

October 8, 2025

Michael W. Smith, P.E.
Environmental Engineer Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – FALL, 2025
RURAL IOWA SLF
IDNR PERMIT #42-SDP-1-72P
VERTICAL EXPANSION AREA - CLOSED
HORIZONTAL EXPANSION AREA - ACTIVE
HLW PN 6006-23A.750**

Dear Mr. Smith:

In accordance with Special Provision XI.8 of the SDP Permit, a semi-annual inspection of the Rural Iowa SLF was personally conducted the morning of October 2, 2025. Clint Reents, Director, and Josh Emerson, Certified Landfill Operator, accompanied me on the inspection. Mr. Reents began his employment on September 29, 2025. Conditions at the time of the inspection were clear with light winds and temperatures in the 70's.

Sanitary Disposal Project Permit

The SDP Permit for the Rural Iowa SLF was renewed on November 29, 2022 (expires November 29, 2027). The facility has received the following revisions to the Permit to date:

- Permit Revision #1, June 2, 2023, approved reducing the frequency of leachate piezometer measurements in the Closed Landfilling area from monthly to quarterly.
- Permit Revision #2, October 31, 2023, approved the request to construct the Trench 3 Phase 2 Expansion area.
- Permit Revision #3, June 3, 2025, approved the Construction Certification Passive Gas Vent Installation and added the new gas vents to the Gas Monitoring System Plan.

Office/Scale Area

The Rural Iowa Waste Management Association (RIWMA) shares scale operations with the Hardin County Solid Waste Disposal Commission (HCSWDC). The scale is operated by HCSWDC personnel.

RIWMA has an equipment and maintenance building located west of the closed west slope of the original landfilling area. This building is used to house staff offices, sanitary facilities, and to store supplies and maintain/store equipment. The building has a concrete parking area for the convenience of employees and customers.

Recycling Facilities/Material Stockpiles

RIWMA does not accept materials for recycling at the landfill. Member counties/communities are responsible for recycling activities. The HCSWDC has recycling operations at their location adjacent to the landfill property. The HCSWDC owns the compost pad and compost pad retention basin west of the original landfilling area.

Original Landfilling Area (Vertical Expansion Area) - CLOSED

All waste disposal operations were completed in the original landfilling area (vertical expansion area) in 2005. The entire original landfilling area is closed with a 4-foot cap (2-foot low hydraulic conductivity infiltration layer and 2-foot erosion layer) in accordance with the approved Closure/Postclosure Plan and applicable IDNR regulations. Construction Certification Reports and Record Drawings were submitted to IDNR and approved for each phase of the closure. As per Special Provision XI.1 of the SDP Permit the thirty year post closure period for the Original Landfilling Area/Vertical Expansion Area began on October 15, 2007.

Leachate collection laterals extending into the waste mass and leachate conveyance piping were installed on the north, east, and west perimeters of the Original Landfilling Area in 1995/1996.

Vegetation is well established on the majority of the Original Landfilling Area. Staff spread topsoil and seeded the majority of the areas where stressed vegetation/bare spots were noted during past inspections. These areas were reviewed with spotty emergency of vegetation to date. We discussed the option of placing clean rock in some of the areas where vegetation is difficult to establish to control potential erosion.

A portion of the cap was mowed in 2024. Mowing improves site aesthetics and aids in the establishment of desirable vegetation by controlling weeds and tree growth on the cap. Mowing also makes potential problem areas, such as leachate seeps and erosion rills, easier to identify. Due to staffing shortages the cap was not mowed in 2025.

The vegetation and terraces have limited the formation of significant erosion rills

Ditch checks constructed of rock and concrete rubble were installed in the ditch along the toe of the east slope to help control erosion. Ditch checks were also installed along the haul road west of the west slope. The ditch checks in both locations have worked well to limit erosion in these areas.

No leachate seeps were noted in the closed area.

No areas of ponded water were noted in the closed area.

