

Burnsville Sanitary Landfill

please see the uploaded files

5.1.8	The Permittee shall submit autumn quarter leachate report: Due annually, by the 1st of February. [Minn. R. 7035.2815, subp. 14(P)]
5.1.9	The Permittee shall submit winter quarter leachate report: Due annually, by the 30th of April. [Minn. R. 7035.2815, subp. 14(P)]
5.1.10	At a minimum of 180 days before the expiration date of this Permit, the Permittee shall submit an application for permit reissuance: Due 3472 calendar days after Permit Issuance Date. [Minn. R. 7001.0040, subp. 3]
5.1.11	The Permittee shall submit work plan: Due by one year after permit issuance. The work plan and its required contents are further described in the 'Special Conditions' section for SW-56 Total Facility. [Minn. R. 7001.0150, subp. 2]
5.1.12	The Permittee shall submit a report: Due by three years after permit issuance. The report and its required contents are further described under the 'Special Conditions' section for SW-56 Total Facility. [Minn. R. 7001.0150, subp. 2]

7. Monitoring stations

Assume only points with EQuIS ID have to be reported in EQuIS?

Monitoring type	Station name	Status	EQuIS ID
Groundwater	P-344	Active / Existing	
Groundwater	P-346	Active / Existing	
Groundwater	W-125R	Active / Existing	717737
Groundwater	W-140	Active / Existing	643644
Groundwater	W-222	Active / Existing	449121
Groundwater	W-231	Active / Existing	471400
Groundwater	W-233	Active / Existing	526913
Groundwater	W-235	Active / Existing	552130
Groundwater	W-247	Active / Existing	717738
Groundwater	W-322	Active / Existing	449122
Groundwater	W-325	Active / Existing	449118
Groundwater	W-331	Active / Existing	476352
Groundwater	W-425	Active / Existing	576958
Groundwater	W-431	Active / Existing	476353
Groundwater	W-531	Active / Existing	476354
Groundwater	W139	Active / Existing	643946
Groundwater	W141R	Active / Existing	727768
Groundwater	W242	Active / Existing	643947
Groundwater	W244	Active / Existing	683336
Groundwater	W246	Active / Existing	683335
Liner Leak Detection	LS-10A	Active / Existing	
Liner Leak Detection	LS-15	Active / Existing	
Liner Leak Detection	LS-20	Active / Existing	
Liner Leak Detection	LS-WD1	Active / Existing	
Liner Leak Detection	LS-WD2	Active / Existing	
Liner Leak Detection	LS-WD2B-1	Active / Existing	
Surface Water	S-5	Active / Existing	S008-223
Vapor Point	MMP-1	Active / Existing	

Suggest change to "Sump-10">>>"Sump-WD2B"

Phases 10, 15, 20, 6B sumps have vertical manholes ID'd as MH-10, MH-15, etc.

Phases WD1A, WD2A, WD2B have slope risers and no sump manhole.

Using "Sump" would clarify and avoid confusion with HM/MH issue.

MMP-3 no longer exists

Add station MMP-6A

Add stations:
 MMP-10
 MMP-11
 MMP-12

HM-5A, 7, and 9a no longer exist

Vapor Point	MMP-10	Active / Existing	
	MMP-11	Active / Existing	
	MMP-12	Active / Existing	
	MMP-2	Active / Existing	
	MMP-3	Active / Existing	
	MMP-4A	Active / Existing	
	MMP-5C	Active / Existing	
	MMP-6	Active / Existing	
	MMP-7A	Active / Existing	
	MMP-8A	Active / Existing	
	MMP-9A	Active / Existing	
	HM-10	Active / Existing	
	HM-15	Active / Existing	
	HM-20	Active / Existing	
	HM-5A	Active / Existing	
	HM-6B	Active / Existing	
	HM-7	Active / Existing	
	HM-9A	Active / Existing	
Waste Stream	HM-WD1A	Active / Existing	
Waste Stream	HM-WD2A	Active / Existing	
Waste Stream	HM-WD2B	Active / Existing	
Waste Stream	LT 001	Active / Existing	

8. Monitoring groups

Monitoring of 140 and 141R temporarily discontinued, per 12/23/20 MPCA email. These will ultimately be sealed and new wells installed along north edge of ADA. Suggest keeping them in the water level group, then remove from permit when new ADA wells are added.

