

February 26, 2024

Iowa Department of Natural Resources
Solid Waste Section
Wallace State Office Building
901 East Grand Avenue
Des Moines, Iowa 50319-0034

**RE: Closure/Post-Closure Cost Estimate
Continental Cement Company – Davenport Plant CKD Landfill
Buffalo, Scott County, Iowa
IDNR Permit No. 82-SDP-15-96C and 82-SDP-16-97P**

Dear Sir/Madam:

Blackstone Environmental, Inc. (Blackstone) is pleased to submit the closure/post-closure (CPC) cost estimates for the Continental Cement Company Davenport Plant Cement Kiln Dust (CKD) Landfill. This CPC cost estimate has been prepared in general accordance with the requirements of Title 567 Iowa Administrative Code Chapter 115.31 (567 IAC 115.31).

Continental operates a CKD landfill located in Buffalo, Iowa. A portion of the landfill is closed under Iowa Department of Natural Resources (IDNR) Permit No. 82-SDP-15-96C. The rest of the site is operated as a monofill for disposal of CKD under IDNR Permit No. 82-SDP-16-97P.

A summary of the closure and post-closure cost estimates are provided below. Detailed cost estimate tables are provided on the following pages.

Table 1 – Closure and Post-Closure Cost Estimate Summary

Total Closure Costs	\$528,911.53
Total Post-Closure Costs	\$1,147,098.21
Total CPC Costs	\$1,676,009.74

This cost estimate was prepared in accordance with applicable requirements and generally accepted environmental engineering practices.

If you have any questions, please contact Eric Sonsthagen with Blackstone at 402-208-2014 or Damion Sadd with Continental Cement at Damion.Sadd@continentalcement.com or 309-798-3487.

Respectfully,
BLACKSTONE ENVIRONMENTAL, INC.

A handwritten signature in blue ink that reads 'Eric Sonsthagen'.

Eric Sonsthagen, P.E.
Senior Project Engineer

A handwritten signature in blue ink that reads 'Edward A. Shepard, Jr.'.

Edward A. Shepard, Jr., P.E.
Senior Project Manager

CERTIFICATION

I hereby certify the portion of this engineering document described herein was prepared by me and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.



February 26, 2024

Eric Sonsthagen, P.E.

License No. P24844

Pages covered by this seal: All

License Expiration Date: 12/31/2025

Closure Cost Estimate - Continental Cement Company

FACILITY OWNER: Continental Cement Company
 FACILITY NAME: Davenport Plant CKD Landfill
 DATE: 2/12/2024
 PERMIT NUMBER: 82-SDP-16-97P
 ESTIMATOR: Eric Sonsthagen, P.E.

Permit No.: 82-SDP-16-97P

ITEM	QUANTITY	UNITS	UNIT COST	COST
INITIAL CLOSURE PREPARATION				
CPC Plan Document Revisions	1	Each	\$7,675.08	\$7,675.08
FINAL COVER				
Site preparation earthwork and grading for final cover	5	Days	\$2,686.27	\$13,431.34
Final cover construction	18,000	CY	\$13.82	\$248,735.71
VEGETATIVE LAYER				
Final cover vegetation soil	14,000	CY	\$12.27	\$171,803.81
Seeding, mulching, and fertilizing	4.1	ACRE	\$1,535.01	\$6,293.55
EROSION CONTROL				
Erosion Control structures, ponds, terraces	5	Days	\$2,686.27	\$13,431.34
GROUNDWATER MONITORING SYSTEM				
Upgrade or repair existing wells	1	EACH	\$1,535.01	\$1,535.01
Well abandonment	0	EACH	\$0.00	\$0.00
LEACHATE COLLECTION SYSTEM				
Leachate system modifications	1	EACH	\$4,604.97	\$4,604.97
FACILITY OPERATIONS				
Facility modifications	1	EACH	\$15,350.18	\$15,350.18
PROFESSIONAL SERVICES				
Engineering Services	1	EACH	\$23,025.30	\$23,025.30
ADMINISTRATION AND CONTINGENCY				
Legal, Financial, and Administration Services	1	EACH	\$15,350.18	\$15,350.18
Closure Compliance Documentation	1	EACH	\$7,675.07	\$7,675.07
Total Closure Costs				\$ 528,911.53

