

To: Tom / From: Ron (DAQ)

Subject: DEIS-Freeway Sanitary Landfill Expansion

The project, as proposed in the DEIS, presently does not require DNR Division of Waters Permits. There are no classified public water/wetland in or near the landfill, as presently defined under 105.37 and regulated under 105.42.

However, we would like to make a few comments concerning the DEIS.

The soil in the area have generally moderate to high permeability. The soil is severely limited for use as a sanitary landfill due to seepage problem. The use of these soil as a daily cover is also poor, due also to the same reason.

The desired site for landfill is an area of clay soil (low permeability). Clay could be used as both a lining material and a daily cover material as well. The DEIS states that no clay is being, or will be, used and that eventually leachate would seep into the ground water and into the Minnesota River nearby.

The DEIS did not look into the use of clay or other suitable material to prevent the leachate from leaving the landfill or make any ~~any~~ suggestion to mitigate any resulting impact. The DEIS fails to mention that the site is a poor area for use as a landfill, and that there are more suitable areas in the metro area that can be used as a landfill site.

Ground water problems are basically Water Quality related. More documentation of the analyses used to define pumping "envelops" and water budgets are needed. Also, there appears to be additional wells in the area that were not included in the DEIS, which could have an important bearing on groundwater movement. Conclusions are drawn without complete proof, although the final conclusion that the leachate will end up in the river is certainly correct. Neither this site or the nearby Burnsville landfill site are appropriate for a landfill; however economics and other factors and the necessity for landfills probably predicate this continuance and therefore the need to have sufficient information to understand any resulting impacts.

The text, especially on page 56, should probably include a paragraph on the effect of the landfill have on floodway stage increase upstream of the site, especially at Savage and Shakopee. There should be discussion on how the DEIS was prepared. At the site, the increment over existing condition is .1 foot. Information should be given about upstream effects in the DEIS.

Upon inspection of the existing dike, it would appear to be a simple earth-fill type. Based on a survey made by the USGS, April 26, 1972, the elevation ranged from 717.8 to 723.5. It would appear that most of the dike is above the 100 year regulated flood except at the intersection with the Edward Kraemer dike, which our records show at 717.8 feet. To prevent failure of the dike during a 100-year flood event, the dike should be upgraded (compacted to proper density, erosion control, rip-rap protection, etc.) A professional engineering firm should be consulted. A check should also be made with the Regulatory Function, Corps of Engineer, to determine if a permit is needed for this project.

On page 15 of the DEIS, it mentioned that the flood gates were left open during a flood event. Procedure should be outlined in the DEIS to insure that this does not occur again.

The DEIS did not look into using trenches extensively to collect leachate that might escape from the side or into using collector wells located in key area in the landfill to collect leachate that escapes below the landfill. The collected leachate could then be treated and release. It would seem that it is easier to prevent the leachate from escaping than it is to clean up any resultant problem. In addition, the long-term impact of the landfill was not adequately covered. Leachate may be produced for many hundreds of years. Eventually, someone may be faced with the responsibility for the impact of the landfill, the cost of measuring and monitoring, and any long-term legal liability. This should be discussed in the DEIS.

The DEIS should look into the establishment of a new comprehensive monitoring program. Monitoring wells should be close as possible to the edge of the landfill and also through the landfill. They should extensively monitor PCB's, heavy metals, etc., in addition to COD's, pH, nitrates, chlorides, specific conductivity. There is not enough information presently to indicate what is and will be escaping from the landfill into the groundwater. CB's

DEIS should include specific cost/effective analysis of using alternative solution, such as resource recovery, etc. Although efforts in this direction are projected to be implemented at some future date, a concerned effort could be made today that will have a substantial impact on the amount of solid waste, thus reducing any impact from this landfill. The DEIS should at least identified any future program such as resource recovery so as to give decision makers alternatives to siting new landfills and to start programs to minimize impacts of existing landfill, such as Freeway.