

March 11, 2026  
File No. 27224512.00

Mr. Mike Smith, P.E.  
Iowa Department of Natural Resources  
Land Quality Bureau  
6200 Park Avenue  
Des Moines, Iowa 50321

Subject: Response to Comments Regarding the 2025 Annual Water Quality Report  
SEMCO Sanitary Landfill  
Permit No. 54-SDP-01-75P

Dear Mike:

SCS Engineers, on behalf of the Southeast Iowa Multi-County Solid Waste Agency (SEMCO), submits this response to the Iowa Department of Natural Resources' comment letter dated February 17, 2026 (Doc #16171), concerning the 2025 Annual Water Quality Report dated January 20, 2026 (Doc #11571) for the SEMCO Sanitary Landfill.

*1. Please show the location of monitoring wells MW-6 and MW-18 on the figures in future reports so that the reader can review in concert with the text discussion. Similarly, please show the location of the cell phases on at least one figure in future reports.*

Monitoring well MW-6 was previously misidentified on report figures; this has been rectified, and MW-6 is correctly labeled on the attached site map. Monitoring well MW-18 is also depicted on the attached map. Future reports will include cell phase labels on the relevant figures.

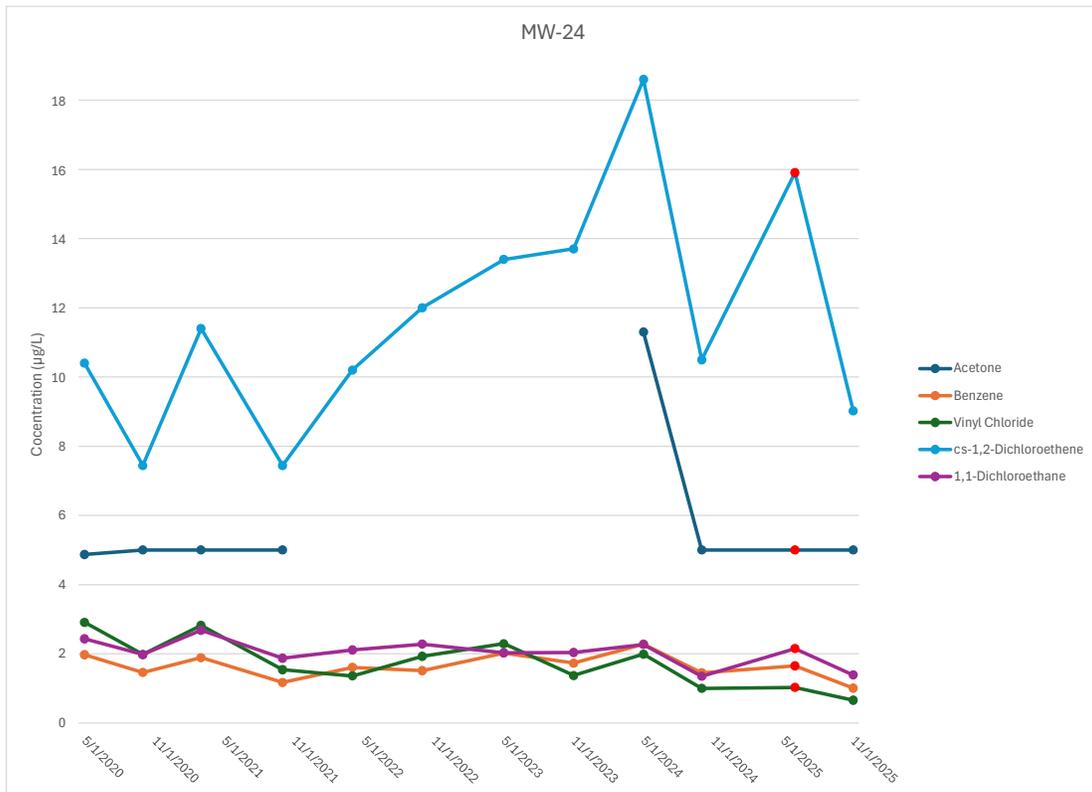
*2. The sampling report for 1<sup>st</sup> semiannual event (June 2025) indicates that the "Cooler temperature outside required temperature criteria." Please provide an evaluation of the impact of this issue on the sample results by March 31, 2026.*

During the June 2–3, 2025 sampling event, the laboratory's case narrative indicated that multiple samples arrived at temperatures exceeding regulatory requirements. According to the U.S. Environmental Protection Agency's SW-846 Compendium (Chapters Three—Inorganic Analytes and Four—Organic Analytes), suitable preservation methods are prescribed for the analytes tested during this sampling event. Table 3-2 of Chapter Three notes that temperature is not a preservation criterion for total metals, except mercury and hexavalent chromium. Mercury has not been detected at quantifiable levels within the Landfill; thus, the non-detect result in MW-5 in June 2025 is likely representative. Hexavalent chromium has not been analyzed at this facility.