Shallow gas vents have been installed on the south slope to limit gas migration toward the agricultural fields to the south.

Six (6) passive gas vents (Vents 1, 2, 3, 4, 5, and 6) were installed during 2025 in accordance with the "Groundwater Study Near MW-49A and Gas Study Near MW-14" dated January 29,

2024 (Doc #108997). A Construction Certification Report documenting the gas vent installation was submitted to IDNR on May 15, 2025 (Doc #113075). Vents 1-6 have been added to the Gas System Monitoring Plan.

Subtitle D Compliant Horizontal Expansion Area

The initial cells of the horizontal expansion area, Phase A of Trench 1 and Phase A of Trench 2, were constructed in 2002. Phase B of Trench 1 was constructed in 2003. Phase C of Trench 1 and Phase C of Trench 2 were constructed in 2005. These areas were constructed with Subtitle D compliant alternative liner systems.

Phase 1 of Trench 1 and Trench 2 was constructed in 2008. Phase 2 of Trench 1 and Trench 2 was constructed in 2009. The Trench 3 Expansion project was completed in 2015. The Trench 3 Phase 2 project was completed in 2024. These areas were constructed with Subtitle D compliant composite liner systems.

The working face was located at the south end of Trench 3 Phase 2 with the compactor being located at the working face. Soil or a tarp system are utilized as daily cover. The use of the tarp should be encouraged as it will help to reduce the amount of soil used for cover and save airspace to help maximize the life of the facility. Cover soils, when needed, are obtained from the soil stockpiles east of Trench 3.

The Trench 3 Phase 2 expansion area, which was authorized to accept waste in the IDNR letter dated August 21, 2024, has received frost protection on the base in accordance with the September 26, 2012 IDNR memo. A letter stating this was provided to IDNR on October 3, 2025.

Some litter was noted away from the working face during the inspection with the majority caught in on site vegetation, no litter was noted off site. A net litter fence has been installed on a portion of the south and east perimeter of the site to limit litter movement off site. Additional net fencing was installed late in 2024 and again this year to aid in litter control. Portable litter fences are used when practical to limit litter movement. RIWMA staff retrieve litter on an as needed basis, concentrating on off-site litter first. The RIWMA also has a litter vacuum to aid litter collection efforts. The litter log is maintained by Bruce Rewoldt, Hill Supervisor. The recent addition of two staff members will aid future litter collection efforts.

Intermediate cover is added to the north, east, and west slopes of the Horizontal Expansion Area as needed. The intermediate cover was seeded in 2023 and vegetation is becoming established over the majority of the intermediate cover although some bare areas were still noted on the west and north slopes.

A few small seeps were noted during the inspection from the east slope of Trench 3. The seepage was migrating a short distance into the Trench 3 Phase 2 lined area and was being absorbed into the waste mass. These seeps will be covered with waste in the near future as the second lift of waste in Trench 3 Phase 2 progresses to the north.

Leachate collected in the Horizontal Expansion Area flows to a pump station north of Trench 2. The leachate is then pumped through a force main to MH-3(N), at the northeast corner of the

Original Landfilling Area. From MH-3(N), the leachate joins leachate collected from the Original Landfilling Area and flows to the underground leachate storage tanks.

A fire was noted in the initial lift of waste in the Trench 3 Phase 2 area on the evening of April 16, 2025. IDNR was notified and due to the location of the fire there was some concern that the fire could have affected the liner system. The area of Trench 3 Phase 2 affected by the fire was potholed to document the condition of the drainage layer and the flexible membrane liner. No damage was noted, documentation on the observations were submitted to IDNR on May 2, 2025 (Doc #112999).

Staff reported an overflow from the leachate pump station on April 21, 2025. IDNR Field Office (FO) #2 visited the site in response on April 22, 2025 and issued a Notice of Violation (NOV) – Prohibited Discharge dated May 13, 2025. The NOV required a response which was submitted to IDNR on June 6, 2025 (Doc #113211). A subcontractor was hired to troubleshoot the pump station and it was discovered that the check valves associated with the pump station were no longer working and one of the two pumps had to be rebuilt. Two new check valves were installed on October 4, 2025. The pump has been rebuilt; however, when it was going to be installed a broken pipe was discovered in the pump station which did not allow the installation to be completed.

