

West Des Moines, IA

PROJECT: Des Moines Co, FY25-27 On-Call Support, IA
27224414.00 DATE: 7/27/2026

SUBJECT: Des Moines County Regional Sanitary Landfill - 29-SDP-01-76 -
Response to Comments Regarding the 2025 Annual Water Quality Report TRANSMITTAL ID: 00002

PURPOSE: For your approval VIA: Info Exchange

FROM

NAME	COMPANY	EMAIL	PHONE
Sean Marczewski West Des Moines, IA	SCS Engineers	SMarczewski@scsengineers.com	+1-515-631-6152

TO

NAME	COMPANY	EMAIL	PHONE
Alexis Slade		alexis.slade@dnr.iowa.gov	

REMARKS: Alexis -

SCS Engineers, on behalf of the Des Moines County Regional Solid Waste Commission, is submitting the Response to Comments Regarding the 2025 Annual Water Quality Report, for the Des Moines County Regional Sanitary Landfill. If you have any questions or comments regarding this response, please contact me at the number below.

Thanks,

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Transmittal

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1	7/27/2026	2026-07-27_Des Moines County Sanitary Landfill_2025 AWQR Comment Letter Response_v1.0.pdf	

COPIES:

Chris Ball	(Des Moines County)
Christine Collier	(SCS Engineers)
Sean Marczewski	(SCS Engineers)
Becky Jolly	
Eric Houtz	(Des Moines County)

July 27, 2026
File No. 27224414.00

Ms. Alexis Slade
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
Des Moines County Regional Sanitary Landfill
Permit No. 29-SDP-01-76

Dear Alexis:

On behalf of the Des Moines County Regional Solid Waste Commission (Commission), SCS Engineers (SCS) is submitting this response to Iowa Department of Natural Resources (DNR) comments in correspondence, dated July 2, 2026 (Doc #117469), regarding the 2025 Annual Water Quality Report for the Des Moines County Regional Sanitary Landfill (Landfill), dated February 11, 2026 (Doc #116136). The DNR comment is repeated below in *italics*, followed by our response.

Water Quality Sampling and Reporting

Although the DNR concurs with the recommendations in Section 6.0 of the AWQR, the DNR notes the limited progress toward remedy completion at most of the wells in corrective action since implementation approximately 8 years ago. However, we recognize that the proposed sampling and analysis may clarify things. Therefore, the DNR requests that the remedy and the progress toward completion be included in the next report. In addition, the discussion shall include recommendations for any changes to the remedy that may be needed to move toward completion.

A discussion of the remedy and progress towards completion of wells in corrective action will be included in the 2026 Annual Water Quality Report.

Monitoring Well Maintenance and Performance Re-Evaluation

Below are responses on multiple wells requested to be addressed.

1. *MW-4-93, MW-38, and PZ-10 have maximum depth discrepancies greater than 1 foot. Please provide a plan to evaluate and address the depth discrepancies.*

The maximum depth measured in monitoring point MW-4-93 was 1.9 feet less than the installed total depth during both sampling events in 2025 and 2.0 feet less during the June 2026 sampling event. The screened interval of MW-4-93 is 10 feet, leaving 8.0 feet exposed when it was measured as 2.0 feet shallower. Similarly, the maximum depth measured in monitoring point PZ-10 has consistently been 1.0 to 3.0 feet shallower than the installed depth since 2010. The screened interval of PZ-10 is 10 feet, leaving 7.0 feet of exposed when it is measured as 3.0 feet shallower. These measurements suggest that minor siltation may have occurred within the wells since installation. However, the available monitoring data indicates that any such siltation has not adversely affected well performance. MW-4-93 has successfully produced a groundwater



sample during every semiannual monitoring event for at least the past 10 years. Likewise, PZ-10 has produced a sample during every semiannual monitoring event over the same period, with the exception of November 2024, when insufficient water was present; November 2023, when sampling equipment failure occurred; and May 2018, when sampling the well was inadvertently missed. Because both monitoring points have consistently yielded samples over an extended period, the observed reduction in measured depth does not appear to impair their ability to provide representative groundwater monitoring data.

The maximum depth measured in monitoring point MW-38 was 0.8 feet deeper than the installed depth during the first 2025 sampling event and 1.9 feet deeper than the installed depth during the 2026 sampling event. MW-38 is sampled annually in accordance with the Groundwater Monitoring Optimization Report, approved on September 21, 2020 (Doc #98499), and has successfully produced a sample during every annual sampling event since that time. Because the well continues to function as intended and consistently provides samples suitable for monitoring purposes, the observed depth discrepancy is not considered indicative of a condition requiring corrective action.

