

October 13, 2025

Mr. Brad Davison
Environmental Specialist
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – FALL 2025
MONONA COUNTY SANITARY LANDFILL
IDNR PERMIT #67-SDP-01-75P
HLW PN 6036-23A.750**

Dear Mr. Davison:

In accordance with the General Provisions of the SDP Closure Permit dated January 19, 2016, a semi-annual inspection of the Monona County SLF was personally conducted the morning of October 7, 2025 with the results being discussed with Logan Persinger, Manager, after the inspection. Conditions at the time of the inspection were clear and calm with temperatures in the 50's.

The landfill stopped accepting waste as of November 1, 2014 and the landfill closed with a 4' soil cap in accordance with the approved closure/postclosure plan. Construction of the closure cap was completed on September 14, 2015. Terraces, letdown piping, and seeding were also included in the closure project. A Quality Control and Assurance Report/Closure Compliance Report was submitted to IDNR on September 23, 2015 (Doc #84296). This document was approved in Special Provision X.2.c of the SDP Closure Permit dated January 19, 2016. A notification was filed and recorded with the Monona County Recorder on September 9, 2015 to notify potential future purchasers of the property that the land was once used as a landfill facility. A copy of the notification was included in the report referenced above.

Status of the Permit

The Sanitary Disposal Project Closure Permit for the Monona County SLF was issued on January 19, 2016. The facility has received the following amendments to the Permit to date:

- Permit Amendment #1, May 3, 2016, incorporates the Construction Documentation Form and Boring Log for MW-3R, as well as the Well Plugging Record for MW-3 into the permit documents.
- Permit Amendment #2, July 13, 2017, incorporates the Abandoned Water Well Plugging Record forms for MW-2, PZ-2, MW-8, and PZ-8 into the permit documents. It also acknowledges the inability to locate temporary groundwater monitoring well TMW-1.
- Permit Amendment #3, March 26, 2019, 1) authorizes the permit holder to discontinue sampling and analysis as required by 567 IAC 114.26(4)"d" and conduct sampling and analysis for total recoverable metals; 2) authorizes the temporary suspension of sampling for indicator parameters in accordance with 114.26(4)"e" and "f"; 3) reduces the frequency of routine site inspections from

monthly to semiannually; and 4) reduces the frequency of leachate head measurements from monthly to quarterly.

- Permit Amendment #4, August 2, 2019, 1) eliminates the requirement to install a third downgradient water table monitoring well; and 2) changes MW-3R and MW-4 from downgradient monitoring points to background monitoring points.
- Un-numbered Permit Amendment, January 16, 2020, requires the Annual Water Quality Report (AWQR) to be submitted in the new IDNR format by the designated AWQR submittal date in 2021.

IDNR approved a variance to IAC 114.26(4)d, e, and f on March 25, 2019 to discontinue collection of filtered samples and conduct sampling and analysis for total recoverable metal in its place. This variance was incorporated into the SDP Closure Permit in Permit Amendment #3.

IDNR approved a variance to IAC 567-114.22(2) on August 2, 2019 to reduce the number of downgradient monitoring wells required to two (three are required by rule). This variance was incorporated into the SDP Closure permit in Permit Amendment #4.

Annual Water Quality Report

The 2024 Annual Water Quality Report (AWQR) was received by IDNR on November 20, 2024 (Doc #111402). IDNR comments on the AWQR were received on January 23, 2025. The IDNR letter acknowledged that MW-4 was not sampled in the fall of 2024 due to unfavorable conditions. MW-4 was sampled during the routine spring 2025 sampling event conducted on April 1, 2025.

Monitoring Well Maintenance Performance Reevaluation Plan

The most recent Monitoring Well Maintenance Performance Reevaluation Plan (MWMPRP) was submitted to IDNR for review on May 10, 2024 (Doc #110033). The report recommended no changes to the monitoring well system or the Hydrologic Monitoring System Plan. As per IDNR Regulations, the MWMPRP is required every 5 years.

