



**Grain Processing Corporation
1600 Oregon St.
Muscatine, IA 52761**

ENVIRONMENTAL SERVICES

February 14, 2024

Bill Blum
Finance & Business Assistance Program Planner
Iowa Department of Natural Resources
Land Quality Bureau
502 E. Ninth Street
Des Moines, IA 50319-0034

Subject: Financial Assurance, Grain Processing Corporation Monofill

Dear Mr. Blum:

Enclosed please find a completed and signed Coal Combustion Residue Monofill Financial Assurance Report Form, Closure and Post Closure Opinion of Probable Cost, a copy of the Irrevocable Letter of Credit, and an independent accountant's report as required by IAC 567 Chapters 115 and Chapter 103.3(6) "c".

The original signed Irrevocable Letter of Credit that remains in your possession, was sent by Wells Fargo, and delivered to the IDNR as of February 27, 2023. The Letter of Credit (No. Nzs622791) issued was amended February 24, 2023, in an amount of \$750,000. These funds are restricted for closure and/or post-closure care of the Grain Processing Corporation Landfill on I Avenue in Louisa County located on 57.5 acres within the NW ¼ and 5.3 acres within the SW ¼ of the NW ¼ all located in Section 13, T75N, R3W, Louisa County.

The name and address of the lending institution is as follows:

Wells Fargo Bank, National Association
Attn: U.S. Standby Trade Services
794 Davis Street, 2nd Floor
MAC A0283-023
San Leandro, CA 94577-6922
1-800-776-3862, Option 2

If you have any questions regarding this letter or its contents, please contact Mackenzie Holladay, Environmental Specialist at 563.264.4870.

Sincerely,

A handwritten signature in cursive script that reads "Brian Peters".

Brian Peters
Senior Vice President of Operations



Coal Combustion Residue Monofill Financial Assurance Report Form

SECTION 1: FACILITY INFORMATION

(please print or type)

Information Requested

Facility Name: Grain Processing Corporation Permit Number: 58-SDP-03-92C

Permitted Agency/Entity: Iowa Department of Natural Resources

SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ -	
Updated Postclosure Cost Estimate	\$ 488,902.43	January 29, 2024
Initial or Updated Corrective Action Cost Estimate	\$ -	

*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 103.3(3)"c" for closure and 103.3(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	0
Amount of waste disposed of at the facility during the prior year	0

SECTION 4: PROOF OF COMPLIANCE

Publicly Owned Coal Combustion Residue Monofills

(ATTACH AUDIT REPORT)

Owner's Most Recent Annual Audit Report

Prepared by: Stanley Consultants, Inc.

For fiscal year ending: 2023

Privately Owned Coal Combustion Residue Monofills

(ATTACH AFFIDAVIT)

Attach owner/operator's affidavit indicating that an annual review has been performed by a certified public accountant to determine whether the privately owned monofill is in compliance with IAC 567 Chapter 103. 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 103.3(6)"a"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Surety Bond 567 IAC 103.3(6)"b"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Letter of Credit 567 IAC 103.3(6)"c"	February 24, 2023	Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input checked="" type="checkbox"/>	\$ 750,000
Insurance 567 IAC 103.3(6)"d"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Financial Test 567 IAC 103.3(6)"e"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't. Financial Test 567 IAC 103.3(6)"f"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Guarantee 567 IAC 103.3(6)"g"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't Guarantee 567 IAC 103.3(6)"h"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov't. Dedicated Fund 567 IAC 103.3(6)"i"		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$

SECTION 6: FUND PAYMENTS

(only if using dedicated or trust fund)

Completion of the following fund information complies with the annual financial statement requirements of IAC 567 103.3(3)"a" and 103.3(4)"a" by indicating the current balance(s) of the dedicated/trust fund and the projected amount(s) to be deposited in the fund(s).

Under "Beginning Balance", please state the fund balance 30 days after the start of the previous fiscal year, for "Ending Balance", indicate the fund 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
Dedicated Fund Balance <i>(see formula below)</i>	\$	\$	\$
Trust Fund Balance <i>(see formula below)</i>	\$	\$	\$

Formula for Projected Deposits

Dedicated/Trust Fund

$$\frac{CE-CB}{Y}$$

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.

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

SECTION 7: 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 103.

