

GOVERNOR KIM REYNOLDS
DIRECTOR KAYLA LYON

September 29, 2025

EMAIL ONLY: kmiller@cityofdubuque.org, dmayne@cityofdubuque.org

ATTN: KEN MILLER DUBUQUE METRO AREA SOLID WASTE AGENCY 925 KERPER COURT DUBUQUE, IOWA 52001-2405

SUBJECT: Compliance Evaluation Inspection: Permit No. 31-SDP-02-75P

Dear Mr. Miller:

Enclosed you will find a copy of the Sanitary Disposal Project Inspection report conducted at the Dubuque County Sanitary Landfill on September 23, 2024.

We believe you will find the report self-explanatory and strongly encourage you to take action on the requirements and/or recommendations listed at the end of the report.

If you have any questions about the inspection or report, please contact me at 563-920-2695 or by email.

Sincerely,

Environmental Specialist Senior, FIELD OFFICE #1

c: DNR Solid Waste section, Becky Jolly (e-mail)
Joe Mayne, Facility Supervisor, dmayne@cityofdubuque.org
Efile: 31 SW Dubuque Co Landfill ins 092325 als

Phone: 563-927-2640 www.iowadnr.gov Fax: 563-927-2075

IOWA DEPARTMENT OF NATURAL RESOURCES Sanitary Disposal Project Inspection											
Permit #: 31-SDP-02-75P	Page 1										
Facility Name: Dubuque County Sanitary Landfill											
	Responsible Official: Ken Miller, Agency Administrator										
County: Dubuque	Address: 925 Kerper Court, Dubuque, Iowa 52001-2405										
Joe Mayne, Landfill Supervisor  Facility Operator: Mike Walsh, HDR	Phone: 563/557-8220										
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Address: 14501 Hwy 20 West Dubuque, Iowa 52102	Date Last Inspection: 09/30/2024										
Phone 563/557-8220	Date This Inspection: 9/23/2025 7:30 AM										
At the time of this Inspection:											
facility personnel     Joe Mayne, Facility Supervisor											
present:	surface conditions: Dry     ambient temperature: 60										
active unit(s):     Cell 9											
	wind direction and speed:     N 5 MPH										
Yes – compliance was being achieved; No	a – compliance was not being achieved										
N/A – not applicable or not observed; PN											
I. Documents and I	<del> </del>										
Yes No N/A PND Item	Yes No N/A PND Item  9. Financial assurance										
1. Permit/Amendment documents											
✓   ✓     ✓   ✓     2. Site exploration report     ✓   ✓     3. Plans/Specs and QC&A Reports	☐ ☐ ☐ ☐ 10. Stormwater permit ☐ ☐ 11. SWA/SWAC documentation										
3. Flatis/specs and QCAA Reports  4. Waste screening inspection records	2 Departor Certification										
4. Waste screening inspection records  5. Leachate recirculation authorization	12. Operator Certification										
S. Ceachate recirculation authorization  6. Gas monitoring/remediation results	□ □ 14. ERRAP										
7. Groundwater monitoring results	15. Other										
8. Closure/Postclosure plans/results											
II. Operating F											
Yes No N/A PND Item	Yes No N/A PND Item										
1. All weather access road to facility	☐ ☐ 10. Scavenging and Salvaging										
2. Controlled Access at facility	a. scavenging prohibited										
a. fencing or other perimeter barriers	b. salvaging authorized										
b. entrance gate with lock c. safe/proper on-site traffic patterns 3. Signage a. facility name and permit number b. days and hours of operation	c. salvaged material orderly										
c. safe/proper on-site traffic patterns	d. salvage removal adequate  11. Animal feeding and grazing										
3. Signage a. facility name and permit number	a. animal feeding prohibited										
b. days and hours of operation	b. grazing on final cover limited										
C. wastes accepted/not accepted	2 . Survey controls and monuments										
	a facility and waste boundaries										
d. telephone # of resp. official	surveyed and marked										
4. All weather access road in facility	□ □ □ b. survey monuments established										
5. Adequate vehicle queuing	c. stakes clearly marked										
	☐ ☐ 13. Fill Sequencing										
7. Waste Screening											
a. random inspections performed	□ □ □ b. slope failure controlled										
b. inspection records	c. differential settlement controlled										
C. trained personnel	a. liner system protected b. slope failure controlled c. differential settlement controlled d. run-on and runoff controlled 14. Control of Workface										
d. EPA notification procedures	14. Control of Workface										
	a. size of area controlled										
9. Open Burning and Fire Hazards	b. slope is stable  c. litter control devices used										
a. open burning prohibited	C. litter control devices used										
b. vehicle fueling prohibited within 50 feet of workface	☐ ☐ d. vectors controlled										
ieer of worklace	e. operator at workface										

