

April 29, 2025
File No. 27225013.00

Mr. Mick Leat
Iowa Department of Natural Resources
Land Quality Bureau
6200 Park Avenue
Suite 200
Des Moines, Iowa 50321

Subject: Spring 2025 Semiannual Inspection Report
Climax Molybdenum Company IW Landfill
Permit No. 56-SDP-06-80P-ILF

Dear Mick,

This brief report documents the semi-annual inspection required by the facility's Iowa Department of Natural Resources (DNR) Sanitary Disposal Project Permit and the Iowa Administrative Code. The inspection was made to evaluate the site's general conformance with the permit and the approved plans and specifications. A site map is attached for reference (Figure 1). A copy of the observation checklist used during the inspection is included in Attachment A. A summary from the inspection is provided below.

SUMMARY OF INSPECTION OBSERVATIONS

The following items were observed:

- Landfilling was last performed in late fall 2024. Intermediate cover was placed and seeded on the active cell area in December 2024.
- No significant cap erosion was observed on the active cell. Intermediate cover and vegetation growth had started to emerge at the time of the inspection.
- Construction of landfill Phases 4, 5, and 6 is expected to begin late spring/early summer 2025.
- Cap vegetation was well established on the closed cell.
- No areas of ponding were observed.
- No leachate seeps were observed.

SUMMARY OF NON-CONFORMANCE WITH PERMIT CONDITIONS

There were no items of non-conformance observed during the inspection.

Items not considered non-compliance but should continue to be monitored included the following:

- Continue to monitor and maintain the landfill cover as necessary.



If you have any questions about this report, please contact us as noted below.

Sincerely,



Semir Omerovic
Technical Associate
SCS Engineers
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(515) 988-3237


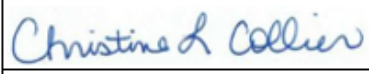


Christine L. Collier, P.E.
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SO/KAJ/CLC

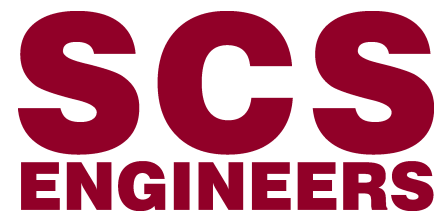
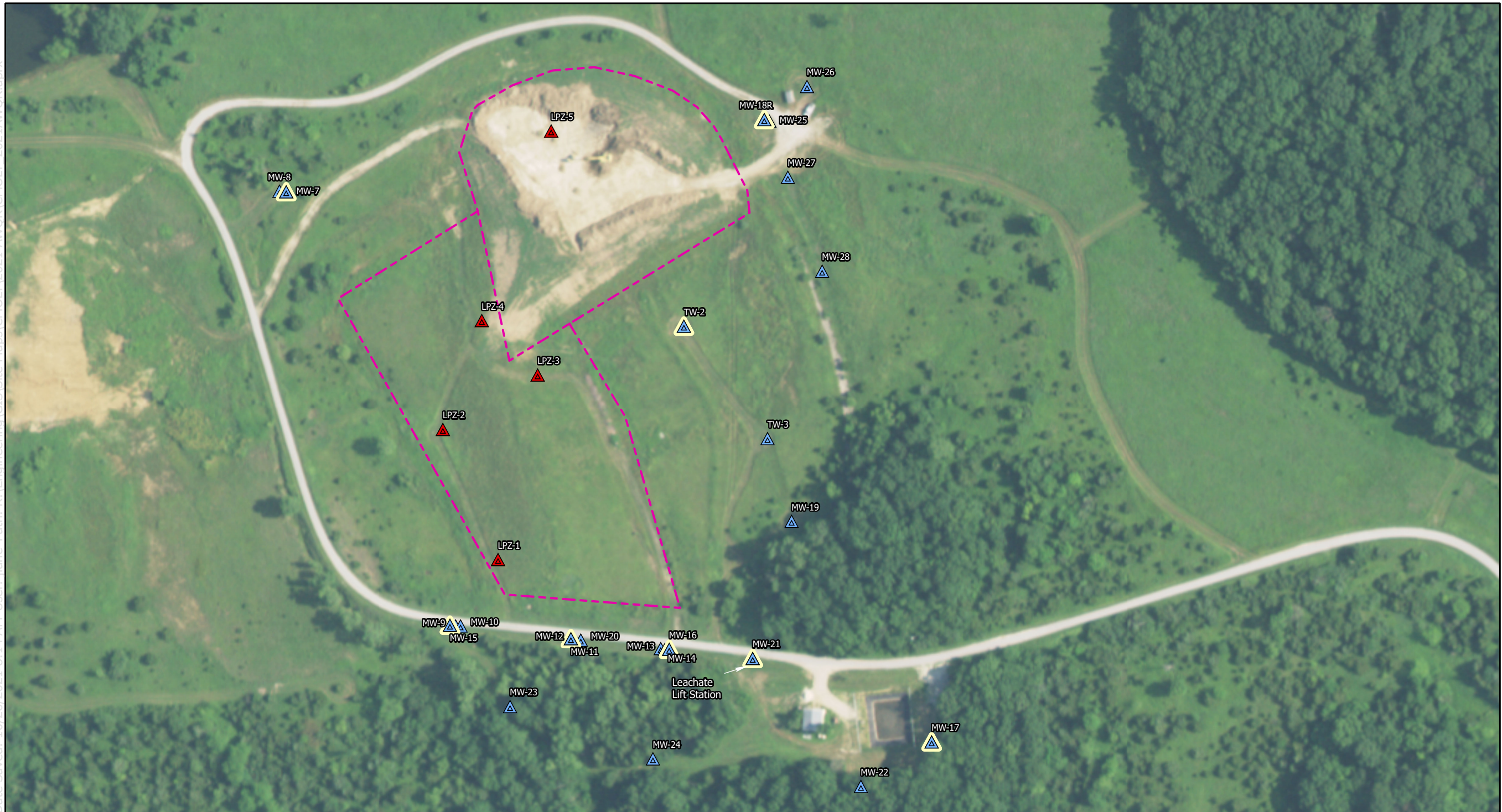
cc: David Caskey – Climax Molybdenum Company
Iowa DNR Field Office #6

