



December 1, 2025

Chris Green
Minnesota Pollution Control Agency
504 Fairgrounds Rd. Suite 200
Marshall, MN 56258

Dear Mr. Green:

Thank you for the opportunity to provide comments as part of the proposed Elk River Landfill Expansion Scoping Environmental Assessment Worksheet. The City of Elk River has the following comments to offer:

General:

The current active disposal area of municipal solid waste (MSW) for the Elk River Landfill (ERL) is located within the City of Elk River, and the proposed ERL north development expansion project lies north of the city limits. The City of Elk River regulates the activities at the current site through a solid waste license and conditional land use permit. The license indicates the final date for MSW disposal within the City of Elk River as December 30, 2030.

Groundwater:

Section 12.a.2 reviews the groundwater conditions for the proposed expansion project. The historic operation of the current landfill has resulted in the contamination of groundwater to the west of the site. The known contaminant plume extends nearly one mile from the waste fill limits and has impacted residential water wells. An approved Groundwater Corrective Action Plan to address the contamination has involved the replacement of numerous residential wells with deeper wells and an ongoing groundwater monitoring program.

Although the landfill expansion will utilize a base liner and leachate collection system, there is still a risk of contamination to groundwater resources from the failure of control measures for the proposed MSW disposal area. Long-term (60+ years) protection of downgradient groundwater resources and water wells for City of Elk River residents is a concern.

Leachate:

Section 12.b.1 reviews the management of wastewater or leachate for the proposed expansion project. The ERL currently has an agreement with the City of Elk River for the treatment of

leachate at its publicly owned treatment facility. Because the expansion project will extend outside of the Elk River City limits and add to the amount of leachate that is currently generated for the site, the City will reserve the right to amend its current Leachate Disposal Use Agreement. The city cannot guarantee that treatment capacity will be available for the additional volume of leachate caused by the expansion. The landfill expansion is planned for 60+ years of operation and similarly, the city cannot fully predict the wastewater treatment needs of future residents and industry.

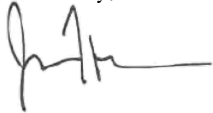
Traffic:

Section 20. reviews the transportation aspects for the proposed expansion project. With the closing/capping of the existing facility by December 30, 2030, the city also expects the current main entrance point to be decommissioned as part of said closure. The proposed expansion should be planned with a new access point connection to TH 169 outside the City of Elk River.

The additional landfill area will result in the generation of more leachate. If the leachate is managed utilizing the Metro Council Environmental Services wastewater treatment facilities, there will be additional tanker trucks that will be traveling through the City of Elk River along the Hwy 169 corridor. The increased truck traffic will create a corresponding impact.

Please let me know if you have any questions related to these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Joe Hale', with a long horizontal stroke extending to the right.

Joseph Hale
Environmental Services and Projects Specialist
763.635.1030