



Jolly, Becky <becky.jolly@dnr.iowa.gov>

Fwd: Permit Renewal, Cass County Transfer Station, IDNR Permit No. 15-SDP-06-22P XFR

1 message

Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
To: Becky Jolly <becky.jolly@dnr.iowa.gov>

Tue, Apr 1, 2025 at 10:01 AM

Becky - Please file this as received as part of their 2025 permit renewal application. Thanks

Chad A. Stobbe**Environmental Specialist Senior**

Solid Waste and Contaminated Sites Section

Iowa Department of Natural Resources

6200 Park Avenue, Suite 200

Des Moines, IA 50321

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----- Forwarded message -----

From: **Doug Luzbetak** <dluzbetak@hlwengineering.com>

Date: Tue, Apr 1, 2025 at 7:58 AM

Subject: Re: Permit Renewal, Cass County Transfer Station, IDNR Permit No. 15-SDP-06-22P XFR

To: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>Cc: Brandi Mericle <casscountylandfill@gmail.com>, Mary Klemesrud <mary.klemesrud@dnr.iowa.gov>

Good morning Chad,

We struggled with this as well. The significant difference between both closure cost estimates was the cost per ton of disposal of the potential waste on site. Both cost estimates assumed the same available transfer station "storage" capacity, the 2025 estimate used two trailers as opposed to the one trailer referenced in the 2022 estimate (by others). The 2022 estimate used a disposal cost for the waste of \$102.80/ton - no derivation of this amount was included in the closure cost estimate. The 2025 estimate used actual costs per ton for disposal (\$21.63) and hauling (\$21.00), resulting in a disposal cost of \$42.63/ton.

The 2022 estimate also included a lump sum fee for "Reporting of Completion of Closure Activities", which is not required in 567-106.18(4).

The closure cost estimate in the 2025 permit renewal application is based on the same format, assumptions, and factors that HLW has used on numerous other transfer station closure cost estimates.

I hope the above answers your questions, please contact me if you need any further information,

Doug

Doug Luzbetak, P.E.
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On Mon, Mar 31, 2025 at 5:05 PM Stobbe, Chad <chad.stobbe@dnr.iowa.gov> wrote:
Doug & Brandi -

With regard to financial assurance, the 2022 permit application ([Doc # 103459](#)) referenced as still being principally current had a closure cost estimate of \$21,504. This 2025 permit renewal application now indicates the closure cost estimate is \$9,806. That's a significant decrease given all things remain unchanged. Please clarify why there is such a discrepancy between the two estimates within one renewal period.

Mary - Please note that the 2025 landfill FA submission ([Doc #112525](#)) subtracted \$21,504 (2022 XFR closure estimate) from the current LGDF balance for determining this year's projected deposit.

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On Thu, Mar 27, 2025 at 11:45 AM Doug Luzbetak <dluzbetak@hlwengineering.com> wrote:
Chad,

Attached is Permit Renewal Documentation for the Cass County Transfer Station, IDNR Permit No. 15-SDP-06-22P XFR. The current permit expires July 1, 2025.

Please let me know if you have any questions or need any additional information,

Doug

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