

April 10, 2025

KEVIN NELSON  
317 TIPTON STREET  
PO BOX 240  
SALIX IA 51052

**Re: Woodbury County Sanitary Landfill  
Permit #97-SDP-2-75  
Permit Amendment No. 15  
Permit Revision**

Dear Mr. Nelson:

The Iowa Department of Natural Resources (DNR) has updated the permit by incorporating the permit amendments issued since the original closure permit was issued. These changes are as follows:

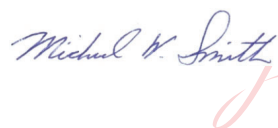
1. Changed the Responsible Official to Kevin Nelson (Provision IV),
2. Changed the Licensed Design Engineer to Timothy Buelow (Provision V),
3. Incorporated the status and installation of final cap to date (Special Provision X.4.),
4. Updated the Hydrologic Monitoring System Plan to reflect current permit status (Special Provision X.5.),
5. Updated the Gas Monitoring Plan to reflect current permit status (Special Provision X.9.), and

In addition to the above, we have added a new special provision, which requires the preparation and submittal of a Post-Closure Reduction/Termination Plan no later than May 7, 2033. Please refer to Special Provision X.13 of your permit and the associated [guidance](#) and webinar on our [webpage](#) for additional information.

The permit and the approved plans must be kept at the sanitary disposal project in accordance with Iowa Administrative Code 567 subparagraph 113.11(1) ([567 IAC 113.11\(1\)](#)). Please review this revision with your operators, as they must become familiar with it. Note that the permit contains conditions that require a response or action by you, which if not properly complied with, may prompt enforcement action by the DNR.

If you have any questions, please contact me at [\(515\) 229-8356](tel:515-229-8356) or [mike.smith@dnr.iowa.gov](mailto:mike.smith@dnr.iowa.gov).

Sincerely,



Digitally signed by  
Michael W. Smith  
Date: 2025.04.10  
10:37:29 -05'00'


Michael W. Smith, P.E.  
Environmental Engineer Senior

cc: Tim Buelow, P.E.  
SCS Engineers  
1690 All State Ct Suite 100  
West Des Moines, Iowa 50265

DNR Field Office 3

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

- I. Permit Number:** 97-SDP-02-75C
- II. Permitted Agency:** Woodbury County Area Solid Waste Agency
- III. Project Location:** NW ½, NW ¼, Section 6, T87N, R44W, Woodbury County, Iowa
- IV. Responsible Official**
- Name: Kevin Nelson  
Address: 317 Tipton Street  
PO Box 240  
Salix, IA 51052  
Phone: (712) 898 6354  
Email: salixmayor@gmailcom
- V. Licensed Design Engineer**
- Name: Timothy C. Buelow, P.E.  
Address: SCS Engineers  
1690 All Sates Ct Suite 100  
West Des Moines, IA 50265  
Phone: (515) 256-8814  
Email: tbuelow@scsengineers.com  
License Number: 14445
- VI. Date Permit Issued:** May 7, 2008  
**Date Revised:** April 10, 2025 Permit Amandment No. 15
- VII. Permit Expiration Date:** May 7, 2038

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Digitally signed  
by Michael W.  
Smith  
Date: 2025.04.10  
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- VIII. Issued by:** \_\_\_\_\_  
Environmental Services Division  
for the Director

## **IX. General Provisions**

The above named permitted agency is hereby authorized to close the sanitary landfill at the described location in conformance with Chapter 455B of the Code, 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 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 disposal project.

No legal or financial responsibility arising from the closure and post closure of the approved project shall attach to the state of Iowa or the Department of Natural Resources due to the issuance of this permit.

If title to this project is transferred, the new owner must apply to the Department for a transfer of this permit within thirty days of the date of title transfer pursuant to rule 113.9 <sup>2</sup>. This permit is void sixty days after the date of title transfer unless the Department has transferred the permit.

The permit holder shall comply with the gas control provisions of IAC 567 Chapters 20 through 31, including paragraph 23.1(2)“rrr” for the New Source Performance Standards and paragraph 23.1(5)“a” for the Emission Guidelines.

The permit holder shall ensure that the sanitary disposal project does not (1) cause a discharge of pollutants into waters of the United States, including wetlands, that violates any requirements of the Clean Water Act, including, but not limited to, the National Pollutant Discharge Elimination System (NPDES) requirements, pursuant to Section 402 of the Clean Water Act, and (2) cause the discharge of a nonpoint source of pollution into waters of the United States, including wetlands, that violates any requirement of an areawide or statewide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act.

