



Jolly, Becky <becky.jolly@dnr.iowa.gov>

Re: 07-SDP-12-89 Viking Pump - Foundry Sand Landfill: Permit Renewal Comments

1 message

Rath, Brian <brian.rath@dnr.iowa.gov>

Thu, Apr 17, 2025 at 3:09 PM

To: Michael Alowitz <Michael.Alowitz@ghd.com>

Cc: "Becky Jolly (becky.jolly@dnr.iowa.gov)" <becky.jolly@dnr.iowa.gov>, "Arachikavitz, Evan" <earachikavitz@idexcorp.com>, Margaret Zuckweiler <Margaret.Zuckweiler@ghd.com>, Mary Grace Armbrust <MaryGrace.Armbrust@ghd.com>

Michael - Thank you for calling and discussing these documents earlier this week. During that conversation, I concurred that the provided information regarding protection of the liner is adequate and no further action is required at this time. Since then, we have reviewed the TCLP for the baghouse dust, and hereby approve Viking to commence disposal of that material in the landfill. Lastly, we have no further comments on your other responses, and we will be issuing your renewed permit soon. If you have any questions, please let me know.

Thanks,
Brian

Brian Rath, P.E.**Environmental Engineer Senior**

Solid Waste and Contaminated Sites Section

Iowa Department of Natural Resources

6200 Park Ave, Suite 200

Des Moines, IA 50321

515-537-4051

brian.rath@dnr.iowa.govwww.iowadnr.gov

On Fri, Feb 14, 2025 at 2:42 PM Michael Alowitz <Michael.Alowitz@ghd.com> wrote:

Brian,

For the ease of record keeping we prepared a response to comments letter that repeats your comments below for reference. I'm also attaching the ERRAP and DOP dated February 14, 2024 which have minor updates. The most significant update is the inclusion of TCLP for baghouse dust.

Please reach out again with any questions.

Mike

On Tue, Dec 24, 2024 at 1:00 PM Rath, Brian <brian.rath@dnr.iowa.gov> wrote:

We have reviewed your permit renewal application and have the following comments.

1. Baghouse Dust - DOP (Page 20 of the PDF). Section 1.1 states that you are proposing to dispose of baghouse dust. Per the rules, additional information is needed with a request to landfill a waste stream. Please provide this information.
2. Baghouse Dust - DOP (Page 21 of the PDF). The operations are described in Section 3.3 by saying the baghouse dust will be "directly" covered. Please clarify what the intent of "directly" is (i.e. immediately following waste placement). See also ERRAP Baghouse Dust comment below.
3. TCLP—DOP (Page 21 of the PDF). It is unclear if the TCLP in Appendix B is for the baghouse dust or the TCLP the DNR previously requested for the foundry sand, as stated in this paragraph. However, based on other information in the document, it appears it is a TCLP for the baghouse dust. Please discuss why only metals were analyzed.
4. Liner protection - DOP (Page 21 of the PDF). It is stated that the north side of the landfill has portions without 3 feet of sand. The DNR is concerned about the impact on this area's liner and drainage layer, considering it has been uncovered for 10 years. Therefore, the DNR requests an action plan, including a schedule, to perform an evaluation to verify the integrity of the liner and leachate collection system in this area, provide recommendations for any repairs, and provide a timeframe for placing 3 feet over this area.
5. ERRAP Baghouse Dust (Page 83 of the PDF). It is stated that the baghouse dust may be sprinkled to control dust. However, this is not stated in the DOP. Please correct this omission and provide more detail on the operational procedures for placing this material, including preventing runoff, etc.
6. ERRAP Offsite Releases (Page 83 of the PDF). Section 2.4.8 states there won't be offsite releases, but 2.6 states that there may be. It is suggested to refer 2.4.8 to 2.6.

Please provide responses to our comments on or before January 31, 2025. Meanwhile, please let me know if you have any questions.

Thanks,
Brian

Brian Rath, P.E.
Environmental Engineer Senior
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Ave, Suite 200
Des Moines, IA 50321
515-537-4051
brian.rath@dnr.iowa.gov
www.iowadnr.gov



CONFIDENTIALITY NOTICE: This email, including any attachments, is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately, and please delete it; you should not copy it or use it for any purpose or disclose its contents to any other person. GHD and its affiliates reserve the right to monitor and modify all email communications through their networks.

