

June 13, 2025

TANNER KRUM
RURAL IOWA WASTE MANAGEMENT
20488 M AVE
ELDORA IA 50627

Subject: **Notice of Violation** – Operating Procedures
Sanitary Disposal Project Inspection; Permit No. 42-SDP-1-72P

Dear Mr. Krum:

Madelynn Austin, Environmental Specialist with this office, conducted an inspection of the subject facility on June 5, 2025. A field inspection report was completed and is enclosed for your file.

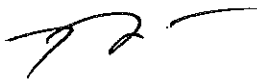
Please refer to the last page of the enclosed inspection report for a summary of required actions that must be completed to comply with the Iowa Administrative Code.

Please submit a written response to this office **by June 30, 2025** describing the actions you have taken, or will take, to correct these violations. Please submit the response to: Iowa Dept. of Natural Resources, attn: Madelynn Austin, 2300 15th St. SW, Mason City, IA 50401, or madelynn.austin@dnr.iowa.gov.

Feel free to contact Ms. Austin at madelynn.austin@dnr.iowa.gov or 641 424-4073 with any questions you have concerning this report.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Trent Lambert
Field Office Supervisor

TL/ma

Enc: Inspection report

C: Becky Jolly (becky.jolly@dnr.iowa.gov); Rusty Eddy (Rusty.eddy1969@gmail.com); Lance Granzow (lgranzow@hardincountyia.gov); Doug Luzbetak (dluzbetak@hlwengineering.com)

**IOWA DEPARTMENT OF NATURAL RESOURCES
Municipal Landfill (MLF) Inspection**

Permit #: 42-SDP-1-72P

Page 1

Facility Name:	Rural Iowa Waste Management Association Landfill	Date This Inspection:	June 5, 2025
County:	Hardin	Waste Amount:	Approx 120 tons/day
Facility Operator:	Tanner Krum	Date Last Inspection:	March 22, 2024
Address:	20488 M Ave, Eldora IA 50627		
Phone:			
Responsible Official:	Rusty Eddy, RIWMA Chairman		
Address:	PO Box 572, Parkersburg, IA 50665		
Phone:	319-269-0811		

At the Time of This Inspection:

- **personnel present:** Tanner Krum, Bruce Rewoldt, Todd Whipple, HLW, Mike Smith, DNR
- **active unit(s):** New cell, old cell trench 1
- **surface conditions:** Clear
- **ambient temperature:** 75 degrees F
- **wind direction and speed:** 5 MPH E

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

I. Documents and Record Keeping:

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. Permit/Amendment documents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9. Financial assurance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Site exploration report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. Storm water permit
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. Plans/Specs and QC&A Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11. SWA/SWAC documentation
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Waste screening inspection records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12. Operator Certification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Leachate recirculation authorization	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13. DOPs
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Gas monitoring/remediation results	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14. ERRAP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Groundwater monitoring results	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	15. Other
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Closure/Postclosure plans/results					

II. Operating Procedures:

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. All weather access road to facility					10. Scavenging and Salvaging
				2. Controlled Access at facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. scavenging prohibited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. fencing or other perimeter barriers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. salvaging authorized
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. entrance gate with lock	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. salvaged material orderly
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. safe/proper on-site traffic patterns	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. salvage removal adequate
				3. Signage					11. Animal feeding and grazing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. facility name and permit number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. animal feeding prohibited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. days and hours of operation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. grazing on final cover limited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. wastes accepted/not accepted					12. Survey controls and monuments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. telephone # of resp. official	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. facility and waste boundaries surveyed and marked
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. All weather access road in facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. survey monuments established
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Adequate vehicle queuing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. stakes clearly marked
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Certified scale used					13. Fill Sequencing
				7. Waste Screening	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. liner system protected
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. random inspections performed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. slope failure controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. inspection records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. differential settlement controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. trained personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. run-on and runoff controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. EPA notification procedures					14. Control of Workface
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Prohibited materials listing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. size of area controlled
				9. Open Burning and Fire Hazards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. slope is stable
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. open burning prohibited	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. litter control devices used
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. vehicle fueling prohibited within 50 feet of workface	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. vectors controlled

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"/>	14e. operator at workface	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	22b. head measurement device
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Special Waste Handling a. operator familiar with SWAC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. seeps controlled
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16. Waste Fill Cover a. daily cover adequate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. leachate tank maintained
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. alternative cover authorized	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. leachate lagoon maintained
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	c. scarification of daily cover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	f. POTW agreement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. intermediate cover adequate (30/180 day)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	g. sanitary sewer discharge
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. final cover maintained	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	h. NPDES discharge permit
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17. Leachate seeps a. seeps identified and controlled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	i. NPDES on-site treatment
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Leachate recirculation a. composite liner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	23. Run-on/Runoff Control Systems a. ponding controlled
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	b. RD&D authorization	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. dikes, ditches, berms & terraces intact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	c. personnel protected	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. tile lines maintained
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	d. erosion controlled	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	24. Landfill Equipment a. working properly
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	e. vegetation maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. backup equipment available
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	19. Site Litter Control a. on-site litter picked up daily	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	25. Groundwater Monitoring Wells a. wells intact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. offsite litter picked up daily	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. caps and locks
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. record of why litter not picked up	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	26. Gas Monitoring Wells/Points
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	20. Dust Control a. dust controlled as vehicles enter/exit facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	27. Emergency Procedures a. ERRAP available to staff
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. dust controlled on internal roads	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. emergency numbers posted
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. dust controlled at the workface	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	28. Final Cover System a. final cover over completed areas
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	21. Mud Control a. mud controlled as vehicles enter/exit facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. seeded
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	22. Leachate Control and Treatment a. system operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. vegetation established
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. run-on, runoff, and ponding controlled
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. differential settlement controlled
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	29. Other

