April 28, 2025

Geoffrey Spain
Environmental Engineer
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

HLW Engineering Group
Engineering Management

RE: SEMI-ANNUAL INSPECTION REPORT – SPRING, 2025
NEWTON SLF - PERMIT NO. 50-SDP-1-75P
1945 SLF – CLOSED
1975 SLF – CLOSED
AREA A – CLOSED
AREAS B, C, AND D - ACTIVE
HLW PN 6002-23A.750

Dear Mr. Spain:

A semi-annual inspection of the Newton Sanitary Landfill was personally conducted the morning of April 16, 2025. Mike Ward, Public Works Operations Superintendent, City of Newton, accompanied me on the inspection. Weather conditions during the inspection were clear with moderate winds and temperatures in the 50's.

Office/Scale House & Recycling Complex

The 24 hour yard waste area continues to be well received by customers. The area was very neat with no litter noted. Surveillance cameras are present to control illegal dumping and Mr. Ward reported minimal problems with illegal dumping in this area since the recycling bin was relocated to within the gated/fenced perimeter of the landfill (west of the tire cage).

The small load drop off is continuing to improve conditions at the site by reducing traffic and congestion at the working face. The size of the area was increased in 2023 to allow four roll offs to be used instead of the two that were utilized previously. The approach to the new roll offs was paved in 2024.

The Newton SLF has an agreement with the Regional Collection Center (RCC) in Bondurant for a satellite building for the collection and storage of HHM on site. The satellite building is located directly south of the scale house. HHM material is accepted at the landfill from April 1 to October 31. Mr. Ward and I viewed the interior of the building and it was neat and orderly. Materials collected are periodically picked up and processed by RCC personnel. The City of Newton currently has 9 staff members who have completed the 25 hour HAZWOPER course to handle HHM. Note that due to personnel sharing with other City departments all HAZWOPER trained personnel are not on site daily.

A cage is provided for tires on a concrete pad in the recycling area.

The recycling bin is located west of the tire cage. Mr. Ward reported no problems with contamination of the recyclables in the bin since the bin was moved into the fenced area of the landfill and customer access was limited to the landfill open hours.

A building used for storage of supplies and materials is located south of the scale house. Lead acid batteries and fluorescent tube bulbs received at the site are stored in this building. These materials are stored on a secondary containment pallet.

The City has sponsored an off-site collection event for electronics, scrap metal, and appliances annually since 2017. The 2025 event is scheduled for September 13, 2025.

Yard waste is delivered to two areas southwest of the scale house. Residential customers drop off yard waste in the recycling/yard waste drop off area outside of the main gate. Yard waste collected by contractors is delivered to the old farmstead area. Both areas are outside of the waste boundary of the 1945 SLF. Yard waste from the two areas is combined and windrowed in the old farmstead area, typically turned twice per month, allowed to break down, and used on site as a soil amendment. The yard waste areas were well controlled and free of debris and litter. Wood chips are also stockpiled in the old farmstead area. The wood chips are typically used on site at the active area during wet weather to improve customer access. Small quantities of wood chips are also available to residents free of charge.

The ground tree and brush debris from the August 10, 2020 derecho stockpile has been removed. Grading is needed in this area to restore drainage.

Clean soil accepted from customers is stockpiled south of the scale house. Soil from City street projects is also stockpiled in this area. This material is mixed with the yard waste from the windrows and used for repairs and maintenance activities on site. Use of the yard waste mixed with clean soil as a soil amendment aids in the establishment of vegetation. Past use of the material has led to improvements in the success of vegetation, and leads to an improved overall site appearance.

Accumulated concrete and rubble were crushed during the first quarter of 2017. The crushing operation resulted in several different aggregate products that were stockpiled and used on site or sold for off site use. Clean concrete and rubble are being stockpiled as received for future crushing/reuse. Mr. Ward reported that crushing this material is currently scheduled for Fiscal Year 26.

Some tree and brush waste material was smoldering in the designated area during the inspection. City staff has constructed a grate to allow the ash to be separated from unburned wood debris to allow more efficient ash disposal.

The continued improvements to the recycling and small load drop off areas have improved customer and employee convenience and safety as well as aided landfill operations at the working face.

