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Clinton County Sanitary Landfill-East, South MSWLF Unit - 23-SDP-01-74P - DNR Comment Letter Response

1 message

Ohrt, Nathan <NOhrt@scsengineers.com>

Fri, Aug 8, 2025 at 2:56 PM

To: "Smith, Mike" <mike.smith@dnr.iowa.gov>

Cc: Brad Seward - Clinton County Area Solid Waste Agency <ccaswa@gmtel.net>, "Marczewski, Sean" <SMarczewski@scsengineers.com>, Becky Jolly <becky.jolly@dnr.iowa.gov>

Good afternoon Mike-

SCS Engineers, on behalf of the Clinton County Area Solid Waste Agency, is submitting this response to DNR comments dated July 7, 2025 (Doc #113350) regarding the 2024 Annual Water Quality Report, dated January 29, 2025 (Doc #112063) for the South MSWLF unit at the Clinton County Sanitary Landfill-East.

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".

The column headers will be changed to Specific Conductance in future reports.

b. The Groundwater Sampling Form for the May 8, 2024 sampling event at Monitoring Well MW05-3 indicates no cap (also at MW-19). Please address.

Caps will be installed on monitoring wells MW-05-3 and MW-19 during the next sampling event, which is currently scheduled for August 2025.

c. Please evaluate the impact of samples received outside of the holding time (lab report date 5/23/2024).

The holding time of 48 hours for nitrate was exceeded for monitoring wells MW-90-11, MW-20, MW-24, MW-32, and MW-33. However, the analytical results were within the historical range for each of these monitoring wells, indicating the measured

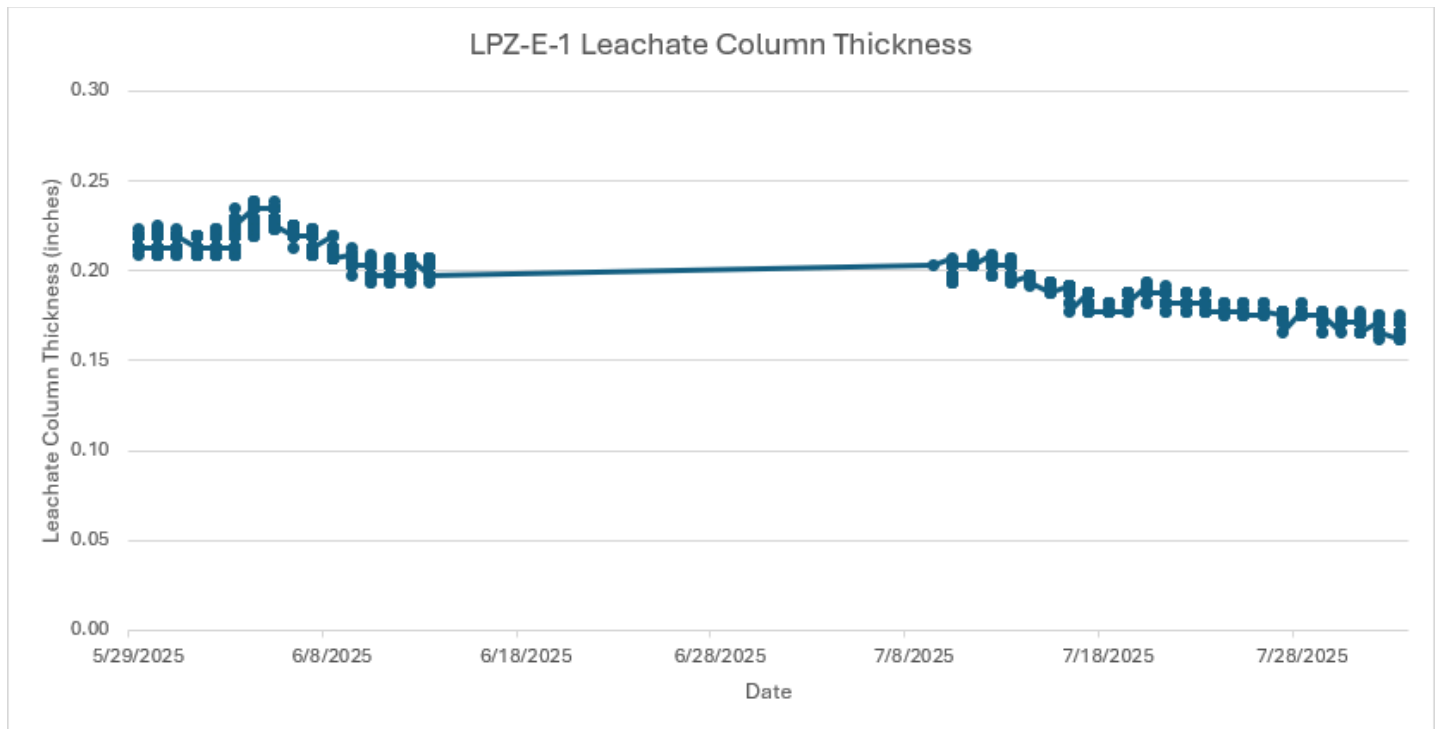
concentrations or non-detect results are likely valid. Monitoring wells MW-90-11, MW-32, and MW-33 have no historical detections of nitrate, which continued during the 2024 reporting period.

2. Leachate Control System Performance Evaluation

a. Please provide an update on the status of the leachate piezometers LPZ-1 and LPZ-E1.

A 2024 camera investigation of leachate piezometer LPZ-1 indicated an obstruction in the casing that prevented an accurate measurement of leachate levels. The piezometer was cleaned on August 6, 2025 and video recording confirmed the obstruction was cleared.

The transducer that measured leachate levels in LPZ-E1 malfunctioned. After replacement of the transducer in May 2025, the SCADA system indicated leachate levels in the piezometer were below the compliance level. Recent data is shown in the graph below.



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.

Staffing challenges of the contract operator resulted in insufficient leachate level measurements. After staffing changes, leachate measurements have been received each month of 2025.

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.

Leachate measurements have been received each month of 2025.

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

Acknowledged.

If you have any questions regarding these responses, please contact me at the number below.

Nathan Ohrt

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