



February 27, 2023

RON KNOCHE PE
CITY OF IOWA CITY
PUBLIC WORKS DIRECTOR
410 E WASHINGTON ST
IOWA CITY IA 52240

**RE: City of Iowa City Sanitary Landfill
Permit No. 52-SDP-01-72P
Alternative Daily/Intermediate Cover**

Dear Mr. Knoche:

The Iowa Department of Natural Resources (DNR) staff from Field Office #6 in Washington, Iowa visited the City of Iowa City Sanitary Landfill (Landfill) on February 7, 2023 and February 15, 2023. On both occasions, DNR staff observed that the spray-on cover had been sparsely applied to the exposed waste. The improper application of the spray-on cover has been an ongoing concern at the Landfill. For example, the DNR's May 5, 2022 letter ([Document No. 103166](#)) stated that "spray-on cover application, especially on the working-face edges, needs to be improved and photo-documented."

Therefore, the DNR met with City of Iowa City (City) staff on February 23, 2023, to discuss suspending the use of spray-on daily cover. During the meeting, City staff explained how they had recently changed their operations.

- More frequent application of spray-on alternative intermediate cover.
- Increased the amount of product (ConCover) in the slurry mix for alternative intermediate cover.
- Purchase and receipt of two additional tarps.
- Placement of soil daily/intermediate cover in key areas in lieu of alternative daily/intermediate cover.

Following the meeting, the DNR determined that action regarding spray-on daily cover is still warranted. Therefore, the DNR is requiring the alternative daily cover to be applied at least at the same rate and same material quantities as the intermediate cover. Further, this is a trial period during which time the DNR will determine if the use of spray-on cover will continue to be allowed.

As part of this determination, staff from the DNR's Field Office #6 may be making more frequent inspection trips to the Landfill. And since the spray-on cover is potentially related to other items such as litter and bird control, the DNR is requiring the Landfill to notify the Field Office when the Landfill is closing early.

Specifics regarding the spray-on cover trial period are as follows.

- Trial period commences on Tuesday, February 28, 2023.
- Trial period ends no later than Friday, April 14, 2023.
- Adequate coverage shall be defined as not being able to observe the underlying waste through the spray-on cover (e.g. the color of a black trash bag should not be visible after application) for approximately 95% of any given area (e.g. approximately 95 square feet of a 10' by 10' area shall be adequately covered).

- The product shall be cross-applied (i.e. from at least two directions that are at least 90 compass degrees apart) each time spray-on is applied.
- If weather or conditions preclude adequate coverage, six inches of soil cover shall be applied.
- Re-application shall occur at least every five calendar days.
- Prepare daily logs with the approximate location and dimensions of the working face and the types of cover applied (soil, spray-on, or tarp), quantities of materials placed (cubic yards of soil, bales and gallons of water for spray-on, and the number of tarps), application directions of spray-on cover, pictures/videos, name of operator inspecting for adequate coverage and cover integrity, and any relevant notes regarding equipment, application, or other issues and the resolutions. Daily logs shall also document weather, wind speed, ground conditions, and operating hours.
- Daily logs for the prior week shall be submitted by 10 AM on Tuesday to the DNR's Field and Central Offices via email and include a signed cover letter from the permit holder's responsible official summarizing any issues and the subsequent resolutions during the reporting period.
- Notify the DNR's Field Office #6 when the Landfill is closing early.

Please note that the permit holder is still required to comply with their permit, including but not limited to the daily survey form and the quarterly reports for the bird assessment as well as any requirements related to the litter notice of violation and the permit.

If you have any questions, you may contact me at [\(515\) 537-4051](tel:5155374051) or brian.rath@dnr.iowa.gov.

Sincerely,

Brian L. Rath, P.E.
Environmental Engineer Senior
Land Quality Bureau

copy: Jennifer Jordan
Iowa City Landfill and Recycling Center
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DNR Field Office #6 – Washington