

July 22, 2022

ROY HESEMANN
CEDAR RAPIDS WATER POLLUTION CONTROL FACILITIES
7525 BERTRAM ROAD SE
CEDAR RAPIDS IA 52403

**RE: Cedar Rapids Water Pollution Control Facilities Ash Monofill
Permit No. 57-SDP-07-85P
2023 Annual Water Quality Report ([Document No. 108495](#))**

Dear Mr. Hesemann:

The Iowa Department of Natural Resources (DNR) has reviewed the 2022 Annual Water Quality Report (AWQR), dated December 18, 2023, as submitted by HLW Engineering Group. Our comments are below.

Report Priority Items

No priority items were requested in the report.

Groundwater Monitoring

The AWQR was prepared before the submittal and subsequent approval of the updated (current) Hydrologic Monitoring System Program (HMSP) (see Doc # [109868](#)). Therefore, the DNR concurs with the request in the AWQR to suspend conclusions of consequence awaiting implementation of the updated HMSP. Nonetheless, the DNR does want to draw attention to some observations we made.

MW-3R1 is proposed to be abandoned if forthcoming samples are below the Groundwater Protection Standards (GWPS). However, Table 6 of the AWQR shows Arsenic and Cobalt are well above the GWPS. A similar situation exists for MW-22, and Cobalt at MW-24 has historically been above the GWPS except for the most recent sampling event. Therefore, the DNR recommends the permit holder plan on retaining these monitoring points unless something dramatically changes.

Leachate Control System

It is noted that the last monitoring event for the North Disposal Area showed a leachate head of 1'. Since exceedances of 1' have occurred historically in this area, the DNR requests that notification be submitted to the DNR within 14 days of a reading exceeding 1' (12 inches) and submit an action plan, along with a schedule, for investigating and resolving the exceedance within 45 days of taking a reading that exceeds 12 inches. This will be added as a provision to your permit in the future.

Groundwater Underdrain System

The DNR acknowledges that the groundwater contours developed from the monitoring well measurements were lower than the groundwater diversion system, so the influence of the diversion system could not be modeled in Figure 2 of the AWQR. Thank you for including this information in the report.

If you have any questions, you may contact me at [\(515\) 537-4051](tel:5155374051) or brian.rath@dnr.iowa.gov.

Sincerely,

Brian L. Rath, P.E.
Environmental Engineer Senior
Land Quality Bureau

copy: DNR Field Office #1 – Manchester
Greg Shafer, HDR
Jason Decker, City of Cedar Rapids
Douglas J. Luzbetak, P.E., HLW Engineering Group