



# Industrial Monofill Financial Assurance Report Form

## SECTION 1: FACILITY INFORMATION

(please print or type)

### Information Requested

Facility Name: Amsted Rail Company, Inc. Permit Number: 56-SDP-15-89  
Permitted Agency/Entity: \_\_\_\_\_

## SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 0	2/2024
Updated Postclosure Cost Estimate	\$ 137,817.08	2/2024
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 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	0
Amount of waste disposed of at the facility during the prior year	0

## SECTION 4: PROOF OF COMPLIANCE

### Publicly Owned Municipal Solid Waste Landfills

(ATTACH AUDIT REPORT)

Owner's Most Recent Annual Audit Report

Prepared by: \_\_\_\_\_

For fiscal year ending: \_\_\_\_\_

### Privately Owned Municipal Solid Waste Landfills

(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 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)

(ATTACH INSTRUMENT(S))

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”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
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**

Submission 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: Paul Sheppard Title: Environmental Manager

Agency/Entity: Amsted Rail Company, Inc./Griffin Wheel

Address: 416 Carbide Lane

City: Keokuk State: Iowa Zip: 52632

Telephone: 319-524-2962 X20712 Fax: 319-524-8119

Email Address: psheppard@amstedrail.com

Signature of Official: \_\_\_\_\_ Date: \_\_\_\_\_

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

## **IOWA DEPARTMENT OF NATURAL RESOURCES SANITARY DISPOSAL PROJECT CLOSURE PERMIT**

Amsted Rail Company, Inc. (Griffin Wheel Company) was issued a Closure Permit for the Griffin Wheel Company Foundry Waste Landfill from Michael B. "Mick" Leat of IDNR dated September 27, 2022.

The issued Closure Permit date is September 27, 2022, and it expires September 27, 2027. The facility entered Post-Closure at this time.

The financial assurance cost estimate reflects the Post-Closure care stated in Special Conditions 6 of the Closure Permit.

The facility will operate under IDNR "Solid Waste By-Product Beneficial use Determination Rule" moving forward, as stated in Special Provision 8 of the Closure Permit.

Amsted will continue to submit financial assurance for the Post-Closure landfill during this time period.

Attached are the IDNR letter and Closure-Permit.



September 27, 2022

PAUL SHEPPARD  
GRIFFIN WHEEL COMPANY  
416 CARBIDE LANE  
KEOKUK IA 52632

RE: Griffin Wheel Company Foundry Sand Landfill  
Permit #56-SDP-15-89P  
Closure Permit

Dear Mr. Sheppard:


Enclosed is the closure permit for the Griffin Wheel Company Foundry Waste Landfill.

The closure permit must be kept with the approved plans at the sanitary disposal project in accordance with solid waste rule 567 IAC 115.26(2)“c”. Please review this permit with your operators, as they must become familiar with it.

Please contact me at (515) 689-6548 or email at [mick.leat@dnr.iowa.gov](mailto:mick.leat@dnr.iowa.gov) with any questions.

Sincerely,

Michael B.  
"Mick" Leat

Digitally signed by Michael B. "Mick" Leat  
Date: 2022.09.27 14:49:52 -05'00'

Michael B. "Mick" Leat  
Land Quality Bureau

cc: Thomas Vanage and Nick Perrotta, P.E.  
Haley & Aldrich, Inc.  
8899 Gander Creek Drive  
Miamisburg, OH 45342

DNR Field Office #6

Chad Stobbe, DNR

Bill Blum, DNR

**IOWA DEPARTMENT OF NATURAL RESOURCES  
SANITARY DISPOSAL PROJECT CLOSURE PERMIT**

- I. Permit Number:** 56-SDP-15-89-91C  
Griffin Wheel Foundry Waste Landfill
- II. Permitted Agency:** Amsted Rail Company, Inc. (Griffin Wheel)
- III. Project Location:** Part of the SE1/4, Section 15, T65N, R5W, 5th P.M., City of Keokuk, Lee County, Iowa, lying west of the Burlington Northern Railroad, East of U.S. Highway 61 By-Pass, and North of Carbide Lane (approximately 113.7 acres).
- IV. Responsible Official**
- Name: Paul Sheppard  
Amsted Rail Company, Inc.
- Address: 416 Carbide Lane  
Keokuk, IA 52632
- Phone: (319) 795-0692
- V. Licensed Design Engineer**
- Name: Nick Perrotta, P.E.
- Address: Haley & Aldrich, Inc.  
3899 Gander Creek Drive  
Miamisburg, OH 45342
- Phone: (937) 384-9940
- Iowa License Number: 22717
- VI. Date Permit Issued:** **September 27, 2022**
- VII. Permit Expiration Date:** **September 27, 2027**
- VIII. Issued by:** Michael B. "Mick" Leat  
Digitally signed by Michael B. "Mick" Leat  
Date: 2022.09.27 14:48:59 -05'00'  
Iowa Department of Natural Resources