				15. Special Waste Handling a. operator familiar with SWAC		$\boxtimes$				23. Run-on/Runoff Control Systems a. ponding controlled					
				16. Waste Fill Cover		$\boxtimes$				b. dikes, ditches, berms & terraces intact					
				a. daily cover adequate		$\boxtimes$				c. tile lines maintained					
				b. alternative cover authorized		$\boxtimes$				24. Landfill Equipment					
$\boxtimes$				c. scarification of daily cover		$\boxtimes$				a. working properly					
				d. intermediate cover adequate (30/180 day)		$\boxtimes$				b. backup equipment available					
$\boxtimes$				e. final cover maintained		$\boxtimes$				25. Groundwater Monitoring Wells					
				17. Leachate seeps		$\boxtimes$				a. wells intact					
$\boxtimes$				a. seeps identified and controlled		$\boxtimes$				b. caps and locks					
		$\boxtimes$		18. Leachate recirculation		$\boxtimes$				26. Gas Monitoring Wells/Points					
		$\boxtimes$		a. composite liner		$\boxtimes \boxtimes$				27. Emergency Procedures					
		$\boxtimes$		b. RD&D authorization		$\boxtimes$				a. ERRAP available to staff					
		$\boxtimes$		c. personnel protected		$\boxtimes$				b. emergency numbers posted					
		$\boxtimes$		d. erosion controlled						28. Final Cover System					
		$\boxtimes$		e. vegetation maintained		$\boxtimes$				a. final cover over completed areas					
$\boxtimes$				19. Site Litter Control		$\boxtimes$				b. seeded					
				a. on-site litter picked up daily		$\boxtimes$				c. vegetation established					
$\boxtimes$				b. offsite litter picked up daily		$\boxtimes$				d. run-on, runoff, and ponding controlled					
$\boxtimes$				c. record of why litter not picked up		$\boxtimes$				e. differential settlement controlled					
$\boxtimes$				20. Dust Control		$\boxtimes$				29. Other- RCC					
$\boxtimes$				a. dust controlled as vehicles enter/exit											
$\boxtimes$				facility b. dust controlled on internal roads											
	H	H	H	c. dust controlled at the workface											
	+	쓔	+	21. Mud Control											
	Ш	Ш	Ш												
				<ul> <li>a. mud controlled as vehicles enter/exit facility</li> </ul>											
	Ц	Ц	$\sqcup$	22. Leachate Control and Treatment											
$\boxtimes$	Ш	$\sqcup$	$\sqcup$	a. system operational											
$\boxtimes$				b. head measurement device											
$\boxtimes$				c. seeps controlled											
		$\boxtimes$		d. leachate tank maintained											
		$\boxtimes$		e. leachate lagoon maintained											
$\boxtimes$				f. POTW agreement											
$\boxtimes$				g. sanitary sewer discharge											
		$\boxtimes$		h. NPDES discharge permit											
		$\boxtimes$		i. NPDES on-site treatment											
				AUTHEN	TIC	ATION									
INSPECTOR															
				Environmental Specialist Sociar											
				Environmental Specialist Senior		- Uc :			Cali	_					
	REVII	EWER		Chris Gelner Date: 2025.09.29 14:32:28 -05'00'											
				Environmental Specialist Senior		Environmental Specialist Senior									

# **General Description:**

On September 23, 2025, I conducted a routine compliance evaluation inspection at the Dubuque County Sanitary Landfill. Joe Mayne accompanied me during the inspection.