1945 SLF - CLOSED

This area was closed with a minimum 2' soil cap prior to October 25, 1989 in accordance with the rules in effect at the time of closure. Depth confirmation activities were completed in 2013 and fill was added to areas of the cap as necessary to maintain the required 2' cap over the 1945 SLF. A Final Cover Certification Report documenting the work on the cap was submitted to IDNR on November 4, 2013 (Doc #78505) and approved in Special Provision X.17.e of the SDP Permit.

There is a small rubble stockpile located within the waste boundary. Mr. Ward indicated that this rubble will be removed, soil added if needed to restore drainage, and the area seeded.

The 1945 SLF was mowed several times in 2024 and vegetation is in excellent condition over the majority of the area. No seeps were noted during the inspection and vegetation is established on areas of past seep repairs.

A portion of the northeast corner of the area was disturbed during the replacement of the 72" CMP under the access road. This area had straw wattles installed and was seeded at the completion of the project and vegetation is becoming established.

No ponded water were observed in the 1945 SLF during the inspection.

A Request to End Regulation under Chapter 113 for the 1945 SLF was submitted to IDNR on April 14, 2023 (Doc #106380). An IDNR response was received on October 5, 2023. A Trend Analysis for MW-44 was submitted to IDNR on October 17, 2023 (Doc #107965) in response to the IDNR letter. IDNR staff visited the site on October 18, 2023 to view site conditions to determine eligibility of the 1945 SLF for an Environmental Covenant (EC). The results of this site visit were documented in the Fall, 2023 Semi-Annual Engineer's Inspection Report dated October 24, 2023 (Doc #108033). The five items identified during the IDNR site visit are discussed below:

- *Remove derecho waste stockpile from the cap over the waste boundary of the 1945 SLF.* The stockpile has been removed. Minor grading needs to be completed in the former stockpile area to restore drainage.
- *Stake the waste boundary of the 1945 SLF.* Mr. Ward will arrange to have the waste boundary staked.
- *Remove or fill the remaining structures on the perimeter of the 1945 SLF from the previous leachate forcemain, two manhole structures associated with the pump station and an air relief valve manhole.* The structures have been removed and/or backfilled. These areas need to be seeded.
- *Remove the rubble that protrudes through the cap.* This material has been removed and fill added to restore the cap. The area needs to have additional soil added and then be seeded.
- *Repair the rill developing associated with a surface water diversion berm that runs in an approximate east-west direction in the middle of the east slope.* Staff has constructed ditch checks and added gabion stone to repair the rill and limit future erosion.

1975 SLF - CLOSED

This area was closed with a minimum 2' soil cap prior to October 25, 1989 in accordance with the rules in effect at the time of closure. Depth confirmation activities were completed in 2013 and fill was added to areas of the cap as necessary to maintain the required 2' cap over the 1975 SLF. A Final Cover Certification Report documenting the work on the cap was submitted to IDNR on November 4, 2013 (Doc #78505) and approved in Special Provision X.17.e of the SDP Permit.

The 1975 SLF was mowed several times in 2024 and vegetation is in excellent condition over the majority of the area. A few saplings were noted on the terrace.

There were several areas in the 1975 SLF where vegetation was noted as sparse during the Spring, 2022 inspection, most likely caused by landfill gas. Staff repaired these areas in 2022 by removing some of the soil and replacing with clean rock underlain by a geotextile filter fabric to allow the gas to vent. These areas appear to be functioning well and vegetation adjacent to the repair areas is in excellent condition.

A leachate collection project was substantially completed in December, 2009. The leachate collection project consisted of installing 12 leachate laterals into the waste mass to relieve leachate pressure and eliminate persistent leachate seepage, primarily on the west slope of the 1975 SLF. No leachate seeps were observed in the 1975 SLF during the inspection.

Area A – CLOSED

This area has been closed as per the approved Closure/Post Closure Plan with a 4 foot soil cap. A Construction Certification documenting the closure was submitted to IDNR on September 30, 1999 (Doc #30742) and is approved in Special Provision X.17.a of the SDP Permit. The cap was mowed several times in 2024. The vegetation on the majority of the area is well established and in excellent condition with no trees noted on the cap.

No leachate seeps or ponded water were observed in Area A during the inspection.

Areas B-1, B-2, C-1, C-2, C-3, D-1, and D-2 (Subtitle D Composite Liners) –ACTIVE

Areas B-1, B-2, C-1, C-2, C-3, D-1, and D-2 constitute the active area at the Newton SLF. The working face was well confined and located in Cell D-1/D-2. The landfill compactor was at the working face.

