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March 31, 2026

Michael W. Smith, P.E.
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321

Re: Response to Comments dated March 2, 2026
Regarding the Water Quality Assessment Plan, HMSPP, and 2025 AWQR
Black Hawk County Sanitary Landfill
Permit #07-SDP-01-75P

Dear Michael W. Smith, P.E.:

On behalf of the Black Hawk County Solid Waste Management Commission (Commission), Foth Infrastructure & Environment, LLC (Foth) is submitting the following responses to the Iowa Department of Natural Resources (IDNR) comment letter dated March 2, 2026 (IDNR, 2026) regarding the 2025 ACM Report (AECOM, 2025), *Hydrologic Monitoring System Plan* (AECOM, 2026b), and 2025 Annual Water Quality Report (AECOM, 2026a).

Department Sampling Summary Comment: *The Section 1.2 Black Hawk County Geology and Hydrogeology indicate a groundwater flow velocity of approximately 0.7 ft/yr in the glacial diamicton. The DNR is receptive to a request to change to biennial sampling frequency where half of the sampling points screened in the glacial diamicton would be sampled every other year.*

Response to Comment: Duly noted. As noted in the Hydrologic Monitoring System Plan (HMSPP) comment and response, a meeting will be scheduled prior to May 8, 2026. This meeting will include a discussion on sampling locations and sampling frequency.

Department Leachate Control System Performance Evaluation Report Comment: *Please report the leachate head levels by **March 31, 2026**. This is the same comment regarding missing data in the 2024 AWQR. The DNR reserves their comments until historical data is available.*

Response to Comment: The 2024 and 2025 leachate head levels are provided in Attachment 1.

Department Landfill Gas Annual Report Comment: *No methane exceedances were recorded for 2025. The DNR has no further comments. Please continue to monitor and operate the system per the permit and rules.*

Response to Comment: Duly noted.

Department Water Quality Assessment Plan Comment: *Section 9 of the report indicated that upon DNR approval of the Assessment of Corrective Measures (ACM) a public meeting would be held. This is the same timeline listed in the 2024 Water Quality Assessment Plan, dated January 30, 2025 (Doc #112125). By rule, upon DNR approval of an ACM a public meeting is held before the selection of a remedy. The ACM was approved by the DNR on October 29, 2019 (Doc #96209), so it would be expected that the public meeting be held within 60 days (567 Iowa Administrative Code 113.10(7)d.) Please clarify by March 31, 2026.*

Response to Comment: We request an extension for addressing the public meeting requirements associated with the assessment of corrective measures (ACM) and remedy selection. We propose to discuss the ACM during the meeting to be held by May 8, 2026. This discussion will include the point of compliance for the locations that triggered ACM, previous submittals, and anticipated next steps.

Department Hydrologic Monitoring System Plan (HMSP) Comment: *With an anticipated change in the groundwater scientist and consultant performing sampling and monitoring going forward, the DNR requests a meeting be scheduled to discuss the sampling frequency mentioned above, the format and content of future reports, and the efficacy of the number of current sampling points prior to conducting the next round of sampling. Please schedule a meeting by **May 8, 2026**.*

Response to Comment: Duly noted. As previously noted, we will schedule and facilitate a meeting by 8, 2026 to discuss sampling locations and frequency, format and content of future reports, and the ACM. The spring sampling event will be scheduled following that meeting.

Department Other – Financial Assurance Comment: *Upon approval of the selected remedy for corrective action, the permit holder is required to comply with 567 Iowa Administrative Code 113.14(5) within 30 days. It is not apparent in the last Financial Assurance submittal that this occurred. Please provide documentation by **March 31, 2026**.*

Response to Comment: Financial assurance for the assessment of corrective measures was addressed in the *Financial Assurance Annual Report* dated March 16, 2026 (Commission, 2026). See Doc #116581.

References

Black Hawk County Solid Waste Management Commission (Commission), 2026. *Financial Assurance Annual Report, Black Hawk County Sanitary Landfill, Permit # 07-SDP-01-75P*. March 16. [Doc #116581].