Name of Official: Brian Peters Title: Senior VP of Operations

Agency/Entity: Grain Processing Corporation

Address: 1600 Oregon Street

City: Muscatine State: Iowa Zip: 52761

Telephone: 563-264-4624 Fax: 563-264-4216

Email Address: brian_peters@grainprocessing.com

Signature of Official: *Brian Peters* Date: 2/15/24


Questions? Contact Bill Blum at (515) 240-6048 or Bill.Blum@dnr.iowa.gov

**POSTCLOSURE
OPINION OF PROBABLE COST
(ADJUSTED FOR INFLATION)**

**FOR THE
GPC CCR LANDFILL**

MUSCATINE, IOWA

CLOSURE PERMIT NO. 58-SDP-03-92C-CCR

	<p>I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.</p>
	<p><i>Trenton Humphrey</i> _____ 1/29/2024 Trenton S Humphrey, P.E. Date License No. P27585 My renewal date is December 31, 2025 Pages or sheets covered by this seal: All pages. Entire Document</p>

**GPC CCR LANDFILL
 POSTCLOSURE OPINION OF PROBABLE COSTS
 CLOSURE PERMIT NO. 59-SDP-03-92C-CCR**

SUMMARY

Postclosure status; Permit effective January 3, 2019 through January 3, 2029

	Amended Estimate (2024)
<hr/>	
POSTCLOSURE COMPONENT	
1. General site facilities, access roads and fencing maintenance	\$30,841.97
2. Cap and vegetative cover maintenance	\$92,526.32
3. Drainage and erosion control systems maintenance	\$39,980.34
4. Groundwater and surface water monitoring systems maintenance	\$5,711.43
5. Groundwater and surface water quality monitoring and reports	\$123,367.98
6. Facility inspections and reports	\$86,813.96
7. Engineering and technical services	\$5,711.43
8. Legal, financial and administrative services	\$103,948.98
Subtotals	<u>\$488,902.43</u>
Summary	
CLOSURE COSTS (Landfill Closed)	\$0.00
POSTCLOSURE COSTS	<u>\$488,902.43</u>
TOTAL CLOSURE/POSTCLOSURE COSTS	\$488,902.43

GPC CCR LANDFILL
POSTCLOSURE OPINION OF PROBABLE COSTS
CLOSURE PERMIT NO. 59-SDP-03-92C-CCR

Postclosure Permit - 10 years (1/3/2019-1/3/2029)

The baseline estimate is adjusted annually for inflation

The current year's inflation factor is:

1.026

IDNR Updated 01/25/2024)

Description	Quantity	Units	Current Year Inflation Adjusted		Amended Estimate (2024)
			\$/Unit	Extension	
1. General site facilities, access roads and fencing maintenance					
a. General facilities/labor (annual)	10	events	\$1,370.76	\$13,707.57	
b. Access roads (annual)	10	events	\$1,142.30	\$11,422.97	
c. Fence maintenance (annual)	10	events	\$571.14	\$5,711.43	
				<u>\$30,841.97</u>	\$30,841.97
2. Cap and vegetative cover maintenance					
a. Mowing (annual)	10	events	\$2,741.51	\$27,415.13	
b. Erosion repair (annual)	10	events	\$5,711.49	\$57,114.86	
c. Reseeding (annual)	10	events	\$799.63	\$7,996.34	
				<u>\$92,526.32</u>	\$92,526.32
3. Drainage and erosion control systems maintenance					
a. Letdown structures repair (annual)	10	events	\$571.14	\$5,711.43	
b. Sediment pond dredging	1	events	\$8,567.22	\$8,567.22	
c. Terrace repairs (annual)	10	events	\$2,284.59	\$22,845.94	
d. Rip rap repair	1	events	\$2,855.74	\$2,855.74	
				<u>\$39,980.34</u>	\$39,980.34
4. Groundwater and surface water monitoring systems maintenance					
a. Letdown structures repair (annual)	10	events	\$571.14	\$5,711.43	
				<u>\$5,711.43</u>	\$5,711.43
5. Groundwater and surface water quality monitoring and reports *					
a. Field sample collection	10	events	\$4,797.65	\$47,976.48	
b. Sample analysis	10	events	\$2,398.82	\$23,988.19	
c. IDNR annual water quality reports	10	events	\$5,140.33	\$51,403.32	
				<u>\$123,367.98</u>	\$123,367.98
6. Facility inspections and reports					
a. Semiannual site inspections	120	events	\$571.14	\$68,537.21	
b. Annual site inspection by licensed engineer	10	events	\$1,827.68	\$18,276.75	
				<u>\$86,813.96</u>	\$86,813.96
7. Engineering and technical services					
a. Site engineering	10	events	\$571.14	\$5,711.43	
				<u>\$5,711.43</u>	\$5,711.43
8. Legal, financial and administrative services					
a. Legal, financial and administrative services	10	events	\$5,711.49	\$57,114.86	
b. Financial assurance updates	10	events	\$1,142.30	\$11,422.97	
c. Accounting	10	events	\$2,170.36	\$21,703.59	
d. Audits/reports	10	events	\$1,370.76	\$13,707.57	
				<u>\$103,948.98</u>	\$103,948.98
Total Postclosure Cost Estimate					\$488,902.43

* IAC Chapter 103 monitoring requirements in effect as of 2018.