Approval of the use of a tarp ADC system is included in Special Provision X.9 of the SDP Permit. Mr. Ward reported that the tarp is typically used for daily cover. Soil cover is removed prior to landfilling to preserve airspace, with the material being reused for cover if possible. Use of the tarp and removal of soil cover has increased the solid waste capacity of the permitted landfilling area.

Daily and intermediate cover appears adequate. The trees noted during the Fall, 2024 inspection on the perimeter of Cell D-1/D-2 have been removed.

The Cell D-1 and D-2 Expansion project was completed in September, 2013. Waste disposal over the portion of the Cell D-1 and D-2 Expansion area that had the 12" (minimum) of drainage layer sand installed was authorized in Permit Amendment #7 dated October 2, 2013. Documentation of the installation of additional drainage layer sand in the Cell D-1 and D-2 Expansion area is submitted to IDNR as applicable. The following certifications of additional drainage layer sand have been submitted and approved to date:

- Certification #1, October 4, 2013 (Doc #78211), approved by IDNR in Permit Amendment #8 dated October 14, 2013
- Certification #2, September 29, 2015 (Doc #84362), approved by IDNR in Permit Amendment #13 dated October 27, 2015.
- Certification #3, December 14, 2023 (Doc #108445), approved by IDNR in the December 20, 2023 Permit Revision.

Mr. Ward and I discussed the need for additional drainage layer sand certification(s) prior to placing additional waste on the east slope of Cell D-1 and/or Cell D-2.

The leachate seep that was repaired last fall was visited, the ground surface was wet in this area. A leachate seep was noted at the toe of the slope near Cleanout 5 but leachate was not leaving the site.

Due to the frequent strong winds experienced at the site this Spring, windblown litter was noted away from the working face during the inspection with some litter noted off site to the east. The majority of the litter was caught in on site vegetation and litter fencing. Portable litter fences are typically located adjacent to the working face to aid in litter control. Mr. Ward reported that they are currently looking to hire a part-time employee to assist with litter control. A litter collection vacuum is also used when conditions allow. The litter log is maintained in the scale house and was reviewed during the inspection.

The landfill has a wind policy to aid in litter control. The policy is to close the site at 1 PM when the National Weather Service issues a wind advisory.

Permanent access roads and service roads are in good condition, and turnaround space is adequate. Minimal dust was noted from vehicular traffic on the main access road during the inspection. The facility has a water truck for dust control.

Borrow is currently being obtained from the planned development cells in the northeast corner of future expansion Area E. Mr. Ward and I discussed having additional area removed from the land rental contract to expand the borrow area.

The signage on the edges of Cells D-1 and D-2 to mark the cell boundaries is still present. Staff can also use the GPS to locate waste boundaries if needed.

Leachate Storage/Pump Stations

There was no water noted in the lagoon during the inspection. Landfill staff cleaned the lagoon in 2023 and 2024.

Two of the manholes constructed during the Cell D-1/D-2 project were constructed with sumps to retain sediment/debris which may be transported in the leachate. The manholes west of Cell D-1, Cell D-2, and future Cell D-3 are regularly cleaned to reduce the amount of sediment getting to the pump station. This practice has contributed to a longer pump life in the pump station.

Pumping Stations No. 1 and No. 2 were both operational during the inspection. Two valves in the control manhole have been replaced. Mr. Ward reported that a valve in Pumping Station No. 2 will also be replaced.

Mr. Ward reported that landfill staff typically check Pumping Station No. 2 daily Monday-Friday and Pumping Station No. 1 twice per week. Personnel from the City of Newton POTW typically check the pumps at Leachate Pumping Stations No. 1 and No. 2 once or twice a week as well.

Sanitary Disposal Project Permit

The SDP Permit for the City of Newton SLF was renewed on March 4, 2022. The facility has received the following revisions to the Permit to date:

- Permit Revision, December 20, 2023, approved Certification #3 of Additional Drainage Layer for the Cell D-1/D-2 Expansion dated December 14, 2023 (Doc #108445).

Annual Water Quality Report

The 2024 Annual Water Quality Report (AWQR) for the 1945 SLF was submitted to IDNR on November 25, 2024 (Doc #111400). IDNR comments on the 2024 AWQR for the 1945 SLF were received on February 4, 2025 (Doc #112225). No response was required.

