



Stantec Consulting Services Inc.
One Carlson Parkway North, Suite 100
Plymouth MN 55447-4440

April 14, 2025

Project/File: 227707611

Iowa Department of Natural Resources
Solid Waste Section
Wallace State Office Building
901 East Grand Ave.
Des Moines, Iowa 50319-0034

Reference: 2025 Closure/Post Closure Cost Estimate Continental Cement Company - Davenport Plant CKD Landfill - DNR Permit No. 82-SDP-15-96C and 82-SDP-16-97P

Dear Permits Coordinator,

On behalf of the Continental Cement Co. LLC, Stantec Consulting Services, Inc. (Stantec) is submitting to the Iowa Department of Natural Resources (IDNR) the 2025 closure/post-closure (CPC) cost estimates for the Continental Cement Company Davenport Plant Cement Kiln Dust (CKD) Landfill.

Continental operates a CKD landfill located in Buffalo, Iowa. A portion of the landfill is closed under Iowa Department of Natural Resources (IDNR) Permit No. 82-SDP-15-96C. The rest of the site is operated as a monofil for disposal of CKD under IDNR Permit No. 82-SDP-16-97P.

This CPC cost estimate has been prepared in general accordance with the requirements of Title 567 Iowa Administrative Code Chapter 115.31 (567 IAC 115.31). The 2024 CPC cost estimates were reviewed and updated to reflect current site conditions and to adjusted pricing to 2025 dollars either by applying an inflation rate based on the change in consumer price index or adjusting unit prices to reflect recently observed construction costs of similar projects.

Detailed cost estimate tables are provided on the following pages. A summary of the closure and post-closure cost estimates are provided below.

Total Closure Construction Costs	\$654,070.85
Total Post-Closure Costs	\$3,712,259.10
Total CPC Costs	\$4,366,329.95

This cost estimate was prepared in accordance with applicable requirements and generally accepted environmental engineering practices.

Reference: 2025 Closure/Post Closure Cost Estimate Continental Cement Company - Davenport Plant CKD Landfill - DNR Permit No. 82-SDP-15-96C and 82-SDP-16-97P

If you have any questions, please contact Brad Sullivan with Stantec at 603-289-5257 or Bill Hilger with Continental Cement at bill.hilger@continentalcement.com or 563-328-6204.

Sincerely,

Stantec Consulting Services Inc.



Brad Sullivan PE
Senior Associate, Civil Engineer
Phone: (763) 252-6807
Mobile: (603) 289-5257
brad.sullivan@stantec.com



Paul Schmidt EIT, TRUE Advisor
Civil Engineer in Training
Phone: (763) 479 5130
Mobile: (507) 241 0277
paul.schmidt2@stantec.com

Attachment:

- Attachment 1 – Closure and Post Closure Cost Estimates
- Attachment 2 – Surety Rider

Attachment 1 – Closure and Post-Closure Cost Estimate

Professional Engineer Certification

This certification covers the closure construction cost opinion and post-closure care cost opinion included in Attachment A.

I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the state of Iowa.



4/14/2025

Brad Sullivan, PE

Date

Table 1				
Closure Cost Estimate				
Continental Cement Company				
		Facility Owner:	Continental Cement Company	
		Facility Name:	Davenport Plant CKD Landfill	
		Date:	4/7/2025	
		Permit Number:	82-SDP-16-97P	
Permit No.: 82-SDP-16-97P				
Item	Quantity	Units	Unit Cost ¹	Cost
1- Initial Closure Preparation				
CPC Plan Document Revisions	1	EA	\$ 12,000.00	\$ 12,000.00
Construction Contract Bidding & Procurement	1	EA	\$ 7,500.00	\$ 7,500.00
2- Final Cover				
Site Preparation Earthwork and Grading for Final Cover	5	DAY	\$ 2,800.00	\$ 14,000.00
Final Cover Construction (Compacted Clay Liner)	17,101	CY	\$ 14.23	\$ 243,350.00
3- Vegetative Layer				
Final Cover Vegetation Soil	17,101	CY	\$ 12.64	\$ 216,160.85
Seeding, Mulching, and Fertilizing	5.3	AC	\$ 1,581.06	\$ 8,380.00
4- Erosion Control				
Erosion Control Structures, Ponds, Terraces	5	DAY	\$ 2,766.86	\$ 13,835.00
5- Groundwater Monitoring System				
Upgrade or Repair Existing Wells	1	EA	\$ 1,581.06	\$ 1,580.00
Well Abandonment	0	EA	\$ -	\$ 0
6- Leachate Collection System				
Leachate System Modification	1	EA	\$ 4,743.12	\$ 4,745.00
7- Facility Operations				
Facility Modifications	1	EA	\$ 15,810.69	\$ 15,810.00
8- Professional Services				
Engineering Services	1	EA	\$ 100,900.00	\$ 100,900.00
9- Administration and Contingency				
Legal, Financial, and Administration Services	1	EA	\$ 15,810.69	\$ 15,810.00
Closure Compliance Documentation	1	EA	\$ -	\$ 0
Closure Costs Estimate				\$ 654,070.85

Note:

¹ Unit costs are based on recent construction costs and/or are inflated year-over-year based on the U.S. Bureau of Labor Statistics consumer price index in the Midwest Region.

