

September 8, 2026

DAVID AMES
CEDAR FALLS UTILITIES
PO BOX 769
CEDAR FALLS IA 50613

**Re: Cedar Falls Utilities Laversee Road Ash Landfill
Permit No. 07-SDP-11-89C
2025 Annual Water Quality Report Received Response Letter (Doc [#118049](#))**

Dear Mr. Ames:

The Iowa Department of Natural Resources (DNR) has reviewed the Response Letter, dated September 1, 2026, as submitted by Stanley Consultants. Our comments are below.

Groundwater Monitoring

- 1. In August 2026, Terracon performed video scoping with the Heron Dipper-See Examiner well inspection camera to evaluate the well. Findings from this inspection were provided to IDNR in a memorandum dated August 5, 2026 (included as an attachment) and is summarized below. The camera inspection indicated that root hairs were present within the well screen at approximately 19 feet below the top of well casing (ft BTOC). Because of this, the camera could not get below 20 ft BTOC. Terracon was able to use a stiff-bristled brush attached to a one-inch PVC handle to loosen additional root hairs throughout the depth of the well. MW-5 will be cleaned prior to the 2026 annual sampling event.**
 - The information provided does not fully resolve DNR's previous comment regarding the approximately seven-foot discrepancy in the measured total depth of MW-5. While the August 2026 investigation identified root intrusion within the well screen and indicates that root material was loosened/removed, the camera could not advance below approximately 20 ft BTOC. Therefore, the condition and integrity of the well below this depth were not visually verified, and the cause of the previously observed well-depth discrepancy has not been conclusively determined.
 - Following cleaning and purging of MW-5, please remeasure and document the total well depth and compare the measurement with the historically documented constructed/total depth of the well. If the original well depth cannot be verified or restored, please further evaluate the cause of the discrepancy and the integrity and suitability of MW-5 for continued groundwater monitoring. Provide DNR with the results of this evaluation and any proposed corrective actions or recommendations.
- 2. Based on observations from a well inspection completed by Cedar Falls Utilities on October 2, 2025, MW-2 was documented as having a bend to the well casing, limiting the diameter of disposable bailer capable of being used. A one-inch bailer was used instead of a two-inch bailer during sampling in October 2025. In August 2026, Terracon performed video scoping with the Heron Dipper-See Examiner well inspection camera to evaluate the well. Findings from this inspection were provided to IDNR in a memorandum dated August 5, 2026, and is summarized below. During the scoping, Terracon was**

unable to place a 1.66-inch outside diameter well bailer below three feet below ground surface (ft bgs), where a slight bow was observed. Cedar Falls Utilities will continue to sample MW-2, implementing either a smaller diameter bailer or peristaltic pump, pending any guidance from IDNR to do otherwise and will also evaluate future abandonment of well MW-2.

- DNR agrees with the recommendations to properly abandon MW-2 and replace it with a new two-inch diameter monitoring well of similar construction and depth. However, there are some discrepancies in your report that may need clarification. In the memo and in the report, you recommend the abandonment and replacement of MW-2, but at the end of your report you state that MW-2 has been shown to be effective since the repair was completed post-closure. Please confirm what your plan of action will be for MW-2.
3. **The current approach of using two times the standard deviation statistics is based on requirements provided in Iowa Administrative Code Chapter 567, Section 113. However, since groundwater monitoring data can be nonparametric, a more robust statistical approach could be used to supplement the trend analysis in groundwater. The proposed approach would be to evaluate trends in groundwater using a Mann-Kendall analysis. This analysis would show whether concentrations are increasing or decreasing to a statistically significant degree or if there is no statistically significant trend. This proposed analysis would only occur for well-constituent pairs that have had detections in at least 50% of samples to reduce the impact of non-detects on the data set. This trend analysis can be incorporated into the 2026 AWQR.**
- DNR does not consider the Mann-Kendall trend analysis alone sufficient to evaluate whether groundwater quality has been or may be affected by the landfill. The Mann-Kendall test evaluates whether concentrations exhibit a statistically significant monotonic trend over time; however, the absence of a significant increasing trend does not necessarily demonstrate the absence of a landfill-related impact. It is recommended that you provide a more comprehensive statistical and hydrogeologic evaluation of the groundwater monitoring data using multiple lines of evidence appropriate for the available dataset.

Please provide a response or schedule a meeting to occur **on or before November 15, 2026**. At that time, we will discuss and set a schedule for completion of the above items.

If you have any questions, you may contact me at [\(515\) 779-5349](tel:5157795349) or alexis.slade@dnr.iowa.gov.

Sincerely,

Alexis Slade
Environmental Engineer

DNR Field Office #1

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