



March 4, 2025

JOHN REYNOLDS
DICKINSON LANDFILL, INC.
2575 190<sup>TH</sup> STREET
SPIRIT LAKE, IA 51360

RE: Dickinson County Sanitary Landfill
Permit No. 30-SDP-1-75P
2024 Annual Water Quality Report (Document No. 112153)

Dear Mr. Reynolds:

The Iowa Department of Natural Resources (DNR) has reviewed the 2024 Annual Water Quality Report (AWQR), dated January 31, 2025, prepared and submitted on your behalf by Stantec Consulting Services. The DNR has the following comments:

## **Report Priority**

None requested.

## **Sampling and Evaluation Summary**

Monitoring is summarized as follows:

- 1. Background monitoring wells are MW-11A, MW-13A, MW-34A, and MW-36A.
- 2. Detection monitoring points are MW-21A, MW-39A, MW-40A and GU-B/C at the Holding Pond.
- 3. Monitoring wells MW-12A, MW-19A, MW-23A, MW-37A, and MW-38A are in assessment monitoring.
- 4. The report indicated in Section 2.2 that the frequency of assessment monitoring is once every five years. Please note that the assessment monitoring is conducted semi-annually at monitoring wells identified as having contaminant levels at a Statistically Significant Increase above background. Perhaps the report is referring to the change in parameter list that may occur every five years (see item 6. below). If not, please clarify the intent of this statement <u>by May 5, 2025.</u>
- 5. The DNR wrote a comment letter dated January 16, 2025 (Document No. <u>111861</u>) about the discharge of the groundwater underdrain holding pond. Please provide an update <u>by May 5, 2025.</u>
- 6. The Permit Special Provision X.4.a.3. allows for a five-year frequency for full Appendix II testing at monitoring wells in assessment monitoring. For reference, the following table provides the last two sampling event dates that the full Appendix II list was analyzed for points in assessment monitoring:

Monitoring Point	Dates of Last Two Full Appendix II Sampling Events
MW-12A	First Sample June 2016, Second Sample May 2021
MW-19A	First Sample June 2016, Second Sample May 2021
MW-23A	First Sample June 2016, Second Sample May 2021
MW-37A	First Sample June 2016, Second Sample May 2021
MW-38A	First Sample June 2016, Second Sample May 2021

## **Leachate Collection System**

No comment.

## **Gas Monitoring Report**

No additional comment.

If you have any questions or comments, please contact Mike Smith at (515) 229-8356 or mike.smith@dnr.iowa.gov.

Sincerely,

Michael W. Smith, P.E. Environmental Engineer Senior

cc: Cory Anderson Stantec Consulting Services 1800 Pioneer Creek Center P.O. Box 249 Maple Plain, MN 55359-0249

> Terry Johnson, P.G. Waste Management, Inc. Suite 202J 3701 Shoreline Drive Wayzata, MN 55391

Field Office #3