



Minnesota Pollution Control Agency
c/o Megen Kabele
7381 Airport View Dr. SW
Rochester, MN 55902

October 15, 2025

East Central Solid Waste Commission Sanitary Landfill (SW-17) Expansion

Kanabec Soil and Water Conservation District (Kanabec SWCD) appreciates the opportunity to review public documents related to the proposed East Central Solid Waste Commission (ECSWC) landfill expansion. The project documents appear to meet the intent of Minnesota's environmental review process and provide a clear description of existing conditions, proposed phases, and environmental safeguards.

However, several baseline operational and environmental concerns remain important to address through permit conditions and long-term monitoring:

1. **Groundwater Quality Protection.** Even with modern composite liners and leachate collection systems, the long-term effectiveness of these features depends on consistent maintenance and monitoring. Kanabec SWCD recommends close review of groundwater quality **trends**, particularly conductivity, chloride, and ammonia levels, rather than relying solely on discrete exceedance events to identify potential liner or leachate issues early.
2. **Surface Water and Stormwater Management.** Because the site drains toward wetlands that ultimately discharge to the Ann River, an impaired water for *E. coli* and aquatic life, continued emphasis on sediment control and stormwater pond maintenance will be important during and after construction.
3. **Litter Control and Wildlife Attraction.** Our constituents have reported multiple instances where garbage trucks traveling to and from the landfill have left trash along public roadways. In addition, the current landfill attracts large numbers of gulls and has recurring issues with litter escaping into nearby fields, wetlands, and ditches. Expansion phases should include strengthened litter and wildlife control measures, such as prompt daily cover, secured transport practices, and debris fencing to minimize off-site impacts to neighboring lands and transportation corridors.



4. **Post-Closure Financial Assurance.** The adequacy of post-closure funding is a critical factor in ensuring that monitoring, cover maintenance, and corrective actions can continue for decades after closure. Kanabec SWCD strongly encourages the MPCA and ECSWC to evaluate long-term financial assurance levels carefully as part of the permit renewal and expansion review.

These comments are provided in the interest of maintaining the long-term environmental integrity of the site and the surrounding watershed. As a local government unit under Minnesota Statutes Chapter 103C, Kanabec Soil and Water Conservation District has a statutory role in promoting the conservation of soil, water, and related natural resources, and submits these comments in support of that mission.

Sincerely,
Kanabec Soil and Water Conservation District
By: Norma Heggernes, Board Chair

