

West Des Moines, IA

PROJECT: GRRWA, FY24 Env Comp, IA 27223129.24 DATE: 3/18/2024
SUBJECT: GRRWA Sanitary Landfill- 56-SDP-07-08P - 2024 Financial Assurance Review TRANSMITTAL ID: 00001
PURPOSE: For your approval VIA: Info Exchange

FROM

NAME	COMPANY	EMAIL	PHONE
Isaac Creech West Des Moines, IA	SCS Engineers	ICreech@scsengineers.com	

TO

NAME	COMPANY	EMAIL	PHONE
michael.sullivan@dnr.iowa.gov		michael.sullivan@dnr.iowa.gov	
Becky Jolly		becky.jolly@dnr.iowa.gov	

REMARKS: Good afternoon,

SCS Engineers, on behalf of the Great River Regional Waste Authority (GRRWA), is submitting the attached 2024 Financial Assurance Review. If you have any questions regarding this submittal, please contact us using the information below.

Thank you,

Isaac Creech, E.I.T.
Associate Professional
1690 All-State Court, Suite 100
West Des Moines, IA 50265
(515) 631-6160 (Office)
(515) 415 -9211 (W)
icreech@scsengineers.com
www.scsengineers.com

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COPIES:

Transmittal

DATE: 3/18/2024
TRANSMITTAL ID: 00001

Isaac Creech
Tim Buelow
Austin Banks

(SCS Engineers)
(SCS Engineers)
(Great River Regional Waste Authority, IA)

March 18, 2024
File No. 27223129.24

Mr. Michael Sullivan
Iowa Department of Natural Resources
Land Quality Bureau
Wallace Street Office Building
502 E 9th Street
Des Moines, IA 50319-0034

Subject: 2024 Financial Assurance Post-Closure Cost Estimate Update
Great River Regional Waste Authority Sanitary Landfill
Permit No. 56-SDP-07-80P

Dear Mr. Sullivan:

SCS Engineers (SCS) on behalf of the Great River Regional Waste Authority (GRRWA) is submitting herewith the 2024 Financial Assurance to the Iowa Department of Natural Resources (DNR). Attached are the completed DNR Form 542-8090 and the 2024 Opinion of Probable Cost Summary for closure and post-closure activities. The local government financial for GRRWA and a local government guarantee from Lee County together provide financial assurance for GRRWA.

The post-closure cost estimate (Attachment A) was prepared by updating the line-item costs using similar costs from other 2023 Iowa landfill cell construction and closure bid tabs, inflated to 2024 dollars. The Phase 1 closed area currently has 12 years remaining in the 30-year post-closure period. Attachment B includes a local government financial test form for GRRWA. A local government financial test form for Lee County will be provided under separate cover when the Lee County Fiscal Year 2023 audit is available.

A copy of the most recent annual audit report in the form prescribed by the Office of the Auditor of the State of Iowa as described in IAC 567 Chapter 113 can be obtained at:
<https://auditor.iowa.gov/audit-reports>.

If you have any questions regarding this submittal, please contact us at (515) 631-6160.

Sincerely,



Isaac Creech
Associate Professional
SCS Engineers



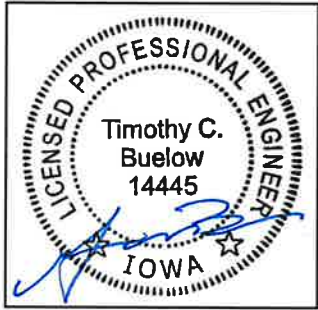

Timothy C. Buelow, P.E.
Project Director
SCS Engineers

IAC/TCB

cc: Austin Banks, General Manager, Great River Regional Waste Authority



Certification

 <p>The seal is circular with a double-line border. The outer ring contains the text "LICENSED PROFESSIONAL ENGINEER" at the top and "IOWA" at the bottom, separated by two stars. In the center, the name "Timothy C. Buelow" and license number "14445" are printed. A blue ink signature is written across the seal.</p>	<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> _____ Timothy C. Buelow, P.E.</p> <p>Date: <u>3/18/24</u></p> <p>License No. 14445</p> <p>My license renewal date is December 31, 2025</p> <p>Pages or sheets covered by this seal: <u>GRRWA Landfill 2024 Closure and Postclosure Cost Estimate</u></p>
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Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form

