

May 19, 2021

Bill Blum
Program Planner
IDNR – Land Quality Bureau
Wallace State Office Building
502 East 9th Street
Des Moines, Iowa 50319



**RE: 2021 FINANCIAL ASSURANCE
PAGE COUNTY SANITARY LANDFILL
IDNR PERMIT NO. 73-SDP-01-75P
HLW PN 6047-20A.360**

Dear Mr. Blum:

Included with this letter is financial assurance documentation for 2021 for the Page County Sanitary Landfill. Documentation submitted with this letter includes the following:

1. Certified copy of the Closure/Postclosure Cost Estimate
2. Signed "Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form"

The audit for Fiscal Year 2020 for the Page County Sanitary Landfill Association has been filed with the State Auditor and is available on the State Auditor's website.

Note that cost estimates have been calculated using actual costs; therefore, adjustments for inflation were determined not to be applicable to the 2021 Closure/Postclosure Cost Estimate.

Please contact me if you have any questions.

Respectfully submitted,
HLW Engineering Group, LLC



Douglas J. Luzbetak, P.E.
Project Manager

cc: Brian Ward, Manager, Page County SLF

CLOSURE COST ESTIMATE

PAGE COUNTY LANDFILL - 2021

Subtitle D Alternative Lined Areas, 1.5 acres

Subtitle D Composite Lined Areas, 12.4 acres

	<u>QUANTITY</u>	<u>UNIT</u>	<u>COST</u>	<u>SUBTOTAL</u>
1. Closure and Post-Closure Plan Document Revisions				
Closure and Post-Closure Plans are now reviewed every five years as a part of the permit renewal process, and modifications to these documents should be minimal			\$1,000.00	
				\$1,000.00
2. Site Preparation, Earthwork and Final Grading				
The operators routinely compact and provide adequate daily and intermediate cover. Additional site preparation for the clay cap is not anticipated. Preparation for the FML cap is included in item #6				
Estimated area	-	acres	None	
				\$0.00
3. Erosion Control Structures, Sediment Ponds, Terraces, Etc.				
Estimated area	13.9	acres	\$1,000.00	
				\$13,900.00
4. Infiltration Layer - Subtitle D compliant alternative lined cells				
The final cap design calls for two feet of compacted soil over the alternative lined portion of the site.				
Estimated area	1.5	acres		
Estimated volume of soil	4,840	cubic yards		
Place & compacted	\$ 3.55	\$/cy	\$17,182.00	
				\$17,182.00
5. Erosion Layer - Subtitle D compliant alternative lined cells				
The final cap design calls for a two foot erosion layer over the infiltration layer				
Estimated area	1.5	acres		
Estimated volume of soil	4,840	cubic yards		
Placing of soil	\$ 3.00	\$/cy	\$14,520.00	
				\$14,520.00
6. Final Cap Construction - Subtitle D composite lined cells				
The final cap design over the composite lined cells will include a gas control layer gas piping, gas vents, 1.5 ft of infiltration layer, FML, drainage layer, and 2 ft erosion layer				
Estimated area	12.4	acres		
Estimated cost per acre	\$ 131,100			
				\$1,625,640.00

	<u>QUANTITY</u>	<u>UNIT</u>	<u>COST</u>	<u>SUBTOTAL</u>
7. Cap Seeding, Mulching, and Fertilizing				
Area	13.9	acres		
\$	1,000.00	\$/acre	\$13,900.00	\$13,900.00
8. Monitoring Well, Piezometer and Gas Control Modifications				
Monitoring wells, piezometers or gas control modifications due to closure are not expected for this site.			None	\$0.00
9. Leachate Systems Cleanout and Extraction Well Modifications				
The leachate system has been installed per IDNR approval. No modifications due to closure are anticipated at this time.			None	\$0.00
10. Monitoring Well Installations and Abandonment				
The IDNR has approved the existing HMSP and additions or changes to the current monitoring wells due to closure are not anticipated at this time			None	\$0.00
11. Facility Modifications to Effect Closed Status				
No Facility modifications are anticipated for the site.			None	\$0.00
12. Engineering and Technical Services - Closure				
Design, bid documents & administration			\$40,000.00	
Staking, inspections & testing			\$45,000.00	
				\$85,000.00
13. Legal, Financial and Administrative Services				
The site is owned and operated by the 28E agency. No additional costs for legal, financial or administrative activities are anticipated due to closure.			None	\$0.00
14. Closure Compliance Certifications and Documentation				
Engineering cost for verification and certification of closure			\$10,000.00	\$10,000.00
<u>TOTAL CLOSURE COST ESTIMATE</u>				<u>\$1,781,142.00</u>



"Cost estimates have been reviewed and recalculated using actual costs. Therefore, adjustments for inflation were determined to not be applicable for this year's Estimate."