Certification

	I hereby certify that this document 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.
	 Christine L. Collier Date
	My license renewal date is: December 31, 2025 Pages or sheets covered by this seal: All





Encl. Figure 1 – Site Map
Attachment A – Sanitary Landfill Inspection Checklist

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Site Map

Legend

-  Approximate Monitoring Well Location
-  HMSP Monitoring Well
-  Approximate Leachate Monitoring Location
-  Approximate Waste Boundary

Climax Molybdenum Industrial
Landfill
Argyle, Iowa
Project No: 27225013.00
Drawing Date: April 2025

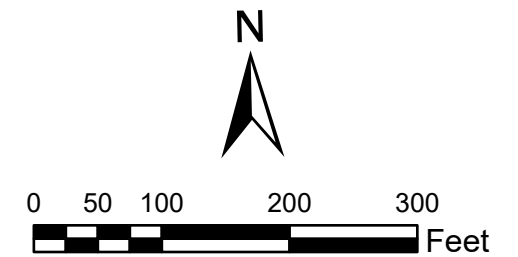


Figure 1

ATTACHMENT A
SANITARY LANDFILL INSPECTION CHECKLIST

SCS Engineers
1690 All-State Court, Suite 100
Sanitary Landfill Inspection Checklist

Permit #: 17-SDP-08-99P

Facility Name: Climax Molybdenum Company (IW) Landfill **Responsible Official:** David Caskey
County: Lee **Address:** 2598 U.S Hwy 61, Fort Madison, IA
Facility Operator: Climax Molybdenum Company **Phone:** (319) 463-7151
Address: 2598 U.S Hwy 61, Fort Madison, IA **Date Last Inspection:** October 10, 2024
Phone: (319) 463-7151 **Date This Inspection:** April 17, 2025

At the Time of this Inspection:

- **Facility personnel present:** Jessi Woods, Mandy Lilla • **Surface conditions:** Dry
- **Wind direction and speed:** South, 10-15 mph • **Ambient temperature:** 70° F

Yes – compliance was being achieved; **No** – compliance was not being achieved,
N/A – not applicable or not observed; **PND** – previously noted deficiency (PND).

Observations

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Fill Cover: final	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Special Waste Handling
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2. Control of Face	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11. Recycling Activities
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Compaction	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Operator Certification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Cover erosion; Ponding	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. Staffing
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Drainage into fill	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	14. Equipment Backup/Maintenance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Leachate Mgmt. & Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Interior Roads
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7. Litter	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16. Perimeter fence, gate, signs, wells
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Wet Weather Area	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	17. Photos taken
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9. Construction & Demolition Area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Follow-up needed? (Yes/No)

Comments: The comments below correspond to the numbered observation items listed above.

1. Cap vegetation was well established on the closed cell final cover. Vegetation growth had started to emerge on the active cell intermediate cover.
4. No areas of erosion were observed on the closed cell final cover. Intermediate cover was placed and seeded on the active cell area in December 2024. Construction of landfill Phases 4,5, and 6 is expected to begin late spring/early summer 2025. No significant cap erosion was observed on the active cell intermediate cover. No areas of ponding were observed.
6. No leachate seeps were observed.
15. Access roads leading to the site and within the site were in good condition.
16. The perimeter fence, gate, signs, and wells were in good condition.
18. The landfill cap should continue to be periodically monitored and maintained as needed.

AUTHENTICATION

INSPECTOR	Kevin Jensen and Semir Omerovic	Date: 4/17/2025
REVIEWER	Christine L. Collier, P.E.	Date: 4/18/2025