**IX. General Provisions**

The above named permitted agency is authorized to conduct and maintain postclosure activities at the sanitary landfill at the described location in conformance with Iowa Code Chapter 455B, the rules pursuant thereto existing at the time of issuance, and any subsequent new rules which may be duly adopted, and any provisions contained in Section X of this permit.

The facility shall be maintained according to the engineering plans and specifications approved by the Department of Natural Resources (DNR) and these shall become a part of this permit. Any modifications or deviations from the engineering plans and specifications must have prior approval by the DNR and an amendment to this permit issued.

The issuance of this permit in no way relieves the applicant of the responsibility for complying with all other local, state, and federal statutes, ordinances, and rules or other requirements applicable to the closure and maintenance of this closed sanitary landfill.

No legal or financial responsibility arising from the closure and postclosure of the approved project shall attach to the State of Iowa or the DNR due to the issuance of this permit.

If title to this project is transferred, the new owner must apply to the DNR for a transfer of this permit within thirty days of the date of title transfer. This transfer is void sixty days after the date of title conveyance unless the DNR has transferred the permit.

This facility shall be surveyed as necessary and inspected as described in the special provisions of this permit. Semiannual reports shall be prepared containing a brief report describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections. These reports shall be submitted by May 1 and November 1 each year to both the Field and Main offices of the DNR. The DNR shall be notified if any inspection reveals any nonconformance with the permit and approved plans and specifications.

Failure to comply with Iowa Code Chapter 455B, or any rule of order promulgated pursuant thereto, or any or all provisions of this permit may result in a civil penalty of up to \$5000 for each day of violation, pursuant to Iowa Code section 455B.307.

#### **X. Special Provisions**

1. The five-year postclosure period for this facility begins on the issuance date of this permit.
2. Issuance of this closure permit prohibits the disposal of any additional foundry wastes within the Phase 1 Landfill Sand Area boundaries shown on plan sheet C-101, located in Appendix D of document #96671, or the Phase I or II Landfill Slag Area boundaries shown on plan sheet C-300, located in Appendix C of document #103590.

Previously-placed slag, emplaced to the elevations shown within the Phase I and II Slag Areas on plan sheet C-300 located in Appendix C of document #103590, are approved as a basal working surface for the ongoing slag recovery operations at the site. The Phase I and II Slag Area will continue to be used for storage of spent foundry materials from the facility awaiting recycling operations in accordance with their Solid By-Product Management Plan. These materials are unprocessed and comingled foundry slag and refractory materials in a stockpile; processed and sized foundry slag/refractory aggregate in separate stockpiles; and processed foundry refractories in stockpiles.

3. Clean closure activities for the Phase 1 Sand Area are documented in the Construction Documentation Report for the Foundry Waste Landfill Closure – Phase 1 Sand Area (doc #96671), dated December 30, 2019, and the supplement to the Construction Documentation Report (doc #98039), dated July 7, 2020, both submitted by Haley & Aldrich, which was approved on July 31, 2020. This area was closed on July 31, 2020.
4. Clean closure activities for the Phase I and II Slag Area are documented in the Construction Documentation Report for the Foundry Waste Landfill Closure – Phase I and II Slag Area (doc #103590), dated July 13, 2022, as submitted by Haley & Aldrich and approved on September 27, 2022. The Phase I and II Slag Area was closed on the date of this closure permit.
5. An Environmental Covenant (doc#104167), dated September 19, 2022, has been placed on the property. The covenant places permanent restrictions on the construction of drinking water wells and residences on the property, and requires the biennial submission of engineering reports that verify that the property restrictions have been complied with.
6. The permit holder shall conduct post-closure care for the closed Phase 1 Sand Storage and the Phase I and II Slag Areas in accordance with the Closure/Post-Closure Plan for Clean Closure (doc #94768), dated April 1, 2019, as submitted by Haley & Aldrich, and approved on April 9, 2019.