Type			Assigned stations
Ground Water Monitoring Group	Groundwater Level Monitoring	water levels measurements for groundwater flow evaluation around the facility	P-344, P-346, W-233, W-322, W-325, W-331, W-425, W-431, W-531, W246, W-140, W-141R
Ground Water Monitoring Group	Groundwater Quality Monitoring	Used to evaluate groundwater quality at upgradient and downgradient monitoring wells	S-5, W-125R, W-140, W-222, W-231, W-235, W-247, W139, W-141R, W242, W244
Leachate Monitoring Group	Leachate Head Level Monitoring	Sump	HM-10, HM-15, HM-20, HM-6B, HM-WD1A, HM-WD2A, HM-WD2B, LT 001
Leachate Monitoring Group	Liner Leak Detection System Monitoring	Lysimeter	LS-10A, LS-15, LS-20, LS-WD1, LS-WD2, LS-WD2B-1
Vapor/Gas Monitoring Group	Landfill Gas Monitoring	Gas Monitoring	MMP-1, MMP-10, MMP-11, MMP-12, MMP-2, MMP-4A, MMP-5C, MMP-6, MMP-7A, MMP-8A, MMP-9A, MMP-6A

9. Sampling and monitoring requirements

Type	Parameter	CAS	Limit	Unit	Sampling freq.
Groundwater Level Monitoring					
8.1.1	Static Water Level (Elevation, MSL)	PCA-001		ft msl	Apr, Jul, Oct
Groundwater Quality Monitoring	Parameters highlighted yellow are new i.e., were not included in parameter list from 2011 permit modification or 2015 renewal app. Note that MPCA had indicated via email dated 7/18/22 that there would be 7 inorganic parameters added (Ba, Be, Fluoride, Li, Mo, B, P) as well as 1,4-dioxane, however, it appears that more parameters were added than what MPCA had indicated				
8.2.1	Ammonia	7664-41-7	125	ug/L	Jul
8.2.2	Chloride	16887-00-6	215,000.0	ug/L	Jul
8.2.3	Cyanide, Total (as CN)	57-12-5	5.5	ug/L	Jul
8.2.4	Fluoride	16984-48-8		ug/L	Jul
8.2.5	Phosphorus	7723-14-0		ug/L	Jul
8.2.6	Sulfate	14808-79-8		ug/L	Jul
8.2.7	Arsenic	7440-38-2	90	ug/L	Jul
8.2.8	Barium	7440-39-3		ug/L	Jul
8.2.9	Antimony	7440-36-0	22.5	ug/L	Jul
8.2.10	Beryllium	7440-41-7		ug/L	Jul
8.2.11	Boron	7440-42-8		ug/L	Jul
8.2.12	Cadmium	7440-43-9	35.5	ug/L	Jul
8.2.13	Calcium	7440-70-2		ug/L	Jul
8.2.14	Chromium	7440-47-3	1239.5	ug/L	Jul
8.2.15	Cobalt	7440-48-4	109	ug/L	Jul
8.2.16	Copper	7440-50-8	14.75	ug/L	Jul
8.2.17	Iron	7439-89-6		ug/L	Jul
8.2.18	Lead	7439-92-1	104.25	ug/L	Jul
8.2.19	Lithium	7439-93-2		ug/L	Jul
8.2.20	Magnesium	7439-95-4		ug/L	Jul
8.2.21	Manganese	7439-96-5	75	ug/L	Jul
8.2.22	Mercury	7439-97-6	0.5	ug/L	Jul
8.2.23	Molybdenum	7439-98-7		ug/L	Jul
8.2.24	Nickel	7440-02-0	1048	ug/L	Jul
8.2.25	Nitrate (as Nitrogen)	14797-55-8		ug/L	Jul
8.2.26	Potassium	7440-09-7		ug/L	Jul
8.2.27	Selenium	7782-49-2	5	ug/L	Jul
8.2.28	Sodium	7440-23-5		ug/L	Jul
8.2.29	Thallium	7440-28-0	16	ug/L	Jul
8.2.30	Tin	7440-31-5		ug/L	Jul
8.2.31	Zinc	7440-66-6	86.5	ug/L	Jul
8.2.32	1,4-Dioxane (p-Dioxane)	123-91-1		ug/L	Apr, Jul, Oct