Wells Fargo Bank, N.A.
U.S. Trade Services
Standby Letters of Credit
401 N. Research Pkwy, 1st Floor
MAC D4004-017,
Winston-Salem, NC 27101-4157
Phone: 1(800) 776-3862 Option 2
E-Mail: StandbyCustomerCare@wellsfargo.com

**Amendment To
Irrevocable Standby Letter of Credit**

Number : NZS622791

Amendment Number : 006

Amend Date : February 24, 2023

BENEFICIARY

IOWA DEPART. OF NATURAL RESOURCES
ENERGY & WASTE MGMT. BUREAU
THE WALLACE STATE OFFICE BLDG.
502 E.9TH ST.
DES MOINES, Iowa 50319

APPLICANT

GRAIN PROCESSING CORPORATION
1600 OREGON ST
MUSCATINE, Iowa 527611404

LADIES AND GENTLEMEN:

AT THE REQUEST AND FOR THE ACCOUNT OF THE ABOVE REFERENCED APPLICANT, WE HEREBY AMEND OUR IRREVOCABLE STANDBY LETTER OF CREDIT (THE "WELLS CREDIT") IN YOUR FAVOR AS FOLLOWS:

THE CURRENT AVAILABLE AMOUNT IS INCREASED BY USD 250,000.00 TO USD 750,000.00 .

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

THIS AMENDMENT IS TO BE ATTACHED TO THE ORIGINAL WELLS FARGO STANDBY LETTER OF CREDIT AND IS AN INTEGRAL PART THEREOF.

Very Truly Yours,

WELLS FARGO BANK, N.A.

By: _____
Authorized Signature

The original of the Letter of Credit contains an embossed seal over the Authorized Signature.

Please direct any written correspondence or inquiries regarding this Letter of Credit, always quoting our reference number, to **Wells Fargo Bank, National Association**, Attn: U.S. Standby Trade Services

at either 794 Davis Street, 2nd Floor
MAC A0283-023,
San Leandro, CA 94577-6922

or 401 N. Research Pkwy, 1st Floor
MAC D4004-017,
WINSTON-SALEM, NC 27101-4157

Phone inquiries regarding this credit should be directed to our Standby Customer Connection Professionals

1-800-776-3862 Option 2
(Hours of Operation: 8:00 a.m. ET to 5:00 p.m. PT)



RSM US LLP

Independent Accountant's Report

Management
Grain Processing Corporation

We have performed the procedures enumerated below on the January 29, 2024, GPC CCR Landfill Postclosure Opinion of Probable Cost report. Grain Processing Corporation is responsible for the January 29, 2024, GPC CCR Landfill Postclosure Opinion of Probable Cost report.

Grain Processing Corporation has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting users reviewing the January 29, 2024, GPC CCR Landfill Postclosure Opinion of Probable Cost report. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and the associated findings are as follows:

Procedures

1. Obtain a copy of GPC CCR Landfill Postclosure Opinion of Probable Cost report and observe that the report is signed/stamped by a licensed professional engineer.
2. Inspect the engineering report for the following components:
 - a. Closure Components:
 1. Closure and postclosure plan document revisions;
 2. Site preparation, earthwork and final grading;
 3. Drainage control culverts, piping and structures;
 4. Erosion control structures, sediment ponds and terraces;
 5. Final cap construction;
 6. Cap vegetation soil placement;
 7. Cap seeding, mulching and fertilizing;
 8. Monitoring well and piezometer modifications;
 9. Monitoring well installations and abandonments;
 10. Facility modifications to effect closed status;
 11. Engineering and technical services;
 12. Legal, financial and administrative services; and
 13. Closure compliance certifications and documentation.

THE POWER OF BEING UNDERSTOOD
AUDIT | TAX | CONSULTING

- b. Postclosure Components:
 - 1. General site facilities, access roads and fencing maintenance;
 - 2. Cap and vegetative cover maintenance;
 - 3. Drainage and erosion control systems maintenance;
 - 4. Groundwater to waste separation systems maintenance;
 - 5. Groundwater and surface water monitoring systems maintenance;
 - 6. Groundwater and surface water quality monitoring and reports;
 - 7. Groundwater monitoring systems performance evaluations and reports;
 - 8. Facility inspections and reports;
 - 9. Engineering and technical services;
 - 10. Legal, financial and administrative services; and
 - 11. Financial assurance, accounting, audits and reports.
- 3. Trace current year inflation adjusted estimates from summary report to supplemental detail of the report.
- 4. Foot totals of closure components and postclosure components.
- 5. Agree that report totals are equal to the closure and postclosure cost estimate.

Responses

There were no closure cost components included in the January 29, 2024, GPC CCR Landfill Postclosure Opinion of Probable Costs report as the landfill was closed effective January 3, 2019. Postclosure cost components related to 2.b #4, #7 and #11 in the engagement letter attachment dated February 6, 2024, were not included in the cost estimate report as they are estimated to have zero costs. All procedures were performed without exception.

We were engaged by Grain Processing Corporation to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the January 29, 2024, GPC CCR Landfill Postclosure Opinion of Probable Costs report. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Grain Processing Corporation and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Board of Directors and management of Grain Processing Corporation and is not intended to be, and should not be, used by anyone other than the specified parties.

RSM US LLP

Cedar Rapids, Iowa
February 12, 2024