March 24, 2025

Brad Davison Environmental Specialist IDNR – Land Quality Bureau 6200 Park Avenue Suite 200 Des Moines, IA 50321



RE: BIENNIAL INSPECTION REPORT – 2025 CLARKE COUNTY SANITARY LANDFILL – NORTH SITE (CLOSED) HLW PN 6037-24A.200

Dear Mr. Davison,

In accordance with Item 7.d.2) of the Environmental Covenant between IDNR and the Clarke County Landfill Commission, a biennial inspection of the Clarke County Sanitary Landfill – North Site was personally conducted the afternoon of March 12, 2025. Conditions at the time of the inspection were clear with moderate winds and temperatures in the 60's.

Previous biennial inspections have been conducted:

- March 17, 2021, submitted to IDNR on March 19, 2021 (Doc #99986)
- April 10, 2023, submitted to IDNR on April 13, 2023 (Doc #106372)

Status of the Permit

The Environmental Covenant was recorded with the Clarke County Recorder as Instrument 2019-1547 on November 15, 2019 (Doc #96548). As a result, IDNR SDP Permit Number 20-SDP-02-75C was rescinded in the IDNR letter dated December 23, 2019 (Doc #96638). This letter also served as "notice of completion of the regulated post-closure care period for the Clarke County Sanitary Landfill (North Site)".

Environmental Covenant, Item 7 - Activity and Use Limitations and Terms

General Restrictions

- a. No excavations greater than 2' have been completed on the property covered by the Environmental Covenant.
- b. No waste has been excavated, disrupted, or removed from the closed landfill site.
- c. No drinking water wells have been constructed within the boundaries of the property covered by the Environmental Covenant.
- d. No residences have been constructed with the boundaries of the property covered by the Environmental Covenant.

Specific Restrictions

- a. Restrictions and use limitations and terms due to continued management of landfill gas:
 - 1) No enclosed structures have been placed or constructed on the landfill cap.
 - 2) No controlled burns have been conducted on the property covered by the Environmental Covenant.
- b. Restrictions and use limitations and terms due to continued management of leachate:

 None.
- c. Restrictions and use limitations and terms related to site access:
 - 1) The front gate was locked. No signs of trespassing were noted during this inspection.
- d. Restrictions and use limitations and terms related to land use:
 - 1) The landfill's cap integrity is being maintained. Additional discussion on the landfill cap is contained in the text below.
 - 2) The report serves at the Biennial Inspection.

Landfill Cap Integrity

Vegetation on the North Site is well established. The majority of the North Site was mowed in 2024. There were some small cedar trees noted on the cap, these have been controlled by mowing to date. Mowing improves site aesthetics and aids in the establishment of desirable vegetation by controlling weeds and tree growth on the cap. Mowing also makes potential problem areas, such as leachate seeps and erosion rills, easier to identify. Regular mowing should continue - annual mowing may not be necessary if a longer mowing interval can still control tree growth.

A bare area was noted on the slope in the northeast quadrant of the waste boundary. The surface of the soil in this area was very rocky, no erosion or other ground disturbance was noted. The approximate location of the bare area is shown on the attached figure.

Ponded water was noted at the upper terrace intake immediately east of the intake. The approximate location of the ponding is shown on the attached figure. It appears a small area of the terrace channel is below the intake grade. Fill should be added in this area to restore channel flow to the intake. The vegetation in this area did not show evidence of long term ponding; however, frequent ponding may lead to additional settlement in the channel.

Ponded water was noted in the lower terrace channel approximately 60 feet west of the intake. The ponding appeared to be temporary with no vegetation changes noted in this area.

Several small vegetated erosion rills were noted on the north slope, with the largest (approximately 6" deep) noted between the two terraces approximately 120' west of the intakes. The approximate location of this rill is shown on the attached figure. The vegetation within and adjacent to the rills was in excellent condition.

No leachate seeps were noted on the North Site during this inspection.

Additional Comments

Based on observations during the inspection it appears that the facility is in general conformance with the Environmental Covenant.