Type	Parameter	CAS	Limit	Unit	Sampling freq.
8.2.33	2,2-Dichloropropane	594-20-7		ug/L	Apr, Jul, Oct
8.2.34	Acetone	67-64-1		ug/L	Apr, Jul, Oct
8.2.35	Allyl chloride (3 chloropropene)	107-05-1		ug/L	Apr, Jul, Oct
8.2.36	Benzene	71-43-2	1121.75	ug/L	Apr, Jul, Oct
8.2.37	Dichloromethane (Methylene chloride)	75-09-2	3468.75	ug/L	Apr, Jul, Oct
8.2.38	Tetrachloroethylene (Perchloroethylene)	127-18-4	107	ug/L	Apr, Jul, Oct
8.2.39	Trichloroethylene (TCE)	79-01-6	1747	ug/L	Apr, Jul, Oct
8.2.40	1,1,1,2-Tetrachloroethane	630-20-6		ug/L	Apr, Jul, Oct
8.2.41	1,1,1-Trichloroethane	71-55-6	739.25	ug/L	Apr, Jul, Oct
8.2.42	1,1,2,2-Tetrachloroethane	79-34-5	281.75	ug/L	Apr, Jul, Oct
8.2.43	1,1,2-Trichloroethane	79-00-5		ug/L	Apr, Jul, Oct
8.2.44	1,1,2-Trichlorotrifluoroethane	76-13-1		ug/L	Apr, Jul, Oct
8.2.45	1,1-Dichloroethane	75-34-3	25	ug/L	Apr, Jul, Oct
8.2.46	1,1-Dichloroethylene (Vinylidene chloride)	75-35-4	50	ug/L	Apr, Jul, Oct
8.2.47	1,1-Dichloropropene	563-58-6		ug/L	Apr, Jul, Oct
8.2.48	1,2-(trans-) Dichloroethylene	156-60-5		ug/L	Apr, Jul, Oct
8.2.49	1,2,3-Trichlorobenzene	87-61-6		ug/L	Apr, Jul, Oct
8.2.50	1,2,3-Trichloropropane	96-18-4		ug/L	Apr, Jul, Oct
8.2.51	1,2,4-Trichlorobenzene	120-82-1		ug/L	Apr, Jul, Oct
8.2.52	1,2,4-Trimethylbenzene	95-63-6	25	ug/L	Apr, Jul, Oct
8.2.53	1,2-Dibromo-3-chloropropane	96-12-8		ug/L	Apr, Jul, Oct
8.2.54	1,2-Dibromoethane (Ethylene dibromide); EDB	106-93-4		ug/L	Apr, Jul, Oct
8.2.55	1,2-Dichlorobenzene (ortho-)	95-50-1		ug/L	Apr, Jul, Oct
8.2.56	1,2-Dichloroethane	107-06-2	4750	ug/L	Apr, Jul, Oct
8.2.57	1,2-Dichloroethylene (cis-)	156-59-2	1322	ug/L	Apr, Jul, Oct
8.2.58	1,2-Dichloropropane	78-87-5		ug/L	Apr, Jul, Oct
8.2.59	1,3,5-Trimethylbenzene	108-67-8	25	ug/L	Apr, Jul, Oct
8.2.60	1,3-Dichlorobenzene	541-73-1		ug/L	Apr, Jul, Oct
8.2.61	1,3-Dichloropropane	142-28-9		ug/L	Apr, Jul, Oct
8.2.62	1,3-Dichloropropene (cis-)	10061-01-5		ug/L	Apr, Jul, Oct
8.2.63	1,3-Dichloropropene (trans-)	10061-02-6		ug/L	Apr, Jul, Oct
8.2.64	1,4-Dichlorobenzene (para-)	106-46-7		ug/L	Apr, Jul, Oct
8.2.65	2-Chlorotoluene	95-49-8		ug/L	Apr, Jul, Oct
8.2.66	4-Chlorotoluene (para-)	106-43-4		ug/L	Apr, Jul, Oct

