

March 28, 2025
File No. 27224523.25

Ms. Mary Klemesrud
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, IA 50321

Subject: 2025 Financial Assurance
Scott Area Landfill and Scott County Landfill
Permit Nos. 82-SDP-09-92P and 82-SPD-03-77C

Dear Ms. Klemesrud:

SCS Engineers (SCS), on behalf of the Waste Commission of Scott County (Commission), is submitting herewith the 2025 Financial Assurance to the Iowa Department of Natural Resources (DNR) for the above-referenced facilities. Attached are the completed DNR Form 542-8090 and the 2025 Opinion of Probable Cost Summary for closure and post-closure activities (Attachment A).

Attachment B includes a letter signed by the Chief Financial Officer for the Commission, which contains information sufficient to demonstrate that the facility qualifies under the local government financial test for financial assurance coverage of a portion of the closure and post-closure costs.

Please feel free to contact us if you have any questions, require any additional details, or need any further clarification.

Sincerely,



Isaac Creech
Associate Professional
SCS Engineers

IAC/TCB




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

copies: Bryce Stalcup, Waste Commission of Scott County
Brian Seals, Waste Commission of Scott County
Bobbi Draheim, Waste Commission of Scott County



Certification

	<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><u><i>T. C. Buelow</i></u> Date: <u><i>3/28/2025</i></u> Timothy C. Buelow, P.E. License No. 14445 My license renewal date is December 31, 2025 Pages or sheets covered by this seal: Waste Commission of Scott County 2025 Financial Assurance Documentation Attachment A Only.</p>



Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form

SECTION 1: FACILITY INFORMATION

(please print or type)

Information Requested

Facility Name: Scott Area Landfill, Scott County Landfill Permit Number: 82-SDP-09-92P, 82-SDP-03773
 Permitted Agency/Entity: Waste Commission of Scott County

SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 3,140,368	3/25/2025
Updated Postclosure Cost Estimate	\$ 6,608,769	3/25/2025
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 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	9,688,965
Amount of waste disposed of at the facility during the prior fiscal year	299,328

SECTION 4: PROOF OF COMPLIANCE

Publicly Owned Municipal Solid Waste Landfills

(ATTACH AUDIT REPORT)

Owner's Most Recent Annual Audit Report

Prepared by: Eide Bailly, LLP -CPSs and Business Advisors

For fiscal year ending: June 30, 2024

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 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”	March 2022	Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 6,772,002
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 type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Dedicated Fund 567 IAC 113.14(6)“i”	July 1, 1991	Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 2,977,135

*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: New Mechanism Previously Submitted

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.

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.

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.

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 Account Balance <i>(see formula below)</i>	\$	\$	\$
Postclosure Account Balance <i>(see formula below)</i>	\$	\$	\$
Or			
Dedicated Fund Balance <i>(see formula below)</i>	\$ 2,833,083	\$ 2,977,135	\$ 209,212
Trust Fund Balance <i>(see formula below)</i>	\$	\$	\$

Formula for Projected Deposits

Closure or Postclosure Account

$$\frac{CE - CB}{RPC} \times TR$$

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.

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 and Postclosure

$$\frac{\$9,749,137 - \$2,977,135}{9,688,965} \times 299,328 = \$209,212$$

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.

Name of Official: Bryce Stalcup Title: Executive Director

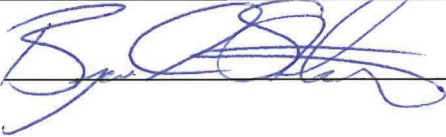
Agency/Entity: Waste Commission of Scott County

