

April 15, 2025

Michael W. Smith, P.E.
Environmental Engineer Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: ANNUAL INSPECTION – 2025
PLYMOUTH COUNTY SANITARY LANDFILL
IDNR PERMIT #75-SDP-01-74P
HLW PN 6052-23A.750**

Dear Mr. Smith:

In accordance with IAC 567-114.26(2)j, an annual inspection of the Plymouth County SLF was personally conducted the morning of April 11, 2025. Kent Herbold, Site Manager, was on site during the inspection and the results were discussed with Mr. Herbold upon completion. Conditions at the time of the inspection were clear with light winds and temperatures in the 40's.

Status of the Permit

The SDP Permit was renewed on March 17, 2023 with expiration on December 5, 2025. The following revisions to the permit have been issued to date:

- Permit Revision, August 4, 2023, defined the approved fill areas and fill heights (Special Provision X.2.a) and authorized filling in the sidewall liner area (Special Provision X.3.f).
- Permit Revision, October 17, 2024, approved no purge sampling.
- Permit Revision, December 18, 2024, authorized filling in the sidewall liner area (Special Provision X.3.g).

Annual Water Quality Report

The 2024 Annual Water Quality Report (AWQR) was submitted to IDNR on December 2, 2024 (Doc #111399). IDNR comments on the 2024 AWQR were received on January 3, 2025 (Doc #111627). The IDNR letter required a response regarding the blank sample temperatures during the May, 2024 sampling event. Mr. Herbold submitted the response on January 6, 2025 (Doc #111693).

Financial Assurance

The 2025 Financial Assurance documentation was initially submitted to IDNR on December 16, 2024 (Doc #111484) with a revised IDNR form 542-8090 submitted on March 31, 2025 (Doc #112683). IDNR approved the Financial Assurance documentation on April 2, 2025 (Doc #112714).

SDP Permit Special Provisions

1. The landfill is accepting construction and demolition waste for disposal in accordance with the Plymouth County Solid Waste Agency (PCSWA) Comprehensive Plan. The latest update of the Comprehensive Plan was approved by IDNR on October 26, 2021.

2. The landfill is being operated in general accordance with the information in the 2022 Application for Landfill Permit Renewal dated September 6, 2022 (Doc #103957) and the updated 2022 Application for Landfill Permit Renewal dated February 28, 2023 (Doc #105974). Waste disposal is limited to Trench 10S, Trench 11S, and the Sidewall Liner Area.

Leachate is stored in the leachate storage lagoon and hauled to the City of Le Mars POTW for treatment and disposal when needed. The lagoon was reviewed during the inspection and had adequate storage available. Staff added solar powered pumps to LW-3 and LW-4 to remove accumulated leachate, Mr. Herbold reported that the pump in LW-3 was replaced on April 11, 2025. The leachate is pumped into above ground totes located at these LW's and the totes are hauled and emptied into the leachate storage lagoon when needed. The totes are opaque so the leachate level in the totes can be visually determined. Staff checks the leachate levels in the totes on a weekly basis.

This permit provision requires monthly leachate level measurements; however, the IDNR letter dated December 27, 2023 changed the frequency of leachate level measurements from monthly to quarterly. Results will be included in the Leachate Control System Performance Evaluation Report that will be in the AWQR.

An updated Emergency Response and Remedial Action Plan (ERRAP) was included in the 2022 Application for Landfill Permit Renewal dated September 6, 2022 (Doc #103957).

3. This provision includes the approval of the Sidewall Liner Certification Report dated June 1, 2023 (Doc #106908), the supplemental information dated August 3, 2023 (Doc # 107391), and the Construction Certification Sidewall Liner report dated December 5, 2024 (Doc #111440) allowing filling in the portions of the Sidewall Liner covered by the certifications.
4. The HMSP includes:
 - Background Well: MW-17
 - Downgradient Wells: MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, and MW-14
 - Impact Delineation Well: MW-16

The no purge sampling method has been approved. Mr. Herbold reported that the initial no purge sampling event is scheduled for April 16, 2025.

