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August 20, 2025

CLIMAX MOLYBDENUM COMPANY
ATTN: DAVE CASKEY
PO BOX 220
FORT MADISON, IA 52627
dcaskey@fmi.com

SUBJECT: Industrial Landfill Inspection; FOCD Inspection # 100515
SDP Permit #56-SDP-06-80P; Climax Molybdenum Industrial SDP, Lee County, IA

Dear Mr. Caskey:

On July 29, 2025, I completed an inspection of the Climax Molybdenum Industrial Landfill located near Argyle, Iowa. I met with Jessica Woods on site and we observed and discussed the current status of the landfill. Jessica Woods provided me a tour of the landfill and property in order to complete the inspection.

Attached you will find an inspection report including an outline of observations made. No compliance issues were determined at the time of this inspection.

If you have any questions or would like further explanation of any part of this report, please contact me at 319-461-5090 or at Ryan.stouder@dnr.iowa.gov.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Ryan Stouder
Environmental Specialist Senior

Encl. Inspection Report

xc: Becky Jolly, IDNR Solid Waste Section, via email
FOCD - Climax Industrial Landfill #56-SDP-06-80P

IOWA DEPARTMENT OF NATURAL RESOURCES**Field Office 6****1023 West Madison, Washington, IA 52353****319-653-2135****Industrial Landfill Inspection****Permit #:** 56-SDP-06-80P**Date this Inspection:** 07/29/2025 9:00 am**Previous Visit Date:** 08/16/2023**Facility:** Climax Industrial Landfill**Weather Conditions:** 78 °F, Sunny, Wind 5-10 mph SSE**Person(s) Contacted:** Dave Caskey, Jessica Woods

Were deficiencies noted or significant observations made during this inspection?

Yes – See Comments Sec., No – No deficiencies noted, Blank – Not applicable or observed, PND – Previously Noted Deficiency

Observations

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

Comments:

I met with Jessica Woods on site to conduct this industrial landfill inspection. Ms. Woods was able to provide me a tour of the landfill with several stops to better evaluate the landfill operations. I observed that the landfill has signage posted at the entrance with a locked gate. The landfill has a perimeter fence to control access to the area. The roadway to the active cell was rocked and well maintained. The current fill area was vegetated. I observed that there are a few areas with thin vegetation. I observed a few areas that had some signs of erosion, primarily near the landfill working face area and roadway to the working face. Minimal eroded areas were observed around the current active cell or property. The edge of the active cell was marked with yellow posts.

No gypsum sludge has been landfilled since the Fall of 2024. The cover and any bare areas have been vegetated, but may need to be evaluated after the numerous rain events within 2025. The borrow area was mostly vegetated, with only a minor area disturbed due to soil use.

The closed portion southwest of the active cell was also well vegetated. A periodic evaluation of this area needs to eliminate any small trees or saplings. Mowing the active and closed landfill portions on an annual basis is recommended. As the fall approaches, verify the woody vegetation is minimized to prevent impacts to the covering of the landfill.

The leachate lagoon and collection system appeared to be well maintained. The lagoon had plenty of freeboard. Leachate was being pumped down and hauled by a contractor to the main Climax facility for disposal in their treatment system. The leachate pump station has a single pump. The facility can also remotely monitor the leachate system. I did not observe any issues with the monitoring wells on site.

AUTHENTICATION**INSPECTOR:** Ryan Stouder**REVIEWER:** Terry Jones