

Route to:

- (1) J. Warner
- (2) RS 23
- (3) copy to Bruce Davis
- (4) File No. SW-57

OFFICE MEMORANDUM

File: Freeway SLF EIS

Location: Burnville, Dakota
(City, Village, Township, Section, Range, County, etc.)

Subject: Participation in Mtg - MC Staff (Paul Smith) & Enforcement Section, MPCA

By Whom: L.L. DUGDALE Date: 2/17/81

Investigation Conference Field Hearing Meeting Phone

- Items to be Covered:
- (1) Those present and/or those interviewed
 - (2) Situation
 - (3) Further action, follow-up, recommendations

(1) Paul Smith (Met Council) set up meeting with Tom Clark & others)
TDC, Bruce Davis, Jerry Stalke, Ent. Staff
Cliff Anderson, EPRU

Sandra Forrest, G.W. Section
Dave Gurney, Dakota County
L.L.D., SWD Permits

(2) Paul Smith requested Agency staff positions on enforcement strategies/policies on landfill operations as they relate to Environmental Impact Statements generally and Freeway SLF in particular.
Paul asked if Agency would be submitting a statement concerning Freeway SLF at the public meeting set for February 26 to receive comments on the Supplements to the EIS for Freeway SLF Expansion.

(Note: No public meeting was deemed necessary on the Burnville SLF Exp.)
Discussions of both MPCA and County enforcement policies and actions ensued with Paul Smith being advised that EPRU staff will be submitting a prepared statement on the EIS Supplement for Freeway.

(3) Input from SWD Enforcement and Permits Section, as well as WQD Ground Water Section, will be to EPRU as a basis for Agency comments at the public meeting. Presentation will be by Cliff Anderson. I plan to attend the meeting also since I will be involved in public noticing the Agency's intent to issue, or deny, the permit for the proposed vertical expansion of the landfill and preparing the draft permit if the determination is made to issue the Amended Permit.

The supplemental EIS states that the potential exists for the Freeway Sanitary Landfill to adversely impact the City of Burnsville's well field. The MPCA agrees that there is a potential for adverse impacts, but that the degree of potential should be evaluated in terms of water quality data and an assessment of mitigative measures.

Water quality samples were obtained from monitoring wells south and east of the abandoned landfill during the months of July through October 1980. In the Liesch report, the sampling analyses results were deemed inconclusive. No further water quality analyses have been identified.

The Minnesota Department of Health, however, recommended that four of Burnsville's City wells be phased out as a precautionary measure. The City well field, during a pumping test interpreted by Liesch, created a reversal of ground water flow so that ground water in the Shakopee formation recharged the Jordan aquifer. The abandoned landfill was within the area where ground water flow is reversed so that if leachate is being produced by the abandoned landfill it could be drawn into the Burnsville City wells. Freeway landfill is located just north of the expected flow reversal zone.

By phasing out several City of Burnsville wells, the zone of flow reversal would be expected to recede to the south, effectively creating a mitigating zone between the Freeway Landfill and the zone of influence of the City of Burnsville wells.

There is a potential for adverse impacts from Freeway Landfill on several City of Burnsville wells, however it must be recognized that the more imminent threat, at this time, is the abandoned landfill.

Discussed at mtg 2/25 with Jim Warkner,
Greg Downing, Sandra Forrest & LLS

DRAFT 2/24/81

COMMENTS ON SUPPLEMENT TO FREEWAY SANITARY LANDFILL EIS

Leachate is being produced at the landfill. When precipitation infiltrates the cover material at a landfill, the refuse eventually becomes saturated, ^{reaches} ~~ie~~, at field capacity. From that point in time the volume of water that enters the fill about equals the volume of leachate that exits the landfill. Solid Waste Rules SW-6 require the landfill operator to minimize the volume of precipitation that can enter the landfill by sloping, covering, and compacting the refuse.

Operations at the landfill, over the years, have not been exemplary of the best management practices. Repeated violations of daily cover and ponding of precipitation above refuse for extended periods of time have been documented. These operating violations would tend to saturate the refuse thus contributing to leachate formation and adverse ground^{water} quality impacts.

The Freeway Landfill is located in a discharge zone to the Minnesota River. Natural ground water flow would be mainly lateral through the surficial geology to the Minnesota River. Since leachate that reaches the surficial geology would be dispersed into the ground water, it, too, would discharge in the Minnesota River. No indicator parameters characterizing leachate have been found in significant amounts in the Minnesota River down-gradient of Freeway Landfill. However, leachate is present in the first water-bearing zone beneath Freeway Landfill and in the on-site ditch along I-35.

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