SCS ENGINEERS

Transmittal

West Des Moines, IA

PROJECT:	Anderson Ex Co.,CY26 On-Call Support,IA 27226025.00	DATE:	7/7/2026
SUBJECT:	Anderson Excavating C&D Landfill - 78-SDP-04-89C - Response to Comments Regarding the 2025 Annual Water Quality Report	TRANSMITTAL ID:	00003
PURPOSE:	For your approval	VIA:	Info Exchange

FROM

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TO

NAME	COMPANY	EMAIL	PHONE
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REMARKS:

Brian -

SCS Engineers, on behalf of the Anderson Excavating Company, is submitting the Response to Comments Regarding the 2025 Annual Water Quality Report, for the Anderson Excavating C&D Landfill. If you have any questions or comments regarding this response, please contact me at the number below.

Thanks,

Sean A. Marczewski
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QTY	DATED	TITLE	NOTES
1	7/7/2026	2026-07-07_Anderson Excavating C&D Landfill_AWQR Comment Letter Response_v1.0.pdf	

Transmittal

DATE: 7/7/2026
TRANSMITTAL ID: 00003

COPIES:

Sean Marczewski	(SCS Engineers)
Tim Buelow	(SCS Engineers)
Virginia Anderson	(Anderson Excavating Company)
Becky Jolly	

July 7, 2026
File No. 27226025.00

Mr. Brian Rath, 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
Anderson Excavating C&D Landfill
Permit No. 78-SDP-04-89C

Dear Brian:

On behalf of Anderson Excavating Company, SCS Engineers is submitting this response to Iowa Department of Natural Resources (DNR) comments in correspondence, dated February 20, 2026 (Doc #116196), regarding the 2025 Annual Water Quality Report for the Anderson Excavating C&D Landfill (Landfill), dated December 30, 2025 (Doc #115314). The DNR comment is repeated below in *italics* followed by our response.

1. *Quality Control: In April 2025, field duplicates for MW-12 and MW-D exceeded 50% RPD for Chemical Oxygen Demand. Please evaluate the impact this has on the lab results and its incorporation into the data set.*

   The duplicate sample identified in Appendix B-2 of the AWQR was inadvertently reported as having been collected from monitoring well MW-12 rather than MW-2R. However, the RPD was calculated using analytical results from MW-2R and the duplicate, 8.62 mg/L and 16.6 mg/L, respectively, which resulted in an RPD greater than 50%.

   According to the laboratory, the results are near the low end of calibration, and the QC acceptance range of 60% to 140% may explain the difference. It should also be noted that a 2x dilution was performed on the duplicate but not the sample.

   Additionally, laboratory analysis of chemical oxygen demand requires a homogeneous aliquot of suspended solids. Chemical Oxygen Demand (COD) sample bottle sets are not collected at the exact same time when sampling. It is possible that there was a difference in the concentration of suspended solids in the two bottle sets based on the temporal nature of filling sample bottles. However, since total suspended solids were not analyzed, that is unknown. Both COD concentrations were within the historical range; however, the duplicate concentration was the second highest in the period of record. It was noted that ammonia and dissolved iron were non-detect in both samples, and the RPD for chloride was only 5.6%. Based on this information, it appears that the data is acceptable and will be retained in the dataset.

2. *MW-3: This well was dry or had insufficient water in April 2024, October 2024, and April 2025. In addition, an apparent blockage at 73.89 ft (installed depth 118.0 ft) prevented sampling in October 2025. Therefore, a new upgradient well needs to be sited, installed, developed, and sampled. Please provide a schedule for completing this prior to the next AWQR.*

The depth measurement recorded during the October 2025 sampling event appears to have been inadvertently collected from monitoring well MW-4 rather than MW-3 and was confirmed by the depth measurement recorded during the June 2026 sampling event. However, MW-3 was measured as being dry during the June 2026 sampling event.

A schedule to site, install, develop, and sample a new upgradient well will be included in the 2026 Annual Water Quality Report (AWQR). It is proposed to schedule drilling activities at the Landfill after an evaluation can be performed of the potential implications of the results of the additional analytical parameters listed in Comment No. 4 below. Should the need for additional monitoring well installation result from that data, drilling activities for the new background monitoring well, along with bracketing wells, if needed, can be performed in a single drilling event. Two groundwater sampling rounds that include the additional parameters will be completed and evaluated in the 2026 AWQR. Attempts to sample MW-3 will continue to be made during future sampling events until a new background well is installed.

