUS REQUIREMENTS

- 1) Is there evidence of leachate seeps? If yes, note if flowing or not.

Yes	No	Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Note any repairs that need to be made or that were made. Include locations on a site map or describe below.