



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.

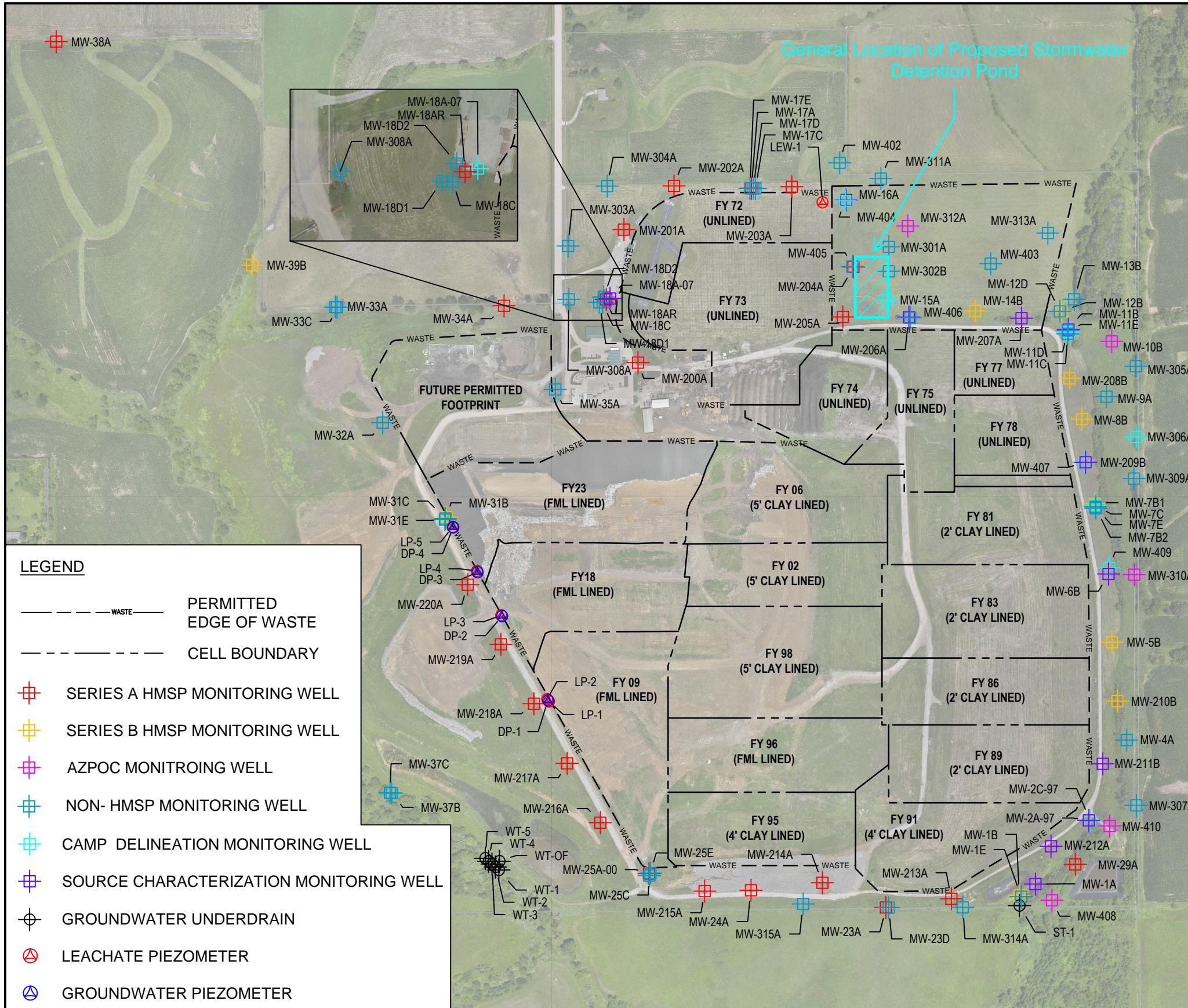
If there are any questions regarding this submittal, please do not hesitate to contact Richard Wilson at (402) 392-6714.