Type	Parameter	CAS	Limit	Unit	Sampling freq.
8.2.67	Bromobenzene	108-86-1		ug/L	Apr, Jul, Oct
8.2.68	Bromochloromethane (Chlorobromomethane)	74-97-5		ug/L	Apr, Jul, Oct
8.2.69	Bromodichloromethane (Dichlorobromomethane)	75-27-4		ug/L	Apr, Jul, Oct
8.2.70	Bromoform	75-25-2	725	ug/L	Apr, Jul, Oct
8.2.71	Bromomethane (Methyl bromide)	74-83-9		ug/L	Apr, Jul, Oct
8.2.72	Carbon tetrachloride	56-23-5	147.5	ug/L	Apr, Jul, Oct
8.2.73	Chlorobenzene (Monochlorobenzene)	108-90-7	105.75	ug/L	Apr, Jul, Oct
8.2.74	Chlorodibromomethane (Dibromochloromethane)	124-48-1		ug/L	Apr, Jul, Oct
8.2.75	Chloroethane	75-00-3		ug/L	Apr, Jul, Oct
8.2.76	Chloroform	67-66-3	348	ug/L	Apr, Jul, Oct
8.2.77	Cumene (Isopropylbenzene)	98-82-8		ug/L	Apr, Jul, Oct
8.2.78	Dibromomethane (Methylene bromide)	74-95-3		ug/L	Apr, Jul, Oct
8.2.79	Dichlorodifluoromethane	75-71-8	175	ug/L	Apr, Jul, Oct
8.2.80	Dichlorofluoromethane	75-43-4		ug/L	Apr, Jul, Oct
8.2.81	Ethyl ether	60-29-7	50	ug/L	Apr, Jul, Oct
8.2.82	Ethylbenzene	100-41-4	12.5	ug/L	Apr, Jul, Oct
8.2.83	Hexachlorobutadiene	87-68-3		ug/L	Apr, Jul, Oct
8.2.84	Chloromethane	74-87-3		ug/L	Apr, Jul, Oct
8.2.85	Methyl ethyl ketone (MEK)	78-93-3		ug/L	Apr, Jul, Oct
8.2.86	Methyl isobutyl ketone (4- Methyl-2-pentanone)	108-10-1		ug/L	Apr, Jul, Oct
8.2.87	Methyl-tert-butylether	1634-04-4		ug/L	Apr, Jul, Oct
8.2.88	Naphthalene	91-20-3	102.25	ug/L	Apr, Jul, Oct
8.2.89	n-Butylbenzene	104-51-8		ug/L	Apr, Jul, Oct
8.2.90	n-Propylbenzene	103-65-1		ug/L	Apr, Jul, Oct
8.2.91	p-Isopropyltoluene	99-87-6		ug/L	Apr, Jul, Oct
8.2.92	sec-Butylbenzene	135-98-8		ug/L	Apr, Jul, Oct
8.2.93	Styrene	100-42-5	55.875	ug/L	Apr, Jul, Oct
8.2.94	tert-Butylbenzene	98-06-6		ug/L	Apr, Jul, Oct
8.2.95	Tetrahydrofuran	109-99-9		ug/L	Apr, Jul, Oct
8.2.96	Toluene	108-88-3	50	ug/L	Apr, Jul, Oct
8.2.97	Trichlorofluoromethane	75-69-4		ug/L	Apr, Jul, Oct
8.2.98	Vinyl chloride (chloroethene)	75-01-4	230	ug/L	Apr, Jul, Oct
8.2.99	Xylene	1330-20-7	351.75	ug/L	Apr, Jul, Oct
8.2.100	Aluminum	7429-90-5	268	ug/L	Jul
8.2.101	Solids, Total Dissolved	C010		ug/L	Apr, Jul, Oct