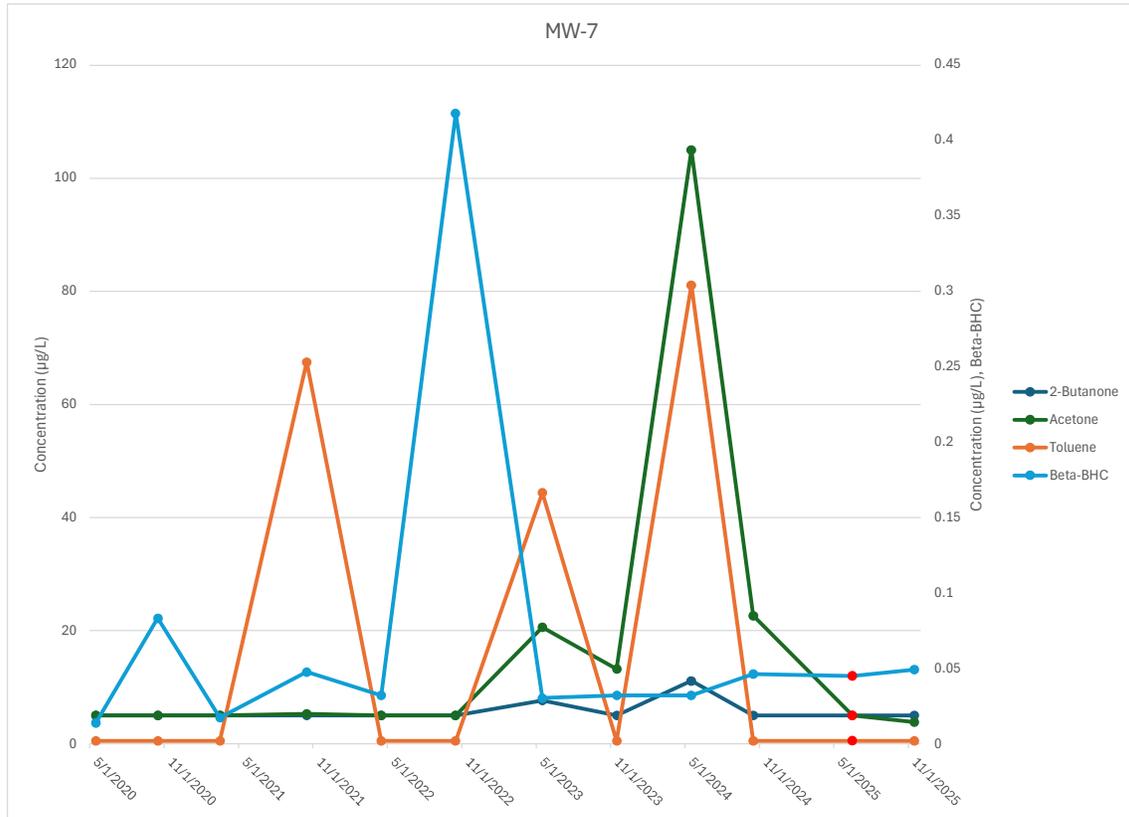
For most non-metal analytes, the temperature criterion is  $\leq 6^{\circ}$  C. The coolers received above temperature were  $7.3^{\circ}$  C,  $8.9^{\circ}$  C, and  $11.0^{\circ}$  C. The sample receipt forms note that the coolers at  $7.3^{\circ}$  C and  $8.9^{\circ}$  C contained wet ice, while the cooler at  $11.0^{\circ}$  C contained wet ice and melted ice.



