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Subject: Dakota County Comment EAW Pine Bend Vertical Expansion
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Good morning,

Thank you for the opportunity to review the Environmental Assessment Worksheet (EAW) for the project to develop and permit a vertical expansion over the Phase 5 and 6 areas, to increase the permitted capacity of the existing Pine Bend Landfill in Inver Grove Heights. County Physical Development Staff reviewed the document and offer the attached comments for consideration.

Thank you,
Cindy

Cindy Tonsager
Admin Operations Manager



Physical Development Division

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Megen Kabele
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Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

December 13, 2023

Thank you for the opportunity to review the Environmental Assessment Worksheet (EAW) for the project to develop and permit a vertical expansion over the Phase 5 and 6 areas, to increase the permitted capacity of the existing Pine Bend Landfill in Inver Grove Heights. County Physical Development staff reviewed the document and offer the following comments for consideration.

Environmental Resources

- Cell 6C and 6B have intermediate cover and will be in an open condition at least until Phase 7 is well along in its fill development in several years. Despite engineering plans that meet requirements and have been MPCA approved, the steeper side slopes and heavy rainfall have caused the outside berms in areas of Cell 6C and 6B to be overtopped by stormwater on several different occasions leading to erosion. The erosion can be severe and at times, waste is washed out off the landfill liner. With the increased height of the landfill, longer slopes for water to run down through open cells, and predictions of more frequent heavy rains, what contingencies are being planned by Pine Bend Landfill for addressing and minimizing these expected events?
- Windspeeds increase with height about the ground surface. One could expect that with the increase of landfill height, stronger winds will impact litter dispersal. Over the past couple of years, even with numerous litter fences, the landfill has at times struggled to contain litter near the working face in Cell 6, and significant amounts of litter can leave the site. With waste filling at higher elevations above the perimeter litter fences, what planning is being done to address the likelihood of increased amounts of wind-blow litter? What are the specific parameters that will cause the landfill to stop accepting waste until the windspeeds drop?
- 8 to 9 million gallons of leachate is presumed by BFI to be generated. Have there be discussions or are there plans to treat the leachate before transport to the Metropolitan Council's wastewater treatment facility (WWTF)? The effluent from the WWTF will likely contain contaminants from Pine Bend Landfill leachate that the Mississippi River Pool 2 water or fish are already impaired as stated on page 43, paragraph titled MPCA 303d Impaired waters list. "The Mississippi River is designated as impaired for aluminum; fecal coliform; mercury in fish tissue and the water column; nutrients; polychlorinated biphenyls ("PCBs") in fish tissue and the water column; perfluorooctane sultonate ("PFOS" and total suspended solids ("TSS").