Type	Parameter	CAS	Limit	Unit	Sampling freq.
	(TDS)				
8.2.102	Solids, Total Suspended (TSS)	C009			Oct
8.2.103	Eh (Oxidation potential)	4			Oct
8.2.104	Specific Conductance	C-011		umhos/cm	Apr, Jul, Oct
8.2.105	Static Water Level (Elevation, MSL)	PCA-001		ft msl	Apr, Jul, Oct
8.2.106	Temperature	T-121		degrees C	Apr, Jul, Oct
8.2.107	Color	M002		SU	Apr, Jul, Oct
8.2.108	pH, Field	C006		SU	Apr, Jul, Oct
Landfill Gas Monitoring					
8.3.1	Carbon Dioxide	124-38-9		%	Apr, Jul, Oct, Dec
8.3.2	Methane	74-82-8		%	Apr, Jul, Oct, Dec
8.3.3	Oxygen	0		%	Apr, Jul, Oct, Dec
Leachate Head Level Monitoring					
8.4.1	Leachate Head		12	in	Jan-Dec
Liner Leak Detection System Monitoring					
8.5.1	Alkalinity, Total as CaCO3	T-005			
8.5.2	Ammonia	7664-41-7			
8.5.3	Chloride	16887-00-6			
8.5.4	Cyanide, Total (as CN)	57-12-5			
8.5.5	Fluoride	16984-48-8		ug/L	Apr, Jul, Oct
8.5.6	Phosphorus	7723-14-0		ug/L	Apr, Jul, Oct
8.5.7	Sulfate	14808-79-8		ug/L	Apr, Jul, Oct
8.5.8	Arsenic	7440-38-2		ug/L	Apr, Jul, Oct
8.5.9	Barium	7440-39-3		ug/L	Apr, Jul, Oct
8.5.10	Antimony	7440-36-0		ug/L	Apr, Jul, Oct
8.5.11	Beryllium	7440-41-7		ug/L	Apr, Jul, Oct
8.5.12	Boron	7440-42-8		ug/L	Apr, Jul, Oct
8.5.13	Cadmium	7440-43-9		ug/L	Apr, Jul, Oct
8.5.14	Calcium	7440-70-2		ug/L	Apr, Jul, Oct
8.5.15	Chromium	7440-47-3		ug/L	Apr, Jul, Oct
8.5.16	Cobalt	7440-48-4		ug/L	Apr, Jul, Oct
8.5.17	Copper	7440-50-8		ug/L	Apr, Jul, Oct
8.5.18	Iron	7439-89-6		ug/L	Apr, Jul, Oct

Are all these intended to be field parameters? Suggest creating a new sampling group for field parameters

Lysimeters are currently sampled for major ions (Ca, Mg, Na, K, Cl, SO4, Alk) per the 2018 SAP. Chemistry is analyzed using Piper and Stiff diagrams. Suggest limiting parameter list to major ions and expanding list if necessary if ion analysis indicates leachate influence.