Address: 11555 110th Avenue

City: Davenport State: Iowa Zip: 52804

Telephone: 563-381-1300 Fax: 563-381-1301

Email Address: bryce.stalcup@wastecom.com

Signature of Official:  Date: 3-28-25

Questions? Contact Chad Stobbe at (515) 201-8272 or Chad.Stobbe@dnr.iowa.gov

Attachment A

2025 Opinion of Probable Cost Summary
for Closure and Post-Closure Activities

2025 Closure Cost Estimate - Scott Area Landfill

Task ¹	Units	Cost per Unit		Cost	
				Year	Cost of Task
1. Closure and Postclosure Plan Document Revisions	1.0	\$ 21,012	lump sum	2025	\$ 21,012
2. Site Preparation, Earthwork, and Final Grading	1.0	\$ 238,965	lump sum	2025	\$ 238,965
3. Drainage Control Culverts, Piping, and Structures	0.0	\$ -	lump sum	2025	\$ -
4. Erosion Control Structures, Sediment Ponds, and Terraces	1.0	\$ 287,043	lump sum	2025	\$ 287,043
5. Final Cap Construction ⁽²⁾	49.10	\$ 30,535	per acre	2025	\$ 1,499,290
6. Cap Vegetation Soil Placement ⁽²⁾	49.10	\$ 8,270	per acre	2025	\$ 406,054
7. Cap Seeding, Mulching, and Fertilizing ⁽³⁾	1.00	\$ 125,008	per acre	2025	\$ 125,008
8. Monitoring Well, Piezometer, and Gas Control Modifications	1.0	\$ 354,530	lump sum	2025	\$ 354,530
9. Leachate System Cleanout and Extraction Well Modifications	1.0	\$ 5,734	lump sum	2025	\$ 5,734
10. Monitoring Well Installation and Abandonments	0.0	\$ -	lump sum	2025	\$ -
11. Facility Modifications to Effect Closed Status	1.0	\$ 1,536	lump sum	2025	\$ 1,536
12. Engineering and Technical Services	1.0	\$ 168,100	lump sum	2025	\$ 168,100
13. Legal, Financial, and Administrative Services	1.0	\$ 24,164	lump sum	2025	\$ 24,164
14. Closure Compliance Certifications and Documentation	1.0	\$ 8,930	lump sum	2025	\$ 8,930
Total Cost of Closure					\$ 3,140,368

Notes:

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

² Current area requiring evapotranspirative (ET) final cover: 49.10 acres

³ Current approximate borrow area: 12.00 acres

2025 Postclosure Cost Estimate - Scott Area Landfill

Task ¹	Units	Cost per Unit	Cost	
			Year	30 Year Cost
1. General Site Facilities, Access Roads, and Fencing Maintenance	30	\$ 1,083 / year	2025	\$ 32,476
2. Cap and Vegetative Cover Maintenance	30	\$ 12,948 / year	2025	\$ 388,447
3. Drainage and Erosion Control Systems Maintenance	30	\$ 2,898 / year	2025	\$ 86,948
4. Groundwater to Waste Separation Systems Maintenance	30	\$ 1,991 / year	2025	\$ 59,736
5. Gas Control Systems Maintenance	30	\$ 56,538 / year	2025	\$ 1,696,147
6. Gas Control Systems Monitoring and Reporting	30	\$ 30,807 / year	2025	\$ 924,204
7. Groundwater and Surface Water Monitoring Systems Maintenance	30	\$ 550 / year	2025	\$ 16,514
8. Groundwater and Surface Water Quality Monitoring and Reporting	30	\$ 27,406 / year	2025	\$ 822,187
9. Groundwater Monitoring Systems Performance Evaluations and Reports	30	\$ - / year	2025	\$ -
10. Leachate Control Systems Maintenance	30	\$ 4,076 / year	2025	\$ 122,280
11. Leachate Management, Transportation, and Disposal	30	\$ 24,540 / year	2025	\$ 736,203
12. Leachate Control Systems Performance Evaluations and Reports	30	\$ 3,030 / year	2025	\$ 90,900
13. Engineering and Technical Services	30	\$ 1,576 / year	2025	\$ 47,278
14. Legal, Financial, and Administrative Services	30	\$ 43,727 / year	2025	\$ 1,311,818
15. Financial Assurance, Accounting, Audits, and Reports	30	\$ 1,792 / year	2025	\$ 53,760
Total Cost of Postclosure				\$ 6,388,898

Notes:

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

² MSWLF Unit area

61.1 acres

2025 Postclosure Cost Estimate - Scott County Landfill

Task ¹	Units	Cost per Unit	Cost	
			Year	2 Year Cost
1. General Site Facilities, Access Roads, and Fencing Maintenance	2	\$ 132 /year	2025	\$ 263
2. Cap and Vegetative Cover Maintenance	2	\$ 10,950 /year	2025	\$ 21,901
3. Drainage and Erosion Control Systems Maintenance	2	\$ - /year	2025	\$ -
4. Groundwater to Waste Separation Systems Maintenance	2	\$ - /year	2025	\$ -
5. Gas Control Systems Maintenance	2	\$ 31,402 /year	2025	\$ 62,805
6. Gas Control Systems Monitoring and Reporting	2	\$ 4,993 /year	2025	\$ 9,985
7. Groundwater and Surface Water Monitoring Systems Maintenance	2	\$ 215 /year	2025	\$ 430
8. Groundwater and Surface Water Quality Monitoring and Reporting	2	\$ 25,490 /year	2025	\$ 50,980
9. Groundwater Monitoring Systems Performance Evaluations and Reports	2	\$ - /year	2025	\$ -
10. Leachate Control Systems Maintenance	2	\$ - /year	2025	\$ -
11. Leachate Management, Transportation, and Disposal	2	\$ 11,900 /year	2025	\$ 23,799
12. Leachate Control Systems Performance Evaluations and Reports	2	\$ - /year	2025	\$ -
13. Engineering and Technical Services	2	\$ - /year	2025	\$ -
14. Legal, Financial, and Administrative Services	2	\$ 24,854 /year	2025	\$ 49,707
15. Financial Assurance, Accounting, Audits, and Reports	2	\$ - /year	2025	\$ -
Total Cost of Postclosure		\$ 109,935		\$ 219,871

Notes:

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

² MSWLF Unit area 54.0 acres

³ For the site wide items covered under the Scott Area Landfill postclosure fund and for which no change in scope resulted from the addition of the Scott County Landfill, no additional funding will be required within the Scott County Landfill postclosure financial assurance.