Post-Closure Cost Estimate - Continental Cement Company

FACILITY OWNER: Continental Cement Company
 FACILITY NAME: Davenport Plant CKD Landfill
 DATE: 2/12/2024
 PERMIT NUMBER: 82-SDP-16-97P
 ESTIMATOR: Eric Sonsthagen, P.E.

Permit No.: 82-SDP-16-97P

ITEM	QUANTITY	UNITS	UNIT COST	COST
MAINTENANCE ITEMS				
General Maintenance	30	Years	\$1,688.52	\$50,655.57
Cap and Vegetation Maintenance	30	Years	\$3,377.03	\$101,310.80
Drainage and Erosion Control Maintenance	30	Years	\$0.00	\$0.00
Waste Systems Maintenance	30	Years	\$0.00	\$0.00
Gas Control Maintenance	30	Years	\$0.00	\$0.00
Leachate Control Maintenance	30	Years	\$2,726.60	\$81,797.85
Groundwater Monitoring System Maintenance	30	Years	\$1,535.01	\$46,050.39
LEACHATE SYSTEM				
Leachate Management and Disposal	30	Years	\$0.00	\$0.00
Leachate Control Performance Evaluations	30	Years	\$0.00	\$0.00
GROUNDWATER MONITORING SYSTEM				
Groundwater Monitoring Performance Evaluations	30	Years	\$3,070.00	\$92,100.09
Groundwater Monitoring and Reporting	30	Years	\$19,955.25	\$598,657.54
INSPECTIONS				
Facility Inspections	30	Years	\$3,070.00	\$92,100.09
ADMINISTRATION AND ENGINEERING				
Legal, Financial, and Administration Services	1	EACH	\$15,350.18	\$15,350.18
Engineering Services	1	EACH	\$23,025.30	\$23,025.30
Financial Assurance Accounting	30	Years	\$1,535.01	\$46,050.39
Total Post-Closure Costs				\$ 1,147,098.21



Industrial Monofill Financial Assurance Report Form

SECTION 1: FACILITY INFORMATION

(please print or type)

Information Requested
Facility Name: <u>Davenport Plant CKD Landfill</u> Permit Number: <u>82-SDP-16-97P</u>
Permitted Agency/Entity: <u>Continental Cement Company</u>

SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 528,911.53	2/12/24
Updated Postclosure Cost Estimate	\$ 1,147,098.21	2/12/24
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 115.31(3)"c" for closure and 115.31(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	741,285
Amount of waste disposed of at the facility during the prior year	775

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: _____	
For fiscal year ending: _____	

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 monofill is in compliance with IAC 567 Chapter 115. 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)	<i>(ATTACH INSTRUMENT(S))</i>
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Assurance Instrument	Establishment Date	Mechanism Covers	Instrument Value*
Trust Fund 567 IAC 115.31(6)“a”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Surety Bond 567 IAC 115.31(6)“b”	March 1, 2016	Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 1,676,009.74
Letter of Credit 567 IAC 115.31(6)“c”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Insurance 567 IAC 115.31(6)“d”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Financial Test 567 IAC 115.31(6)“e”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Financial Test 567 IAC 115.31(6)“f”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Guarantee 567 IAC 115.31(6)“g”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t Guarantee 567 IAC 115.31(6)“h”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Dedicated Fund 567 IAC 115.31(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 567 115.31(3)“a” and 115.31(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

Closure	Postclosure
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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 115.

