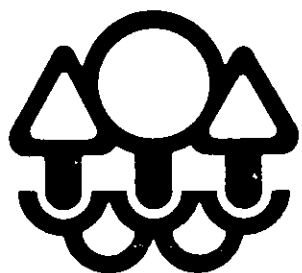


SW-57



# Minnesota Pollution Control Agency

March 17, 1981

Paul Smith  
Metropolitan Council  
300 Metro Square Building  
7th & Robert Streets  
St. Paul, Minnesota 55101

Dear Mr. Smith:

Agency staff have received the supplement to the draft EIS on the proposed expansion of the Freeway Landfill and offer the following comments on the draft EIS.

The Agency staff believes the supplement presents sufficient information regarding the possibility that leachate from the Freeway Landfill may contaminate wells operated by the City of Burnsville. As stated in the conclusions of the supplement, the information indicates that under current maximum pumping conditions at the Burnsville well field, the normal upward flow of groundwater from the Jordan aquifer to the Shakopee aquifer is reversed in an area which has a boundary close to the Freeway Landfill. Due to the theoretical nature of the boundary determination, the boundary may actually include the southern portion of the Freeway Landfill. If the landfill is within this zone of influence, the leachate known to be produced in the landfill would be expected to enter the Jordan aquifer. The Agency staff believes that further study to attempt to quantify leachate migration from the Freeway Landfill is properly a matter to be taken up as part of the permit application. The results from any further study could lead to an expansion of the groundwater monitoring system at the landfill. Therefore, the information presented in the EIS is sufficient for the purposes of the EIS, and the Agency staff agrees that a final EIS should be prepared and submitted to the EQB for approval.

It should be noted that the additional hydrological studies of the bedrock aquifers may be unnecessary if the City of Burnsville phases out the four wells. The Minnesota Department of Health recommends discontinuing using these wells in order to avoid contamination by the abandoned dump which lies

3040081



Paul Smith, Met Council  
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between the Freeway Landfill and the well field. The furthest extent north in which water would migrate down and enter the Jordan aquifer from the Shakopee formation would recede south from the vicinity of the Freeway Landfill if this occurs. Consequently, the potential impact of the Freeway Landfill on the Burnsville wells would be virtually eliminated. In this case, further hydrologic investigations may not be necessary as part of the permit application.

Attached to this letter is an Agency staff memorandum dated February 23, 1981, entitled "Enforcement Chronology at Freeway Sanitary Landfill." As the memorandum states, it presents a supplement to the enforcement chronology included as "Appendix II" of the draft EIS. I request that this information be added to the EIS in order to present a complete record of the findings of Agency and county inspections at the Freeway Landfill.

If you have any further questions, feel free to contact Gregg Downing at 297-2733.

Sincerely,



Louis J. Breimhurst  
Executive Director

Attachment

cc: Gregg Downing

3040080

SUBJECT: Enforcement Chronology at Freeway Sanitary Landfill (SW-57)

The purpose of the attached is to present a chronology of inspections at Freeway Sanitary Landfill, which will supplement and update information provided by the Metropolitan Council in its draft EIS for the landfill. The major differences between this chronology and Met Council's are:

1. This chronology deals only with site inspections and enforcement related issues. It does not deal with those matters related to permit issuance.
2. This chronology is significantly longer and includes additional inspections not recorded by Met Council.
3. This chronology updates the Met Council's chronology for the period September 10, 1979, to January 22, 1981. This is significant since during that period, the operation of Freeway Sanitary Landfill was poor which resulted in issuance of Notices of Noncompliance and Violation by the Agency.

The reader should bear in mind that in the early inspections conducted at this site, it is difficult to determine if the inspector considered the problems listed on his inspection sheet violations of operating procedures, or just "noteworthy" since the present day inspection reports were not in use.

November 16, 1971

monitoring wells must be installed  
need to extend dike  
monthly reporting  
construct toxic and hazardous waste facilities

December 8, 1971

no violations noted

February 8, 1972

working face too large

February 18, 1972

burning

March 7, 1972

burning

March 17, 1972

litter  
access road

3040079

April 27, 1972

no violations noted

May 3, 1972

no violations noted

May 19, 1972

no violations noted

June 6, 1972

working face too large  
daily cover

July 10, 1972

no violations noted

September 22, 1972

burning  
working face too large  
daily cover

October 6, 1972

burning  
working face too large  
daily cover

October 10, 1972

daily cover  
demolition area not maintained

October 16, 1972

no violations

November 28, 1972

daily cover  
working face too large  
demolition area not maintained  
litter control  
water monitoring system

March 13, 1973

daily cover  
working face too large  
spreading and compaction

April 23, 1973

daily cover  
working face too large  
litter control  
intermediate cover

June 6, 1973

working face  
intermediate cover  
demolition area not maintained

August 16, 1973

leachate  
dumping into stream (property separation)  
surface drainage

September 6, 1973

daily cover  
working face too large  
intermediate cover  
dumping into stream (property separation)  
site maintenance (does not correlate to any present Minn. Rule SW-6(2) violation)

October 30, 1973

daily cover  
working face  
litter  
intermediate cover  
water monitoring system  
filling into stream (property separation)  
site maintenance (does not correlate to any present Minn. Rule SW-6(2) violation)

November 13, 1973

daily cover  
intermediate cover

December 7, 1973

water monitoring system  
demolition area not maintained

February 8, 1974

litter

February 15, 1974

water monitoring system

March 27, 1974

daily cover  
salvaging

May 28, 1974

litter  
intermediate cover

June 21, 1974

daily cover

July 12, 1974

working face too large  
demolition area not maintained

July 16, 1974

working face  
intermediate cover

July 31, 1974

water monitoring system

September 17, 1974

working face

October 1, 1974 (Dakota County inspection)

prohibited waste (raw sewage sludge or septic tank pumpings)

October 7, 1974

daily cover  
final cover  
litter control

From this period on inspection letters properly reference violations and it is quite apparent when the inspector considered the noted problem a violation of Minn. Rule SW-6 or county ordinance.

