



March 27, 2019

Con 12-1-1
Doc # 94733

JOTHAM ARBER
GUTHRIE COUNTY ENVIRONMENTAL HEALTH
GUTHRIE COUNTY COURTHOUSE
200 NORTH 5TH STREET
GUTHRIE CENTER IA 50115

Re: Guthrie County Sanitary Landfill
Permit No. 39-SDP-01-73C
2018 Annual Water Quality Report (Doc. No. 94161)

Dear Mr. Arber:

The Iowa Department of Natural Resources (DNR) has reviewed the 2018 Annual Water Quality Report, dated January 11, 2019, submitted on your behalf by Turkle-Clark Environmental Consulting, L.C., and has the following comments:

Water Quality Report

Monitoring wells in assessment monitoring remain MW-3 and MW-16. These wells continue to show levels of metals (particularly cobalt, nickel, and arsenic) that exceed statewide standards. For these, and other metals occasionally detected above prediction limits, the groundwater protection standard used remains a combination of both site specific and state-wide levels depending on background detections.

Table 5 "Background and GWPS Summary" notes that the statistical test for barium is non-parametric. Barium has been detected in all 18 sampling events at MW-12 and has been found to be normally distributed for the purposes of groundwater analysis. The tests used by Otter Creek Environmental in "Statistical Analysis For The Guthrie County Sanitary Landfill" reflect a normal data distribution for barium.

The permit holder shall continue biannual sampling and analysis of Appendix I parameters along with total suspended solids at monitoring points MW-3, MW-5, MW-12, MW-14, MW-16, MW-19, and any applicable Appendix II parameters that have been detected and confirmed as recommended by your consultant.

If you have any questions or if we may be of further assistance please contact me at matthew.graesch@dnr.iowa.gov or by phone at (515) 725-8331.

Sincerely,



Matthew Graesch
Environmental Specialist
Solid Waste Section

Copy: Cindy Turkle
Turkle-Clark Environmental Consulting
12662 McKinley Trail
Indianola, IA 50125

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