Table 2				
2025 Post Closure Cost Estimate				
Continental Cement Company				
		Facility Owner:	Continental Cement Company	
		Facility Name:	Davenport Plant CKD Landfill	
		Date:	4/7/2025	
		Permit Number:	82-SDP-16-97P	
Permit No.: 82-SDP-16-97P				
Item	Quantity	Units	2025 Unit Cost	Cost
1- Maintenance items				
General Maintenance	30	YR	\$ 1,740.00	\$ 52,200.00
Cap and Vegetation Maintenance	30	YR	\$ 3,478.34	\$ 104,350.20
Drainage and Erosion Control Maintenance	30	YR	\$ 0	\$ 0
Waste Systems Maintenance	30	YR	\$ 0	\$ 0
Gas Control Maintenance	30	YR	\$ 0	\$ 0
Leachate Control Maintenance	30	YR	\$ 2,808.40	\$ 84,252.00
Groundwater Monitoring System Maintenance	30	YR	\$ 1,581.06	\$ 47,431.80
2- Leachate System				
Leachate Management and Disposal	30	YR	\$ 82,125.00	\$ 2,463,750.00
Leachate Control Performance Evaluations	30	YR	\$ 0	\$ 0
3- Ground Water Monitoring System				
Groundwater Monitoring Performance Evaluations	30	YR	\$ 3,162.10	\$ 94,863.00
Groundwater Monitoring and Reporting	30	YR	\$ 20,553.91	\$ 616,617.30
4- Inspections				
Facility Inspections	30	YR	\$ 3,162.10	\$ 94,863.00
5- Administration And Engineering				
Legal, Financial, and Administration Services	30	YR	\$ 550.00	\$ 16,500.00
Engineering Services	30	YR	\$ 3,000.00	\$ 90,000.00
Financial Assurance Accounting	30	YR	\$ 1,581.06	\$ 47,431.80
2025 Post Closure Costs				\$ 3,712,259.10

Note:

¹ Unit costs are inflated year-over-year based on the U.S. Bureau of Labor Statistics consumer price index in the Midwest Region.



Industrial Monofill Financial Assurance Report Form

SECTION 1: FACILITY INFORMATION

(please print or type)

Information Requested

Facility Name: Davenport Plant CKD Landfill Permit Number: 82-SDP-16-97P
Permitted Agency/Entity: Continental Cement Company

SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$ 654,070.85	4/7/2025
Updated Postclosure Cost Estimate	\$ 3,712,259.10	4/7/2025
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 115.31(3)"c" for closure and 115.31(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	740,510
Amount of waste disposed of at the facility during the prior year	1451

SECTION 4: PROOF OF COMPLIANCE

Publicly Owned Municipal Solid Waste Landfills

(ATTACH AUDIT REPORT)

Owner's Most Recent Annual Audit Report

Prepared by: _____

For fiscal year ending: _____

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 monofill is in compliance with IAC 567 Chapter 115. 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)	<i>(ATTACH INSTRUMENT(S))</i>
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Assurance Instrument	Establishment Date	Mechanism Covers	Instrument Value*
Trust Fund 567 IAC 115.31(6)“a”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Surety Bond 567 IAC 115.31(6)“b”		Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 4,366,329.95
Letter of Credit 567 IAC 115.31(6)“c”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Insurance 567 IAC 115.31(6)“d”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Financial Test 567 IAC 115.31(6)“e”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Financial Test 567 IAC 115.31(6)“f”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Guarantee 567 IAC 115.31(6)“g”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t Guarantee 567 IAC 115.31(6)“h”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Dedicated Fund 567 IAC 115.31(6)“i”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$

SECTION 6: FUND PAYMENTS

(only if using dedicated or trust fund)

Completion of the following fund information complies with the annual financial statement requirements of IAC 567 115.31(3)“a” and 115.31(4)“a” by indicating the current balance(s) of the dedicated/trust fund and the projected amount(s) to be deposited in the fund(s).

Under “Beginning Balance”, please state the fund balance 30 days after the start of the previous fiscal year, for “Ending Balance”, indicate the fund 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
Dedicated Fund Balance <i>(see formula below)</i>	\$	\$	\$
Trust Fund Balance <i>(see formula below)</i>	\$	\$	\$

Formula for Projected Deposits

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

SECTION 7: 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 115.

