



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

RE: Viking Pump Landfill - 07-SDP-12-89: Draft Permit Renewal for Review

1 message

Michael Alowitz <michael.alowitz@ghd.com>

Wed, Aug 6, 2025 at 8:14 AM

To: "Rath, Brian" <brian.rath@dnr.iowa.gov>, "Arachikavitz, Evan" <earachikavitz@idexcorp.com>

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

Brian –

Here is the word doc with some additional comments and questions from us. I don't think anything major. Give me a ring to discuss if appropriate. I think the big one is around scales and weights.

We'll get you a copy of the latest pretreatment agreement too.

Mike

Michael Alowitz, P.E. IA and TXD 01 515 414 3934 M 01 515 321 2725 E michael.alowitz@ghd.com

From: Rath, Brian <brian.rath@dnr.iowa.gov>**Sent:** Friday, August 1, 2025 3:40 PM**To:** Arachikavitz, Evan <earachikavitz@idexcorp.com>**Cc:** Michael Alowitz <michael.alowitz@ghd.com>; Becky Jolly (becky.jolly@dnr.iowa.gov) <becky.jolly@dnr.iowa.gov>; Mary Grace Armbrust <MaryGrace.Armbrust@ghd.com>; Margaret Zuckweiler <margaret.zuckweiler@ghd.com>**Subject:** Re: Viking Pump Landfill - 07-SDP-12-89: Draft Permit Renewal for Review

Good afternoon, Evan. Following up on this since I haven't heard anything since June. Please provide your review comments by 8/15/25, so we can issue the permit. Thanks.

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
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On Mon, Jun 16, 2025 at 10:32 AM Margaret Zuckweiler <Margaret.Zuckweiler@ghd.com> wrote:

Hi Brian

Thank you for sending the draft permit.

Viking Pump and GHD will review and respond to those items you have included as questions or requests for clarification. Once we have reviewed we will schedule a meeting for discussion and or provide feedback for those items directly.

Thank you

MARGARET ZUCKWEILER | A GHD Associate

TECHNICAL SERVICES LEADER – US Central Region
Senior Environmental Engineer PE (MN, AL)

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From: Rath, Brian <brian.rath@dnr.iowa.gov>
Sent: Friday, June 13, 2025 11:27 AM
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>
Subject: Viking Pump Landfill - 07-SDP-12-89: Draft Permit Renewal for Review

Good morning. I hope you are all enjoying your summer so far, and staying cool the past few days.

As we were working on writing your renewed permit, we came across a few things that we need clarification on, so we have attached a draft of the permit and included comments in the sidebar. Some just draw attention to updates/changes made but there are a few that ask for your clarification.

I apologize for how drawn out the process has become, and I'm confident these are the last items.

Please note that I'm out of the office next week and have a full schedule the rest of today, so take your time to review and if you want to discuss this when I return, you can look at my availability at the link below and then use your virtual meeting system to schedule with me.

https://doodle.com/bp/brianrath/brian_rath_iowa_dnr

Thanks,

Brian

Brian Rath, P.E.
Environmental Engineer Senior
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On Thu, Apr 17, 2025 at 3:09 PM Rath, Brian <brian.rath@dnr.iowa.gov> wrote:

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

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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

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8/6/25, 8:21 AM

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