Groundwater and surface water monitoring in accordance with special provision #7 shall continue for a minimum duration of five years after the date of this closure permit.

Following completion of the April 2027 groundwater and surface water monitoring event, the permit holder shall submit the results to the DNR for review. If the DNR determines that all monitored parameters are exhibiting stable or declining concentrations, this permit will expire and all groundwater monitoring wells shall be abandoned with documentation submitted to DNR. If the monitoring results exceed applicable health-based standards and do not exhibit stable or declining concentrations, DNR may extend the monitoring period if any environmental or human health concerns remain that are not addressed by the Environmental Covenant placed on the property.

7. Hydrologic monitoring at the site shall be conducted in accordance with the Revised Hydrologic Monitoring System Plan (doc #85182), dated January 19, 2016, as submitted by Haley & Aldrich, Inc. and approved on April 25, 2016, and the following:
  - a. The HMSP shall include upgradient groundwater monitoring points MW-12, MW-16, MW-20, and MW-21; downgradient groundwater monitoring points MW-5, MW-6, MW-7, MW-25, MW-26, and MW-27; upgradient surface water monitoring point SW-1 and downgradient surface water monitoring point SW-2.
  - b. Monitoring points that are not sampled may be retained as water level measuring points.



- c. Semiannual sampling shall take place with analyses for the parameters listed in 567 IAC 115.26(4)“e”; the supplemental parameters boron, lithium, sodium, strontium, fluoride, sulfate; and any parameters deemed necessary by DNR. Routine annual testing for the parameters listed in 567 IAC 115.26(4)“f” shall be conducted during October of each year.
  - d. The Method Detection Limit (MDL) for the test parameters shall not exceed action levels as defined in 567 IAC Chapter 133. If the action levels cannot be feasibly achieved using procedures described in 567 IAC 115.26(5), then the MDL shall not exceed the lowest feasible level.
  - e. Samples collected for dissolved metals analysis shall be field filtered, preserved, and promptly transferred to a certified laboratory for analysis. Samples collected for total recoverable analysis shall **not** be field-filtered prior to laboratory analysis.
  - f. Surface monitoring points must be clearly marked in the field and a method for measuring the flow rate at each sampling point shall be devised.
  - g. An Annual Water Quality Report (AWQR) summarizing the effects the facility is having on groundwater and surface water quality shall be submitted to the DNR’s Main and local Field offices by November 30 each year. The AWQR shall include the results of the groundwater measurements conducted at the monitoring points and all analyses and the associated DNR sampling Forms 542-1322 and 542-1324.
8. The permit holder shall comply with the legitimate recycling provisions in 455D.4a of the Iowa Code. Ongoing beneficial use projects shall comply with the state’s solid waste by-product beneficial use determination rules (Iowa Administrative Code 567 Chapter 108) and be tracked and reported with each Quarterly Solid Waste Fee Schedule and Retained Fees Report.
  9. The permit holder shall provide dust control using a watering truck or other acceptable method as needed to control nuisance dusts.
  10. The foundry waste landfill sign on Carbide Lane is approved for removal.
  11. A certified landfill operator must be maintained during the duration of this closure permit.

**FINANCIAL ASSURANCE 2023 - COST ESTIMATE DATA**

**Facility** Amsted Rail Company, Inc. "Materials Recovery and Reuse Area"  
**Permit #:** 56-SDP-15-89P-FSL  
**Date Submitted:**  
**Engineering Firm:** Haley & Aldrich, Inc.

Iowa DNR Inflation Factor (2023 over 2022) 1.026

<u>Closure Cost Estimate*</u>	No. of Units **	Unit Cost	Cost
Document Revisions*	0	\$2,698.52	\$0.00
Site Preparation, Earthwork and Grading			
<i>Rough Dozing*</i>	0 cu.yd.	\$4.20	\$0.00
<i>Finish Grading*</i>	0 sq.yd.	\$1.40	\$0.00
Drainage Control (Rip-Rap)*	0 cu.yd.	\$76.97	\$0.00
Erosion Control*	0 ft.	\$1.68	\$0.00
Final Cap Construction			
<i>Fill with Clay Soil (Graded)*</i>	0 cu.yd.	\$11.90	\$0.00
<i>Compaction of Clay Soil*</i>	0 cu.yd.	\$2.45	\$0.00
<i>Fill with Vegetative Soil (Graded)*</i>	0 cu.yd.	\$6.30	\$0.00
Cap Vegetation(Seeding)*	0 sq.ft.	\$0.03	\$0.00
Monitoring and Gas Control Modifications	0	0	\$0.00
Leachate System Modifications	0	0	\$0.00
Monitoring Well Installations and Abandonments	0	0	\$0.00
Facility Modifications for Closure	0	0	\$0.00
Engineering and Technical Services*	0	\$49,986.80	\$0.00
Legal, Financial and Administrative*	0	\$3,790.77	\$0.00
Closure Compliance Certifications*	0	\$6,682.04	\$0.00
Submitted Cost Estimate Total			\$0.00