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- Is there backup power to manage water in a 100-year storm event in case of a power outage?
- Question 6. b., Page 6-7 - Landfill system related new construction or processes – Leachate collection sump and dual extraction wells: Will these new or expanded systems or processes take into consideration emerging contaminants such as PFAS?
- Page 7 Dual extraction system, regarding the statement, "The number of dual extraction wells has been reduced to allow for the construction of Phase 5 and 6 landfill." Does "reduced" mean sealed? If yes, what year did the sealing occur? As waste placement within Phases 5 and 6 continues, the wells will be brought back online into the dual extraction system to maximize the capture of leachate and landfill gas." Does "online" mean new well construction by a licensed well contractor?
- Page 10 and Drawing Number 16. Gas System Details - are these deeper than 15 feet? If yes, they are regulated. Dakota County's Delegated Well Program permits the sealing and construction of wells. Environmental wells that are 15 feet or more deep require a permit to construct from Dakota County. A variance from the MN Department of Health would be required for not full-length grouting, a deviation from MN Rules 4725, but the proposed alternating clean soil backfill and bentonite.
- Page 11 Final Closure will consist of 18 inches of soil fill, six inches of vegetation supporting topsoil and then seed and mulch. Page 36 Item 8. states, "At closure, disturbed areas will be re-vegetated as lawn/grassland. The DNR recommends that reseeding of disturbed soils be done with native species of grasses and forbs using BWSR Seed Mixes or MnDOT Seed Mixes.
- Question 7. a. and b., Tables 5 and 6, Page 20-33 – Climate Resiliency: With increased leachate collection, will the Metro Plant in St Paul have capacity and technology to treat PFAS or other contaminants that may show increased levels due to identified climate impacts? Increasing groundwater levels increases risk of contamination from leachate – is dewatering a possible adaptation or mitigation? Will this potential be fully evaluated?
- Page 40, The Franconia Formation is now referred to as the Tunnel City Group - Lone Rock Formation and the Ironton and Galesville are now referred to as the Wonewoc Sandstone.
- Page 44. 12 ii. states, "If the Proposer observes groundwater quality impacts during monitoring, they will closely coordinate with the MPCA to develop appropriate actions to address and improve groundwater quality under the terms of their solid waste permit." The sample results from the environmental wells at the site already show that the groundwater is contaminated. Page 69 states that "If any groundwater impacts are identified, the Proposer will coordinate closely with the MPCA to implement appropriate actions to address and improve groundwater quality in compliance with the solid water permit." There are already multiple contaminants detected in the existing environmental well network.
- Page 44 ii.3. Statement " The majority of the public supply wells are east of the Project Area." Figure 10 shows four wells east of the site that are Public Supply. Minnesota Unique Numbers 207297, 44188 and 207292 are all sealed; 265255 is suspect because there is so little information. Table 13. is incomplete. The Pine Bend Landfill owns 57 environmental wells and one water supply (commercial) well, that have an assigned Minnesota Unique Well number. The records should be available from the proposer for inclusion in Appendix D. Only 22 records are currently located in Appendix D.

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- Question 12. a. ii. Page 44-46 – Groundwater: *“The July 2022 sampling event included analyses for PFAS at 22 monitoring wells and 2 springs.” “Levels were detected at or above set limits for one or more of the PFAS at 12 wells and two springs.”* PFAS contaminants have been detected in the monitoring well network, how will expansion impact the presence of PFAS and other contaminants identified in the monitoring well network and the leachate?
- Page 46 Section Perfluoroalkyl substance analyses *“The July 2022 sampling event included analyses for PFAS at 22 monitoring wells and 2 springs, see Appendix D.”* There is no PFAS data in Appendix D. Note: the Minnesota Department of Health now refers to monitoring wells as environmental wells.
- Page 46 *“A submersible pump capable of pumping approximately 80 to 120 gallons per minute (gpm) will pump leachate collected in the sumps to the existing force main that encircles the perimeter of the Facility”. Is there a backup power supply for the submersible pump for the leachate?*
- Question 12. b. ii. Page 47-48 – Stormwater: *“The system consists of benches, catch basins, drainage piping, downslope structures, junction vaults, and infiltration ponds.”* Has stormwater or accumulated sediment been sampled for contaminants that may be carried with stormwater to the various ponds and catch basins? Does sediment or stormwater remain within the landfill property? Has PFAS been included in any stormwater or sediment sampling?
- FYI Minnesota Department of Health has a designated Special Well and Boring Construction Area that due to the contaminants in groundwater from the Pine Bend Landfill, mainly solvents and other contaminants originating at nearby industrial properties. The Boundaries of the Special Well and Boring Construction Area fully encompass the Pine Bend Landfill and are defined as follows Sections 33, 34 and 35 of Township 27 North and Range 22 West. New water supply wells constructed within the Area would be permitted with requirements to avoid contaminated groundwater.
- Page 92 Drawings 8 and 9: Is a licensed well contractor installing the horizontal collectors?
- Appendix B: what is the purpose of the Injections Wells not discussed in the text but on the Drawings 2, 6, 7, 8 and 9?
- Appendix B Plan Drawings - Pages 89 thru 91 were blank which could be missing Drawings 1, 3, 4 and 5. Drawing 16 - should the gas extraction wells be 15 feet or deeper they will be required to be permitted as Environmental Wells by the Dakota County Delegated Well Program, full length grouted and labeled with the official Minnesota Unique Well Number tag provided by the well contractor.
- Page 133 Table 1 Environmental Monitoring System Summary has two or three asterisks after five of the well locations and no explanation of what the asterisks mean.
- Page 134 Table 4 Summary of Groundwater Field Parameters for 2022. The pH in upgradient wells MW-100 and MW-101 is between 3 and 4. Any explanation of why the pH is so acidic?
- Throughout the document, Figure 10 *“County Well Index Map”* can be updated to the current name of *“Minnesota Well Index”*.