POST CLOSURE COST ESTIMATE

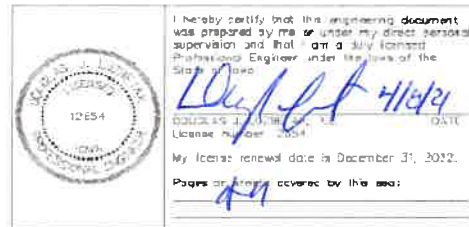
PAGE COUNTY LANDFILL - 2021

The solid waste disposal area is approximately 39.4 acres.
Post-closure currently includes approximately 25.5 acres of closed vertical expansion on unlined areas, 1.5 acres of Subtitle D compliant alternative lined disposal areas, and 12.4 acres of Subtitle D composite lined disposal areas.

	<u>QUANTITY</u>	<u>UNIT</u>	<u>COST</u>	<u>SUBTOTAL</u>
1. General Site Facilities, Access Roads and Fencing Maintenance				
Arrangements will be made with a local individual or business to provide routine inspections and arrange for general site maintenance				
Estimated annual costs		per year	\$500.00	\$500.00
2. Cap and Vegetative Cover Maintenance				
Repairing erosion, settlement, reseeding and periodic fertilizing.				
Repairs will likely be minimal after the initial five years. Estimate has been extrapolated, knowing that all the site will <u>not</u> need cover repairs on an annual basis. Estimate uses 10% of acreage per year.				
Cap repair \$100/ac		per year	\$400.00	
Reseeding and fertilizing \$100/ac		per year	\$400.00	
				\$800.00
3. Drainage and Erosion Control Systems Maintenance				
Maintaining the terraces and letdown structures				
Erosion control maintenance		per year	\$500.00	\$500.00
4. Groundwater to Waste Separation Systems Maintenance				
The groundwater diversion system gravity flows to a ravine.				
No maintenance is expected				
Maintenance		per year	None	\$0.00
5. Gas Control Systems Maintenance				
With the composite cap on the horizontal expansion, a gas venting system will be required				
Annual maintenance should be minimal				
Estimated annual costs		per year	\$50.00	\$50.00
6. Gas Control Systems Monitoring and Reports				
IDNR rules require quarterly monitoring for methane gas and annual reporting of the results				
Estimated annual costs		per year	\$1,200.00	\$1,200.00
7. Groundwater and Surface Water Monitoring System Maintenance				
Existing monitoring wells will require minimal maintenance.				
Estimated annual costs		per year	\$100.00	\$100.00

	<u>QUANTITY</u>	<u>UNIT</u>	<u>COST</u>	<u>SUBTOTAL</u>
8. Groundwater and Surface Water Quality Monitoring and Reports				
Semi-annual monitoring is currently required. Estimated cost is based upon Ch. 113 rules and the current SDP Permit.				
Monitoring and Testing (semiannually)	\$ 6,080	per event	\$12,160.00	
AWQR and Semi-Annual Report	\$ 3,500	annually	\$ 3,500.00	
				\$15,660.00
9. Groundwater Monitoring Systems Performance Evaluations and Reports				
At this time it is assumed all evaluations and reporting will be included in the AWQR				
		None		\$0.00
10. Leachate Control Systems Maintenance				
LCS cleaning of collection pipes every 3 years at an estimated \$3,000/event				
Annual maintenance rate		per year	\$1,000.00	
				\$1,000.00
11. Leachate Management, Transportation and Disposal				
HELP model analysis as detailed in the <i>4.5 Acre New Cell DOP</i> (July 2003) indicates leachate generation rates for a soil cap at 438 gpd. Using this value results in an estimated leachate generation rate of 97.3 gpd/ac for lined areas closed with a soil cap. HELP model analysis for FML caps estimate leachate generation rates following closure will be less than 1 gpd/ac. Using these generation rates results in an estimate of approximately 60,000 gallons of leachate per year from the lined areas on site. There is also leachate/groundwater collection in unlined areas that will contribute an unknown volume of leachate during closure. Use an estimated leachate volume of 450,000 gallons per year for consistency with past financial assurance calculations.				
Operational costs & pump maintenance	\$ 1,000.00	per year		
Annual leachate testing	\$ 1,200.00	per year		
Transportation costs	\$ 7,200.00	per year		
Disposal at POTW (\$0.015 gal)	\$ 6,750.00	per year		
				\$16,150.00
12. Leachate Control Systems Performance Evaluations and Reports				
These are included in the AWQR				
Annual report		per year	None	
				\$0.00
13. Facility Inspections and Reports				
Routine inspections are included as part of the facility maintenance cost.				
Under Ch 113 rules, engineering inspections are no longer required.			None	
				\$0.00
14. Engineering and Technical Services				
Additional engineering or other technical services should be minimal.				
		per year	\$200.00	
				\$200.00
15. Financial Assurance, Accounting, Audits and Reports				
The financial assurance documents will continue to be updated annually. Any audit will be assumed to be a portion of the audit for the entity monitoring the closed landfill.				
		per year	\$1,200.00	
				\$1,200.00

