June 6, 2025

Madelynn Austin Environmental Specialist IDNR Field Office #2 2300 15th St SW Mason City, Iowa 50401



RE: Plan of Action

Notice of Violation – Prohibited Discharge, DNR Spill Number: 042125-HG-1840 Rural Iowa Sanitary Landfill, IDNR Permit #42-SDP-01-72P

Dear Mr. Watterson:

In accordance with the May 13, 2025 Notice of Violation (NOV) for Prohibited Discharge issued to the Rural Iowa Waste Management Association (RIWMA), this letter is being provided to outline the "Plan of Action" in response to the April 21, 2025 discharge from the leachate pump station that conveys leachate from the Horizontal Expansion Area to the leachate conveyance/storage system on the perimeter of the closed Original Landfilling Area.

As noted in the NOV, the discharge was discovered on April 21, 2025 and stopped shortly after discovery by RIWMA staff. The site was visited by IDNR Field Office #2 as well as HLW Engineering on April 22, 2025 to review the pump station and the discharge area. As noted in the IDNR NOV "no downstream negative effects from the discharge were discovered."

Actions in response to the discharge are outlined below.

Tanner Krum, Director of the Rural Iowa SLF, contacted Iowa Pump Works to troubleshoot the pump station. Iowa Pump Works discovered that one (out of two) of the pumps in the pump station was not operational – this pump has been repaired. They also discovered that one of the check valves in the system had failed. New check valves have been ordered and the second pump will be reinstalled when the new check valves are available.

Staff is planning to remove and replace the rock surfacing impacted by the discharge. Material removed will be placed in the active landfilling area.

lowa Pump Works is currently reviewing all of the components of the leachate pump station associated with the Horizontal Expansion Area and will recommend upgrades to the system as needed. Their review will include the pump size/capacity, force main size/capacity, control panel, and the communications system.

The steps outlined above (completed and ongoing) comprise the Plan of Action required by the May 13, 2025 NOV. Updates will be provided to IDNR as the work progresses.

Please let Tanner Krum or me know if you have any questions.

Sincerely,

HLW Engineering Group

Douglas J. Luzbetak, P.E.

Project Manager

cc: Mike Smith, P.E., Environmental Engineer Senior, IDNR (electronic copy)

Tanner Krum, Director, RIWMA (electronic copy)