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- There is no Table 2 or Table 3 in Appendix D.
- There is habitation, likely an old farmstead mapped in the 1896 and 1916 plat maps and visible on the 1945 and 1951 air photos. There is no Well and Boring Sealing Record for a domestic well at this location. See attached figure. This area is still accessible. so a well search should be conducted and the well(s) ultimately sealed by a licensed well contractor. A magnetometer is the best, sometimes only way to locate wells that are below grade. Dakota County can help locate a wells using a magnetometer by calling 952-891-7000. Magnetometers work best on a clear site free from large metal obstructions. A Dakota County well inspector must be present during any well searches to rule out the presence of a well.

If you have any questions relating to our comments, please contact me at 952-891-7007 or Georg.Fischer@co.dakota.mn.us

Sincerely,



Georg T. Fischer, Director
Physical Development Division

cc: Commissioner William Droste, District 4
Matt Smith, County Manager

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Habitation in SE quarter of Section 33 on Pine Bend Landfill at 2495 117th St E, Inver Grove Heights. Area of possible one or more unsealed domestic wells is circle in yellow in figures below.

Figure 1. 1916 plat map – 116.79 acre parcel owned by J. Chapron

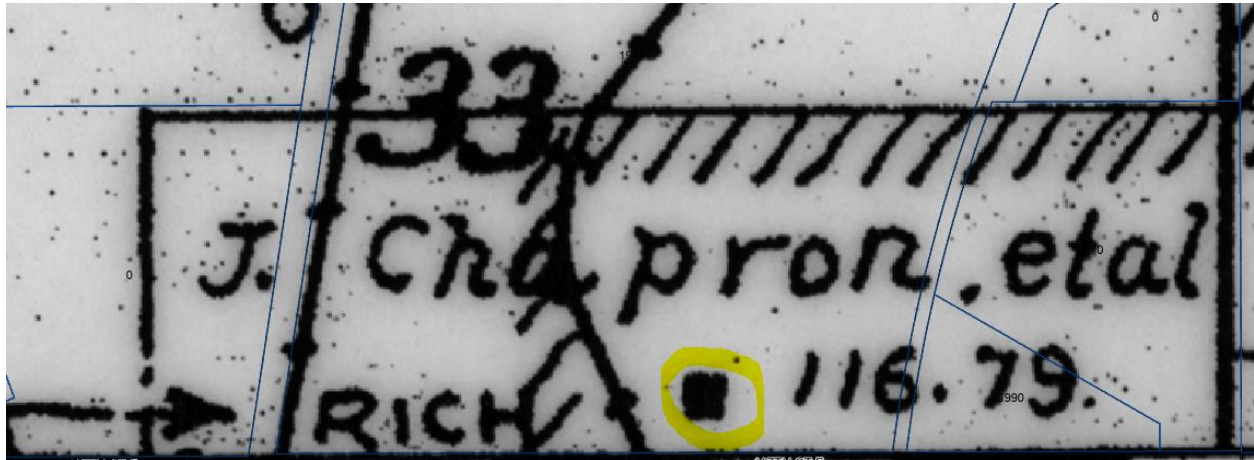


Figure 2. 1951 air photo – habitation is visible.



Figure 3. 2023 property is accessible for a well search, excavation and sealing

