

March 6, 2025

Kent Herbold  
Plymouth County Solid Waste Agency  
34898 150<sup>th</sup> Street  
LeMars, IA 51031

SUBJECT: Sanitary Disposal Project Inspection  
SDP Permit #75-SDP-1-74P, Plymouth County

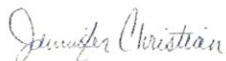
Dear Mr. Herbold:

Enclosed is a copy of the report resulting from the November 20, 2024, inspection of the Plymouth County C&D Landfill.

The report is believed to be self-explanatory. You are strongly encouraged to act on the requirements and recommendations listed near the end of the report.

If you have any questions or comments, please contact me.

Sincerely,



Jennifer Christian, Environmental Specialist Senior  
jennifer.christian@dnr.iowa.gov  
Field Services and Compliance Bureau

JC:lw

C: -Becky Jolly, PP&ES, E&WMB, ESD, DNR, Des Moines

Enc: -Inspection report

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**IOWA DEPARTMENT OF NATURAL RESOURCES  
Sanitary Disposal Project Inspection**

Permit #: 75-SDP-1-74P

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<b>Facility Name:</b> Plymouth County C&D Landfill <b>Facility Operator:</b> Kent Herbold <b>Address:</b> Plymouth County Solid Waste Agency 34898 150 <sup>th</sup> Street LeMars, IA 51301  <b>Responsible Authority:</b> Plymouth County Solid Waste Agency <b>Responsible Official:</b> Rick Bohle, Chairman <b>Address:</b> 34898 150 <sup>th</sup> Street LeMars, IA 51031	<b>County:</b> Plymouth  <b>Phone:</b> 712-546-6071 712-540-1680  <b>Phone:</b> 712-546-6071
<b>Date This Inspection:</b> 11/23/24	
<b>Waste Amount:</b> ~ 5000 ton per year	

**At the Time of this Inspection:**

- |                                                                                                                                                                               |                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• facility personnel present: Kent Herbold</li> <li>• present fill location: 10S and 11S</li> <li>• future fill location: 5</li> </ul> | <ul style="list-style-type: none"> <li>• surface conditions: dry</li> <li>• ambient temperature: 32 degrees</li> <li>• wind direction and speed: NW 30</li> </ul> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Yes – compliance was being achieved; No – compliance was not being achieved,  
 N/A – not applicable or not observed; PND – previously noted deficiency (PND).

**I. Documents and Record Keeping:**

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Permit and Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Storm Water Permit
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Permit Amendments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. ERRAP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. Permit Special Provisions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. DOP, LCP, HMSP, CPCP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Permit Required Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Leachate volume record
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. quarterly solid waste report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9. LCSPE
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. water quality monitoring report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. SWA & SWAC
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. semi-annual engineer's report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11. Financial Assurance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. gas monitoring report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12. Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. other					

**II. Operating Procedures:**

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1. Fill Cover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Special Waste Handling
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. daily	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Recycling Activities
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. intermediate (7-day)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9. Scavenging & Vector Control
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. final (60-day)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. Litter Control
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Fill Elevations (adequate surveying)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. fences
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. Control of Face	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. hand picking
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. width	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11. Staffing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. slope	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. operators/personnel
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. dumping location	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. incoming waste
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Compaction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. operator certification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Drainage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12. Equipment
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. cover erosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. operation/ maintenance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. ponding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. backup availability
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. drainage structures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13. Road Adequacy
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. dikes, berms & terraces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14. Monitoring Wells
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. tile lines	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Adverse Weather Operations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. ditches	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16. On-Site Facilities
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Leachate Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. perimeter fence/gate
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. system operation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. signs
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. head measuring device operation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. separation distances
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. seepage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17. Other

**AUTHENTICATION**

<b>INSPECTOR</b>	Name: Jennifer Christian 	Date: 3/06/25
<b>REVIEWER</b>	Name: Tom Roos 	Date: 3/06/25

**General Description:**

**I. Record Keeping:**

**1. Permit and Plans –**

The permit for this landfill was issued on December 5, 2019, and will expire on December 5, 2025.

**2. Permit Amendments –**

On December 18, 2024, DNR approved the Construction Certification Sidewall Liner which approved the construction and waste may be placed in that area.

**3. Permit Special Provisions –**

The permitted service area for this landfill is limited to construction and demolition waste generated in all cities and unincorporated areas of Plymouth County.

**4. Permit Required Reports: a. quarterly solid waste report; b. water quality monitoring report; c. semi-annual engineer's report; d. gas monitoring report; e. other –**

All reports are submitted as required.

**5. Storm Water Permit –**

This facility has a General Permit #1 for "Storm Water Discharge Associated with Industrial Activity" that expires October 1, 2025. There were no violations observed associated with storm water activities during the inspection.

**6. Emergency Response and Remedial Action Plan –**

The staff is familiar with the ERRAP and it should be updated as required with the permit renewal.

