

April 3, 2026
File No. 27225262.00

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

Subject: Response to Comments Regarding the 2025 Annual Water Quality Report
Clinton County Area Sanitary Landfill (East)
North MSWLF Unit
Permit No. 23-SDP-01-74P

Dear Mike:

On behalf of the Clinton County Area Solid Waste Agency, SCS Engineers is submitting this response to Iowa Department of Natural Resources (DNR) comments in correspondence, dated February 17, 2026 (Doc #116165), regarding the 2025 Annual Water Quality Report for the North municipal solid waste landfill (MSWLF) unit at the Clinton County Area Sanitary Landfill (East), dated December 30, 2025 (Doc #115315).

1. The text refers to various ravines yet the figures do not show the location of the ravines. Please label the ravines in future reports.

The ravines will be labeled in future reports.

2. For future sampling events, please correct the column label on the groundwater sampling forms from "Specific Conductivity" to the material property label of "Conductivity" or to "Specific Conductance".

The referenced column label on the groundwater sampling forms will be labeled as "Specific Conductance" in future reports.

3. It is unclear what actions or decisions depend on data from MW-90-5. Please evaluate the benefit of continued sampling of MW-90-5.

Monitoring well MW-90-5 has persistent detections of multiple volatile organic compounds, including trichloroethene at a statistically significant level above the groundwater protection standard. However, the monitoring well's location between the North MSWLF unit and South MSWLF unit likely precludes statistical conclusions that would lead to any actions or decisions. It is recommended to discontinue monitoring of monitoring well MW-90-5.



4. The Groundwater Sampling Form for the March 24, 2025 sampling event at Monitoring Well MW-90-13 indicates "ponding around well, leachate running out of sump close to well". It is unclear if the ponding around the well was leachate or not, please advise. In addition, please provide details on how and when the leachate release was resolved.

Field staff were unable to determine if the ponded liquid was leachate or not. However, due to a suspected leachate seep in the area, a leachate interceptor trench to mitigate the seep was installed in November-December 2024, as reported in correspondence dated May 1, 2025 (Doc #112987). The trench construction documentation was approved by the DNR in the permit revision dated May 15, 2025 (Doc #113065). Following the observation during the March 24, 2025, sampling event, landfill staff began operating the sump pump daily. Gaskets were also installed on the manhole lids to ensure that, should a pump failure occur, any leachate would be contained within the manhole. No leachate was observed flowing out of the sump after the March 2025 sampling event.

5. The Groundwater Sampling Form for the March 24, 2025 sampling event at Monitoring Well PZR3 indicates no lock. The next sampling event also indicated no lock. Also, the Groundwater Sampling Form for the November 5, 2025 sampling event at Monitoring Well MW-90-13 indicated no lock. Please replace the missing locks during the next sampling event and notify the DNR when complete.

Missing locks will be replaced during an upcoming sampling event and the replacement will be reported to the DNR.

Sincerely,



Nathan Ohrt
Senior Project Professional
SCS Engineers



Sean Marczewski
Senior Project Professional
SCS Engineers

NPO/SAM

Copies: Mr. Brad Seward, Clinton County Area Solid Waste Agency