

July 30, 2026
File No. 27225280.00

Mr. Mike Smith, P.E.
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

Subject: Response to DNR Comment Regarding the Corrective Action Evaluation
Northwest Iowa Area Sanitary Landfill
Permit No. 84-SDP-01-74P

Dear Mike:

SCS Engineers, on behalf of the Northwest Iowa Area Solid Waste Agency, is submitting this response to Iowa Department of Natural Resources (DNR) comments in correspondence dated June 24, 2026 (Doc #117407) regarding the *Corrective Action Evaluation* for the Northwest Iowa Area Sanitary Landfill (Landfill) dated June 23, 2026 (Doc #117388). The DNR comments are cited below in *italics*, followed by the response.

1. The 2025 Annual Water Quality Report stated that "Evidence of arsenic impact downgradient of the leachate storage lagoon near monitoring well DGP-1500 is present. Characterization and bracketing efforts performed during this reporting period will be discussed in the ACM report by June 23, 2026." A new Assessment of Corrective Measures (ACM) report has not been submitted to date. Instead, it appears that the Corrective Action Evaluation seeks approval to modify/update the current ACM (dated March 28, 2017, Document No. 88848) to include the management/control of current levels of arsenic at DGP-1500. The DNR supports this effort.

The *Corrective Action Evaluation* demonstrates that the current remedy in place at the Landfill for groundwater impact near monitoring well DG-1301 is appropriate to address the newly identified impact at monitoring well DGP-1500. The current remedy is passive venting of the subsurface to vent landfill gas. In addition, the use of attenuation zone point of compliance (AZPOC) monitoring wells is recommended to monitor the effectiveness of the remedy at monitoring wells DG-1301 and DGP-1500.

2. The Corrective Action Evaluation also proposes that a revised corrective assessment monitoring plan and an evaluation for additional source control for the arsenic plume be prepared. The DNR supports this effort.

If the DNR agrees with the assertion in Item #3 that further bracketing is not necessary, the revised corrective action groundwater monitoring program would include MW-17 (for DG-1301) and MW-19 (for DGP-1500) as AZPOC monitoring wells. Source control would likely consist of landfill gas vents installed within the waste mass.



3. The delineation of the arsenic plume in the vicinity of DGP-1500 does not appear to be complete. The DNR requests that the plume be bracketed both horizontally and vertically.

Monitoring well MW-19, downgradient of DGP-1500, horizontally brackets the arsenic impact. A sample collected on May 21, 2026 had an arsenic concentration of 0.0034 mg/L, lower than the prediction limit of 0.00555 mg/L.

The suspected source of impact is landfill gas, which would migrate in the vadose zone. Directly downgradient of monitoring well MW-19 is the Floyd River, which would preclude further vadose zone migration.

The boring log for monitoring well MW-19 indicated the screen bottom at 3 feet below the top of a strata described as "brown gray dense clay," likely a transition zone from oxidized till to unoxidized till. It is expected that unoxidized till underlies the transition zone, resulting in a decrease in hydraulic conductivity with depth from the oxidized till to the transition zone to the unoxidized till, which would favor primarily horizontal flow over vertical flow. The screen also intersects a 1-foot layer described as "brown sand." The more permeable "brown sand" would likely be the dominant material conducting groundwater toward the Floyd River. Based on the above discussion, vertical bracketing does not appear necessary.

Please provide the DNR a schedule by July 31, 2026 to address and/or complete these items.

The implementation of source control would be dependent on the schedule of the well contractor, but could likely be completed by September 30, 2026. The revised corrective action monitoring plan would be completed by August 31, 2026.

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

Sincerely,



Nathan Ohrt
Senior Project Professional
SCS Engineers

NPO/TCB

Copies: Mr. Brent Kach, Northwest Iowa Area Sanitary Landfill



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