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

Information Requested	
Facility Name	Great River Regional Waste Authority Sanitary Landfill
Permitted Agency/Entity	Great River Regional Waste Authority
Permit Number	56-SDP-07-80P

Section 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 4,454,966	March 18, 2024
Updated Post Closure Cost Estimate	\$ 1,599,192	March 18, 2024
Initial or Updated Corrective Action Cost Estimate	\$ N/A	N/A

*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	9,434,289*
Amount of waste disposed of at the facility during the prior year	85,179

* From October 2023 Airspace Analysis

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>Ted M. Wiegand, CPA</u>	
For fiscal year ending: <u>June 30, 2023</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 checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 1,919,839
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 checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$404,774
Local Gov’t. Dedicated Fund 567 IAC 113.14(6)“i”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	

*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/Postclosure Account Balance <i>(see formula below)</i>	\$ 3,677,290	\$ 3,729,545	\$ 20,988

Or

Dedicated Fund Balance <i>(see formula below)</i>			
Trust Fund Balance <i>(see formula below)</i>			

Formula for Projected Deposits

Closure or Postclosure Account	Dedicated/Trust Fund
$\frac{CE - CB}{RPC} \times TR$	$\frac{CE - CB}{Y}$
<p>Where “CE” is the closure or postclosure cost estimate, “CB” is the balance 30 days after close of the previous fiscal year, “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>	<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


$$\frac{\$6,054,158 - \$3,729,545^{(1)}}{9,434,289} \times 85,179 = \$20,988$$

Note (1): \$26,753 was subtracted from the closure and post closure care amounts shown in the June 30, 2023 audit report to accommodate the Keokuk Transfer Station closure financial assurance. The updated Keokuk Transfer Station financial assurance was submitted as part of the 2023 Solid Waste Transfer Station Permit Renewal Application, dated January 31, 2023 (Doc #105754) and supplemental information submitted on February 2, 2023 (Doc #105749) and approved on February 6, 2023 (Doc #105771).

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.

Austin Banks		General Manager	
Name of Official		Title	
Great River Regional Waste Authority			
Agency/Entity			
2092 303 rd Avenue			
Address			
Fort Madison		Iowa	52627
City		State	Zip
319-372-6140		319-372-6222	
Telephone		Fax	
abanks@grrwa.com			
Email Address			

		General Manager		3-18-2024	
Signature of Official		Title		Date	

Questions? Contact Bill Blum at (515) 725-8376 or bill.blum@dnr.iowa.gov

Attachment A
2024 Opinion of Probable Cost Summary
for Post-Closure Activities



2024 Closure Cost - Phase 2 - GRRWA Sanitary Landfill

Task ¹	Units	Cost per Unit		Cost	
				year	Cost of Task
1. Closure and Postclosure Plan Document Revisions	1	\$ 10,906	lump sum	2024	\$ 10,906
2. Site Preparation, Earthwork, and Final Grading	1	\$ 114,176	lump sum	2024	\$ 114,176
3. Drainage Control Culverts, Piping, and Structures	0	\$ -	lump sum	2024	\$ -
4. Erosion Control Structures, Sediment Ponds, and Terraces	1	\$ 174,061	lump sum	2024	\$ 174,061
5. Final Cap Construction ⁽²⁾	26.3	\$ 86,949	acre	2024	\$ 2,286,767
6. Cap Vegetation Soil Placement ⁽²⁾	26.3	\$ 22,032	acre	2024	\$ 579,436
7. Cap Seeding, Mulching, and Fertilizing ⁽³⁾	36.3	\$ 2,391	acre	2024	\$ 86,778
8. Monitoring Well, Piezometer, and Gas Control Modifications	1	\$ 935,378	lump sum	2024	\$ 935,378
9. Leachate System Cleanout and Extraction Well Modifications	1	\$ 15,117	lump sum	2024	\$ 15,117
10. Monitoring Well Installation and Abandonments	0	\$ -	lump sum	2024	\$ -
11. Facility Modifications to Effect Closed Status	1	\$ 1,500	lump sum	2024	\$ 1,500
12. Engineering and Technical Services	1	\$ 212,674	lump sum	2024	\$ 212,674
13. Legal, Financial, and Administrative Services	1	\$ 29,993	lump sum	2024	\$ 29,993
14. Closure Compliance Certifications and Documentation	1	\$ 8,180	lump sum	2024	\$ 8,180
Total Cost of Closure					\$ 4,454,966

Notes:

¹ Task items based on the list from 567 IAC 113.14(3)"c"(6).