All monitoring wells viewed during the inspection were locked.

5. Quarterly gas monitoring is conducted by landfill staff. Gas monitoring results will be included in the AWQR.
6. Shingles are no longer recycled.
7. The concrete stockpile was viewed during the inspection – there did not appear to be any trash or other material in the rubble.
8. The clean wood stockpiles were viewed during the inspection – there did not appear to be any trash or other material in the wood. Two stockpiles were being maintained, one stockpile was tree waste and the other lumber and other wood products.

9. The tire stockpile was viewed during the inspection – there did not appear to be any trash or other material in the tires.
10. Lead acid batteries are accepted, stored, and recycled in general accordance with the SDP Permit. Batteries are stored on a pallet in the transfer station building.
11. White goods are accepted, stored, and demanufactured in general accordance with the SDP Permit and the Appliance Demanufacturing Permit (#75-ADP-01-05). Appliances are stored on a concrete base. Three staff members have appliance demanufacturing certificates – the certificates are posted in the transfer station office.

The scrap metal collected and salvaged is stored in roll offs and recycled through a local scrap dealer.

12. This provision approved the installation of a drain tile southwest of the landfill. Updates on the effects of this drain tile on site water quality, if any, will be included in the AWQR.
13. The landfill will be closed in general accordance with the Closure and Post Closure Plan (CPCP) included as Appendix 11 of the Updated 2022 Application for Landfill Permit Renewal.

Based on observations during the inspection, along with discussions with Landfill personnel, it appears that the facility is operating in general conformance with the permit.

Stormwater Pollution Prevention Plan

The facility operates under NPDES General Permit No. 1 for the PCSWA (Authorization Number 10471-10266, expires 10/01/25). Mr. Herbold is in the process of updating the Stormwater Pollution Prevention Plan (SPPP).

No erosion was noted on the cap during the inspection. The eroded areas noted during the 2024 inspection have been repaired and were seeded on April 11, 2025.

The vegetation on site is in good condition with the exception of thin vegetation noted on the east slope of the intermediate cover where additional material was added in 2024. There were a few small trees noted on the cap.

A separate “Stormwater Industrial Routine Facility Inspection Report” was completed during this inspection to satisfy the annual inspection requirement in accordance with the SPPP. The stormwater inspection report is attached to this inspection report and will be filed in the SPPP.

Spill Prevention, Control, and Countermeasures Plan

Due to the amount of petroleum products stored on site, the PCSWA operates the landfill/transfer station under a Spill Prevention, Control, and Countermeasures Plan (SPCC). It appears that all petroleum products are being stored properly. Oil dry is available on site.

The exterior of the tanks and secondary containment systems were visually observed during the inspection and no significant problems/concerns were noted.

Additional Comments

At the time of the inspection the waste disposal area was located in Trenches 10/11 and the compactor was operational. Weekly and intermediate cover appeared adequate, although some areas of the intermediate cover are steep which has led to thin vegetation on the west slope.

Due to the frequently windy conditions this spring litter was noted away from the disposal area during the inspection. Mr. Herbold reported that off site litter had been recently collected and no litter was noted off site during the inspection. An outside contractor will be contacted to collect the on site litter.

Clean soil from a flood repair project has been stockpiled on site and is available for landfill use. The stockpile is located south of the wood waste stockpiles.

Staff is starting to haul soil to construct the next phase of the sidewall liner. A Certification Report will be submitted to IDNR at the completion of the liner construction for review and approval prior to waste deposition against the sidewall liner starting.

The PCSWA currently has 4 certified landfill operators on staff. The certificates were posted in the transfer station office.

IDNR Field Office (FO) #3 inspected the landfill on November 23, 2024. The report listed no Requirements or Recommendations and noted that the site appeared to be “extremely well managed...Mr. Herbold and his staff are highly efficient with their specific duties”. The report concluded that “there were no violations or concerns observed during the inspection.”

