

July 7, 2025

BRAD SEWARD, DIRECTOR
CLINTON COUNTY AREA SOLID WASTE AGENCY
4292 220TH STREET
PO BOX 996
CLINTON IA 52733

**RE: Clinton County Sanitary Landfill (East)
Permit No. 23-SDP-01-74P
2024 Annual Water Quality Report (AWQR) – South MSWLF Unit ([doc #112063](#))**

Dear Mr. Seward:

The Iowa Department of Natural Resources (DNR) has reviewed the 2024 AWQR for the South MSWLF unit, dated January 29, 2025, as submitted on your behalf by SCS Engineers. Our comments follow.

1. Water Quality.

- a. Recommend changing the column label on the groundwater sampling forms from “Specific Conductivity” to the material property label of “Conductivity” or to “Specific Conductance”.
- b. The Groundwater Sampling Form for the May 8, 2024 sampling event at Monitoring Well MW-05-3 indicates no cap (also at MW-19). Please address.
- c. Please evaluate the impact of samples received outside of the holding time (lab report date 5/23/2024).

2. Leachate Control System Performance Evaluation.

- a. Please provide an update on the status of the leachate piezometers LPZ-1 and LPZ-E1.
- b. It is noted that leachate level data was not collected from May 28, 2024 through the end of calendar year 2024 from the piezometers in both the North Unit and South Unit.
- c. It is also noted that leachate levels were collected on bimonthly intervals. The permit requires monthly measurements. Please provide a process to keep the data collection in compliance with the permit.

3. Gas Monitoring. Please continue gas monitoring as required in the rules and your permit.

You are required to respond to this letter by August 7, 2025. If you have any questions, please contact me at (515) 229-8356 or mike.smith@dnr.iowa.gov.

Sincerely,

Michael W. Smith, P.E.
Environmental Engineer Senior
Land Quality Bureau

CC: Timothy C. Buelow, P.E. DNR Field Office #6
SCS Engineers
1690 All-State Court Suite 100
West Des Moines, IA 50265