Rubble ditch checks have been installed on both sides of the access road west of Trench 1 to help control erosion in this area and have worked well to date.

Annual Water Quality Report

The 2024 Annual Water Quality Report (AWQR) was received by IDNR on January 28, 2025 (Doc #112039). IDNR comments on the 2024 AWQR were received on June 11, 2025 (Doc #113244). The required response was submitted to IDNR on June 11, 2025 (Doc #unavailable).

The 2025 Spring Water Quality Notification letter was submitted to IDNR on July 10, 2025 (Doc #113413).

Stormwater Pollution Prevention Plan

The facility operates under NPDES General Permit No. 1 (expires June 16, 2026).

Many of the activities discussed in this inspection report are to insure continued compliance with the Storm Water Pollution Prevention Plan (SPPP). The annual stormwater sample required by the NPDES Permit was collected on June 3, 2025.

Runoff from the horizontal expansion area drains into several sediment control structures located northeast of Trench 3. Staff removed a portion of the sediment and willow trees from the upper sediment basin in 2024 to restore sediment capacity. Accumulated sediment was removed from the lower sediment basin in 2023 and landfill staff replaced the outlet pipe in 2024. Both basins have adequate sediment storage capacity available and the inlets appear to be free flowing. We discussed additional sediment removal from the upper sediment basin in 2026.

The sediment basin located in the northwest corner of the landfill property had accumulated sediment removed in 1999 and has accumulated minimal additional sediment to date. This sediment basin is generally dry, and has an excellent stand of vegetation established. The vegetation helps to slow water flow and trap sediment in the basin.

The southeast detention basin had the sediment storage capacity increased, outlet pipe replaced, and a stoplog structure installed on the outlet pipe during the Trench 3 Phase 2 Expansion project in 2024. The stoplog structure appears to be free flowing.

Landfill staff remove accumulated sediment from the sediment control structures when needed to maintain sediment storage. Accumulated sediment should be removed from the ditch west and north of Trenches 1 and 2.

The SPPP and mapping was updated in January 2025 to reflect the completion of the Trench 3, Phase 2 project as well as the improvements to the sediment basins. Areas disturbed during Trench 3, Phase 2 construction were seeded at the completion of the project – emergence has been spotty.

As a result of an inspection on June 5, 2025, IDNR FO #2 issued an NOV dated June 10, 2025 related to NDPS General Permit No. 1. The NOV contained the following:

Summary of Requirements:

1. Scrape or pump leachate from drainage area around tanks. This work was completed by staff and documented in the August 25, 2025 response. Material removed was hauled to the landfill working face for disposal.
2. Plug the drainage in the fuel tank secondary containment area and add valve to allow for appropriate STW discharge. Staff plugged the drainage as documented in the August 25, 2025 response. A drain with a valve has not been installed to date but was discussed during this inspection.

Summary of Recommendations:

1. Update the SWPPP and associated documents to reflect the new director. This work was completed on February 3, 2025 (prior to the FO inspection) but was not provided to the FO by the former Director as documented in the August 25, 2025 response. Due to personnel changes the SPPP will be updated again.
2. Sampling must continue as required with sampling data records retained. The annual sampling for 2025 was completed by on June 3, 2025 and documented in the August 25, 2025 response.
3. Continue to repair seeps as needed. A few small seeps were noted during the inspection from the east slope of Trench 3. The seepage was migrating a short distance into the Trench 3 Phase 2 lined area and was being absorbed into the waste mass. These seeps will be covered with waste in the near future as the second lift of waste in Trench 3 Phase 2 progresses to the north.

4. Continue visual inspections and employee training on a regular basis. Document inspections and training and keep them with your records. This will be discussed with the new Director when the SPPP is updated.