DISCUSSION

Section I.

Items 1-14. All documents are stored electronically on the computer's desktop. As the documents are updated over-time, older versions are archived in a file folder on the computer. We discussed the ERRAP requires an annual safety training for all employees.

Section II

Items 1-6 - Road to facility is gravel. Facility has a gate that is closed and locked at the end of each day. Signage throughout the facility clears marks traffic patterns and wastes accepted. Certified scale used is at Hardin County Recycling Center next door to landfill.

Item 7 - Random waste screening is conducted twice per month and records of the screenings are being kept. Records are kept in the dozer which was in the shop and not on site at the time of the inspection. The facility should keep these records in the office moving forward.

Item 9 - Fire Hazards - The facility accepts waste from multiple manufacturing industries in the area. Diatomaceous Earth from Cargill has resulted in multiple landfill fires. It is advised that this waste is considered a hazardous waste because of it's ignitability and should be treated as such.

Item 14 - The working face appeared to be manageable and well maintained. The facility utilizes a litter vacuum for litter picking.

Item 16 - Although daily cover is being completed as required, it does not appear 6" of dirt is being utilized. Exposed garbage was abundant throughout the facility. The C&D waste area was not being covered daily. Intermediate cover areas also showed exposed garbage. This area should be covered and reseeded in areas garbage is exposed.

As a reminder, the new cell first lift must be completed by December 31, 2025.

Item 17 - Numerous leachate seeps were noted throughout the site, mostly on the active cell in the intermediate cover area. Leachate was also noted pooling in the southwest side of the new cell as well as along the current working face in. These should be mitigated as soon as they are noted.

Item 18. Leachate is not typically recirculated. Only a portion of the active landfill has a composite liner, which limits the area available for leachate recirculation.

Item 19 - A large litter fence has been installed along several hundred feet of the south landfill boundary and will soon be installed along the east side. While this does keep litter on site, significant litter accumulation was noted along the fence line. This area should be cleaned daily.

Item 22 - Leachate is hauled primarily to the City of Alden, though at times leachate is hauled to Des Moines. The landfill is required to sample once per month and gallons that can be discharged to the City are calculated based on that sample. The landfill exceeded the ammonia loading limit on five occasions in 2023. The landfill hauled 1.2 million gallons of leachate in 2024.

The facility recently had a leachate discharge due to pump failure from the lift station in this area. We viewed the area and noted the rock discoloration was still present. Mr. Krum indicated that Iowa Pump Works was out recently and would be replacing the pumps as soon as they could.

It is noted that the same pump failure spill recently reported at the lift station also caused an overflow from the tanks. This area still had black leachate pooling that would eventually reach the north sediment basin. This area should be pumped or scraped and disposed of properly; please see required actions.

Item 23 - This office has periodically received complaints from the neighboring property owner to the east regarding sediment deposition in the field. A tile intake was put in by the neighbor to help with washout. The landfill also intends to improve the settling pond in the southwest corner by adding rip rap and improving the slope to catch more sediment.

Item 24 - The dozer was down at the time of the inspection and being repaired. The facility was able to rent another to use in the meantime.

Item 28 - The previous inspection noted trees along the north side of the closed landfill cell. These trees were determined to be off of the closed cell and can be left standing. There are bare spots throughout the closed cell that were noted in the last inspection. These areas have not yet been fixed, but dirt piles have been added around the closed cell to repairs these areas. The facility must ensure the repairs are made timely and that the areas are reseeded when the dirt is spread.

Required Actions:

1. Ensure that employees are trained on the ERRAP and maintain training documentation.
2. Ensure 6" of dirt is being used for cover over the entirety of the working face daily.
3. Repair leachate seeps throughout the site.
4. Add more seed to intermediate cover in dead spot areas.
5. Continue to repair areas of final cover where erosion occurs.
6. Continue to work at on-site litter.
7. Scrape or pump around the tanks to clear out leachate overflow.

Recommendations:

1. Begin keeping waste screening records on file.

Reminders:

1. Various documents have the "responsible person identified" as former directors. The facility has begun updating these documents, but a reminder to continue to update these documents.

AUTHENTICATION

INSPECTOR:	Madelynn Austin	<i>Madelynn Austin</i>	DATE: 6/12/25
REVIEWER:	Jeremy Klatt	<i>Jeremy Klatt</i>	DATE: 6/12/25