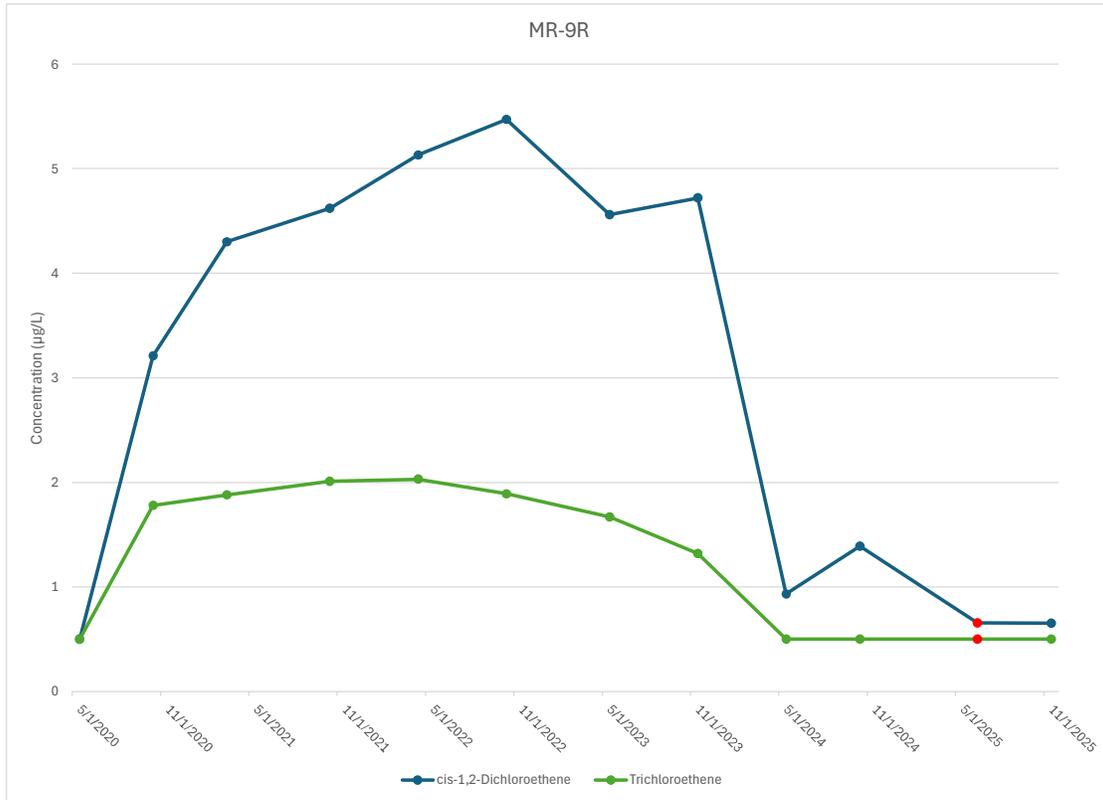
A review of analytical data for VOCs and SVOCs from 2020–2025 showed that only five of the eleven samples that exceeded temperature criteria had quantified detections. The time series plots below show concentration trends for monitoring wells with multiple detected organic parameters. The June 2025 sampling event is noted with a red data point.



In monitoring well MW-24, acetone was non-detect in June 2025, which is typical, as the monitoring well only had one quantified detection for acetone in the dataset that occurred in May 2024. The June 2025 concentrations for the remaining parameters were within the historical range and within a more condensed range comprising 2024 and 2025. The June 2025 concentrations appear to be representative.



2-butanone, toluene, and beta-BHC were non-detects during June 2025 in monitoring well MW-7, which was unchanged from October 2024 and November 2025. The concentration measured in May 2024 for 2-butanone was the only quantified concentration for the constituent in the monitoring well. The most recent six beta-BHC samples have been non-detect; reporting limit changes are causing the apparent increase in the graph above. The June 2025 concentrations were within the historical range and within a more condensed range comprising 2024 and 2025. The June 2025 concentrations appear to be representative.



The concentrations of cis-1,2-dichloroethene and trichloroethene have declined recently in monitoring well MW-9R, with no detections for trichloroethene and one quantified concentration for cis-1,2-dichloroethene in 2024 – 2025. The June 2025 concentrations appear to be representative.

MW-5 and MW-28 each had one organic parameter detected in the 2020 – 2025 time period. 4,4-DDT was detected in monitoring well MW-5 in June 2025, but was not detected in November 2025. The only detection in monitoring well MW-28 was acetone in May 2024.

Considering that metal analyses (except for mercury) do not require temperature preservation, and that measured VOC concentrations from June 2025 were consistent with previous values, it appears that the analytical results are representative, and it is not likely that the elevated sample temperatures measurably affected the sample results.

To avoid samples being received above temperature, field staff will prioritize procedures such as insulating void spaces in the cooler to minimize warm air pockets, using plenty of ice above, below, and around the sample containers, and protecting the samples/coolers from external heat, when possible, when sampling in hot temperatures.

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If you have any further questions or comments regarding this response, please contact Nathan Ohrt at (319) 331-9613.