January 15, 1975

no violations

February 26, 1975

litter  
surface drainage  
prohibited waste (truckloads of snow on working face)

March 31, 1975

daily cover  
litter control  
water monitoring system

May 2, 1975

water monitoring system

June 13, 1975

litter control  
water monitoring system (must resample)

July 3, 1975

no violations

July 21, 1975

water monitoring system (must resample)

July 30, 1975

water monitoring system  
salvaging

September 22, 1975

working face too large  
no monthly reports

October 3, 1975

burning  
working face too large  
daily cover  
grading  
prohibited waste in demolition area

October 9, 1975

working face too large  
monthly operational reports

November 4, 1975 (Dakota County inspection)

litter  
dust control

November 5, 1975

must repair gate on culvert

December 29, 1975 (Dakota County inspection)

screening

January 12, 1976

daily cover  
water monitoring system

February 24, 1976 (Dakota County inspection)

litter  
final cover

March 18, 1976

prohibited waste (3M tile plant on Lexington Avenue approximately 1,800  
gallons of cutting water fluid every 10 days)

April 13, 1976

litter  
working face too large  
leachate

April 26, 1976 (Dakota County inspection)

leachate  
litter  
working face too large

May 26, 1976

litter  
leachate  
prohibited waste (35 barrels of paint sludge, thinner and other unidentified chemical waste present; later returned to Graves Construction for proper disposal)

May 27, 1976 (Dakota County inspection)

litter  
prohibited wastes were removed

June 10, 1976 (Dakota County inspection)

leachate

July 14, 1976 (Dakota County inspection)

property line separation  
working face too large

August 20, 1976 (Dakota County inspection)

litter control  
working face too large  
property line separation

September 3, 1976

litter

September 22, 1976 (Dakota County inspection)

leachate  
final cover

October 14, 1976

water monitoring system  
leachate

October 15, 1976 (Dakota County inspection)

litter

November 4, 1976 (Dakota County inspection)

prohibited waste (8 yds<sup>3</sup> ink sludge)

November 26, 1976 (Dakota County inspection)

working face too large

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0000074



December 29, 1976 (Dakota County inspection)

leachate  
litter control

January 12, 1977 (Dakota County inspection)

litter  
leachate

February 11, 1977

litter  
screening  
vegetation  
water monitoring system  
leachate  
excavating to bedrock

April 15, 1977 (Dakota County inspection)

final cover  
vegetation  
litter

May 8, 1977 (Dakota County inspection)

litter  
leachate  
top surfaces need to be surveyed  
excavating to bedrock  
water monitoring system  
prohibited waste in demolition area

June 11, 1977

working face too large  
leachate  
plan compliance

July 1, 1977

stipulation agreement presented to Freeway to address leachate problem;  
not signed

July 11, 1977 (Dakota County inspection)

working face too large  
leachate  
plan compliance

August 4, 1977

final cover  
water monitoring system  
leachate  
prohibited garbage in demolition area

September 26, 1977

working face too large  
surface drainage

October 3, 1977 (Dakota County inspection)

working face  
site drainage

October 21, 1977

working face  
litter  
leachate

December 23, 1977 (Dakota County inspection)

excavating to bedrock  
prohibited waste (2-55 gallon drums turpentine from D.J. Kranz Company)

January 3, 1978

excavating to bedrock  
hazardous waste

January 25, 1978

no violations noted

February 16, 1978 (Dakota County inspection)

excavating to bedrock

May 10, 1978 (Dakota County inspection)

daily cover  
vegetation  
litter  
leachate  
water monitoring system

June 29, 1978 (Dakota County inspection)

daily cover  
ponded water  
working face too large  
water monitoring system  
final cover

July 31, 1978

no violations noted

August 29, 1978 (Dakota County inspection)

daily cover  
final cover  
vegetation  
surface drainage

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Cliff Anderson

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November 29, 1978

no violations noted

December 26, 1978 (Dakota County inspection)

daily cover  
working face too large

January 2, 1979 (Dakota County inspection)

daily cover  
working face too large

January 17, 1979

operational reports

April 20, 1979

litter  
daily cover

May 4, 1979

litter  
daily cover

June 1, 1979

working face too large  
daily cover  
intermediate cover  
demolition area

July 2, 1979

litter  
daily cover

August 1, 1979

daily cover  
final cover  
demolition area

September 5, 1979

daily cover  
surface drainage  
final cover

November 28, 1979

Notice of Noncompliance issued to site

December 3, 1979

no violations noted

3040071

December 14, 1979

working face  
daily cover  
equipment  
demolition area

January 18, 1980

no violations noted

February 12, 1980

no violations noted

March 3, 1980

no violations noted

April 11, 1980

no violations noted

May 2, 1980

no violations noted

June 10, 1980

operational reports

July 9, 1980

daily cover  
operational reports

August 15, 1980 (preoperational inspection)

daily cover  
surface water drainage

September 18, 1980 (preoperational inspection)

daily cover

October 7, 1980

Notice of Violation issued

October 21, 1980

leachate  
working face  
daily cover  
intermediate cover

November 7, 1980 (preoperational inspection)

daily cover  
intermediate cover

Cliff Anderson  
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December 15, 1980 (preoperational inspection)

daily cover

January 22, 1981 (preoperational inspection)

no violations noted

TPC/GJS:ds

cc: Greg Downing, EPRU Solid Waste Coordinator

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