A Passive Engineered Conveyance Structure (PECS) was installed at SW-101R in 2020. The construction of the PECS added a new sampling point, PECS 1, to the HMSP for the 1945 SLF. The sampling results from PECS 1 provided in the 2024 AWQR for the 1945 SLF documented no VOC detected in PECS 1 during the semi-annual sampling events in 2024. Sampling results from PECS 1 for 2025 will be included in the 2025 AWQR.

The 2024 AWQR for Areas A, B, C, and D was submitted to IDNR on January 28, 2025 (Doc #112037). IDNR comments on the 2024 AWQR for Areas A, B, C, and D were received on March 13, 2025 (Doc #112574). No response was required.

The 2025 Spring Water Quality Notification letter was submitted to IDNR on April 16, 2025 (Doc #112865).

Stormwater Pollution Prevention Plan

The facility currently operates under NPDES General Permit No. 1 (expires March 10, 2026).

The annual stormwater samples required by the General Permit for 2024 were collected on November 3, 2024. Annual stormwater samples for 2025 have not been collected to date.

Landfill staff replaced the 72" CMP under the main access road in 2024. Upon completion staff placed straw wattles and seeded areas disturbed during pipe installation. The vegetation is starting to become established.

The ditch checks west of Cell D-1/D-2 were removed and replaced in October, 2024 and appeared to be in good shape.

There are two sediment basins on site, one constructed in 1995 and the other constructed in 2018. Both basins are operating as intended. Landfill staff removed accumulated sediment from the 1995 basin in 2020. Sediment removed is typically stockpiled to dry and mixed with borrow soil to use for cover. Vegetation is well established around each basin and staff maintains access roads on the dikes. The tree growth noted around both standpipes during the Fall, 2024 inspection has been removed.

Updated Stormwater Pollution Prevention Plan (SPPP) mapping adding the 2018 basin and other improvements was provided to landfill staff on May 17, 2019.

Landfill borrow operations are located in the northeast corner of future development Area E. Straw wattles and soil berms were placed on the perimeter of the borrow area prior to excavation starting to control sediment movement and erosion. Note that drainage from the borrow area goes through the 2018 sediment basin prior to leaving the site.

The landfill joined two other City departments in the purchase of a hydroseeder. The hyrdoseeder is typically kept at the landfill. Use of the hydroseeder reduces damage to existing vegetative cover when making vegetative repairs and allows staff to make prompt repairs of small areas.

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 should be filed in the SPPP.

Spill Prevention, Control, and Countermeasures Plan

The Newton Sanitary Landfill operates under the guidance of a spill prevention, control, and countermeasures (SPCC) plan for the storage of petroleum products.

Oil dry is available adjacent to the maintenance fluids in the east maintenance building to control spillage as needed.

The exterior of the tanks and secondary containment systems were visually observed during this inspection and no significant problems or concerns were noted. Forms documenting the visual inspections were completed and will be provided to City staff for inclusion in the SPCC.

Financial Assurance

The City of Newton received an extension from the State Auditor's office for the submission of the Fiscal Year 2024 audit until June 30, 2025. As a result, a request to extend the submission deadline for the 2025 Financial Assurance documentation to July 31, 2025 was submitted to IDNR on March 31, 2025 (Doc #112667). IDNR approved the extension request on March 31, 2025 (Doc #112668).

Monitoring Well Maintenance Performance Reevaluation Plan

The most recent Monitoring Well Maintenance Performance Reevaluation Plan (MWMPRP) was submitted to IDNR on May 10, 2021 (Doc #100448). The report recommended abandonment and replacement of MW-45. MW-45 was abandoned and replaced with MW-45R in May, 2021. As per IDNR Regulations, the MWMPRP is required every 5 years. Note that due to the variance granted January 25, 2012, the MWMPRP requirement is limited to the monitoring wells associated with the 1945 SLF.

Additional Comments

The City currently has 9 certified landfill operators on staff. Note that due to personnel sharing with other City departments all certified operators are not on site daily.

The City of Newton utilizes an online portal to document staff training including annual review of the ERRAP and SWPPP.

We viewed conditions in the east maintenance building - the interior of the building was very neat and orderly. Mr. Ward reported that the roof of this building will be replaced this year.