In FY 2025 this facility received 180,384 tons of solid waste for a calculated daily average of 494 tons per day. In FY 2024 173,016 tons were received. An approximate 20 tons per day increase in solid waste between FY 2024 and 2025. In July 2025, 20,822 tons were received after storm damage in the service area.

The compost facility is no longer included in the sanitary disposal project permit and is now a separate permit.

### Record Keeping:

- 1. Permit application, permit renewal and permit modifications application materials pursuant to rule 113.5(455B). [See 113.11 (1)"a"]:
  - Permit revision #4 was issued on September 6, 2024. The original permit was issued on October 27, 2022 and expires on October 27, 2027.
- 2. The site exploration and characterization reports pursuant to subrule 113.6(4). [See 113.11 (1)"b"]:
- 3. Design and construction plans and specifications, and related analyses and documents, pursuant to rule 113.7(455B). The QC&A final reports, and related analyses and documents, pursuant to paragraph 113.7(6) "d". [See 113.11 (1)"c"]:
- 4. Inspection records, training procedures, and notification procedures required in rule 113.8(455B). [See 113.11 (1)"d"]:
  - Engineering services are now being overseen by HDR. It was noted that many of the training processes are being reviewed to ensure proper documentation is being maintained. This should include documenting training associated with recognizing hazardous, PCB and prohibited wastes.
- 5. Any MSWLF unit design documentation for placement of leachate or gas condensate in an MSWLF unit as required under numbered paragraphs 113.8(1)"b"(3)"2" and "3". [See 113.11 (1)"e"]:
- 6. Gas monitoring results from monitoring and any remediation plans required by rule 113.9(455B). [See 113.11 (1)"f"]:
- 7. Any demonstration, certification, finding, monitoring, testing, or analytical data required by rule 113.10(455B). [See 113.11 (1)"g"]:
- 8. Closure and postclosure care plans and any monitoring, testing, or analytical data as required by rules 113.12(455B) and 113.13(455B). [See 113.11 (1)"h"]:
- 9. Any cost estimates and financial assurance documentation required by this chapter. [See 113.11 (1)"i" and 113.8(3)"j"]:
- 10. Stormwater permit [See 64.3(455B)]:

A pollution prevention plan update was recently completed by HDR. This plan was just provided to the operator and he is reviewing it.

Staff training is scheduled for October 15.

Samples have not yet been completed. Mr. Walsh indicated that he will collect samples the next time conditions are appropriate.

11. Special Waste Authorizations and Special Waste Acceptance Criteria [See 109(455B)]:

During a review of records, one new special waste authorization # 31-SWA-53-25 was noted. This authorization covers non-hazardous paint booth filters and debris/sweepings/rags.

Special waste authorizations are maintained electronically. Scale house staff have copies of each authorization and require haulers to provide the authorization number upon arrival. If the authorization is not current or waste beyond what is noted arrives, the material will not be accepted.

12. Operator certifications [See 113.8(6)]:

All operators and scale attendants are required to obtain landfill operator certification.

There are currently 2 scale staff who are certified and six additional operators. In addition, there is an environmental technician and mechanic on staff.

- 13. DOPs [See 113.8(455B)]:
- 14. ERRAP [See 113.8(5)]:

Other:

## I. Operating Procedures:

- 1. All-weather access roads to the facility [See 113.7(3) "a"]:
- 2. Controlled access into and within site [See 113.8(3) "a"]:

-Including a perimeter fence with a lockable gate(s) to help prevent unauthorized access [See 113.7(3) "b"]:

-Including signs or pavement markings clearly indicating safe and proper on-site traffic patterns. [See 113.7(3) "e"]:

- 3. A sign at the entrance to the facility specifying: [See 113.7(3) "c"]:
  - (1) Name and permit number of the facility:
  - (2) Days and hours that the facility is open to the public or a statement that the facility is not open to the public:
  - (3) A general list of materials that are not accepted:
  - (4) Telephone number of the official responsible for operation of the facility and the emergency contact person(s):

All required information is provided on the access sign.

