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April 11, 2025

Project/File: 227702549

Michael W. Smith, PE
Engineer Environmental Senior
Land Quality Bureau
Iowa Department of Natural Resources
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Dear Michael W. Smith, PE,

Reference: IDNR Comments - 2024 Annual Water Quality Report

On behalf of Central Disposal Systems, Inc. (CDS), this letter addresses your comments on the 2024 Annual Water Quality Report (IDNR Doc ID #112174). Comments were received in a letter to John Reynolds dated March 17, 2025. Commentary on the Leachate Control System Performance report required a response. For ease of review, the actionable comment is provided in italics below, with a response also provided. Other commentary within the letter is acknowledged.

Comment: *The report indicated that leachate head levels were only collected once in calendar year 2024 at LHW-11. Table 1 and Table 2 do not indicate whether leachate levels were below 1 foot in Phase VIII. The permit requires monthly monitoring (Special Provision X.2.b). Please advise regarding the missing data and provide data collected this calendar year **by April 14, 2025.***

Response: CDS acknowledges that LHW-11 was only monitored once in 2024 as described in Section 3.1.1 of the LCSPE report. This description was inadvertently included in the “old” leachate head well discussion and monitoring in 2024 was concurrent with the historic leachate head wells. CDS acknowledges that monthly monitoring per Special Provision X.2.b is appropriate for LHW-11 as it is in the recently developed Phase VIII disposal area. Table 1 in the 2024 report did not indicate leachate levels below 1 foot based on the LHW-11 monitoring (one data point). This was described in Section 3.1.1 of the LCSPE report. Upon re-review, considering the method of data collection (measurement to top of liquid) and the constructed profile (slope) of the monitoring device, the recorded and reported leachate head elevation may not be accurate. Data has not been collected monthly to date in 2025 but will take place monthly going forward.

Table 2 **did** indicate that leachate levels were below 1 foot in the primary compliance point in Phase VIII. Table 2 included monthly data for the Phase VIII sump (P5) and all recorded liquid levels were below the exceedance level, as shown on the Table. The exceedance level at P5 is 84 inches and the measured

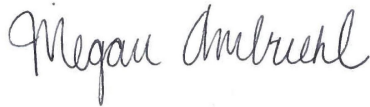
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liquid levels ranged from 37.7 to 53.1 inches (below the exceedance threshold). These readings indicate that leachate levels were below 1 foot in Phase VIII. Data collected at the P5 sump in January through March is provided below.

Date	P5 Phase VIII Sump Liquid Level Point of Compliance Exceedance level is 84-inches
January	31.50
February	45.45
March	36.82

Sincerely,

Stantec Consulting Services Inc.



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