Leachate lines were cleaned in 2022. The lines should be cleaned again in 2025 to meet the 3 year cleaning frequency required by IDNR in IAC 567-114.26(11)a(8).

Mr. Herbold reported that staff receives training on the Emergency Response and Remedial Action Plan and the Storm Water Pollution Prevention Plan annually.

The HHM RCC license (23-RCC-2013) expires on November 1, 2028.

Recommendations

1. Clean leachate lines.
2. Continue to remove saplings from landfill as needed.
3. Continue to retrieve windblown litter as needed.
4. Continue to monitor vegetation on the cover and repair any deficiencies as necessary.



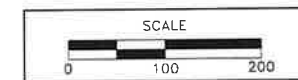
cc: Kent Herbold, Manager, Plymouth County SLF (electronic copy)
Jennifer Christian, IDNR Field Office #3 (electronic copy)

HLW Engineering Group, 204 West Broad Street, P.O. Box 314, Story City, Iowa 50248
(515) 733-4144  **(515) 733-4146 Fax**



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- LOCATED WASTE BOUNDARY
- INTERPOLATED WASTE BOUNDARY
- PROPOSED FUTURE WASTE BOUNDARY
- BUILDING
- GRAVEL ROAD
- FENCELINE
- CULVERT
- EXISTING CELL BOUNDARY
- APPROXIMATE LOCATION OF MONITORING WELL
- APPROXIMATE LOCATION OF ABANDONED MONITORING WELL
- APPROXIMATE LOCATION OF LEACHATE WELL
- LANDFILL GAS VENT



AERIAL DATED 8/12/23

AERIAL PROVIDED BY THE IOWA STATE UNIVERSITY GEOGRAPHIC INFORMATION SYSTEMS SUPPORT AND RESEARCH FACILITY IN COOPERATION WITH THE IOWA DEPARTMENT OF NATURAL RESOURCES, THE USDA NATURAL RESOURCES CONSERVATION SERVICES, AND THE MASSACHUSETTS INSTITUTE OF TECHNOLOGY.

FIGURE: 1

SITE PLAN
2025 ANNUAL INSPECTION
PLYMOUTH COUNTY SANITARY LANDFILL
LE MARS, IOWA

HLW Engineering Group
204 West Broad Street, P.O. Box 314
Story City, Iowa 50248
Phone: (515) 733-4144
FAX: (515) 733-4146



Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Plymouth County Sanitary Landfill		
NPDES Tracking No.	Authorization # 10471-10266		
Date of Inspection	April 11, 2025	Start/End Time	9:00 AM/11:00 AM
Inspector's Name(s)	Douglas J. Luzbetak, P.E.		
Inspector's Title(s)	Project Manager		
Inspector's Contact Information	HLW Group, PO Box 314, Story City, IA 50248, (515)733-4144		
Inspector's Qualifications	Professional Engineer, project manager at the site since 2023		
Weather Information			
Weather at time of this inspection? <input checked="" type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: Temperature: 40's			
Have any previously unidentified discharges of pollutants occurred since the last inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe:			
Are there any discharges occurring at the time of inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe:			

Areas of Industrial Materials or Activities exposed to stormwater

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Solid waste is unloaded in the interior of the building.
2	Equipment operations and maintenance areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3	Fueling areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Diesel tanks have secondary containment.
4	Freon containing appliances storage area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Appliances stored on a concrete base. Surface water is directed away from the storage area.
5	Scrap metal storage area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Scrap metal is stored in roll offs.
6	Dust generation and vehicle tracking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dust was not noted during the inspection. No tracked litter or mud was noted at transfer station entrance/exit

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

None.

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

None

Notes

Use this space for any additional notes or observations from the inspection:

Outfall #1 and the sediment basin were both dry during the inspection.

Thin vegetation was noted in the area where additional intermediate cover was added in 2024. This area should be monitored during future inspections.

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title:

Douglas J. Luzbetak, PE

Signature:



Date:

4/15/25