<u>QUANTITY</u>	<u>UNIT</u>	<u>COST</u>	<u>SUBTOTAL</u>
<u>ANNUAL POST-CLOSURE COSTS ESTIMATE</u>			\$37,360.00
<u>30 YEAR POST-CLOSURE COSTS ESTIMATE</u>			\$1,120,800.00



"Cost estimates have been reviewed and recalculated using actual costs. Therefore, adjustments for inflation were determined to not be applicable for this year's Estimate."

Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form

Section 1: FACILITY INFORMATION *(please print or type)*

Information Requested	
Facility Name	Page County Sanitary Landfill
Permitted Agency/Entity	Page County Sanitary Landfill Association
Permit Number	73-SDP-01-75P

Section 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 1,781,142	April 8, 2021
Updated Postclosure Cost Estimate	\$ 1,120,800	April 8, 2021
Initial or Updated Corrective Action Cost Estimate	\$ Not Applicable	Not Applicable

*Attach closure/postclosure cost estimate(s) signed and certified by an Iowa-licensed professional engineer. Cost estimates shall include, at a minimum, each of the cost line items defined in 113.14(3)"c" for closure and 113.14(4)"c" for postclosure. Please provide closure and/or postclosure site area acreage information with the estimates.

Provide a cost estimate for corrective action only if corrective action is required and a corrective action plan has been approved by the Department. Attach the corrective action cost estimate signed and certified by an Iowa-licensed professional engineer. The cost estimate shall account for total costs of the activities described in the approved corrective action plan for the corrective action period.

Section 3: FACILITY WASTE TONNAGE INFORMATION

Information Requested	Tons
Remaining permitted capacity as of the beginning of permit holder's current fiscal year	132,186
Amount of waste disposed of at the facility during the prior year	19,449

Section 4: PROOF OF COMPLIANCE

Publicly Owned Municipal Solid Waste Landfills	<i>(ATTACH AUDIT REPORT)</i>
Owner's Most Recent Annual Audit Report	
Prepared by: <u>Office of Auditor, State of Iowa</u>	
For fiscal year ending: <u>June 30, 2020</u>	
Privately Owned Municipal Solid Waste Landfills	<i>(ATTACH AFFIDAVIT)</i>
Attach owner/operator's affidavit indicating that an annual review has been performed by a certified public accountant to determine whether the privately owned landfill is in compliance with IAC 567 Chapter 113. The affidavit shall state the name of the certified public accountant, the dates and conclusions of the review, and the steps taken to rectify any deficiencies identified by the accountant.	

Section 5: FINANCIAL ASSURANCE INSTRUMENT

Type and Value of Financial Assurance Instrument(s)		(ATTACH INSTRUMENT(S))	
Assurance Instrument	Establishment Date	Mechanism Covers	Instrument Value*
Trust Fund 567 IAC 113.14(6)“a”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Surety Bond 567 IAC 113.14(6)“b”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Letter of Credit 567 IAC 113.14(6)“c”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Insurance 567 IAC 113.14(6)“d”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Financial Test 567 IAC 113.14(6)“e”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't. Financial Test 567 IAC 113.14(6)“f”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Guarantee 567 IAC 113.14(6)“g”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't Guarantee 567 IAC 113.14(6)“h”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't. Dedicated Fund 567 IAC 113.14(6)“i”	April 1997	Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action NA	\$ 2,353,176

*Pursuant to IAC 567 113.14(9), if account(s) are restricted/reserved to pay for closure, postclosure or corrective action costs, then the amount of the financial assurance instrument may be reduced by the sum of the cash balance of the account(s) established to comply with subrule 113.14(8).