3. *Robust Statistics: Groundwater monitoring data is frequently non-parametric. Therefore, the current two times the standard deviation statistics may not be appropriate. We need to discuss whether the current approach or more robust statistics are applicable so we can make necessary changes before the next round of statistical analysis.*

   It is recommended to update the statistical evaluation to include prediction limits following the Unified Guidance to accommodate both parametric and non-parametric datasets.

   Statistical evaluation will continue to utilize the historical dataset from monitoring well MW-3 until sufficient data has been collected from a new background well. If statistically appropriate, consideration of combining the historical MW-3 data set with the new background monitoring well data will be evaluated.

4. *Exceedances: Increasing trends or statistical exceedances have been noted for several parameters. However, since these parameters are considered indicators, the actual impact on the groundwater is unknown. Therefore, additional parameters are needed to evaluate groundwater conditions. The DNR would like to discuss adding the following parameters to the sampling list: antimony, beryllium, boron, chloride, manganese, methylene chloride, nickel, and vinyl chloride. Additionally, we would like to discuss sampling the leachate and adding any detected parameters as well.*

   Antimony, beryllium, boron, manganese, methylene chloride, nickel, and vinyl chloride were sampled during the June 2026 sampling event and will continue to be sampled semi-annually. Additionally, total suspended solids were also sampled. Chloride is included in the “e” list parameters and will continue to be sampled semi-annually in accordance with IAC 567 114.26(4)”e”. Additionally, the “f” list parameters will continue to be sampled annually in accordance with IAC 567 114.26(4)”f”.

   An Appendix I sample was collected from the leachate storage tank during the June 2026 sampling event. Detected parameters will be sampled in the monitoring wells MW-2R, MW-3 (if there is sufficient water), MW-12, and MW-13 during the 2nd 2026 semi-annual sampling event.

5. *TSS/Turbidity: Elevated turbidity was noted in MW-12 (382.3 to 518.8 NTU) and MW-13 (51.8 to 131.2 NTU). We would like to discuss the correlation between metals and turbidity along with potential changes to sampling procedures that could reduce the impact of turbidity.*

It is understood that elevated turbidity and total suspended solids concentrations could potentially affect metals concentrations and may contribute to elevated analytical results. To reduce the potential influence of turbidity on future samples, dedicated low-flow submersible pumps are recommended for installation within the screened interval of monitoring wells MW-2R, MW-12 and MW-13 prior to the 2nd 2026 semi-annual sampling event. New monitoring wells at the Landfill will also be outfitted with dedicated low-flow sampling equipment, as appropriate. As stated above, total suspended solids will be sampled semi-annually along with the additional metals parameters.

6. *Leachate Collection System. The DNR will provide its review of this submittal and the more recent one under separate cover.*

   Received in correspondence dated May 13, 2026 (Doc #117129).

7. *Methane Monitoring. To reduce or terminate post-closure care in the future, the facility needs subsurface methane monitoring. We want to discuss the potential monitoring network based on the availability of existing monitoring wells with unsubmerged screens.*

   Water levels in monitoring wells MW-1, MW-2R, MW-3, MW-9, MW-12, and MW-13 were measured during the June 2026 sampling event and compared to the top of screen elevations. The water level in monitoring well MW-4 could not be measured as the measurement device could not progress past 75.2 feet below the top of casing, while the screen depth is located at 190.6 feet below the top of casing. Monitoring wells MW-2R and MW-3 had unsubmerged screens with an exposed screen interval of 1.59 feet and 8.83 feet, respectively. Monitoring well MW-2R is located south of the waste boundary, and monitoring well MW-3 is located northwest of the waste boundary, and it is recommended that quarterly methane monitoring be conducted in monitoring wells MW-2R and MW-3. A plan to install additional subsurface methane monitoring points, if necessary, will be prepared to coincide with the installation of a new upgradient well, if applicable, and will be included in the 2026 AWQR.

Sincerely,

Sean Marczewski
Senior Project Professional
SCS Engineers

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

SAM/TCB

Copies: Ms. Virginia Anderson, Anderson Excavating Company