A separate “Stormwater Industrial Routine Facility Inspection Report” was completed during this inspection to satisfy the annual inspection requirement in accordance with the SPPP. The stormwater inspection report is attached to this inspection report and will be filed in the SPPP.

Spill Prevention, Control, and Countermeasures Plan

Due to the amount of petroleum products stored on site, the Rural Iowa Sanitary Landfill operates under a Spill Prevention, Control, and Countermeasures Plan (SPCC). It appears that all petroleum products are being stored as designated in the SPCC. The open drain in the secondary containment system for the diesel and gas tanks noted during past inspections has been plugged.

Leachate Collection, Storage, and Loadout

Leachate is stored in two dual walled underground leachate storage tanks, each with a capacity of 25,000 gallons. Leachate was being aerated during the inspection. The tanks are equipped with a monitoring and alarm system. The tank monitoring system in the loadout building (adjacent to the tanks) was working during the inspection, the system in the office was not working.

The RIWMA has a leachate treatment agreement with the City of Alden as the primary method of leachate disposal. The RIWMA also has a leachate treatment agreement with the Des Moines Metropolitan Wastewater Reclamation Authority as a backup disposal option if needed. Leachate is also recirculated. Additional information on leachate disposal/recirculation volumes will be provided in the AWQR.

The leachate loadout has a concrete spill pad to capture leachate that may be spilled during tank truck loading and direct it back to the leachate storage tanks. No sign of spillage was noted on the pad.

Financial Assurance

The 2024 Financial Assurance documentation was submitted to IDNR on September 27, 2024 (Doc #110956) and approved by IDNR on September 29, 2024. 2025 Financial Assurance documentation has not been submitted to date.

Tree Removal/Stump Monitoring

IDNR FO #2 issued an NOV on September 30, 2019 regarding tree growth on the closure cap. This section of the report has been added as required by the NOV. The majority of the trees were previously removed from the cap; however, regrowth is occurring and the trees should be removed and stumps treated where needed.

Additional Comments

As a result of an inspection on June 5, 2025, IDNR FO #2 issued an NOV – Operating procedures on June 13, 2025. The NOV contained the following:

Summary of Requirements:

1. Ensure that employees are trained on the ERRAP and maintain training documentation. This will be discussed with the new Director when the ERRAP is updated
2. Ensure 6" of dirt is being used for cover over the entirety of the working face daily. Soil or the approved tarp Alternative Daily Cover is used at the working face. Minimal uncovered waste away from the working face was noted during this inspection.
3. Repair leachate seeps throughout the site. A few small seeps were noted during the inspection from the east slope of Trench 3. The seepage was migrating a short distance into the Trench 3 Phase 2 lined area and was being absorbed into the waste mass. These seeps will be covered with waste in the near future as the second lift of waste in Trench 3 Phase 2 progresses to the north.
4. Add more seed to intermediate cover in dead spot areas. This has not been done to date but the need was discussed with Mr. Reents and Mr. Emerson during the inspection.
5. Continue to repair areas of final cover where erosion occurs. The majority of the bare areas in the closed area had topsoil added and were seeded this fall. Emergence has been spotty to date.
6. Continue to work at on-site litter. Additional net litter fence was recently installed. The recent addition of two staff members will aid future litter collection efforts.
7. Scrape or pump around the tanks to clear out leachate overflow. This work was completed by staff and documented in the August 25, 2025 response. Material removed was hauled to the landfill working face for disposal.

Summary of Recommendations:

1. Begin keeping waste screening records on file. Waste screening records, except for the current month's records, are now kept in the landfill office.

Documentation on Random Load Inspections is maintained by Mr. Rewoldt.

The leachate lines were cleaned in 2023. As per IDNR regulations leachate lines must be cleaned every 3 years so the next cleaning should be scheduled for 2026.