Financial Assurance

The 2025 Financial Assurance Documentation was received by IDNR on January 28, 2025 (Doc #112054) and approved on March 4, 2025 (Doc #112441).

Special Provisions

1. The 30 year closure/postclosure period began on January 19, 2016.
2. The site will be maintained in accordance with the closure permit.
3. The Spring groundwater sampling was completed on April 1, 2025. The Fall sampling has not been conducted to date.
 - a. Samples are collected from MW-1, MW-3R, MW-4, MW-5, and MW-7.
 - b. Water levels are measured at LW-1, PZ-1A, PZ-4, PZ-5, and PZ-7

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- c. Addressed by Permit Amendment #1 (Doc #86174)
 - d. Sampling is completed in accordance with Permit Amendment #4 and the AWQR comment letter dated March 16, 2023.
 - e. No change.
 - f. No change.
4. As per this provision, monthly inspections of the site are required for the first year after issuance of the Closure Permit at a minimum. Permit Amendment #3 reduced the inspection frequency from monthly to semi-annually.
5. Diversion and drainage systems were damaged by a large rain event shortly after completion of the closure cap. Significant repairs have been made to the ditch checks east of the closure area. There is still some erosion present in the upper ditch checks, but the ditch between the ditch checks is well vegetated and appears stable. Repairs to the cap have been documented in past inspection reports. Erosion repair will continue as needed. Diversion and drainage systems are also discussed under “Additional Comments” below.
6. The vegetative cover is continuing to improve. Staff continues to re-seeded portions of the cap where vegetation was previously damaged or where erosion repairs have been made and vegetation is becoming established. Volunteer tree removal was conducted in 2024 and is on-going with a few cottonwood saplings noted on the cap during the inspection. Vegetative cover is discussed in more detail under “Additional Comments” below.
7. Refer to Items 5 and 6.
8. The frequency of explosive gas monitoring was reduced to semi-annually in accordance with the June 13, 2024 IDNR letter. Explosive gas monitoring is conducted by HLW during the April and October groundwater sampling events. Results will be included in the AWQR.
9. a. The facility does not have a leachate control system.
- b. Leachate was measured by HLW staff in LW-1 on April 1, 2025. The measured leachate thickness was 0.1 ft. LW-1 will be measured next during the Fall, 2025 sampling event.
- c. The frequency of leachate level measurements has been reduced to semi-annually in accordance with the June 13, 2024 IDNR letter.
- d. No change.
10. The ERRAP submitted and dated November 2011 is still generally applicable to the closed facility.

Based on observations during the inspection the facility appears to be operating in general conformance with the closure permit.

Additional Comments

The tile blowout just below the crest of the northern most terrace southwest of LW-1 noted during the Spring, 2025 inspection has been repaired by staff. The repair area was reviewed during the inspection with no additional damage observed.

The top of the steel casing at MW-3R was damaged during vegetation removal earlier this year. The well and casing are still intact but the well cannot be locked.

The landfill staff continues to make repairs to erosion rills in the erosive layer as needed.

A well vegetated historic rill was noted on the northwest slope of the cap at the approximate location shown on the attached figure. The rill is well vegetated and based on the condition of vegetation in this area, the rill does not appear to be active. No waste is exposed in the rill.

A vegetated rill was noted below the eastern most terrace due west of MW-4. The rill appears stable and no waste was exposed.

Ditches were free of debris and were draining as intended.

Portions of the landfill cap were mowed in 2025.

IDNR conducted a permit compliance inspection of the landfill on October 29, 2024. The site was described as having no ponded water and strong vegetation. No deficiencies were noted. A letter was issued to the facility on November 6, 2024 (Doc #111297).

Recommendations

1. Repair the top of the steel casing of MW-3R so the well can be locked.
2. Continue to remove trees and saplings on the cap and in the drainage ways.
3. Continue to monitor vegetative rills and repair as necessary.
4. Continue to remove accumulated sediment from sediment basin, terrace channels, and drainage ways as needed.
5. Continue to monitor diversion and drainage systems and repair as necessary.



cc: Logan Persinger, Manager, Monona County Landfill (electronic copy)

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