Sincerely,



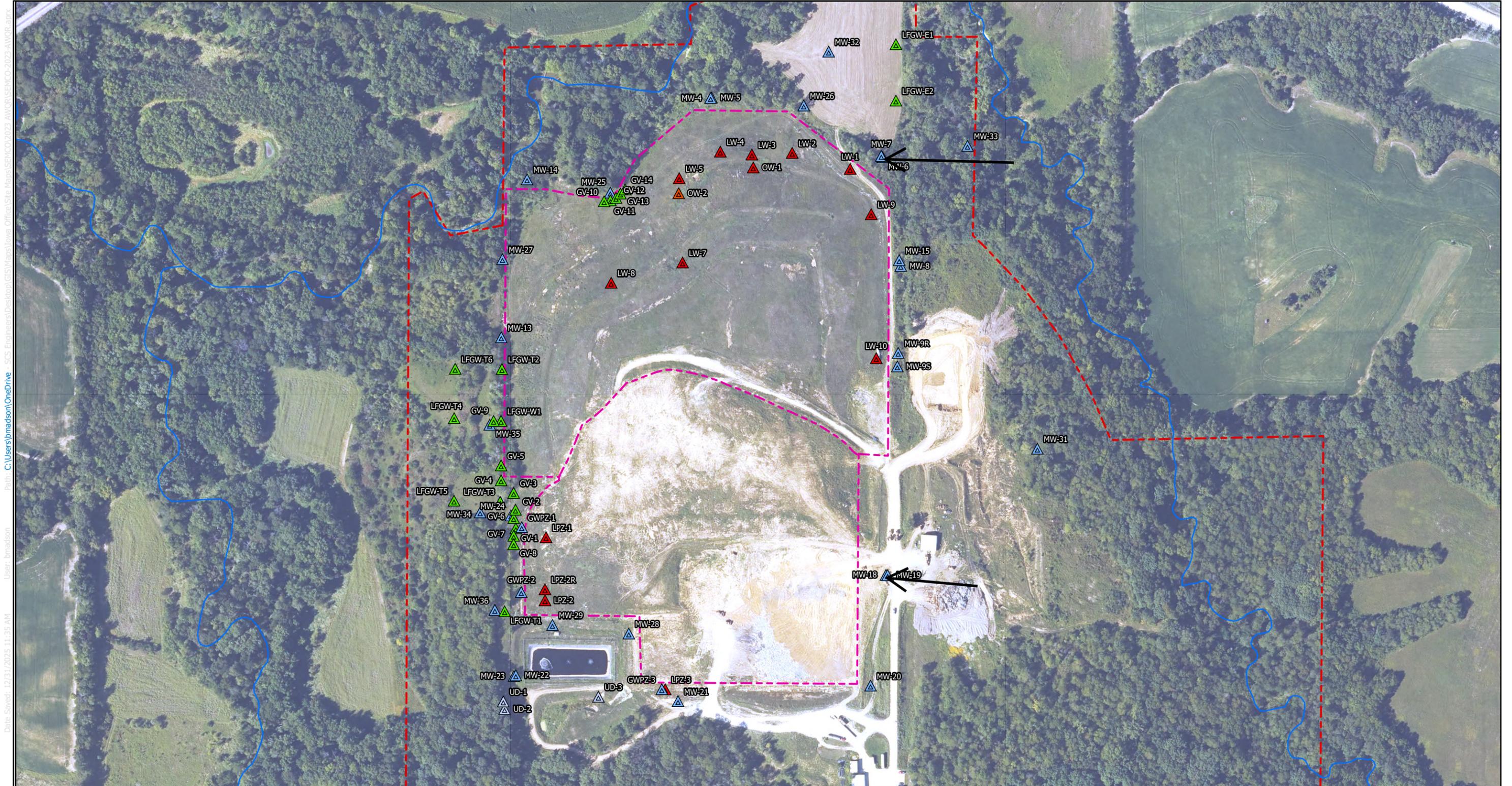
Nathan Ohrt  
Senior Project Professional  
SCS Engineers



Timothy C. Buelow, P.E.  
VP - Senior Project Advisor  
SCS Engineers

NPO/TCB

Copies: Mr. Bill Sloop, SEMCO Landfill

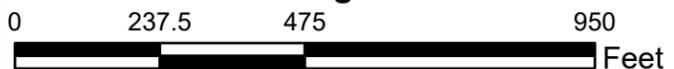
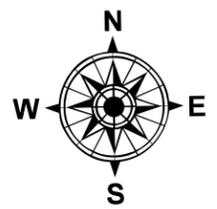


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### Site Map

Legend	
	Monitoring Well
	Groundwater Underdrain
	Approximate Landfill Gas Monitoring Location
	Approximate Observation Well Location
	Approximate Leachate Piezometer Location
	Approximate Existing Waste Boundary
	Approximate Property Boundary
	Stream

Southeast Multi-County  
 Sanitary Landfill  
 Richland, Iowa  
 Project No: 27224512.26  
 Drawing Date: March 2026



**Figure 1**



Source: Data from various sources, including aerial photography, GIS data, and field observations. The GIS data was provided by the Iowa State University GIS Facility.