**7. Development & Operation Plan, Leachate Control Plan, Hydrologic Monitoring System Plan, Closure Postclosure Plan –**

These plans have been approved by the Department and have been incorporated as required operating conditions of their permit.

**8. Leachate Volume Record –**

Leachate head levels must be recorded as required. All leachate is hauled to the leachate storage pond located on the west side of the property. Any leachate that does not evaporate could be hauled to the LeMars waste water treatment plant.

**9. Leachate Control System Performance Evaluation –**

No concerns.

**10. Special Waste Authorization & Special Waste Acceptance Criteria –**

No issues.

**11. Financial Assurance –**

This facility has been submitting their financial assurance as required.

**12. Other –**

**II. Operating Procedures:**

**1. Fill Cover: a. daily; b. intermediate (7-day); c. final (60-day) –**

This facility is doing a satisfactory job covering the working area of the landfill which is weekly for C&D.

**2. Fill Elevations (adequate surveying): –**

Mr. Herbold is adequately familiar with fill elevations and the progression of the fill sequencing.

3. **Control of Face: a. width; b. slope; c. dumping location –**  
The control of the working face was in excellent condition during the inspection. The mini excavator continues to improve the efficiency of removing salvageable/recyclable materials.
4. **Compaction –**  
The L-John Compactor Advantage 500 continues to provide tremendous compaction of construction and demolition waste.
5. **Drainage: a. cover erosion; b. ponding; c. drainage structures – 1. dikes, berms & terraces, 2. tile lines, 3. ditches –**  
There were no drainage issues observed during the inspection.
6. **Leachate Control: a. system operation; b. head measuring device operation; c. seepage –**  
The aeration pump and a load out device at the leachate control pond continue to function properly. Evaporation continues to be the key factor with the low liquid levels.
7. **Special Waste Handling –**  
None.
8. **Recycling Activities –**  
There are two scrap metal roll off containers. One is next to the working face and the other is near the scale house. Sioux City Compressed Steel picks up the metal which recently took place.

The waste tire pile contained about 200 tires and are picked up by Butler and shredded.

The wood pile is chipped by Kolbeck Grinding. The woodchips are hauled to the ethanol plant in Chancellor, South Dakota, to be used as fuel.

Van's Recycling out of LeMars takes all of the recyclables including paper, newspaper, cardboard, tin cans and plastics 1-7.

Grass clippings and expired livestock feed continues to be land applied to the closed, vegetated areas of the landfill. During the inspection there was one pile of compost and one windrow that is still composting.

A pile of concrete will be crushed on site by SPI out of Remsen and will be utilized for internal roads.

E-waste is stored indoors and Retrofit hauls when needed.

Batteries are recycled by Call to Recycle and Sioux City Compressed Steel. There were 20 batteries on site during the inspection.

During the inspection there were 175 appliances yet to be demanufactured. Mr. Herbold and two other staff are certified appliance demanufacturers.

Waste oil is collected on site and continues to be recycled by C&D out of Minnesota.

Hazardous wastes are handled and stored in the RCC building by trained staff. TradeBee hauls the hazardous waste on an as needed basis.

The SWAP area is located in the RCC building and is fully separated from the remainder of the hazardous waste stored in the building.

9. **Scavenging & Vector Control –**  
No problems.
10. **Litter Control: a. fences; b. hand picking –**  
Litter control is minimal at this landfill due to the excellent compaction and location of the active cell. Portable fences are used and perimeter hand picking is conducted by Deande Beanwalkers when needed.
11. **Staffing: a. operators/personnel; b. incoming waste screening; c. operator certification –**  
Becky Clark continues to do an excellent job as the scale operator and secretary. Henry Brieze, Brayden Ricky, Becky Clark and Kent Herbold are all certified operators. Henry, Brayden and Kent are certified appliance demanufactures as well.  
  
All incoming waste is being properly screened by staff.
12. **Equipment: a. operation/maintenance; b. backup availability –**  
A new 953 CAT track loader, 299 CAT D3 skid loader, and a walking floor trailer were purchased in 2024. All vehicles and equipment receive regular maintenance and are well taken care of.
13. **Road adequacy -**  
The internal roads were in good condition during the inspection. Crushed concrete is still utilized on the haul roads which keeps the landfill easily accessible.
14. **Monitoring wells –**  
Mr. Herbold continues to monitor the wells. During the inspection, Mr. Herbold stated there are three monitoring wells that indicate elevated VOCs- #7, # 8, and #14. He also stated that eleven gas vents have been installed.
15. **Adverse weather operations –**  
There were no operational concerns regarding adverse weather conditions.
16. **On-site facilities: a. perimeter fence/gate; b. signs; c. separation distances –**  
The signs and perimeter fence were in good condition.
17. **Other –**

#### CONCLUSION

This facility appears to be operating in compliance with the rules and its operation permit. It appears to be extremely well managed by Mr. Herbold and his staff are highly efficient with their specific duties. There were no violations or concerns observed during the inspection.