

October 15, 2026

Ms. Alexis Slade
Environmental Engineer
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: Request to Reduce the Frequency of Leachate Level Measurements
SCISWA Sanitary Landfill
63-SDP-02-77P**

Dear Ms. Slade:

On behalf of the South Central Iowa Solid Waste Agency (SCISWA) we request an amendment to the Permit related to the frequency of leachate level measurements in Areas A1/A2. We request that the frequency of leachate level measurements be reduced from monthly to quarterly.

Area A1 and Area A2 were closed incrementally between 2004 to 2011 as documented in Special Provision X.18.a. of the October 23, 2025, Permit (Doc #114543). Area A1 and Area A2 predate liner and leachate control requirements in rule. Figure 1 illustrates the site.

The Operating Permit currently requires monthly measurements “at all piezometers” (Special Provision X.2.a) and requires specific responses in a case where the measured leachate column exceeds 12-inches (Special Provision X.2.c).

Special Provision X.18.b imposes different requirements for leachate control and head limits in the closed unlined units (Area A1/Area A2), which are evaluated on a “case-by-case basis”.

Leachate monitoring points LW-477, LW-478R, LW-479, and LW-471R are the points currently monitored in Area A1/Area A2 (Figure 1). Table 12A is attached that summarizes the leachate well measurements at LW-477, LW-478R, LW-479, and LW-471R in Area A1/Area A2 between 2022 and August 2026.

Review of the leachate well measurements indicates that there is little variation in the depth to water measurements over time. LW-478R and LW-471 indicate 0 to 0.8 feet of variation over time. LW-477 and LW-479 indicate 2.67 to 4.45 feet of variation over time.

Review of the average water column in each well (total well depth minus average depth to water) is also telling. LW-478R and LW-471 indicate 0 to 0.08 (1.0 inch) feet of water column on average, while LW-477 and LW-479 indicate approximately 12 feet of water column on average.

Given the very static nature of the measurements, we recommend that the frequency of leachate level measurements in Area A1/Area A2 be reduced to quarterly. The quarterly data will be sufficient to identify or evaluate any changes in leachate level conditions in the unlined landfill.



Similar requests to reduce the frequency of leachate level measurements in closed landfills have been previously approved. Examples include Rural Iowa Sanitary Landfill (Doc #106911 June 2, 2023) and Fayette County Sanitary Landfill (Doc #89410 January 13, 2017).

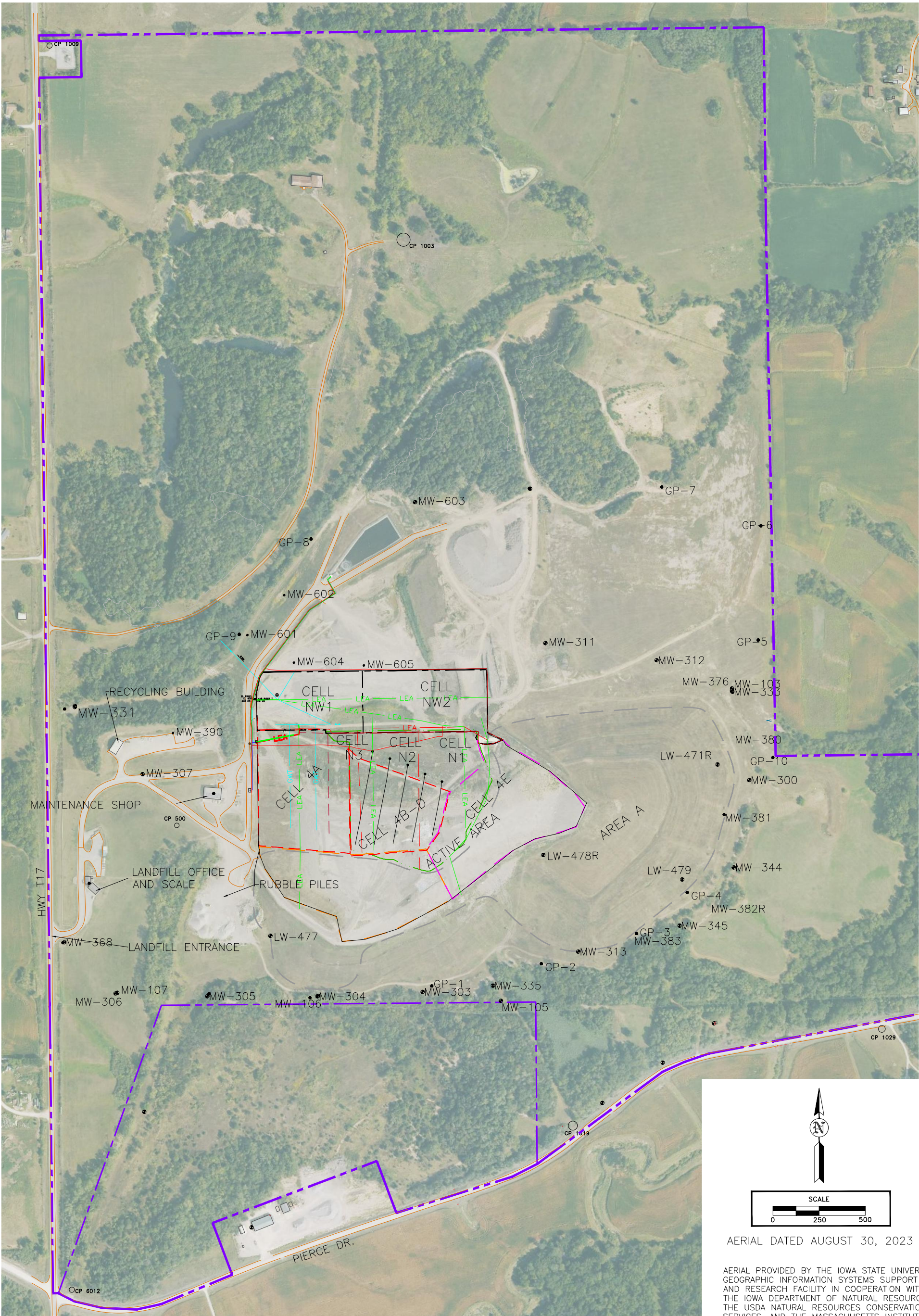
SCISWA appreciates your consideration of this request.