² Current open area requiring final cover: 26.3 acres

31.0 acres (Phase 2 total) minus 7.5 acres (acres closed)

³ Current approximate borrow area: 10.0 acres

2024 Postclosure Cost - Phase 2 - GRRWA Sanitary Landfill

Task ¹	Units	Cost per Unit	Cost	
			year	30 Year Cost
1. General Site Facilities, Access Roads, and Fencing Maintenance	30	\$ 1,117 / year	2024	\$ 33,500
2. Cap and Vegetative Cover Maintenance	30	\$ 5,212 / year	2024	\$ 156,357
3. Drainage and Erosion Control Systems Maintenance	30	\$ 3,001 / year	2024	\$ 90,037
4. Groundwater to Waste Separation Systems Maintenance	30	\$ 819 / year	2024	\$ 24,557
5. Gas Control Systems Maintenance	30	\$ 1,232 / year	2024	\$ 36,974
6. Gas Control Systems Monitoring and Reporting	30	\$ 4,860 / year	2024	\$ 145,800
7. Groundwater and Surface Water Monitoring Systems Maintenance	30	\$ 278 / year	2024	\$ 8,353
8. Groundwater and Surface Water Quality Monitoring and Reporting	30	\$ 18,440 / year	2024	\$ 553,185
9. Groundwater Monitoring Systems Performance Evaluations and Reports	30	\$ - / year	2024	\$ -
10. Leachate Control Systems Maintenance	30	\$ 2,800 / year	2024	\$ 83,986
11. Leachate Management, Transportation, and Disposal	30	\$ 2,794 / year	2024	\$ 83,835
12. Leachate Control Systems Performance Evaluations and Reports	30	\$ 3,345 / year	2024	\$ 100,350
13. Engineering and Technical Services	30	\$ 3,967 / year	2024	\$ 119,000
14. Legal, Financial, and Administrative Services	30	\$ 1,500 / year	2024	\$ 45,000
15. Financial Assurance, Accounting, Audits, and Reports	30	\$ 1,900 / year	2024	\$ 57,000
Total Cost of Postclosure		\$ 51,264		\$ 1,537,934

Notes:

¹ Task items based on the list from 567 IAC 113.14(4)"c"(6).

² Total area of Phase 2:

33.2 Acres

2024 Postclosure Cost - Phase 1 - GRRWA Sanitary Landfill

Task ¹	Units	Cost per Unit	Cost	
			year	30 Year Cost
1. General Site Facilities, Access Roads, and Fencing Maintenance	12	\$ - / year	2024	\$ -
2. Cap and Vegetative Cover Maintenance	12	\$ 2,363 / year	2024	\$ 28,353
3. Drainage and Erosion Control Systems Maintenance	12	\$ 124 / year	2024	\$ 1,491
4. Groundwater to Waste Separation Systems Maintenance	12	\$ - / year	2024	\$ -
5. Gas Control Systems Maintenance	12	\$ - / year	2024	\$ -
6. Gas Control Systems Monitoring and Reporting	12	\$ - / year	2024	\$ -
7. Groundwater and Surface Water Monitoring Systems Maintenance	12	\$ 265 / year	2024	\$ 3,180
8. Groundwater and Surface Water Quality Monitoring and Reporting	12	\$ 1,538 / year	2022	\$ 18,455
9. Groundwater Monitoring Systems Performance Evaluations and Reports	12	\$ - / year	2024	\$ -
10. Leachate Control Systems Maintenance	12	\$ - / year	2024	\$ -
11. Leachate Management, Transportation, and Disposal	12	\$ - / year	2024	\$ -
12. Leachate Control Systems Performance Evaluations and Reports	12	\$ - / year	2024	\$ -
13. Engineering and Technical Services	12	\$ 815 / year	2024	\$ 9,780
14. Legal, Financial, and Administrative Services	12	\$ - / year	2024	\$ -
15. Financial Assurance, Accounting, Audits, and Reports	12	\$ - / year	2024	\$ -
Total Cost of Postclosure		\$ 5,105		\$ 61,258

Notes:

¹ Task items based on the list from 567 IAC 113.14(4)"c"(6).