The permit holder shall submit an updated Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form no later than April 1<sup>st</sup>, annually, pursuant to rule 113.14(455B) <sup>1</sup>. Use of this form provides permit holders a uniform means of submitting all required documentation to ensure that closure and postclosure cost estimates and applicable financial assurance instruments are updated as required.

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 April 30

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03

and October 31 each year for the preceding six-month period to both the Field and Main offices of the Department.

Failure to comply with Chapter 455B of the Code, 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 Section 455B.307 of the Code.

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

1. The thirty-year closure and post closure period for this facility begins on the date of issuance of this Closure Permit.
2. This site shall be closed and maintained in accordance with the hereby approved Revised and Updated Closure and Post Closure Plan, dated July 2007, as included with the July 18, 2007 transmittal and closure permit application, as submitted by Turkle-Clark Environmental Consulting.
3. Issuance of this closure permit prohibits any additional waste disposal, recycling, composting, and other related landfill activities unless they are specifically approved through an amendment to this permit.
4. The permit incorporates the following:
  - a. The documentation dated April 26, 1995 and approved on May 10, 1995, relative to the verification of final cover for areas covered prior to October 1, 1989, is incorporated as part of the permit documents.
  - b. The Closure Documentation dated November 15, 2006, as submitted by Turkle-Clark Environmental Consulting and approved December 29, 2006, certifying closure of 6.9 acres of the site in accordance with the Closure/Postclosure Plan is incorporated as part of the permit documents.
5. Hydrologic monitoring at the site shall be conducted in accordance with the Hydrologic Monitoring System Plan (HMSP) dated October 27, 1992, as submitted by Terracon Environmental; and the following:
  - a. The HMSP shall include upgradient groundwater monitoring point MW-6; downgradient groundwater monitoring points MW-2, PZ-2B, MW-3, MW-5, MW-8, MW-9, MW-11, MW-12, MW-14, and PZ-2A.
  - b. Department construction documentation form 542-1277 and boring logs for all monitoring wells and piezometers shall be submitted within 30 days of installation. Department construction documentation form 542-1323 shall be submitted within 30 days of establishing surface water monitoring points.

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03

- c. The permit holder shall conduct background and routine semiannual groundwater sampling and analysis; as well as perform statistical tests for the approved monitoring points for the Appendix I parameters in accordance with rule 113.10(455B). Groundwater samples shall not be field-filtered prior to laboratory analysis.
  - d. The permit holder shall measure groundwater elevations within 1/100<sup>th</sup> of a foot in each well immediately prior to purging, each time groundwater is sampled.
  - e. The permit holder shall submit the results of the routine semiannual sampling events within 45 days of receiving the results from the laboratory.
  - f. A n Annual Water Quality Report (AWQR) summarizing the effects the facility is having on groundwater quality shall be submitted to the Department's Solid Waste Planning, Permitting & Engineering Services Section by January 31 each year. This report shall be prepared in accordance with subrule 113.10(10) by a qualified groundwater scientist pursuant to paragraph 113.10(1)"d" and by using the DNR Annual Water Quality Report Format.
  - g. The variance request to follow 113.10(5) and 113.10(4) rather than 113.2(5)"d" was aproved on July 12, 2010.
  - h. The request for alternate Appendix II sampling frequency for the closed Woodbury County Sanitary Landfill, dated April 18, 2011, as submitted by Turtle-Clark Environmental Consulting, Inc. is approved and incorporated into the permit documents. For those wells in assessment monitoring, an alternative schedule for full Appendix II resampling is established as once every five years.
  - i. The well construction and boring logs in document entitled Steffen Engineering's reply to the Iowa DNR's Letter of Inquiry dated March 2, 2015, dated March 25, 2015, are hereby approved and incorporated into the permit.
  - j. The request, dated January 27, 2017, in the Annual Water Qaulity Report to change monitoring well maintenance and performance evaluation plan from 567 Iowa Administrative Code (IAC) 113.21 effective 1/15/03 to current IAC 113.10(2)"f" is hereby approved and incorporated into the permit.
6. All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or other damage to the final cover. These diversion and drainage structures must be designed to meet a 25-year, 24-hour rainfall event.