Respectfully Submitted,
HLW Engineering Group



Todd Whipple, CPG
Project Manager

cc: *Ms. Jennifer Murphy, Executive Director*



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AERIAL VIEW

SOUTH CENTRAL IOWA SOLID WASTE AGENCY SLF
MARION COUNTY, IOWA

FIGURE: 1		
REVISION	NO.	DATE
DRAWN JGH	PROJECT NO. 6009-24A	DATE 10/30/25

Table 12A
Leachate Level Monitoring - Area A1 & A2
Annual Water Quality Report
SCISWA Sanitary Landfill
Permit No. 63-SDP-02-77P

	Depth to Water (ft)			
Date	LW-477	LW-478R	LW-479	LW-471R
1/13/2022	29.9	86.9	25.3	20.1
2/21/2022	29.9	86.9	25.0	20.1
3/25/2022	28.9	86.9	24.6	20.1
4/12/2022	28.8	86.9	24.7	20.1
5/5/2022	28.7	86.9	24.8	20.1
6/18/2022	28.1	86.9	25.0	20.1
7/28/2022	28.7	86.8	23.2	20.1
8/26/2022	28.5	86.8	25.8	20.1
9/20/2022	28.8	86.8	25.0	20.1
10/21/2022	29.1	86.8	24.9	20.1
11/18/2022	29.1	86.8	23.5	20.1
12/2/2022	28.6	86.8	24.8	20.1
1/27/2023	28.7	86.7	24.9	20.1
2/11/2023	28.7	86.8	24.8	20.1
3/23/2023	28.7	86.9	25.1	20.1
4/26/2023	28.5	86.9	25.1	20.1
5/22/2023	28.3	86.4	25.1	20.1
6/5/2023	28.3	86.4	25.2	20.1
7/28/2023	28.4	86.4	25.2	20.1
8/25/2023	28.6	86.9	25.3	20.1
9/25/2023	29.0	86.9	25.4	20.1
10/23/2023	29.1	86.9	25.4	20.1
11/30/2023	28.4	86.9	25.3	20.1
12/21/2023	28.9	86.9	25.9	20.1
1/31/2024	28.4	86.9	25.5	20.1
2/7/2024	28.8	86.9	25.5	20.1
3/12/2024	28.3	86.9	25.1	20.1
4/25/2024	28.4	86.1	25.3	20.1
5/16/2024	28.5	86.9	25.3	20.1
6/4/2024	27.9	86.9	25.5	20.1
7/18/2024	27.5	86.9	25.4	20.1
8/27/2024	27.4	86.9	25.1	20.1
9/13/2024	27.5	86.9	25.1	20.1
10/2/2024	27.7	86.9	25.1	20.1
11/12/2024	28.1	86.9	25.4	20.1
12/10/2024	28.0	86.9	25.3	20.1
1/28/2025	28.7	86.9	24.3	20.1
2/28/2025	27.2	86.9	25.0	20.1
3/12/2025	27.4	86.9	25.1	20.1
4/22/2025	27.4	86.1	25.2	20.1
5/8/2025	27.3	86.9	25.4	20.1
6/18/2025	26.9	86.9	25.1	20.1
7/22/2025	26.7	86.9	24.7	20.1
8/20/2025	26.5	86.9	24.7	20.1
9/24/2025	26.6	86.9	24.5	20.1
10/30/2025	26.5	86.9	24.7	20.1
11/5/2025	26.8	86.9	25.7	20.1
12/30/2025	25.9	86.9	24.8	20.1
1/15/2026	25.5	86.9	24.3	20.1
2/4/2026	25.9	86.9	25.7	20.1
3/11/2026	27.4	86.9	25.6	20.1
4/11/2026	26.9	86.9	25.8	20.1
5/29/2026	26.5	86.9	25.4	20.1
6/4/2026	25.9	86.9	25.1	20.1
7/29/2026	25.4	86.9	24.8	20.1
8/24/2026	25.8	86.9	24.8	20.1

Maximum (ft)	29.85	86.90	25.87	20.10
Minimum (ft)	25.40	86.10	23.20	20.10
Range in Water Level (ft)	4.45	0.80	2.67	0.00

Average	27.78	86.82	25.06	20.10
Well Depth (ft)	40.50	86.90	36.90	20.10
Average Water Column (ft)	12.72	0.08	11.84	0.00