Type	Parameter	CAS	Limit	Unit	Sampling freq.
8.5.19	Lead	7439-92-1		ug/L	Apr, Jul, Oct
8.5.20	Lithium	7439-93-2		ug/L	Apr, Jul, Oct
8.5.21	Magnesium	7439-95-4		ug/L	Apr, Jul, Oct
8.5.22	Manganese	7439-96-5		ug/L	Apr, Jul, Oct
8.5.23	Mercury	7439-97-6		ug/L	Apr, Jul, Oct
8.5.24	Molybdenum	7439-98-7		ug/L	Apr, Jul, Oct
8.5.25	Nickel	7440-02-0		ug/L	Apr, Jul, Oct
8.5.26	Nitrate (as Nitrogen)	14797-55-8		ug/L	Apr, Jul, Oct
8.5.27	Potassium	7440-09-7		ug/L	Apr, Jul, Oct
8.5.28	Selenium	7782-49-2		ug/L	Apr, Jul, Oct
8.5.29	Sodium	7440-23-5		ug/L	Apr, Jul, Oct
8.5.30	Thallium	7440-28-0		ug/L	Apr, Jul, Oct
8.5.31	Tin	7440-31-5		ug/L	Apr, Jul, Oct
8.5.32	Zinc	7440-66-6		ug/L	Apr, Jul, Oct
8.5.33	2,2-Dichloropropane	594-20-7		ug/L	Apr, Jul, Oct
8.5.34	pH	C006		SU	Apr, Jul, Oct
8.5.35	Acetone	67-64-1		ug/L	Apr, Jul, Oct
8.5.36	Allyl chloride (3 chloropropene)	107-05-1		ug/L	Apr, Jul, Oct
8.5.37	Benzene	71-43-2		ug/L	Apr, Jul, Oct
8.5.38	Dichloromethane (Methylene chloride)	75-09-2		ug/L	Apr, Jul, Oct
8.5.39	Tetrachloroethylene (Perchloroethylene)	127-18-4		ug/L	Apr, Jul, Oct
8.5.40	Trichloroethylene (TCE)	79-01-6		ug/L	Apr, Jul, Oct
8.5.41	1,1,1,2-Tetrachloroethane	630-20-6		ug/L	Apr, Jul, Oct
8.5.42	1,1,1-Trichloroethane	71-55-6		ug/L	Apr, Jul, Oct
8.5.43	1,1,2,2-Tetrachloroethane	79-34-5		ug/L	Apr, Jul, Oct
8.5.44	1,1,2-Trichloroethane	79-00-5		ug/L	Apr, Jul, Oct
8.5.45	1,1,2-Trichlorotrifluoroethane	76-13-1		ug/L	Apr, Jul, Oct
8.5.46	1,1-Dichloroethane	75-34-3		ug/L	Apr, Jul, Oct
8.5.47	1,1-Dichloroethylene (Vinylidene chloride)	75-35-4		ug/L	Apr, Jul, Oct
8.5.48	1,1-Dichloropropene	563-58-6		ug/L	Apr, Jul, Oct
8.5.49	1,2-(trans-) Dichloroethylene	156-60-5		ug/L	Apr, Jul, Oct
8.5.50	1,2,3-Trichlorobenzene	87-61-6		ug/L	Apr, Jul, Oct
8.5.51	1,2,3-Trichloropropane	96-18-4		ug/L	Apr, Jul, Oct
8.5.52	1,2,4-Trichlorobenzene	120-82-1		ug/L	Apr, Jul, Oct
8.5.53	1,2,4-Trimethylbenzene	95-63-6		ug/L	Apr, Jul, Oct
8.5.54	1,2-Dibromo-3-chloropropane	96-12-8		ug/L	Apr, Jul, Oct
8.5.55	1,2-Dibromoethane	106-93-4		ug/L	Apr, Jul, Oct

