

October 30, 2025

Brian L. Rath, P.E.
Environmental Engineer Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – FALL, 2025
CEDAR RAPIDS WPCF ASH MONOFILL
IDNR PERMIT #57-SDP-07-85P
HLW PN 3422-24A.750**

Dear Mr. Rath:

In accordance with the General Provisions of the SDP Permit dated January 9, 2025, a semi-annual inspection of the Cedar Rapids WPCF Ash Monofill was personally conducted the morning of October 21, 2025. Jason Decker, Utilities Environmental Manager with the City of Cedar Rapids, accompanied me on the inspection. Conditions at the time of the inspection were overcast with strong winds, light rain, and temperatures in the 50's.

The monofill consists of two approved ash sludge disposal areas: the North 1 Disposal Area and the North 2 Disposal Area. The North 2 Disposal Area was been approved for waste deposition in the IDNR email dated October 8, 2025 (Doc #114436); however, no ash sludge has been directed to the North 2 Disposal Area as of the date of the inspection.

The South Disposal Area has been closed in accordance with the Closure/Post Closure Plan. All ash was exhumed and all infrastructure associated with the South Disposal Area was removed. Documentation on the removal was included in the Construction Quality Assurance Report – North 2 Lagoon Construction, North 1 Lagoon Repairs, and South Disposal Area Removal that was submitted to IDNR on September 25, 2025 (Doc #114440). This report will be referred to as CQA Report throughout the remainder of this document.

As per WPCF staff, since the beginning of 2024 ash disposal has been directed into the disposal areas as follows:

- North 1 Disposal Area from November 15, 2023 to May 10, 2024
- South Disposal Area from May 10, 2024 to July 16, 2024
- North 1 Disposal Area from July 16, 2024 to October 16, 2024
- South Disposal Area from October 16, 2024 to November 22, 2024
- North 1 Disposal Area from November 22, 2024 to February 26, 2025
- South Disposal Area from February 26, 2025 to June 3, 2025.
- North 1 Disposal Area from June 3, 2025 to present.

Ash removal since the Fall, 2024 semi-annual inspection has been as follows:

- Approximately 557 dry tons of ash removed, North 1 Disposal Area, November, 2024
- HLW Engineering Group, 204 West Broad Street, P.O. Box 314, Story City, Iowa 50248
(515) 733-4144 ◇◇◇ (515) 733-4146 Fax

- Approximately 1,976 dry tons of ash removed, South Disposal Area, December, 2024
- Approximately 1,379 dry tons of ash removed, South Disposal Area, January, 2025
- Approximately 380 dry tons of ash removed, North 1 Disposal Area, March, 2025
- Approximately 2,423 dry tons of ash removed, South Disposal Area, June, 2025

Mr. Decker reported that the incinerator will be shutdown starting on October 22, 2025. The shutdown is expected to last for 10 days.

Dewatered ash is hauled to the Lee Crawford Quarry for beneficial use under Beneficial Use Determination (BUD) Authorization No. 57-BUD-23-97. This BUD is effective through January 2, 2027. Adequate capacity remains in the North Disposal Areas for current operations.

Status of the Permit

The Sanitary Disposal Project Permit for the Cedar Rapids WPCF Ash Monofill was renewed on January 9, 2025 and expires on January 9, 2028. The site has received the following permit amendments to date:

- Permit Revision #1, January 23, 2025, updated General Provision IX of the permit to require online submittal of tonnage reports.

Annual Water Quality Report

The 2024 Annual Water Quality Report (AWQR) was submitted to IDNR on December 16, 2024 (Doc #111490). IDNR comments on the 2024 AWQR were received in the email dated September 1, 2025 (Doc #114094). The IDNR response required an “implementation plan” including when “statistical analysis and conclusions related to water quality are expected to commence for each well” to be provided in the 2025 AWQR.

A request was submitted to IDNR via email on May 16, 2025 (Doc #113081) to change the Hydrologic Monitoring System Plan (HMSP) from requiring sampling and water level monitoring in “April and October” to “semi-annually”. IDNR approved this change via email on May 16, 2025 (Doc #113083).

As per Special Provision X.4 of the SDP Permit, MW-1, MW-4, MW-23, and MW-26 were abandoned in conjunction with the North 2 Disposal Area project. MW-24 was also mistakenly abandoned and was replaced with MW-24R1. Monitoring well abandonment documentation for MW-1, MW-4, MW-23, MW-24, and MW-26 was submitted to IDNR on March 26, 2025 (Doc #112610). Monitoring well installation documentation for MW-24R1 was submitted to IDNR on May 23, 2025 (Doc #114487).

As per the SDP Permit, MW-2, MW-3R1, MW-22, and MW-24 (replaced with MW-24R1) can be abandoned after the South Disposal Area is removed and if constituents are below the groundwater protection standard. MW-2 and MW-24R1 tested below the applicable groundwater protection standards during testing on June 30, 2025 so abandonment of these points could proceed based on the requirements of the SDP Permit. Documentation was submitted to IDNR on September 8, 2025 (Doc #113805) supporting the abandonment of MW-3R1 and MW-22, IDNR approved the



abandonment of these points in the email dated September 15, 2025 (Doc #113941).