⁴ The 30-year post closure period ends on January 2, 2027.

Attachment B

Local Government Financial Test

IAC 567 113.6(f)(3)1: LETTER SIGNED BY LOCAL GOVERNMENT'S CHIEF FINANCIAL OFFICER FOR LOCAL GOVERNMENT FINANCIAL TEST

March, 2025

Iowa DNR
Wallace Building
502 E 9th Street
Des Moines, IA 50319

Dear Sir or Madam:

I am the chief financial officer of the Waste Commission of Scott County, hereby referred to as "Owner". This letter is in support of the Owner's use of the financial test to demonstrate financial assurance for closure and/or postclosure costs as specified in IAC 567 113.14(3) and 113.14(4).

The Owner is the owner and operator of the following Municipal Solid Waste Landfill(s) for which financial assurance for closure or postclosure care is demonstrated through the financial test specified in IAC 567 113.6(f):

Landfill name(s): Scott Area Landfill, Scott County Landfill

Address: 11555 110th Avenue
Davenport, Iowa 52804

Permit No(s): 82-SDP-09-92P, 82-SDP-03-77C

The current closure and/or postclosure cost estimates, in accordance with IAC 567 113.14(3)c and 113.14(4)c, covered by the financial test are shown below:

Closure/Post-Closure cost to be assured: \$ 6,772,002

The Owner meets or exceeds the financial test criteria as shown below in Alternative II and agrees to comply with the reporting requirements as specified in subrule 113.6(f)(3).

Fill in and attach either Alternative I if meeting the bond ratings in accordance with IAC 567 113.6(f)(1)1 or Alternative II if meeting the financial ratios of IAC 567 113.6(f)(1)1.

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 Iowa Administrative Code Chapter 113 [subrule 113.6(f)(3)1] *Record-keeping and reporting requirements* for the "Local Government Financial Test".

X Bobbi Drake Date: 3/28/25

IAC 567 113.6(f)(3)1: LETTER SIGNED BY LOCAL GOVERNMENT'S CHIEF FINANCIAL OFFICER FOR LOCAL GOVERNMENT FINANCIAL TEST

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 [fiscal year end date].

Alternative I

1. Sum of the current closure and postclosure cost estimates being assured by the financial test *(see note below)		\$
	From most recent annual auditor's report	From 2nd most recent annual auditor's report
2. Total Revenues		
3. Total Expenditures		
4. Current bond rating of most recent outstanding general obligation bonds		
Must be able to answer "yes" or "true" to the following		
	Yes/True	No/False
5. Has evidence been provided of most recent bond rating?		
6. Are outstanding general obligation bonds rated at least Aaa, Aa, A, or Baa, as issued by Moody's or AAA, AA, A or BBB, as issued by Standard & Poor's?		
7. There are no outstanding general obligation bonds that are currently in default.		
8. There are no outstanding general obligation bonds rated lower than Baa as issued by Moody's or BBB as issued by Standard & Poor's.		
9. Have financial statements (audit) been prepared in conformity with Generally Accepted Accounting Principles or with Other Comprehensive Basis of Accounting?		
10. Is line 3 less than line 2 in each of the past two years?		
11. If answered "no" to line 10, line 3 does not exceed line 2 by more than 5 percent in each of the past two years.		
12. Is line 1 less than 43 percent of line 2?		
13. 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.		
14. 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?		

* The amount being assured by the financial test is the total of the cost estimates less the balance of restricted closure/postclosure account(s).

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.

IAC 567 113.6(f)(3)1: LETTER SIGNED BY LOCAL GOVERNMENT'S CHIEF FINANCIAL OFFICER FOR LOCAL GOVERNMENT FINANCIAL TEST

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, 2024.

Alternative II

1. Sum of the current closure and postclosure cost estimates being assured by the financial test	\$ 6,772,002	\$ 5,420,810
	From most recent annual auditor's report	From 2nd most recent annual auditor's report
2. Total Revenues for past two years	\$17,014,770	\$14,290,981
3. Total Expenditures for past two years	\$12,334,229	\$12,086,409
4. Cash plus marketable securities (see definition below)	\$6,695,630	\$4,353,997
5. Annual debt service	\$562,831	\$563,631
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.	Yes	
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.