Name of Official: William Hilger Title: Environmental Manager

Agency/Entity: Continental Cement

Address: 301 E. Front St.

City: Buffalo State: Iowa Zip: 52728

Telephone: 563-742-1619 Fax: _____

Email Address: bill.hilger@continentalcement.com

Signature of Official: *William Hilger* Date: 4/10/2025

Questions? Contact Mary Klemesrud at (515) 802-8835 or Mary.Klemesrud@dnr.iowa.gov

Attachment 2 – Surety Rider

SURETY RIDER

To be attached to and form a part of

Bond No. 019052863

dated March 1, 2016
effective (MONTH-DAY-YEAR)

executed by Continental Cement Co., LLC, as Principal,
(PRINCIPAL)

and by Liberty Mutual Insurance Company, as Surety,

in favor of Iowa Department of Natural Resources
(OBLIGEE)

in consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

The Bond Amount from:

One Million Six Hundred Seventy-six Thousand Nine & 74/100 (\$1,676,009.74)

To:

Four Million Three Hundred Sixty-six Thousand Three Hundred Twenty-nine & 95/100 (\$4,366,329.95)

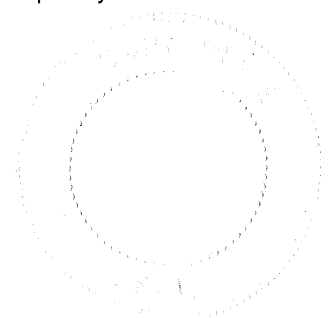
Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective March 1, 2025
(MONTH-DAY-YEAR)

Signed and Sealed April 9, 2025
(MONTH-DAY-YEAR)

Continental Cement Co., LLC
(PRINCIPAL)
By: [Signature]
(PRINCIPAL)

Liberty Mutual Insurance Company
(SURETY)
By: Kimberly Leonard
Kimberly Leonard, Attorney-in-Fact





POWER OF ATTORNEY

Certificate No: 8204866

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company

KNOWN ALL PERSONS BY THESE PRESENTS: That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, Kimberly Leonard

all of the city of Morristown, state of NJ each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

IN WITNESS WHEREOF, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 1st day of July, 2024.

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company



By: *Nathan J. Zangerle*

Nathan J. Zangerle, Assistant Secretary

STATE OF PENNSYLVANIA ss
COUNTY OF MONTGOMERY

On this 1st day of July, 2024, before me personally appeared Nathan J. Zangerle, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my notarial seal at Plymouth Meeting, Pennsylvania, on the day and year first above written.



Commonwealth of Pennsylvania - Notary Seal
Teresa Pastella, Notary Public
Montgomery County
My commission expires March 28, 2029
Commission number 1126044
Member, Pennsylvania Association of Notaries

By: *Teresa Pastella*

Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

ARTICLE IV – OFFICERS: Section 12. Power of Attorney.

Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

ARTICLE XIII - Execution of Contracts: Section 5. Surety Bonds and Undertakings.

Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

Certificate of Designation – The President of the Company, acting pursuant to the Bylaws of the Company, authorizes Nathan J. Zangerle, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

Authorization – By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, of Liberty Mutual Insurance Company, The Ohio Casualty Insurance Company, and West American Insurance Company do hereby certify that this power of attorney executed by said Companies is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 9th day of April, 2025.



By: *Renee C. Llewellyn*

Renee C. Llewellyn, Assistant Secretary

Not valid for mortgage, note, loan, letter of credit, currency rate, interest rate or residual value guarantees.

For bond and/or Power of Attorney (POA) verification inquiries, please call 610-832-8240 or email HOSUR@libertymutual.com.

INDUSTRIAL MONOFILL LANDFILL
OWNER'S AFFIDAVIT

As the Owner and/or Operator of Continental Cement Company Davenport Plant's privately owned industrial monofill landfill, I certify that a yearly review has been performed by a certified public accountant to determine whether the landfill is in compliance with Iowa Administrative Code Chapter 115. Conclusions of the review and the steps taken to rectify any deficiencies identified by the accountant are listed below.

Date of Review: April 8, 2025

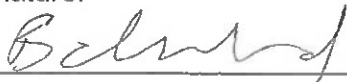
Certifying Accountant: Nathan Koransky, Corporate Controller

Company: Continental Cement Company

Conclusion(s) of the review: Closure/post closure cost estimates appear to have been prepared in accordance with the above mentioned requirements and is supported by Surety Bond #019052863 in the amount of \$4,366,329.95. No warranties, either expressed or implied are intended or made as a result of the review.

Steps taken to rectify any deficiencies identified: NA

Signature:



Printed Name: Brett Imsland

Title: Davenport Plant Manager

Date: 4/8/2025