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Hot Topics

- **State Historic Preservation Office:** The procedures for obtaining a review of your facility from the State Historic Preservation Office (SHPO) have changed due to recent changes in state law. SHPO can no longer be more restrictive than federal law, and is in the process of revising its administrative rules. For the moment, the law is being implemented by requiring applicants for SHPO review to first determine whether or not a federal agency has jurisdiction over a project. Due to the new law, SHPO will only conduct a state-level review of a project if no federal agency claims jurisdiction. In those cases, the request for the state-level review must come from the DNR; SHPO will no longer conduct project reviews unless requested by another state agency. If a federal agency does claim jurisdiction, it will handle the cultural resources review; though it may still consult with SHPO for a state opinion of the project.
For reviews of landfill expansion projects, the new procedures mean that you must first consult with the federal agencies to determine whether they have jurisdiction over a project (e.g. due to the presence of wetlands, flood plains, endangered species, etc.). If a federal agency claims jurisdiction over a project, they will handle the cultural resources review and will solicit an opinion from SHPO. If the federal agencies turn down the project, the DNR permitting officer will coordinate a state-level review with the SHPO. Please contact your DNR permitting officer for more details regarding the application requirements for a state-

level review by SHPO. The DNR's Land and Waters Bureau may also need to be consulted for a review of records for threatened and endangered species. Responses from the federal agencies may add additional time to the approval process, so please be sure to account for this review time when planning future projects.

- **Water Quality, Leachate Control System Evaluation and Gas Monitoring Reports:** The Department is receptive to only getting two reports (for sites only on detection monitoring) per year with one being the Semi-Annual Water Quality Report (SAWQR) and the other being the Annual Water Quality Report (AWQR) that includes the Leachate Control System Performance Evaluation and Gas Monitoring reports with the last 12 months and the last 4 quarters of leachate and gas monitoring respectively. In addition, the Department is receptive to changing the submittal date for the AWQR to dates other than "by November 30 or by January 31." Contact the project officer for your site if interested as a permit amendment may be needed.
- **Protecting Compacted Clay Layers from Freeze/Thaw Damage:** The Department has developed an alternate means of demonstrating compliance with regard to the timeframe for covering a newly constructed liner for frost protection at municipal solid waste landfills subject to Iowa Administrative Code 567-113.7(5)"a"(1): [Freeze Thaw Effects to Landfill Liner](#)
- **Management of Underdrain Water:** The Department requires that when environmental monitoring indicates the presence of contaminants in the underdrain water discharge that this discharge be treated as leachate. This is intended to prevent the discharge of a pollutant into the waters of the United States. Doing so requires a National Pollutant Discharge Elimination System (NPDES) permit. However, now, the Water Resources Bureau and the Land Quality Bureau of the Department have reached an agreement that the Solid Waste Section can review and approve proposals from landfill permit holders that allows for the passive treatment of underdrain water prior to discharge into a water of the United States. Passive treatment is a concept that does not allow for electrical, mechanical or chemical means of treatment (for example aeration pumps, or pH adjustments) and is relatively foolproof and not easily foiled by human error or equipment breakdown or malfunction. Talk to your project officer if you think that a passive treatment system might be an effective means to manage contaminated underdrain water.

Use of Tire Derived Aggregates

The Department asks that engineers and planners consider the possible impact of the use of Tire Derived Aggregate (TDA) may have on nearby ground water quality. Especially if used underneath or outside the waste cell liner and leachate collection system. The impact could be enhanced if migrating landfill gas comes in contact with the TDA and the TDA is also in contact with ground water.

Placement of a large quantity of carbon (rubber) and iron (from bead/belt wire) could affect sensitive aquifer oxidation/reduction conditions, including possibly decreasing the dissolved oxygen levels.

These are some links to studies on these subjects:

- www.betiresmart.org/getfile.cfm?ID=563&type=publication
 - www.rma.org/scrap_tires/scrap_tires_and_the_environment/field_study.pdf
 - www.epa.gov/osw/conservation/materials/tires/tdastudy.pdf
 - www.chelseacenter.org/pdfs/TechReport2.pdf
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Financial Assurance Planning, Closure Costs and Engineer's Closure Cost Estimates

The Department would like to remind permit holders that some approved alternative liner designs also required the use of a specific cap design to limit the amount of leachate generation at closure. Therefore, the professional engineer should take the specific design requirements into account when estimating closure costs.

Approved Laboratory Methods

Not aware of the approved laboratory methods, then visit the University Hygienic Lab website: http://www.shl.uiowa.edu/labcert/idnr/reports/public/series_form.xml

Use of this table can help to reduce costly re-sampling and analysis if the lab that you work with used the wrong method. Careful completion of the chain of custody can also reduce errors in communication between the landfill and the laboratory.

Industrial Sludge

Some interesting statistics on the amount of industrial sludge that is being land applied. You may want to consider this material as a beneficial use for areas that are difficult to establish vegetation such as landfill caps, borrow pits, reclaimed mines, etc.

Industrial Sludge Land Application - Permitted Facilities October 1, 2011 - December 31, 2011

Planning Area	Gallons	Wet Tons	Dry Tons
ECICOG	3,552,294	41,978	14,789
PCB	4,331,237	18,073	957
LNI	818,210	3,414	189
NWIASWA	3,335,663	16,869	2,862
Out of State	12,971,682	58,126	3,036
Floyd-Mitchell	318,989	1,331	58
SCISWA	NA	1,311	906
Totals	25,328,075	141,102	22,797