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)



SERIES A HMSP WELLS		CAMP DELINEATION WELLS	
WELL NO.	CURRENT MONITORING PROGRAM	WELL NO.	CURRENT MONITORING PROGRAM
MW-17A	ASSESSMENT	MW-2C-97	CAMP
MW-18AR	ASSESSMENT	MW-7C	CAMP
MW-23A	ASSESSMENT	MW-11D	CAMP
MW-24A	ASSESSMENT	MW-15A	CAMP
MW-25A-00	ASSESSMENT	MW-306A	CAMP
MW-29A	ASSESSMENT	MW-404	CAMP
MW-34A	BACKGROUND	MW-407	CAMP
MW-38A	BACKGROUND	MW-409	CAMP
MW-200A	ASSESSMENT	AZPOC MONITORING WELLS	
MW-201A	ASSESSMENT	WELL NO.	CURRENT MONITORING PROGRAM
MW-202A	ASSESSMENT	MW-10B	AZPOC
MW-203A	ASSESSMENT	MW-310A	AZPOC
MW-204A	ASSESSMENT	MW-312A	AZPOC
MW-205A	ASSESSMENT	MW-408	AZPOC
MW-206A	ASSESSMENT	MW-410	AZPOC
MW-207A	ASSESSMENT	SOURCE CHARACTERIZATION WELLS	
MW-11D	ASSESSMENT	WELL NO.	CURRENT MONITORING PROGRAM
MW-11E	ASSESSMENT	MW-1A	SOURCE CHARACTERIZATION
MW-12D	ASSESSMENT	MW-2A-97	SOURCE CHARACTERIZATION
MW-12B	ASSESSMENT	MW-6B	SOURCE CHARACTERIZATION
MW-11B	ASSESSMENT	MW-11B	SOURCE CHARACTERIZATION
MW-11E	ASSESSMENT	MW-16A	SOURCE CHARACTERIZATION
MW-10B	ASSESSMENT	SERIES B HMSP WELLS	
MW-208B	ASSESSMENT	WELL NO.	CURRENT MONITORING PROGRAM
MW-305A	ASSESSMENT	MW-18A-07	SOURCE CHARACTERIZATION
MW-9A	ASSESSMENT	MW-206A	SOURCE CHARACTERIZATION
MW-8B	ASSESSMENT	MW-207A	SOURCE CHARACTERIZATION
MW-306A	ASSESSMENT	MW-5B	SOURCE CHARACTERIZATION
MW-309A	ASSESSMENT	MW-209B	SOURCE CHARACTERIZATION
MW-310A	ASSESSMENT	MW-210B	SOURCE CHARACTERIZATION
MW-409	ASSESSMENT	MW-4A	SOURCE CHARACTERIZATION
MW-6B	ASSESSMENT	MW-211B	SOURCE CHARACTERIZATION
MW-83 (2' CLAY LINED)		MW-12B	SOURCE CHARACTERIZATION
FY 86 (2' CLAY LINED)		MW-14B	ASSESSMENT
FY 89 (2' CLAY LINED)		MW-31B	BACKGROUND
FY 91 (4' CLAY LINED)		MW-39B	ASSESSMENT
FY 95 (4' CLAY LINED)		MW-208B	ASSESSMENT
FY 96 (FML LINED)		MW-210B	ASSESSMENT
FY 02 (5' CLAY LINED)		WT-1	DETECTION
FY 09 (FML LINED)		WT-2	DETECTION
FY 18 (FML LINED)		WT-3	DETECTION
FY 23 (FML LINED)		WT-4	DETECTION
FY 6 (5' CLAY LINED)		WT-5	DETECTION
FY 72 (UNLINED)		WT-OF	DETECTION
FY 73 (UNLINED)		WT-1	DETECTION
FY 74 (UNLINED)		WT-2	DETECTION
FY 75 (UNLINED)		WT-3	DETECTION
FY 77 (UNLINED)		WT-4	DETECTION
FY 78 (UNLINED)		WT-5	DETECTION