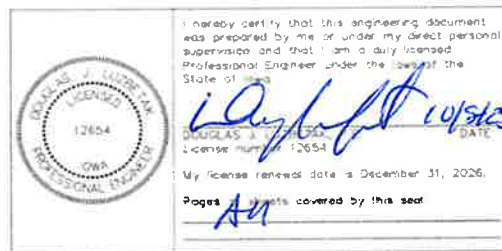
All access roads on site were in good condition; well graded and free of depressions and ruts.

The landfill currently has 2 certified landfill operators. The two new staff members will be taking the 25 hour certification course this fall.

This report is based on observations made at the site at the time of the inspection and the sources referenced in the report and does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

Recommendations

1. Repair pump station and install rebuilt pump.
2. Continue to retrieve windblown litter.
3. Remove sediment from the ditch west and north of Trenches 1 and 2.
4. Seed the bare/thin areas on the intermediate cover.
5. Monitor the reseeded areas on the closure cap and reseed as needed.
6. Continue tree removal as needed, monitor stumps for regrowth, and treat stumps as needed.
7. Monitor level of sediment in sediment basins, ditch checks, and other sediment control structures and remove sediment as needed to maintain capacity.



cc: Clint Reents, Director, Rural Iowa SLF (electronic copy)
Madelynn Austin, IDNR Field Office #2 (electronic copy)

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Rural Iowa Sanitary Landfill		
NPDES Tracking No.	Authorization # 20269-20041		
Date of Inspection	October 2, 2025	Start/End Time	9:00 AM/Noon
Inspector's Name(s)	Douglas J. Luzbetak, P.E.		
Inspector's Title(s)	Project Manager		
Inspector's Contact Information	HLW Group, PO Box 314, Story City, IA 50248, (515)733-4144		
Inspector's Qualifications	Professional Engineer, project manager at the site since 1995		
Weather Information			
Weather at time of this inspection? <input checked="" type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: 70's			
Have any previously unidentified discharges of pollutants occurred since the last inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe:			
Are there any discharges occurring at the time of inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Minimal discharge of clear water from lower sediment basin			

Control Measures

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Terrace system on closed landfill	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
2	Lower Sediment Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Accumulated sediment was removed in 2023. Outlet pipe was replaced by landfill staff in 2024.
3	Upper Sediment Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	A portion of the accumulated sediment was removed in 2024
4	SE Detention Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Sediment storage area was enlarged, outlet pipe replaced, and stoplog structure installed on the outlet pipe in 2024.
5	Tile and intakes (S of Trench 1 and 2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	One intake removed during Trench 3 Expansion project and tile outlet rerouted to SE Detention Basin (Item 4).
6	Rubble ditch checks (E of closed area)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
7	Rubble ditch checks (W of closed area)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
8	W Sediment Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
			<input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
9	Rubble ditch checks (W of Trench 1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2	Equipment operations and maintenance areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3	Fueling areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4	Waste handling and disposal areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Retrieve windblown litter
5	Erodible areas/construction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Monitor intermediate cover and soil stockpiles for erosion
6	Dust generation and vehicle tracking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	No tracked litter or mud was noted at landfill entrance/exit
7	Leachate Tank Loadout	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

None.

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Monitor seeded areas in the closure cap for growth. Continue to seed the intermediate cover of the Horizontal Expansion Area as needed.

Remove accumulated sediment from ditch west of Phase 1 and north of Phases 1 and 2.

Monitor site erosion and repair as necessary.

Monitor site vegetation and repair as necessary.

Notes

Use this space for any additional notes or observations from the inspection:

The annual stormwater sample for 2025 was collected on 6/3/25.

We discussed sediment removal from the upper sediment basin in 2026.

Continue to remove silt fence posts in areas where vegetation is established.

The SPPP and mapping was updated in January 2025 to reflect the completion of the Trench 3, Phase 2 project and personnel changes on site. The SPPP will be updated again to reflect changes in site personnel.

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Douglas J. Luzbetak, PE

Signature:  Date: 10/8/25