Name of Official: Damion Sadd Title: Environmental and Public Affairs Manager
 Agency/Entity: Continental Cement Company
 Address: 301 E. Front Street
 City: Buffalo State: IA Zip: 52728
 Telephone: 563-328-6204 Fax: _____
 Email Address: Damion.Sadd@continentalcement.com

Signature of Official:  Date: 2/26/2024

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

SURETY RIDER

To be attached to and form a part of

Bond No. 019052863

dated March 1, 2016
effective (MONTH-DAY-YEAR)

executed by Continental Cement Co., LLC, as Principal,
(PRINCIPAL)

and by Liberty Mutual Insurance Company, as Surety,

in favor of Iowa Department of Natural Resources
(OBLIGEE)

in consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

The Bond Amount from:

One Million Six Hundred Thirty-three Thousand Five Hundred Thirty-seven & 77/100 (\$1,633,537.77)

To:
One Million Six Hundred Seventy-six Thousand Nine & 74/100 (\$1,676,009.74)

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective March 1, 2024
(MONTH-DAY-YEAR)

Signed and Sealed February 20, 2024
(MONTH-DAY-YEAR)

Continental Cement Co., LLC
(PRINCIPAL)
By: Kevin J. Nard
(PRINCIPAL)

Liberty Mutual Insurance Company
(SURETY)
By: Kimberly Leonard
Kimberly Leonard, Attorney-in-Fact





This Power of Attorney limits the acts of those named herein, and they have no authority to bind the Company except in the manner and to the extent herein stated.

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company

Certificate No: 8204866

POWER OF ATTORNEY

KNOWN ALL PERSONS BY THESE PRESENTS: That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the 'Companies'), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, Kimberly Leonard

all of the city of Morristown, state of New Jersey, each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

IN WITNESS WHEREOF, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 15th day of February, 2021.

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company



By: David M. Carey

David M. Carey, Assistant Secretary

STATE OF PENNSYLVANIA ss
COUNTY OF MONTGOMERY

On this 15th day of February, 2021, before me personally appeared David M. Carey, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my notarial seal at King of Prussia, Pennsylvania, on the day and year first above written.



Commonwealth of Pennsylvania - Notary Seal
Teresa Pastella, Notary Public
Montgomery County
My commission expires March 28, 2025
Commission number 1126044
Member, Pennsylvania Association of Notaries

By: Teresa Pastella
Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

ARTICLE IV - OFFICERS: Section 12. Power of Attorney.

Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

ARTICLE XIII - Execution of Contracts: Section 5. Surety Bonds and Undertakings.

Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

Certificate of Designation - The President of the Company, acting pursuant to the Bylaws of the Company, authorizes David M. Carey, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

Authorization - By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, of Liberty Mutual Insurance Company, The Ohio Casualty Insurance Company, and West American Insurance Company do hereby certify that this power of attorney executed by said Companies is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 20th day of February, 2024



By: Renee C. Llewellyn

Renee C. Llewellyn, Assistant Secretary

Not valid for mortgage, note, loan, letter of credit, currency rate, interest rate or residual value guarantees.

For bond and/or Power of Attorney (POA) verification inquiries, please call 610-832-8240 or email HOSUR@libertymutual.com.

INDUSTRIAL MONOFILL LANDFILL
OWNER'S AFFIDAVIT

As the Owner and/or Operator of Continental Cement Company Davenport Plant's privately owned industrial monofill landfill, I certify that a yearly review has been performed by a certified public accountant to determine whether the landfill is in compliance with Iowa Administrative Code Chapter 115. Conclusions of the review and the steps taken to rectify any deficiencies identified by the accountant are listed below.

Date of Review: February 16, 2024


Certifying Accountant: Brian Franz, VP CAO

Company: Continental Cement Company

Conclusion(s) of the review: Closure/post closure cost estimates appear to have been prepared in accordance with the above mentioned requirements and is supported by Surety Bond #019052863 in the amount of \$1,676,009.74. No warranties, either expressed or implied are intended or made as a result of the review.

Steps taken to rectify any deficiencies identified: NA

Signature:



Printed Name: Brett Inslund

Title: Davenport Plant Manager

Date: 2/16/24