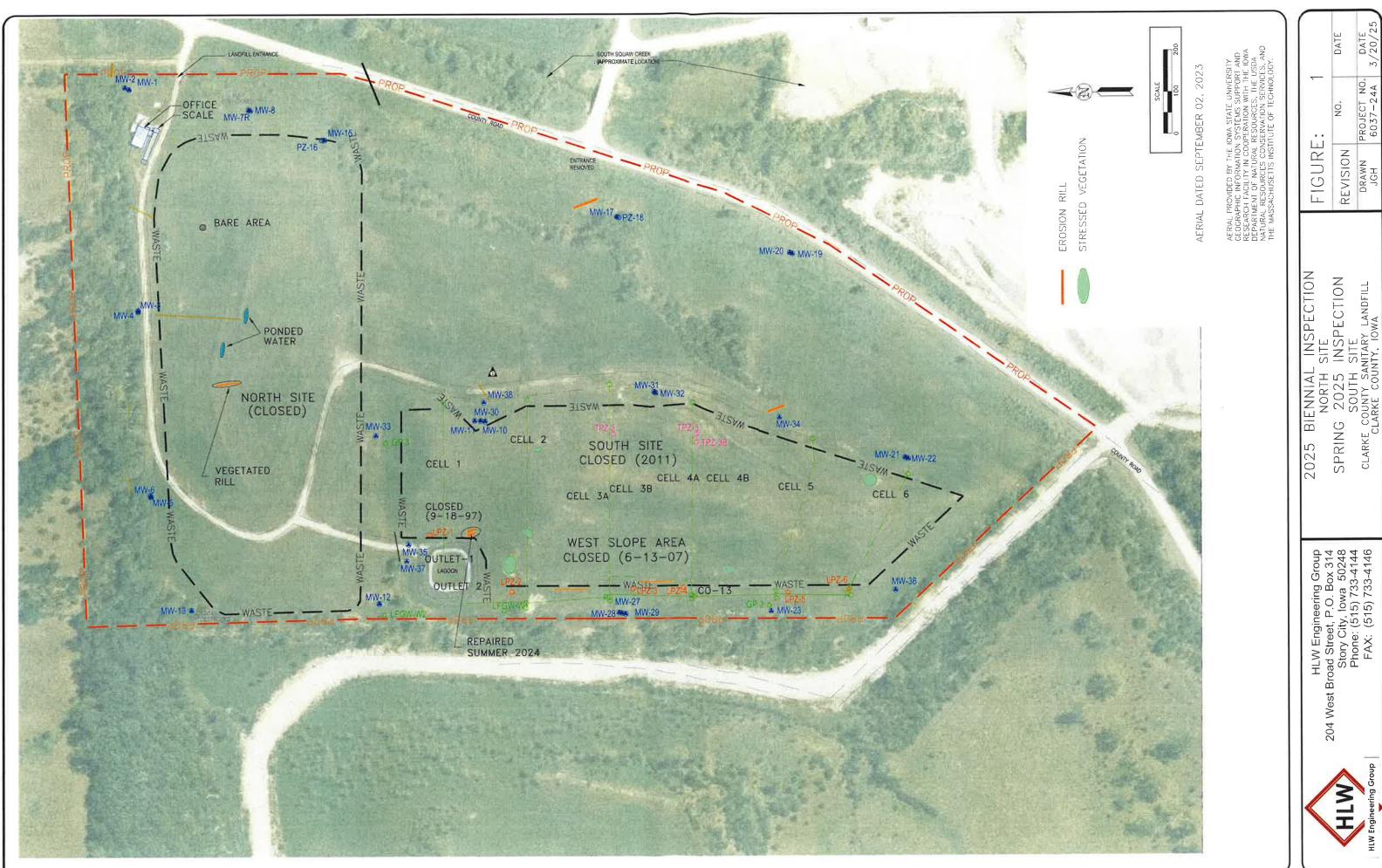
This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

Recommendations

- 1. Add fill east of upper intake to restore flow to the intake.
- 2. Monitor the ponding west of the lower intake for vegetation changes.
- 3. Monitor the vegetated rills on the north slope. If the rills become active repair as necessary.
- 4. Monitor vegetation and erosion and repair as necessary.
- 5. Monitor diversion and drainage systems and repair as necessary.



cc: Dean Robins, Chair, Clarke County Board of Supervisors – electronic submittal Rob McCaulley, Clarke County Environmental Health – electronic submittal



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DATE oN . FIGURE: REVISION

INSPECTION SITE INSPECTION