AECOM, 2025. *2025 ACM Report, Black Hawk County Landfill, MSWLF Black Hawk County – Permit #7-SDP-1-75P*. December 31. [Doc #116086].

AECOM, 2026a. *2025 Annual Water Quality Report, Black Hawk County Landfill, MSWLF Black Hawk County – Permit #7-SDP-1-75P*. January 31. [Doc #116088].

AECOM, 2026b. *Hydrologic Monitoring System Plan (HMSP), Black Hawk County Landfill, Waterloo, Iowa, AECOM #60746421*. February 6. [Doc #116087].

Iowa Department of Natural Resources (IDNR) (Michael W. Smith, P.E.), Letter to John Foster, 2 Mar 2026. "Black Hawk County Sanitary Landfill, Water Quality Assessment Plan (Doc #116086), Hydrologic Monitoring System Plan (Doc #116087), 2025 Annual Water Quality Report (Doc #116088), Permit #07-SDP-01-75P." [Doc #116318].

Thank you for your attention to this matter. Should you have any questions or need further information, please contact us at the numbers listed below.

Sincerely,

Foth Infrastructure & Environment, LLC



Gina Wilming
Senior Project Manager
(319) 297-2065



Chris Oelkers, P.E.
Lead Civil Engineer
Licensed in Iowa
(319) 775-6106

cc: John Foster, Commission
IDNR Field Office #1

Enclosures

Attachment 1 2024 and 2025 Leachate Head Levels

Attachment 1
2024 and 2025 Leachate Head Levels

TABLE 2
2024 LEACHATE DEPTHS
BLACK HAWK COUNTY LANDFILL

| TRANSDUCER READINGS | | | | | | |
|--|------------------|---------------|---------------|----------------|----------------|----------------|
| DateTime | ABS NO. 2 | AREA E | CELL X | CELL W1 | CELL W2 | CELL W3 |
| 01/01/2024 00:00:00 | 0.68 | 10.76 | 46.75 | 0.27 | 2.57 | 50.68 |
| 02/01/2024 00:00:00 | 1.67 | 8.73 | 219.97 | 1.22 | 2.84 | 114.62 |
| 03/01/2024 00:00:00 | 0.87 | 1.76 | 172.81 | 0.41 | 3.04 | 41.75 |
| 04/01/2024 01:00:00 | 1.13 | 0.00 | 195.61 | 0.81 | 2.44 | 39.99 |
| 05/01/2024 01:00:00 | 1.25 | 0.00 | 180.86 | 0.61 | 3.59 | 84.65 |
| 06/01/2024 01:00:00 | 1.01 | 0.00 | 183.91 | 1.08 | 3.45 | 95.07 |
| 07/01/2024 01:00:00 | 0.86 | 1.49 | 275.52 | 0.88 | 2.57 | 132.96 |
| 08/01/2024 01:00:00 | 0.74 | 0.88 | 276.94 | 1.76 | 3.52 | 39.65 |
| 09/01/2024 01:00:00 | 0.67 | 1.29 | 58.19 | 0.54 | 43.37 | 38.57 |
| 10/01/2024 01:00:00 | 0.52 | 0.68 | 65.90 | 0.20 | 45.33 | 67.39 |
| 11/01/2024 01:00:00 | 0.66 | 0.00 | 61.23 | 0.00 | 4.89 | 37.82 |
| 12/01/2024 00:00:00 | 0.90 | 0.00 | 46.28 | 0.00 | 3.96 | 41.27 |
| Transducer | 929.50 | 873.00 | 865.79 | 870.30 | 873.35 | 866.12 |
| Top of Liner | 931.00 | 876.00 | 871.00 | 874.00 | 879.45 | 870.00 |
| FEET OF LEACHATE OVER THE LINER | | | | | | |
| JAN | -1.44 | -2.10 | -1.31 | -3.68 | -5.89 | 0.34 |
| FEB | -1.36 | -2.27 | Manual > 1-ft | -3.60 | -5.86 | 5.67 |
| MAR | -1.43 | -2.85 | Manual > 1-ft | -3.67 | -5.85 | -0.40 |
| APR | -1.41 | -3.00 | Manual > 1-ft | -3.63 | -5.90 | -0.55 |
| MAY | -1.40 | -3.00 | Manual > 1-ft | -3.65 | -5.80 | 3.17 |
| JUNE | -1.42 | -3.00 | Manual > 1-ft | -3.61 | -5.81 | 4.04 |
| JULY | -1.43 | -2.88 | Manual > 1-ft | -3.63 | -5.89 | 7.20 |
| AUG | -1.44 | -2.93 | Manual > 1-ft | -3.55 | -5.81 | -0.58 |
| SEPT | -1.44 | -2.89 | -0.36 | -3.65 | -2.49 | -0.67 |
| OCT | -1.46 | -2.94 | 0.28 | -3.68 | -2.32 | 1.74 |
| NOV | -1.44 | -3.00 | -0.11 | -3.70 | -5.69 | -0.73 |
| DEC | -1.43 | -3.00 | -1.35 | -3.70 | -5.77 | -0.44 |