Section 6: INITIAL PROOF OF ESTABLISHMENT OF ACCOUNTS

Check Which Applies:	<input type="checkbox"/> New Mechanism	<input checked="" type="checkbox"/> Previously Submitted
<p>Pursuant to IAC 567 Chapter 113.14(8)“f”, documentation of the establishment of accounts is to be submitted to the department by April 1, 2003 for currently permitted MSWLFs. Permit holders for MSWLFs permitted after April 1, 2003, shall submit documentation of the establishment of accounts prior to the MSWLF's initial receipt of waste.</p> <p>Please attach documentation indicating accounts/fund have been established for closure and postclosure care and if the account(s) are restricted/reserved for closure or postclosure care. Examples of documentation include bank statements for closure/postclosure accounts, letter signed by the chief financial officer, letter from certified public accountant, etc.</p> <p>Accounts established pursuant to paragraph 113.14(6)“a” for trust funds or paragraph 113.14(6)“i” for local government dedicated funds also satisfies the requirements of this subrule, and the permit holder shall not be required to establish additional closure and postclosure accounts.</p>		

Section 7: CLOSURE AND POSTCLOSURE ACCOUNTS

Completion of the following closure and postclosure account information complies with the annual financial statement requirements of IAC 567 113.14(3)“a” and 113.14(4)“a” by indicating the current balance(s) of the closure/postclosure account(s) or dedicated/trust fund and the projected amount(s) to be deposited in the account(s).

Under “Beginning Balance”, please state the account/fund balance 30 days after the start of the previous fiscal year, for “Ending Balance”, indicate the account balance 30 days after the close of the previous fiscal year, and for “Projected Deposit”, indicate the amount to be deposited within 30 days of the close of the permit holder’s fiscal year.

Information Requested	Beginning Balance	Ending Balance	Projected Deposit
Closure Account Balance (see formula below)	\$	\$	\$
Postclosure Account Balance (see formula below)	\$	\$	\$
Or			
Dedicated Fund Balance (see formula below)	\$ 2,248,777	\$ 2,353,176	\$ 91,461
Trust Fund Balance (see formula below)	\$	\$	\$

Formula for Projected Deposits

Closure or Postclosure Account	Dedicated/Trust Fund
$\frac{CE - CB}{RPC} \times TR$ <p>Where “CE” is the closure or postclosure cost estimate, “CB” is the balance 30 days after close of the previous fiscal year, “RPC” is the remaining permitted capacity in tons, of the landfill from the beginning of the current fiscal year, and “TR” is the total number of tons of solid waste disposed in the prior year.</p>	$\frac{CE - CB}{Y}$ <p>Where “CE” is the closure or postclosure cost estimate, “CB” is the balance 30 days after close of the previous fiscal year, and “Y” is number of years remaining in the pay-in period.</p>

If needed, the space below can be used to show calculations for projected deposits

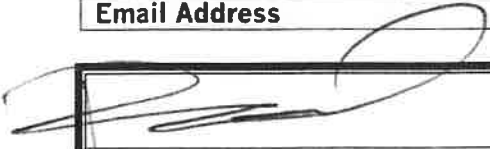
Dedicated fund pay in period of 7 years was used in the 2020 calculations; therefore, use 6 years in the 2021 calculations.

Projected Deposit
 =(\$2,901,942-\$2,353,176)/6 years
 = \$91,461

Section 8: PERMIT HOLDER ENDORSEMENT

SUBMITTAL OF THIS COMPLETED AND ENDORSED FORM ALONG WITH ALL REQUIRED DOCUMENTATION ESTABLISHES NOTIFICATION AND PROOF OF PERMIT HOLDER COMPLIANCE WITH IAC 567 CHAPTER 113.

Brian Ward	Manager	
Name of Official	Title	
Page County Sanitary Landfill Association		
Agency/Entity		
2032 N Avenue		
Address		
Clarinda	IA	51632
City	State	Zip
712-542-4215	712-542-5858	
Telephone	Fax	
pageland@heartland.net		
Email Address		

	MANAGER	05/18/2021
Signature of Official	Title	Date

Questions? Contact Chad A. Stobbe at (515) 242-5851 or Chad.Stobbe@dnr.iowa.gov