Based on the long-term sampling record and the continued ability of MW-4-93, PZ-10, and MW-38 to reliably produce groundwater samples, there is no evidence that the observed depth discrepancies are affecting monitoring performance or data quality. Therefore, no further investigation or corrective action is recommended at this time.

2. *DNR acknowledges that MW-199 requires concrete repairs, please provide a schedule of when you anticipate this work to be completed.*

It is anticipated that repairs will be completed by November 30, 2026.

3. *DNR acknowledges that MW-6-93 was not sampled because it could not be located. Please provide an update on locating the monitoring well, so it can be sampled during the next event.*

During the June 2026 sampling event, MW-6-93 was located, and a water level measurement was recorded. MW-6-93 is sampled annually and is scheduled for the 2nd 2026 semi-annual sampling event. Field staff will coordinate during the sampling event to confirm the well location and collect the scheduled sample.

Leachate Control System Evaluation Report

Please provide a plan of action for addressing the leachate head exceedances of 12" in LM-1 and LM-2. Otherwise, please continue to monitor, report, and operate the system in accordance with the permit and regulations.

The LM-1 and LM-2 level transducers are installed in the Cell 1 and Cell 2 leachate collection system piping, respectively, near the low points of each cell. Installation of the transducers was approved by the DNR on August 5, 2010 (Doc #59554), and was connected to the SCADA monitoring system in Fall 2010, as documented in the 2010 Leachate Control System Performance Evaluation Report (LCSPER) (Doc #63407). Measured liquid levels are adjusted based on the elevation difference between the transducers and the cell low points to calculate leachate column thickness.

Following review of the 2011 LCSPER, the DNR requested that an action plan addressing leachate levels be included in the 2012 LCSPER (Doc #70482). This issue was subsequently discussed during a meeting on June 6, 2012, between DMCSW, Barker Lemar Engineering Consultants, and the DNR (Doc #72474). At that meeting, it was noted that the leachate levels measured in LM-1 and LM-2 did not present an immediate concern because the levels were stable, the Landfill maintained an inward hydraulic gradient, and groundwater collected by the underdrain system was managed as leachate.

Following this discussion, no action plan was included in the 2012 LCSPER, and the DNR issued no further comments or requests regarding LM-1 and LM-2.

Since the transducers were installed in 2010, the calculated leachate column thicknesses in both locations have remained stable, and the measurements recorded in 2025 are consistent with the historical range. More than a decade of monitoring data demonstrates that conditions have not significantly changed and do not indicate an adverse trend requiring corrective action. Based on the long-term stability of the monitored levels, the absence of subsequent DNR concerns following the 2012 discussions, and the continued inward-gradient conditions at the site, SCS concludes that no further action is warranted regarding leachate levels in LM-1 and LM-2 at this time.

Gas Monitoring Report

DNR acknowledges that explosive gas concentrations were found above the lower explosive limit (LEL) for GUCO-2. We see the levels have consistently exceeded 25%, however, we do not have on record of us being notified of this according to rule 113.9(2). Please follow the response procedure.

According to the 2020 Methane Monitoring Report dated January 12, 2021 (Doc #99436), groundwater underdrain monitoring points will be monitored as subsurface points instead of structures, which was reviewed with no comment in correspondence dated March 18, 2021 (Doc #99998). Additionally, GUCO-2 is a groundwater underdrain cleanout in Area 1B and is not located near the facility property boundary; therefore, it does not require notification to the DNR if methane concentrations are measured at or above 100% of the LEL.

Quality Assurance/Quality Control

According to the data validation documentation (Appendix B-2), it was indicated that samples were analyzed outside of the analytical holding time. Please clarify the impact this could have on sampling results.

Samples for alpha-BHC were collected from monitoring wells MW-4-89 and MW-40R on May 20, 2025, to bracket the alpha-BHC impact at monitoring well MW-39R. The samples were received by the laboratory on May 22, 2025, and analyzed on May 29, 2025. Alpha-BHC has a holding time of 7 days. According to Eurofins Environment Testing, since the samples were analyzed outside of the holding time by two days, the results would have a low bias and, technically, would not be valid. However, since monitoring wells MW-4-89 and MW-40R began sampling for alpha-BHC in 2022, the results have been below the laboratory reporting limit, including the 2025 results. These results are likely representative but will be flagged and removed from the dataset. The three groundwater monitoring wells will be tested again for alpha-BHC during the Fall 2026 sampling event and continuing on as the analysis is part of the semi-annual sampling program.

Sincerely,



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Senior Project Professional
SCS Engineers

SAM/CLC



Christine L. Collier, P.E.
Project Director
SCS Engineers

Copies: Mr. Chris Ball, Des Moines County Regional Solid Waste Commission
Mr. Eric Houtz, Des Moines County Regional Sanitary Landfill