

March 7, 2025
File No. 27224523.00

Mr. Mike Smith, P.E.
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue
Des Moines, Iowa 50321

Subject: Assessment of Corrective Measures Schedule
Scott County Landfill
Permit No. 82-SDP-03-77C

Dear Mike:

SCS Engineers, on behalf of the Waste Commission of Scott County, is submitting a schedule for the preparation of an Assessment of Corrective Measures (ACM) for the Scott County Landfill (Landfill) as requested in correspondence from the Iowa Department of Natural Resources (DNR) dated February 10, 2025 (Doc #112251).

The current groundwater protection standard (GWPS) exceedances measured at statistically significant levels (SSLs) at the Landfill are shown in the table below, as reported most recently in the 2024 Annual Water Quality Report, dated January 29, 2025 (Doc #112095).

Well	Constituent	Units	Most Recent Result	Upper Confidence Limit	GWPS	Initial Exceedance
MW-19	Arsenic	mg/L	0.0155	0.1464	0.01	12/2018
	Cobalt	mg/L	0.00559	0.007063	0.003648	6/2018
MW-27	Cobalt	mg/L	0.00737	0.02048	0.003648	6/2018
OP-17	Arsenic	mg/L	0.024	0.02444	0.01	6/2018
	Cobalt	mg/L	0.0238	0.01984	0.003648	12/2018
OP-18	Arsenic	mg/L	0.00739	0.0768	0.01	5/2021
	Cobalt	mg/L	0.00778	0.03458	0.003648	6/2018

Geochemical analysis was last performed at the Landfill in 2012-2013 to evaluate potential leachate and/or landfill gas contributions to concentrations measured at SSLs above the GWPSs. Groundwater and leachate samples will be analyzed for a suite of parameters to develop geochemical signatures of the chemical composition. Updating the characterization of the source will allow appropriate review of existing source control measures as to their adequacy in addressing groundwater impact. It is proposed that updated geochemical sample collection and analysis occur during the 2025 semi-annual sampling events to provide a more current representation of groundwater conditions.



Parameters to evaluate natural attenuation will be collected before the preparation of the ACM report to evaluate the efficacy of monitored natural attenuation as a component of a remedy. Multiple electron acceptors will be measured as a secondary form of evidence to evaluate if natural attenuation is occurring; declining constituent concentrations are the primary form of evidence. The primary form of evidence indicates natural attenuation is occurring as well as effective source control as indicated by the declining trends for each of the SSL parameters as reported in the 2024 Annual Water Quality Report and shown in the table below.

Well	Current SSL	Trend
MW-19	Arsenic	Decreasing
	Cobalt	Decreasing
MW-27	Cobalt	Decreasing
OP-17	Arsenic	Decreasing
	Cobalt	Decreasing
OP-18	Arsenic	Decreasing
	Cobalt	Decreasing

Total organic carbon will also be measured to evaluate the general level of leachate and/or gas influence. The monitoring wells with SSLs and select bracketing monitoring wells will be evaluated for natural attenuation during the 2025 semi-annual sampling events.

To allow time to complete the sampling in 2025 and prepare the ACM, it is requested that June 30, 2026, be established as the submittal date for the Landfill ACM report.

The February 10, 2025 correspondence also requested an update on the easement negotiations between the Waste Commission of Scott County and Linwood Mining and Minerals. The draft easement agreement was approved by the DNR (Doc #111516). The final easement agreement was executed and signed by both parties on February 6, 2025.

If you have any questions regarding this request, please contact Nathan Ohrt at (319) 331-9613 or Tim Buelow at (515) 681-5455.

Sincerely,



Nathan Ohrt
Senior Project Professional
SCS Engineers



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

NPO/TCB

Copies: Mr. Bryce Stalcup, Waste Commission of Scott County
Mr. Brian Seals, Waste Commission of Scott County