**Comments:**

*During closure there are no anticipated monitoring or gas control modifications*

*There are no planned monitoring well abandonments*

*There are no leachate control costs since the landfill has a leachate control exemption for the Phase I Landfill Area*

*The Phase 1 Sand Area Clean Closure Report was Submitted Dec. 30, 2019 and Approved by IDNR by letter dated Jan. 13, 2020. Material The Phase 1 & 2 Slag Area Closure Report was Approved by IDNR by letter dated Sept. 27, 2022. Material quantities and costs associated with \* Phase 1 Sand Area and Phase 1 & 2 Slag areas are closed as of September 27, 2022. Closure costs have occurred. This facility will be operated under IDNR "Solid Waste By-Product Beneficial Use Determination Rule" as stated in Special Provision 8 of the Closure Permit.*

*\*\* Quantities have been reduced to 0 since landfill is closed.*

**FINANCIAL ASSURANCE 2023 - COST ESTIMATE DATA**

**Facility** Amsted Rail Company, Inc. "Materials Recovery and Reuse Area"  
**Permit #:** 56-SDP-15-89P-FSL  
**Date Submitted:**  
**Engineering Firm:** Haley & Aldrich, Inc.

<u>Postclosure Cost Estimate*</u>		Units	Unit Cost	Cost
General Site Facilities Maintenance		1	\$4,754.53	\$4,754.53
Cap and Cover Maintenance***		0	\$3,276.77	\$0.00
Drainage and Erosion Control Maintenance		1	\$2,570.02	\$2,570.02
Groundwater Separation System Maintenance		0	0	\$0.00
Gas Control System Maintenance		0	0	\$0.00
Gas Control Monitoring and Reports		0	0	\$0.00
Groundwater/Surface Water Systems Maintenance***		1	\$3,855.02	\$3,855.02
Water Quality Monitoring and Reports		1	\$2,377.26	\$2,377.26
Water Quality Performance Evaluation and Reports		1	\$5,525.53	\$5,525.53
Leachate Control Systems Maintenance		0	0	\$0.00
Leachate Management, Transport and Disposal		0	0	\$0.00
Leachate Control Performance Evaluations and Reports		0	0	\$0.00
Facility Inspections and Reports***		2	\$1,927.51	\$3,855.02
Engineering and Technical Services		1	\$3,212.52	\$3,212.52
Legal, Financial and Administrative		1	\$706.75	\$706.75
Financial Assurance, Accounting, Audits and Reports		1	\$706.75	\$706.75
Submitted Annual Cost				\$27,563.42
Submitted 5 Year Cost**				\$137,817.08

**Comments:**

*There are no groundwater lowering system, or gas control systems installed at the landfill*  
*There are no leachate control costs since the landfill has a leachate control exemption for the Phase I Landfill Area*  
*The Phase 1 Sand Area Clean Closure Report was Submitted Dec. 30, 2019 and Approved by IDNR by letter dated Jan. 13, 2020.*  
*The Phase 1 & 2 Slag Area Closure Report was Approved by IDNR by letter dated Sept. 27, 2022. Material quantities and costs associated with the*  
*\* Phase 1 Sand Area and Phase 1 & 2 Slag areas are closed as of September 27, 2022. This facility will be operated under IDNR "Solid Waste By-Product Beneficial Use Determination Rule" as stated in Special Provision 8 of the Closure Permit.*

*\*\* Phase 1 Sand Area and Phase 1 & 2 Slag areas are closed as of September 27, 2022. This facility will have a 5-year Post-Closure period on issuance date of this perm, as stated in Special Provision 1 of the Closure Permit.*

*\*\*\* Phase 1 Sand Area and Phase 1 & 2 Slag areas are closed as of September 27, 2022. This facility has an Environmental Covenant effective September 19, 2022, as stated in Special Provision 5 of the Closure Permit.*