Type	Parameter	CAS	Limit	Unit	Sampling freq.
	(Ethylene dibromide); EDB				
8.5.56	1,2-Dichlorobenzene (ortho)	95-50-1		ug/L	Apr, Jul, Oct
8.5.57	1,2-Dichloroethane	107-06-2		ug/L	Apr, Jul, Oct
8.5.58	1,2-Dichloroethylene	540-59-0		ug/L	Apr, Jul, Oct
8.5.59	1,2-Dichloroethylene (cis-)	156-59-2		ug/L	Apr, Jul, Oct
8.5.60	1,2-Dichloropropane	78-87-5		ug/L	Apr, Jul, Oct
8.5.61	1,3,5-Trimethylbenzene	108-67-8		ug/L	Apr, Jul, Oct
8.5.62	1,3-Dichlorobenzene	541-73-1		ug/L	Apr, Jul, Oct
8.5.63	1,3-Dichloropropane	142-28-9		ug/L	Apr, Jul, Oct
8.5.64	1,3-Dichloropropene (cis-)	10061-01-5		ug/L	Apr, Jul, Oct
8.5.65	1,3-Dichloropropene (trans-)	10061-02-6		ug/L	Apr, Jul, Oct
8.5.66	1,4-Dichlorobenzene (para-)	106-46-7		ug/L	Apr, Jul, Oct
8.5.67	2-Chlorotoluene	95-49-8		ug/L	Apr, Jul, Oct
8.5.68	4-Chlorotoluene (para-)	106-43-4		ug/L	Apr, Jul, Oct
8.5.69	Bromobenzene	108-86-1		ug/L	Apr, Jul, Oct
8.5.70	Bromochloromethane (Chlorobromomethane)	74-97-5		ug/L	Apr, Jul, Oct
8.5.71	Bromodichloromethane (Dichlorobromomethane)	75-27-4		ug/L	Apr, Jul, Oct
8.5.72	Bromoform	75-25-2		ug/L	Apr, Jul, Oct
8.5.73	Bromomethane (Methyl bromide)	74-83-9		ug/L	Apr, Jul, Oct
8.5.74	Carbon tetrachloride	56-23-5		ug/L	Apr, Jul, Oct
8.5.75	Chlorobenzene (Monochlorobenzene)	108-90-7		ug/L	Apr, Jul, Oct
8.5.76	Chlorodibromomethane (Dibromochloromethane)	124-48-1		ug/L	Apr, Jul, Oct
8.5.77	Chloroethane	75-00-3		ug/L	Apr, Jul, Oct
8.5.78	Chloroform	67-66-3		ug/L	Apr, Jul, Oct
8.5.79	Cumene (Isopropylbenzene)	98-82-8		ug/L	Apr, Jul, Oct
8.5.80	Dibromomethane (Methylene bromide)	74-95-3		ug/L	Apr, Jul, Oct
8.5.81	Dichlorodifluoromethane	75-71-8		ug/L	Apr, Jul, Oct
8.5.82	Dichloroethylene	25323302		ug/L	Apr, Jul, Oct
8.5.83	Dichlorofluoromethane	75-43-4		ug/L	Apr, Jul, Oct
8.5.84	Ethyl ether	60-29-7		ug/L	Apr, Jul, Oct
8.5.85	Ethylbenzene	100-41-4		ug/L	Apr, Jul, Oct
8.5.86	Hexachlorobutadiene	87-68-3		ug/L	Apr, Jul, Oct
8.5.87	Chloromethane	74-87-3		ug/L	Apr, Jul, Oct
8.5.88	Methyl ethyl ketone (MEK)	78-93-3		ug/L	Apr, Jul, Oct
8.5.89	Methyl isobutyl ketone (4-	108-10-1		ug/L	Apr, Jul, Oct

Type	Parameter	CAS	Limit	Unit	Sampling freq.
	Methyl-2-pentanone)				
8.5.90	Methyl-tert-butylether	1634-04-4		ug/L	Apr, Jul, Oct
8.5.91	Naphthalene	91-20-3		ug/L	Apr, Jul, Oct
8.5.92	n-Butylbenzene	104-51-8		ug/L	Apr, Jul, Oct
8.5.93	n-Propylbenzene	103-65-1		ug/L	Apr, Jul, Oct
8.5.94	p-Isopropyltoluene	99-87-6		ug/L	Apr, Jul, Oct
8.5.95	sec-Butylbenzene	135-98-8		ug/L	Apr, Jul, Oct
8.5.96	Styrene	100-42-5		ug/L	Apr, Jul, Oct
8.5.97	tert-Butylbenzene	98-06-6		ug/L	Apr, Jul, Oct
8.5.98	Tetrahydrofuran	109-99-9		ug/L	Apr, Jul, Oct
8.5.99	Toluene	108-88-3		ug/L	Apr, Jul, Oct
8.5.100	Trichloroethane	25323891		ug/L	Apr, Jul, Oct
8.5.101	Trichlorofluoromethane	75-69-4		ug/L	Apr, Jul, Oct
8.5.102	Vinyl chloride (chloroethene)	75-01-4		ug/L	Apr, Jul, Oct
8.5.103	Xylene	1330-20-7		ug/L	Apr, Jul, Oct
8.5.104	1,3,5-Trichlorobenzene	108-70-3		ug/L	Apr, Jul, Oct



Burnsville Sanitary Landfill, Inc.
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Clifford Shierk, P.E. Engineer
Minnesota Pollution Control Agency
Resource Management and Assistance Division
520 Lafayette Road North St. Paul, MN 55155