TABLE 2
2025 LEACHATE DEPTHS
BLACK HAWK COUNTY LANDFILL

| TRANSDUCER READINGS | | | | |
|--|------------------|----------------|----------------|----------------|
| DateTime | ABS NO. 2 | CELL W1 | CELL W2 | CELL W3 |
| 01/01/2024 00:00:00 | 0.72 | 0.96 | 80.60 | 55.32 |
| 02/01/2024 00:00:00 | 0.40 | 0.39 | 81.73 | 53.86 |
| 03/01/2024 00:00:00 | 0.22 | 1.32 | 82.08 | 54.80 |
| 04/01/2024 01:00:00 | 0.74 | 0.39 | 80.72 | 58.27 |
| 05/01/2024 01:00:00 | 0.56 | 1.15 | 81.52 | 58.03 |
| 06/01/2024 01:00:00 | 0.52 | 1.89 | 83.00 | 57.35 |
| 07/01/2024 01:00:00 | 0.60 | 2.56 | 82.13 | 56.90 |
| 08/01/2024 01:00:00 | 0.34 | 2.23 | 81.62 | 55.34 |
| 09/01/2024 01:00:00 | 0.26 | 1.77 | 84.04 | 56.78 |
| 10/01/2024 01:00:00 | 0.14 | 0.77 | 83.39 | 54.02 |
| 11/01/2024 01:00:00 | 0.08 | 0.41 | 82.73 | 55.76 |
| 12/01/2024 00:00:00 | 0.16 | 0.37 | 81.79 | 56.47 |
| Transducer | 929.50 | 870.30 | 873.35 | 866.12 |
| Top of Liner | 931.00 | 874.00 | 879.45 | 870.00 |
| FEET OF LEACHATE OVER THE LINER | | | | |
| JAN | -1.44 | -3.62 | 0.62 | 0.73 |
| FEB | -1.47 | -3.67 | 0.71 | 0.61 |
| MAR | -1.48 | -3.59 | 0.74 | 0.69 |
| APR | -1.44 | -3.67 | 0.63 | 0.98 |
| MAY | -1.45 | -3.60 | 0.69 | 0.96 |
| JUNE | -1.46 | -3.54 | 0.82 | 0.90 |
| JULY | -1.45 | -3.49 | 0.74 | 0.86 |
| AUG | -1.47 | -3.51 | 0.70 | 0.73 |
| SEPT | -1.48 | -3.55 | 0.90 | 0.85 |
| OCT | -1.49 | -3.64 | 0.85 | 0.62 |
| NOV | -1.49 | -3.67 | 0.79 | 0.77 |
| DEC | -1.49 | -3.67 | 0.72 | 0.83 |

L:\DCS\Projects\TRN\60722882_2024_BH_Landfill_Eng\400_Technical\435 Water Quality\01-IDNR\2023 AWQR\05-Appendix D-G\Appendix D - Leachate Collection System Performance Evaluation Report