	<p>I hereby certify that this engineering document was prepared by me or under my direct supervision and that I am a duly licenced Professionals Engineer under the laws of the State of Iowa</p> <p align="center"><i>Nick Leon Perrotta</i></p> <p align="right">23 February 2024</p> <hr/> <p>Nick Leon Perrotta, P.E. <span style="float: right;">Date</span></p> <p>My licence renewal date is December 31, 2024</p> <p>Pages or sheets cover by this seal: 2 Pages of Cost Estimate Data</p>
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**Keokuk 2022 Landfill tons per quarter**

	<u>IN</u>	<u>OUT</u>	
1st Quarter (Jan.-March)	1647	4551	
2nd Quarter (Apr.-June)	803.75	1581	
3rd Quarter (Jul.-Sept.)	355.94	2175	<b>Landfill closed 9-27-2022. In</b>
4th Quarter (Oct.-Dec.)	0	0	<b>Post-Closure thru 9-27-2027</b>
	2,806.69	8,307.00	

**Keokuk 2023 Landfill tons per quarter**

	<u>IN</u>	<u>OUT</u>	
	0	0	<b>Landfill in Post-Closure 9-27-2022.</b>

## **The 'Inflation Factor' – 2023 over 2022** **for Landfill Financial Assistance Cost Estimates**

**Ref. Iowa Admin. Code [567] sub-sections (3), (4) & (5) in each of sections 113.14, 115.31, 114.31 & 103.3**

Every Annual Financial Assurance Report must UPDATE Closure, Postclosure &/or Corrective Action Cost Estimates, **IN CURRENT DOLLARS**, certified by an Iowa-licensed professional engineer.

*IF* no other re-assessment/computations are done\*\*, Cost Estimates HAVE TO **AT LEAST** BE adjusted for annual inflation By **multiplying** last year's Cost Estimates **times** the **Inflation Factor**.

As of *January 25, 2024*, the Inflation Factor for this year's Financial Assurance Reports is  
**1.026**

**as Derived from Gross Domestic Product statistics, using the formula:**

Implicit Price Deflator of most recent quarter	÷		= <b>Inflation Factor</b>
Implicit Price Deflator of previous year's same corresponding quarter			

Find the Implicit Price Deflators for GROSS DOMESTIC PRODUCT at this website of the U.S. Dept. of Commerce, Bureau of Economic Analysis (BEA):

<https://apps.bea.gov/iTable/?reqid=19&step=3&isuri=1&1921=survey&1903=13>

**So it is then that:**

$$\frac{\text{2023 4}^{\text{th}} \text{ quarter implicit price deflator}}{\text{2022 4}^{\text{th}} \text{ quarter implicit price deflator}} = \text{Inflation Factor}$$

<b>123.226</b>	= <b>1.026</b>
<b>120.093</b>	

*as An Example*, ---with No other re-assessment/re-computations\*\* being made...

**IF, Last Year's combined Cost Estimates = \$2,000,000**

**Applying this year's Inflation Factor then means:**

***\$2,000,000 X 1.026 = \$2,052,000***

*i.e. This Year's updated combined Cost Estimates adjusted for inflation.*

Source of the Implicit Price Deflators for **GROSS DOMESTIC PRODUCT**:

U.S. Department of Commerce  
Bureau of Economic Analysis (BEA)  
4600 Silver Hill Road  
Washington, DC 20233  
Ph. (301) 278-9004  
Link for an e-mail: [Submit a Customer Service Request](#)

\*\* **If Cost Estimates are** re-assessed and re-computed and yet found to be effectively the same as last year, **then** a statement to that effect has to be included with the Financial Assurance Report materials.

# INDUSTRIAL MONFILL LANDFILL OWNER'S AFFIDAVIT

As the Owner and/or Operator of [IMF Name], a 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: 2/23/2024

Certified Accountant  
that performed the Review: Dave Schade

Company that  
owns the landfill: Amsted Industries

Conclusion(s) of the review: Cost for all post closure activities are financially insured through a letter of credit. Amsted Rail continues to provide coverage for all post closure activities. Post closure costs are all reviewed on an annual basis with the assurance of our landfill consultant and contractor.

Steps taken to rectify any deficiencies identified: \_\_\_\_\_

Owner/operator's Signature: Paul Sheppard Date: 2/23/2024

Owner/operator's printed Name: Paul Sheppard

Owner/operator's Title: Environmental Manager