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03

7. The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted soil layer shall be removed or destroyed immediately.
8. The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. If damage to the final cover compacted soil layer occurs, repairs shall be made to correct the damage and return it to original specifications.
9. The permit holder shall quarterly monitor, starting in 2<sup>nd</sup> quarter of calendar year 2020, and annually report the explosive gas concentrations pursuant to paragraph 113.26(15) (rules in effect at the time of closure) at monitoring points LFGW-1, LFGW-2, LFGW-4, LFGW-5, GV-4, GV-5, GV-6, GV-7, GV-8, GV-9, GV-10, GV-10W, GV-11, GV-12, GV-13, GV-14, GV-15, GV-16, GV-17, GV-18, GV-19, GV-20, GV-21, GV-22, GV-23, GV-24, GV-25, GV-26, scale house, transfer station, and building east of the scale house. Specific actions, as defined in the rules, shall be taken in the event of explosive gas level limit exceedances.
  - a. The annual Gas Monitoring Report summarizing the explosive gas monitoring results and any action taken resulting from gas levels exceeding the specified limits during the previous 12 months shall be submitted to the DNR by January 31 of each year. The permit shall also report on the status of installing a gas monitoring point on the southern property line in the 2018 Gas Monitoring Report.
  - b. The Subsurface Methane Monitoring Point Installation and Waste Boundary Delineation report, dated September 6, 2018, as prepared by Barker Lemar Engineering Consultants is approved on September 12, 2018, and hereby incorporated into the permit.
  - c. The Bracketing Monitoring Point, Subsurface Methane Monitoring Point, and Gas Vent Installation report, dated February 15, 2019, as prepared by Barker Lemar Engineering Consultants is approved on March 4, 2019, and hereby incorporated into the permit.
  - d. The Subsurface Methane Monitoring Point Installation and Gas Vent Installation report, dated February 10, 2020, as prepared by Barker Lemar Engineering Consultants is approved on February 14, 2020, and hereby incorporated into the permit.
  - e. The Subsurface Gas Vent Installation report, dated July 27, 2021, as prepared by Evora Consulting is approved on August 23, 2021, and hereby incorporated into the permit.
10. Based on a completed and certified site risk assessment meeting the requirements outlined in Iowa Code section 455B.305(6), the permit holder was conditionally

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03

exempted under the Department letter dated March 29, 1996 from providing and implementing a leachate control plan for the existing waste area that received wastes prior to July 1, 1992.

Continued exemption is subject to control of leachate at the site and compliance with the groundwater sampling and analysis requirements pursuant to subrules 113.26(6) through 113.26(8) <sup>2</sup>. In the event that these conditions are violated, the permit holder shall be required to comply with the environmental corrective action requirements pursuant to 113.10(6) <sup>1</sup> and corrective action requirements in subrules 113.10(7), 113.10(8) and 113.10(9) <sup>1</sup>, if necessary.

11. Leachate head levels and elevations shall be measured quarterly at all piezometers and the volume of leachate collected and transported to the treatment works recorded. Records of leachate contaminants testing required by the treatment works and any NPDES permit for on-site treated leachate discharges shall be maintained.

The permit holder shall routinely collect the necessary information and evaluate the effectiveness of the system in controlling the leachate. All documentation shall be summarized in a Leachate Control System Performance Evaluation (LCSPE) Report. The permit holder shall annually submit the LCSPE Report, including record data, as a supplement to the facility Annual Water Quality Report, as required by paragraph 113.26(8)d <sup>2</sup>. The performance evaluation shall include proposed additional leachate control measures and an implementation schedule in the event that the constructed system is not performing effectively.

12. The permit holder shall follow the approved Emergency Response and Remedial Action Plan (ERRAP) procedures during all emergencies pursuant to subrule 113.8(5). An updated ERRAP shall be submitted at the time of any significant changes in facility closure operations that require modification of the currently approved ERRAP.
13. By May 7, 2033, the permit holder shall submit a Post-Closure Care Reduction/Termination Plan. This plan shall include a description of activities that the permit holder shall conduct during the remaining term of the permit to demonstrate that leachate and groundwater quality, landfill gas, and final cover can be safely managed by alternatives to the permit such as an environmental covenant. In the absence of an approvable demonstration, the closure permit will be extended as necessary to allow for additional activities to support an approvable demonstration.

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03



**XI. Permit Revision History**

Date	Comment
4/10/2025	X.13. Amendment #15 – requires Post-Closure Care Reduction/Termination Plan

<sup>1</sup> See rules published 7/4/07 and effective 12/10/07

<sup>2</sup> See rules published 12/11/02 and effective 1/15/03