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Re: Continental Cement Davenport Plant CKD Landfill, Permit #82-SDP-16-97P  
Response to Iowa DNR April 10, 2025 Comments on 2024 AWQR Comments

Mr. Leat:

On behalf of Continental Cement Co. ("Continental"), we are in receipt of the Iowa Department of Natural Resources' ("Iowa DNR") April 10, 2025 letter providing comments on Continental's 2024 Annual Water Quality Report. As you know, Continental provided responses to most of Iowa DNR's questions in its April 30, 2025 AWQR Supplement. Continental provides the response to the remaining questions with this transmittal.

**IDNR Question 5:** DNR required the completion of a Groundwater Remedial Action Mitigation Plan (RAMP) in our September 9, 2020 letter (doc #98407). Data from lysimeters LL-1, LL-2 and LL-3 and monitoring wells MW-4, MW-4L, and MW-11, in particular, continue to demonstrate groundwater contamination that supports the need for the RAMP.

Please provide an update on the implementation of the component of the RAMP that pertains to the evaluation of potential reuse alternatives to CKD disposal, as described in our April 25, 2024, letter (doc #106450). As stated in earlier letters, this information is necessary to demonstrate to the DNR that a reasonable pathway exists towards meeting the goal of the timely elimination of CKD disposal in the current disposal cell. If a reasonable pathway cannot be demonstrated, we will reinstate the prior permit requirements for landfill redesign and existing cell closure as originally described in DNR's September 9, 2020, NOV (doc #98407).

**Continental Response:** Continental has been working to reduce CKD landfilled in the monofill landfill for many years. This has included reusing CKD in the process and identifying customers who are interested in testing the CKD for potential re-use. As part of its evaluations, Continental has provided material to be used in trials/pilot tests during the last several years. The testing is extensive and implementation can only be achieved on our customers' timelines, but Continental remains vigilant in identifying and pursuing options outside of its facility. In 2024, samples were sent to Omni Materials in Maysville, KY. Discussions have continued throughout 2025 and are ongoing, as Omni must conduct additional testing to determine if the CKD can be accepted for reuse. We will be prepared to discuss reuse in our upcoming meeting.

**IDNR Question 7:** Leachate Collection System Performance Evaluation Report (LCSPER). The numerous exceedances of the 12-inch maximum-allowed leachate head during 2023 at UL-2R and UL-3R continued during 2024, when 80% of all measurements exceeded that threshold. This has been a persistent issue since 2015, as described in September 9, 2020, Notice of Violation (doc #98407).

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Therefore, you are required to submit a plan to return to compliance with the 12-inch maximum leachate head requirement of 567 IAC 115.26(11)" a" (1). This document must include plans for discontinuing all leachate recirculation at the site until consistent compliance is demonstrated.

**Continental Response:** As IDNR is aware, Continental has undertaken an extensive evaluation of the property as part of the Scope of Work proposed to and approved by IDNR in late 2024. This has included reviewing historic information about the landfill. Based on this review, Continental plans to retain a landfill engineer to evaluate the landfill system. In the interim, Continental continues to measure the leachate wells weekly and, if results are over one foot for during two consecutive weeks (non-rain event weeks), Continental will have the lines jetted and cleaned. We believe this will minimize leachate exceedances while we undertake a broader evaluation. We will be prepared to discuss this in our upcoming meeting.

We appreciate IDNR's time and attention to this matter. If you have any questions, you can contact me. If you have additional questions, please feel free to send them in advance of our meeting later this month and we will be prepared to speak to them at that time. Thank you.

Sincerely,

*William J Hilger*