



January 7, 2026

Mr. Brian Rath, P.E.  
Iowa Department of Natural Resources  
6200 Park Avenue, Ste 200  
Des Moines, IA 50321

**RE: City of Iowa City (CIC) Sanitary Landfill  
Permit No. #52-SDP-01-72P  
Request for Review of Decommissioning Site Monitoring Wells**

Dear Mr. Rath,

On behalf of the City of Iowa City (CIC), HDR Engineering, Inc. (HDR) is submitting this request for review of proposed well decommissioning services at the CIC Sanitary Landfill. As a part of compliance activities associated with the facility's compost pad expansion project, CIC is planning to construct a detention pond for runoff from the compost facility pad. The general footprint of the proposed detention pond is depicted on the attached **Figure 1**. With the proposed construction of the detention pond, four (4) monitoring wells will be impacted. This includes the Hydrologic Monitoring System Plan (HMSP) Monitoring Well MW-204A, a former Corrective Action Monitoring Program (CAMP) Monitoring Well MW-15A, and non-HMSP Monitoring Wells MW-302B and MW-405. HDR is recommending and the City is requesting that these four monitoring wells be decommissioned prior to construction of the detention pond. The justification for decommissioning each of the proposed monitoring wells are summarized as follows:

**1. HMSP Monitoring Well MW-204A:**

- The monitoring well is only monitored on an annual basis per the approved permit for the Landfill.
- The well is currently in the assessment monitoring program, however, there have been no statistically significant increases (SSIs) identified or noted in available data since 2018. Based on the available data, it could be justified that management of this monitoring well be under the detection monitoring program.
- The annual monitoring parameter list for the monitoring well is reduced to the Metals List (arsenic, barium, cobalt, copper, lead, and nickel) and total suspended solids (TSS).
- The monitoring well was sampled in the Spring 2025 for the full Appendix II constituent list and TSS. Only arsenic, barium, and TSS were detected above laboratory reporting limits during the Spring 2025 monitoring event.



**2. Former CAMP Monitoring Well MW-15A:**

- Due to completion of the corrective action monitoring, Monitoring Well MW-15A is no longer sampled for arsenic and TSS. In a letter dated September 16, 2025, the Iowa Department of Natural Resources (IDNR) approved the Notification of Corrective Action Remedy Completion and Monitoring Program Modification.

**3. Non-HMSP Monitoring Wells MW-302B and MW-405:**

- Monitoring Wells MW-302B and MW-405 are not a part of the approved HMSP for the Landfill and are not used for groundwater level monitoring.

CIC is requesting an accelerated review by IDNR regarding decommissioning of these monitoring wells and if there are any questions or comments. Beginning on January 21, 2026, CIC plans to request proposals from licensed contractors for the well decommissioning activities. Please let us know prior to January 21, 2026, if IDNR has any concerns with decommissioning activities regarding these monitoring wells.

If there are any questions regarding this submittal, please do not hesitate to contact Richard Wilson at (402) 392-6714.

Sincerely,  
HDR Engineering, Inc.

Richard Wilson  
*Environmental Project Manager (Solid Waste)*

Will Nicholson, P.E.  
*Project Engineer*

cc: Addressee (PDF)  
Jennifer Jordan, Iowa City Landfill and Recycling Center (PDF)  
Joe Welter, Iowa City Landfill and Recycling Center (PDF)  
Michael Smith, Iowa Department of Natural Resources (PDF)  
Daniel Jensen, Shive-Hattery (PDF)