² Total area of Phase 1: 17.9 acres

³ For the site wide items covered under the Phase 2 postclosure fund for which no change in scope resulted from the addition of Phase 1 postclosure, no additional funding will be required within the Phase 1 postclosure cost estimate.

Attachment B
Local Government Financial Test



MUNICIPAL SOLID WASTE SANITARY LANDFILL LOCAL GOVERNMENT FINANCIAL TEST & CFO LETTER

March 18, 2024

Iowa Department of Natural Resources
Planning, Permitting & Engineering Services
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319

Dear Sir or Madam:

I am the chief financial officer for Great River Regional Waste Authority, herein referred to as the "Owner." This letter is in support of the Owner's use of the Financial Test to demonstrate financial assurance for closure and/or postclosure care costs, as specified in IAC 567 Chapter 113.14(3) and 113.14(4).

The Owner is the owner and operator of the following municipal solid waste sanitary landfill(s) for which financial assurance for closure and/or postclosure care is demonstrated through the financial test, as specified in IAC 567 Chapter 113.14(6)"f":

Facility Name: Great River Regional Waste Authority

Address: 2992 303rd Avenue, Fort Madison, IA 52627

Permit No: 56-SDP-07-80P

The current closure and/or postclosure care cost estimate, in accordance with IAC 567 Chapter 113.14(3) and 113.14(4), are shown below for each facility covered by the Financial Test:

Closure/Postclosure cost to be assured: \$ 1,919,839

The Owner meets or exceeds the financial test criteria as shown below in Alternative II and agrees to comply with the requirements, as specified in subrule 113.14(6)"f."

As chief financial officer for the Owner, I hereby certify that the information provided in this letter is true to the best of my knowledge and that this letter is being submitted in accordance with IAC 567 Chapter 113.14(6)"f" for the Local Government Financial Test.

Signature: 

Name: Austin Banks

Date: 3-18-2024

The figures for the following items are derived from the Owner's independently audited, year-end financial statements/audit report for the latest completed fiscal year, ended June 30, 2023.

Alternative II

1. Sum of the current closure and/or postclosure cost estimates being assured by the Financial Test	\$ 1,919,839	\$ 1,493,637
	From most recent annual auditor's report	From 2nd most recent annual auditor's report
2. Total Revenues for past two years	\$ 4,464,741	\$ 3,473,576
3. Total Expenditures for past two years	\$ 2,424,214	\$ 2,346,775
4. Cash plus marketable securities (see definition below)	\$ 4,946,816	\$ 3,573,996
5. Annual debt service	\$ -	\$ -
Must be able to answer "Yes" or "True" to the following		
	Yes/ True	No/ False
6. Is line 4 divided by line 3 greater than 5 percent?	Yes	
7. Is line 5 divided by line 3 less than 20 percent?	Yes	
8. There are no outstanding general obligation bonds that are currently in default.	True	
9. There are no outstanding general obligation bonds rated lower than Baa as issued by Moody's or BBB as issued by Standard & Poor's.	True	
10. Have financial statements (audit) been prepared in conformity with Generally Accepted Accounting Principles or with Other Comprehensive Basis of Accounting?	Yes	
11. Is line 3 less than line 2 in each of the past two years?	Yes	
12. If answered "no" to line 11, line 3 does not exceed line 2 by more than 5 percent in each of the past two years.		
13. Is line 1 less than 43 percent of line 2?	Yes	
14. Have not received an adverse opinion or disclaimer of opinion from the independent certified public accountant or office of the auditor of the state of Iowa.	True	
15. Have closure and postclosure costs being assured been referenced in the owner's most recent audit report or instead placed in the owner's files if timing did not permit reference in the most recent audit?	Yes	

Definitions:

"Deficit" means total annual revenues minus total annual expenditures.

"Total revenues" means revenues from all taxes and fees but does not include the proceeds from borrowing or asset sales, excluding revenue from funds managed by local government on behalf of a specific third party.

"Total expenditures" means all expenditures excluding capital outlays and debt repayment.

"Cash plus marketable securities" means all the cash plus marketable securities held by the local government on the last day of a fiscal year, excluding cash and marketable securities designated to satisfy past obligations such as pensions.

"Debt service" means the amount of principal and interest due on a loan in a given time period, typically the current year.