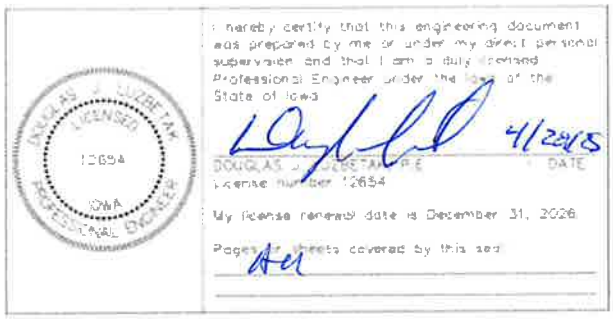
City staff distributes a quarterly newsletter to 28E members as an aid to improve communications and distribute information to customers.

Vegetated areas at the landfill are mowed regularly. Mowing improves site aesthetics and aids in the establishment of desirable vegetation by controlling weeds and trees. Mowing also makes potential problem areas, such as leachate seeps and erosion rills, easier to spot. Staff typically mark rills and other problem areas during mowing, which has led to increased erosion repair.

The overall appearance of the landfill is excellent, and landfill staff should be commended.

Summary of Recommendations

1. Repair the leachate seep.
2. Regrade the location of the former derecho stockpile.
3. Stake the waste boundary for the 1945 SLF.
4. Seed repair areas in 1945 SLF and leachate seep repair.
5. Remove the rubble stockpile in the 1945 SLF.
6. Continue to retrieve windblown litter.
7. Continue to repair erosion noted during mowing and seed repair areas.
8. Continue to monitor closed landfill areas for signs of leachate seepage.
9. Continue to monitor vegetation and erosion rills and repair as necessary.
10. Continue to monitor settlement areas in the 1945 SLF and 1975 SLF and regrade as necessary.



cc: Joe Grife, Public Works Director, City of Newton (electronic copy)
Mike Ward, Public Works Operations Superintendent, City of Newton (electronic copy)

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Newton Sanitary Landfill		
NPDES Tracking No.	Authorization # 5859-5674		
Date of Inspection	April 16, 2025	**Start/End Time**	8:00 AM/10:00 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 1995		

Weather Information

Weather at time of this inspection?
☒ Clear ❑ Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature: 50's

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ☒No
If yes, describe:

Are there any discharges occurring at the time of inspection? ☒Yes ❑No
If yes, describe: Minimal discharge of clear water from the lower sediment basin

Control Measures

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Sediment Basin (constructed in 1995)	☒Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Terrace system, 1975 SLF/Area A	☒Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Ditch Checks	☒Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Sediment Basin (constructed in 2018)	☒Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

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**	☒Yes ❑No ❑ N/A	☒Yes ❑No	
2	**Equipment operations and maintenance areas**	☒Yes ❑No ❑ N/A	☒Yes ❑No	
3	**Fueling areas**	☒Yes ❑No ❑ N/A	☒Yes ❑No	
4	**Outdoor vehicle and equipment washing areas**	❑Yes ❑No ☒ N/A	❑Yes ❑No	
5	**Waste handling and disposal areas**	☒Yes ❑No ❑ N/A	☒Yes ❑No	Retrieve windblown litter as applicable
6	**Erodible areas/construction**	☒Yes ❑No ❑ N/A	☒Yes ❑No	
7	**Non-stormwater/ illicit connections**	❑Yes ❑No ☒ N/A	❑Yes ❑No	
8	**Dust generation and vehicle tracking**	☒Yes ❑No ❑ N/A	☒Yes ❑No	
9	**Leachate Lagoon**	☒Yes ❑No ❑ N/A	☒Yes ❑No	No leachate was in the lagoon during the inspection.

Non-Compliance

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

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:
Repair leachate seep.

Seed repair areas in 1945 SLF.

Notes

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

Annual stormwater samples for 2024 required by NPDES General Permit #1 were taken 11/03/24. Mr. Ward reported that the annual samples for 2025 have not been collected to date.

All on site roads were in very good condition for all weather use.

Landfill staff replaced the 72" CMP under the main access road in 2024. Upon completion staff placed straw wattles and seeded areas disturbed during pipe installation. The vegetation is becoming established.

SWPPP mapping was updated in 2019.

NPDES General Permit #1 expires March 10, 2026.

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. Lutz Istvan, PE

Signature: [signature] **Date:** 4/28/25