

October 15, 2025

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



**RE: SEMI-ANNUAL INSPECTION REPORT – FALL 2025  
GRUNDY COUNTY SANITARY LANDFILL (CLOSED)  
IDNR PERMIT NO. 38-SDP-01-75P  
HLW P.N. 6033-24A.750**

Dear Mr. Davison,

In accordance with Special Provision X.6 of the SDP Permit dated August 27, 2008, a semi-annual inspection of the Grundy County Sanitary Landfill was conducted the morning of October 9, 2025. The results of the inspection were discussed with Mr. Chad Brown, Manager, upon completion. Conditions at the time of the inspection were sunny with a light breeze and temperatures in the low 70's.

#### **Status of the Permit**

The Grundy County Sanitary Landfill Closure Permit was issued on August 27, 2008. The facility has received the following amendments to the Permit to date:

- Permit Amendment #1, November 18, 2011, approved the Landfill Closure Compliance Report (December 29, 2008 – Doc #35361) and the Landfill Closure Compliance Comments (November 2, 2011 – Doc #67468).
- Permit Amendment #2, August 28, 2012, approved the variance for changes to the HMSP to conduct groundwater monitoring in accordance with IAC 567-113.10(4) and 113.10(5).
- Permit Amendment #3, February 28, 2013, added MW-16, MW-17, MW-18, and MW-19 (which had been inadvertently omitted) to the HMSP.
- Unnumbered Permit Amendment, May 22, 2013, eliminated the requirement to submit a Semiannual Water Quality Report.
- Unnumbered Permit Amendment, July 10, 2014, required a review of total suspended solids (TSS) and turbidity testing. Sampling procedures have been modified to address this amendment, and a letter discussing TSS and field turbidity measurements was submitted on March 24, 2015 (Doc #82785). IDNR concurred with the TSS/field turbidity correlation in the letter dated May 20, 2015.
- Permit Amendment #4, May 20, 2015, approved the Monitoring Well Construction Documentation Form for MW-15A submitted on October 12, 2013 (Doc #78336) and sampling for the full Appendix II list once every five years at monitoring points that are in assessment monitoring and have had at least two rounds of analysis using the entire Appendix II list.
- Permit Amendment #5, June 6, 2017, incorporated the installation records of gas probes GP-1 and GP-2 which were submitted on May 22, 2017 (Doc #89537).
- In correspondence dated February 8, 2018 (Doc #91476), IDNR rescinded the requirement to prepare an Assessment of Corrective Measures (ACM) Report based on the water quality at the site.

- In correspondence dated February 8, 2018 (Doc #91476), IDNR approved the suspension of sampling at three (3) monitoring wells (MW-16, MW-17, and MW-19) based on the water quality at the site.
- Revised Closure Permit, May 16, 2022, approved annual monitoring well sampling.
- Revised Closure Permit, January 23, 2023, approved semi-annual gas monitoring at the subsurface gas points (GP-1 through GP-8) and at the Equipment Building and the Recycling Building.
- Revised Closure Permit, September 28, 2023 (Doc #107802), approved a reduced list of monitoring wells to sample (MW-15A (background), MW-9, MW-11, MW-13, and MW-14). The Revised Closure Permit also approved a semi-annual frequency of leachate well measurements.

### **Special Provisions**

1. The thirty (30) year post closure period began on August 27, 2008.
2. The site was closed in accordance with the approved Closure/Postclosure Plan. Closure construction activities were completed by August 2008.
3. All waste disposal ceased prior to October 1, 2007. Landfilling was replaced by direct haul to other approved facilities and an on-site Citizens Convenience Center. The Convenience Center was operational on October 1, 2007.
4. The closure documentation required by this Special Provision was submitted and approved by IDNR in Permit Amendment #1 dated November 18, 2011.
5. All of the monitoring wells observed during the inspection were locked and in good condition. The most recent annual groundwater sampling was completed on October 9, 2025.
6. Formal inspections of the closed landfill are completed semi-annually, with a report submitted to IDNR.
7. All drainage and diversion systems on the landfill were observed to be in good condition.
8. Vegetative cover on the majority of the landfill cap is in excellent condition. A few areas with sparse vegetation were noted on the west slope above the borrow pit pond during the Spring 2025 inspection. The areas near PZ1 and PZ2 are bare to sparse vegetation, however no erosion is noted. The approximate locations of the sparse areas are shown on the attached Figure. Saplings have been mowed recently in the northwest, west side, and in the ditch on the east side near the leachate loadout. Mr. Brown indicated he plans to do additional mowing to control saplings this fall.
9. No significant erosion rills were noted. The vegetation in the terrace channels does not show signs of long-term ponding. The historic area of erosion along the service road to the top of the landfill (repaired) has been monitored routinely for several years and is now considered stable. A narrow (8 inches wide by 8 inches deep) rill was observed at the top of slope immediately west of the leachate

holding tank in October, 2022. Mr. Brown repaired the rill in late 2022 by filling the rill with 1-inch diameter gravel. Vegetation adjacent to the rock is in excellent condition. The approximate location of each of these repaired areas is shown on the attached Figure.