FY 81 (2' CLAY LINED)		ST-1	DETECTION
FY 98 (5' CLAY LINED)		WT-OF	DETECTION
FY 06 (5' CLAY LINED)		WT-1	DETECTION
FY 20 (5' CLAY LINED)		WT-2	DETECTION
FY 22 (5' CLAY LINED)		WT-3	DETECTION
FY 24 (5' CLAY LINED)		WT-4	DETECTION
FY 26 (5' CLAY LINED)		WT-5	DETECTION
FY 28 (5' CLAY LINED)		WT-OF	DETECTION
FY 30 (5' CLAY LINED)		WT-1	DETECTION
FY 32 (5' CLAY LINED)		WT-2	DETECTION
FY 34 (5' CLAY LINED)		WT-3	DETECTION
FY 36 (5' CLAY LINED)		WT-4	DETECTION
FY 38 (5' CLAY LINED)		WT-5	DETECTION
FY 40 (5' CLAY LINED)		WT-OF	DETECTION
FY 42 (5' CLAY LINED)		WT-1	DETECTION
FY 44 (5' CLAY LINED)		WT-2	DETECTION
FY 46 (5' CLAY LINED)		WT-3	DETECTION
FY 48 (5' CLAY LINED)		WT-4	DETECTION
FY 50 (5' CLAY LINED)		WT-5	DETECTION
FY 52 (5' CLAY LINED)		WT-OF	DETECTION
FY 54 (5' CLAY LINED)		WT-1	DETECTION
FY 56 (5' CLAY LINED)		WT-2	DETECTION
FY 58 (5' CLAY LINED)		WT-3	DETECTION
FY 60 (5' CLAY LINED)		WT-4	DETECTION
FY 62 (5' CLAY LINED)		WT-5	DETECTION
FY 64 (5' CLAY LINED)		WT-OF	DETECTION
FY 66 (5' CLAY LINED)		WT-1	DETECTION
FY 68 (5' CLAY LINED)		WT-2	DETECTION
FY 70 (5' CLAY LINED)		WT-3	DETECTION
FY 72 (5' CLAY LINED)		WT-4	DETECTION
FY 74 (5' CLAY LINED)		WT-5	DETECTION
FY 76 (5' CLAY LINED)		WT-OF	DETECTION
FY 78 (5' CLAY LINED)		WT-1	DETECTION
FY 80 (5' CLAY LINED)		WT-2	DETECTION
FY 82 (5' CLAY LINED)		WT-3	DETECTION
FY 84 (5' CLAY LINED)		WT-4	DETECTION
FY 86 (5' CLAY LINED)		WT-5	DETECTION
FY 88 (5' CLAY LINED)		WT-OF	DETECTION
FY 90 (5' CLAY LINED)		WT-1	DETECTION
FY 92 (5' CLAY LINED)		WT-2	DETECTION
FY 94 (5' CLAY LINED)		WT-3	DETECTION
FY 96 (5' CLAY LINED)		WT-4	DETECTION
FY 98 (5' CLAY LINED)		WT-5	DETECTION
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FY 02 (5' CLAY LINED)		WT-1	DETECTION
FY 04 (5' CLAY LINED)		WT-2	DETECTION
FY 06 (5' CLAY LINED)		WT-3	DETECTION
FY 08 (5' CLAY LINED)		WT-4	DETECTION
FY 10 (5' CLAY LINED)		WT-5	DETECTION
FY 12 (5' CLAY LINED)		WT-OF	DETECTION
FY 14 (5' CLAY LINED)		WT-1	DETECTION
FY 16 (5' CLAY LINED)		WT-2	DETECTION
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FY 58 (5' CLAY LINED)		WT-5	DETECTION
FY 60 (5' CLAY LINED)		WT-OF	DETECTION
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