Burnsville Sanitary Landfill Comments on MPCA Draft Solid Waste Permit SW-56-001

Comment 1

BSL requests that the following modified language be incorporated into permit condition 3.2.14 regarding insulating material over the liner:

“The Permittee shall place at least six feet of solid waste, or an alternative insulating material approved by the MPCA prior to its use, on any newly constructed liner utilizing a compacted clay barrier layer by December 31 of each year. If an alternative insulating material is utilized, the Permittee shall install thermocouples in the newly lined area, and shall maintain the approved thickness of the insulating material until six feet of solid waste has been placed on the liner. If an alternative insulating material is utilized, the Permittee shall remove the material prior to the placement of solid waste to prevent biofouling of the drainage layer. No disposal may take place on uncovered areas after December 31 without testing the liner integrity and obtaining written approval from the Commissioner. [Minn. R. 7035.2815, subp. 13(U)]”

Certain areas of the liner system utilize geosynthetic clay liner (GCL) instead of compacted clay for the barrier layer underlying the geomembrane liner. Due to the self-healing properties of a GCL after exposure to freeze-thaw conditions it is not necessary to insulate the liner areas that use a GCL barrier layer. BSL therefore requests that insulating material only be required on areas with a compacted clay barrier layer and not on areas with a GCL barrier layer. This design has been approved by MPCA at other solid waste landfills.

The Facility's Operations Plan will be updated to reflect this change and will be re-submitted to MPCA for inclusion in the final permit.

Comment 2

BSL requests that the following modified language be incorporated into permit condition 5.1.8 regarding submittal date for the autumn quarter leachate report:



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"The Permittee shall submit autumn quarter leachate report: Due annually, by the 1st of ~~February~~March. [Minn. R. 7035.2815, subp. 14(P)]"

The March 1 date corresponds with the autumn water monitoring report required under condition 5.1.4.

Comment 3

As part of the Planned Unit Development (PUD) approval process, the City of Burnsville has requested an updated phasing plan for the Facility. Preparation of the phasing plan is in progress. The updated phasing plan will be similar to that shown on Sheets 28 through 32 of the Permit Modification Drawings, with the following notable changes:

- The perimeter berm/levee for the ADA will be shown in the initial phase of development (i.e. Fill Increment 1). Construction of the levee will require a dry construction season, and planning for levee construction during the early stages of development will allow flexibility to construct when conditions are most suitable. This means construction could begin as early as 2023 if the dry conditions experienced during 2021 and 2022 continue, or if 2023 is a wetter year construction could be delayed to a drier year and/or phased over multiple years. The updated phasing plan will not supersede the requirements of applicable permits and approvals (e.g. MPCA permit, Burnsville PUD, etc.) pertaining to tasks that must be completed prior to expanding the facility footprint and/or constructing new slope liner over unlined areas of the landfill.
- Filling in the ADA will be shown in Fill Increment 3, instead of waiting until Fill Increment 4 as shown in the current phasing plan. This will allow BSL to better optimize the operational area and facilitate stormwater management during cell construction in the ADA.
- Filling in the ADA Phase A-1 and A-2 may be moved forward depending upon when the levee is completed and anticipated waste volume. The 2019 phasing drawing Phase 3 shows construction of the west ½ of the liner over the C&D area and Phase 4 was the construction and filling of the Annex Phase A-1 and A-2. WE are requesting the option to fill per the 2019 phasing plan or to move Phase 4 in front of Phase 3 and develop the first two phases of the annex first to build the base of the landfill before proceeding more vertical will be shown in Fill Increment 3, instead of waiting until Fill Increment 4 as shown in the current phasing plan. This will allow BSL to better optimize the operational area and facilitate stormwater management during cell construction in the ADA

The Facility's Operations Plan and Permit Modification Drawings will be updated to reflect this change and will be re-submitted to the MPCA for inclusion in the final permit.



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Comment 4

BSL requests several changes to the monitoring tables (i.e. sections 7, 8, 9) of the draft permit.
The requested changes are shown on the attached copy of the permit tables.

MICHAEL MILLER

A handwritten signature in black ink that reads 'Michael Miller'. The signature is written in a cursive, flowing style.

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