10. The integrity of the final cover is being maintained.
11. Methane monitoring in the site buildings and the eight subsurface probes is conducted semi-annually in accordance with the Revised Closure Permit. Results will be included with the Annual Water Quality Report.
12. The permit holder is conditionally exempt from providing a leachate collection system.
13. The retrofit water collection system was installed in 1994 and 1995 to eliminate leachate seeps. The system appears to be performing as designed. Improvements were made to the leachate loadout system in 2018. A Leachate Control System Performance Evaluation Report will be included with the Annual Water Quality Report.

The leachate lines were cleaned on August 17, 2023. As per IDNR regulations, the lines should be cleaned every 3 years (next cleaning will be tentatively scheduled for 2026).

14. Maintenance on the landfill Ecolotree Cap is continuing. Maintenance includes removing dead trees and volunteer tree removal. Only 3 trees remain on the Ecolotree Cap. This portion of the cap was mowed in 2024 to control saplings. Mr. Brown is planning to remove the southern most tree himself and indicated he would like to remove the other two trees but would require professional help to safely cut those trees down.
15. The site has closed since the Emergency Response and Remedial Action Plan (ERRAP) was completed; however, the majority of the ERRAP is still applicable to the closed landfill. The Citizens Convenience Center, which is located on the closed landfill property, also has an ERRAP.

Based on observations during the inspection, along with discussions with Landfill personnel, the facility appears to be in general conformance with the Closure Permit.

### **Annual Water Quality Report**

The 2024 Annual Water Quality Report (AWQR) was received by IDNR on December 19, 2024 (Doc #111520). A trend analysis was submitted on December 23, 2024 (Doc #111532) in response to the July 11, 2024 IDNR comment letter on the 2023 Annual Water Quality Report. IDNR comments on the AWQR and the trend analysis were received on February 19, 2025. The IDNR comment letter denied the request to proceed with an Environmental Covenant. HLW Engineering provided a follow up letter (Doc #112923) on April 23, 2025 in support of the EC, no response has been received to date.

## **Financial Assurance**

Documentation for 2025 Financial Assurance was received by IDNR on March 13, 2025 (Doc #112409). The 2025 Financial Assurance documentation was approved by IDNR on March 17, 2025 (Doc #112564).

## **Additional Comments**

As a result of an inspection on August 21, 2025, IDNR Field Office (FO) #2 issued a Notice of Violation (NOV) – Leachate Overflow on September 3, 2025. Mr. Brown responded to the NOV via email on September 26, 2025 with his responses summarized below:

### Recommendations:

1. Install a high-water alarm or other automated system on the south manhole to prevent future overflows. Staff is looking into a high level alarm system. No evidence of further leachate overflow was noted during the HLW inspection on October 9, 2025.
2. Request an increase the current limits with the City of Grundy Center or obtain a treatment agreement with a second City for additional flexibility in leachate disposal. Waterloo has agreed to accept leachate during high flow events. Staff has also contacted Dike.

### Requirements:

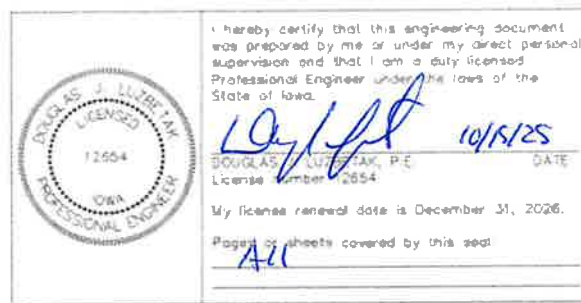
1. Remove the tress from the landfill cap to prevent damage to the cap... Staff is planning to remove trees with the exception of two larger trees that are located closer to landfill infrastructure. A tree removal service will be contacted for the removal of those trees.
2. Take action to prevent additional overflows of the leachate collection system... Waterloo has agreed to accept leachate during high flow events. Staff has also contacted Dike.
3. Ensure that the monthly leachate sample is measured for biochemical oxygen demand... The lab has been contacted and the monthly sample will be monitored for BOD rather than CBOD.
4. Ensure that the monthly leachate sample is taken on a day that leachate is hauled to the City... Staff will take the monthly leachate sample on a day that leachate is being hauled.
5. Ensure that the pH of the leachate sample is measured within 15 minutes of collection... A pH meter has been purchased to allow immediate pH measurement at the landfill when the monthly sample is obtained.

The SDP Permit for the Citizens Convenience Center was renewed August 29, 2025 (Doc #113764).

This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report 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. Remove dead trees and volunteer trees from Ecolotree project at north end of landfill cap when necessary.
2. Continue to routinely mow the willow saplings located on the cap in the southwest corner of the site north of MW-5, and along the east side of the landfill near the leachate loadout area.
3. Monitor the areas where vegetation is noted as sparse. If vegetation continues to decline in these areas take other action to improve the areas.
4. Continue to monitor the erosion repairs along the service road and at the top of slope located west of the leachate tank.
5. Continue to monitor vegetation and erosion and repair as necessary.
6. Continue to monitor diversion and drainage systems and repair as necessary.



cc: Karl Strohhahn, Chair, Grundy County Landfill Commission (electronic copy)  
Chad Brown, Grundy County Landfill (electronic copy)