- 4. All-weather access roads within the facility. [See 113.7(3) "d" and 113.8(3)"c"]:
- Adequate queuing distance for vehicles entering and exiting the property. [See 113.7(3) "f"]:
- 6. A scale certified by the Iowa Department of Agriculture and Land Stewardship. [See 113.7(3) "g" and 113.8(3)"b"]:
- 7. Waste screening for prohibited materials [See 113.8(1) "a"]:
  - (1) Random inspections of incoming load:
  - (2) Records of any inspections:
  - (3) Training of personnel to recognize prohibited wastes:
  - (4) Notification to EPA for hazardous wastes:

At least three random waste screenings occur each week. Scale house staff identify loads that are to be inspected and notify the operators. The operator then observes the load and provides the outcome to the scale house attendant. An electronic record is kept indicating pass/fail. If the load fails, the reason for the failure is recorded.

- 8. Prohibited materials list [See 113.8(1) "b"]:
- 9. Open burning and fire hazards [See 113.8(1) "c"]:
- 10. Scavenging and salvaging [See 113.8(1) "d" and 113.8(3)"d"]: Scavenging and salvaging are not allowed.
- 11. Animal feeding and grazing [See 113.8(1) "e"]: Animal feeding/grazing is not allowed.
- 12. Survey controls and monuments [See 113.8(2) "a"]:
- 13. Fill sequencing [See 113.8(2) "c"]:

Work on the Cell #9 abutment liner phase 1 area 2 was approved earlier this year. The contract was signed the day prior to my inspection. It is anticipated that work will be completed yet in 2025. Seeding may be put off until early 2026.

- 14. Working face controlled [See 113.8(2) "d"]: Seagulls were not present on the day of the inspection. Staff continue to work on discouraging the birds.
- 15. Special Wastes Managed [See 113.8(2) "e"]:
- Cover/Alternative cover material adequate [See 113.8(2) "f"]:
   Tarps are used for daily cover. There is a stockpile of soil when needed.
- 17. Leachate seeps controlled [See 113.8(2) "g"]:
- 18. Leachate Recirculation in composite cell or with RD&D permit [See 113.8(2) "h"]:
- 19. Litter control [See 113.8(3) "f"]:

No litter issues were observed during this inspection outside of the fence or working face. Fencing is used to control litter. Ten fences are purchased annually. This facility has 40 total portable litter fences.

A log is maintained to document litter removal activities. In addition to noting when litter removal does occur the log references when litter removal doesn't occur due to not being necessary or safety concerns.

A wind policy was discussed. This facility has declined to move forward with a formal policy. Implementing a wind policy to make it easier for staff to manage litter continues to be recommended. This policy could, at a minimum, give the operators the ability to restrict the acceptance of loads that are known to cause operational issues in windy weather.

20. Dust control [See 113.8(3) "g"]:

Water is sprayed as needed to control dust.

21. Mud control [See 113.8(3) "h"]:

Material, including wood chips is available to address wet conditions.

- 22. Leachate collection [See 113.7(5)"b"] and treatment [See 113.8(3) "i"]:
- 23. Run-on and Runoff Control Systems [See 113.7(8)]:

- 24. Equipment for disposal operations [See 113.8(455B]:
- 25. Groundwater monitoring wells [See 113.10(2)]:
- 26. Gas monitoring wells/probes [See 113.9(2)]:
- 27. Emergency procedures available to staff [See 113.8(5)]:
- 28. Final cover system control [See 113.12(455B)]:
- 29. Other:

The RCC area was observed. Containers were labeled and materials stored appropriately. It was noted that the dedication of a staff person, Environmental Technician, for this and similar ancillary services appears to have improved compliance.

The small loads/ residential customer area is being constructed. A staffing study is underway to ensure adequate coverage of the new services that this facility will provide. Upon completion, there will be two scale houses. One for the small loads area and the other for commercial haulers. It is anticipated that the commercial scale will be automated.

### SUMMARY OF REQUIREMENTS

No requirements at the time of this inspection.

### **SUMMARY OF RECOMMENDATIONS and REMINDERS**

Implement a wind policy to prevent litter.