Monitoring well abandonment documentation for MW-2, MW-3R1, MW-22, and MW-24R1 was submitted to IDNR on September 30, 2025 (Doc #114319).

In the email dated October 17, 2025 (Doc #114502), IDNR raised questions on both the MW-24R1 well installation documentation as well as the MW-2, MW-3R1, MW-22, and MW-24R1 well abandonment documentation. An email response to the questions regarding the well abandonment documentation was submitted to IDNR on October 30, 2025. A response to the questions regarding the well installation documentation has not been submitted to date.

When the installation/abandonment of the wells is completed, a request to make revisions to the HMSP will be submitted to IDNR. It is anticipated that this request will be included in the 2025 AWQR.

Monitoring Well Maintenance Performance Reevaluation Plan

The most recent Monitoring Well Maintenance Performance Reevaluation Plan (MWMPRP) was included in the 2024 AWQR submitted to IDNR on December 16, 2024 (Doc #111490). The Plan recommended no significant modifications to the Hydrologic Monitoring System Plan (HMSP) or site monitoring wells; however, significant changes to the HMSP are anticipated later this year due to the completion of the current construction activities. As per IDNR Regulations, the MWMPRP is required every 5 years.

Financial Assurance

2025 Financial Assurance documentation was submitted to IDNR on January 14, 2025 (Doc #111836) and approved by IDNR on March 27, 2025 (Doc #112619).

Special Provisions of the SDP Permit

1. The permit holder is authorized to accept sewage sludge incinerator ash slurry from the Cedar Rapids WPCF for storage and dewatering prior to disposal.
2.
 - a) Revise to remove disposal approval for South Disposal Area, add approval of disposal in North 2 Disposal Area.
 - b) No changes.
 - c) Results from TCLP testing of the ash in accordance with this provision were included in the 2024 SDP Permit Renewal documentation submitted to IDNR on July 14, 2024 (Doc #110268). TCLP test results for the ash are also submitted to IDNR in accordance with the BUD Authorization.
 - d)-j) No changes.

3. No changes.
4. Update the HMSP when all wells are installed/abandoned..
5. No changes.
6. No changes.
7. Revise to add closure documentation for the South Disposal Area.

Based on observations during the inspection, along with discussions with Mr. Decker, the facility appears to be in general conformance with the SDP Permit.

Additional Comments

Depressions were noted under the leachate and seepage cleanout pipes at the top of the slope on each side of the North 2 Disposal area. Based on the appearance of the area the contractor is planning to do additional work on the exterior of the North 2 Disposal area including filling these depressions.

The flexible membrane liner in the anchor trench on the north perimeter of the North 1 Disposal Area was damaged during construction activities associated with the North 2 Disposal Area. IDNR was notified of the damage. The repairs were documented in the QCA Report.

IDNR Field Office #1 completed the New Cell Inspection Checklist for the North 2 Disposal Area on July 1, 2025 (Doc #113342).

Leachate lines were cleaned in July, 2024 (North 1 Disposal Area). As per the 3 year cleaning frequency required by IDNR the lines should be cleaned in 2027.

As reported in past AWQR's, elevated levels in the leachate head monitoring point in the North 1 Disposal Area have historically been recorded. All measurements in the leachate head monitoring point in 2025 have been less than 12". The 2024-2025 measurements are attached. No material has been deposited in the North 2 Disposal area as of the date of the inspection so monthly leachate measurements have not commenced.

Recommendations

1. Fill in the depressions under the leachate and seepage cleanout pipes at the top of the slope on both sides of the North 2 Disposal Area.
2. Respond to the IDNR email dated October 17, 2025 regarding the well installation documentation for MW-24R1.
3. Request revisions to the HMSP upon completion of well installation/abandonment.
4. Include an implementation plan in the 2025 AWQR.
5. Continue operations in accordance with the SDP Permit.



cc: Jason Decker, Utilities Environmental Manager, Cedar Rapids WPCF (electronic copy)

Ash Lagoon Underdrain Level Measurements
City of Cedar Rapids Water Pollution Control Facilities

Date	Time	South Ash Lagoon			North Ash Lagoon Leachate
		Ground Water	Collection Pipe	Drainage Media	
1/2/2024	8:59	0.9'	0.4'		0.8'
2/1/2024	14:40	0.2'	0.3'		1.1'
3/1/2024	8:42	0.3'	0.2'		0.5'
4/1/2024	10:29	0.6'	0.5'		0.6'
5/1/2024	9:48	0.5'	0.4'		0.8'
6/5/2024	8:24	0.4'	0.3'		0.6'
7/1/2024	9:06	0.5'	0.4'		0.6'
8/1/2024	11:42	0.4'	0.3'		
8/7/2024	12:17				0.8'
9/5/2024	10:11	0.9'	0.4'		0.9'
10/1/2024	8:26	0.9'	0.5'		0.8'
11/1/2024	9:50	0.7'	0.5'		0.7'
12/2/2024	9:35	0.7'	0.2'		0.9'
1/2/2025	9:51	0.9'	0.4'		0.9'
2/10/2025	13:49	0.9'	0.6'		0.5'
3/3/2025	9:24	0.7'	0.3'		0.9'
4/1/2025	9:31	0.6'	0.3'		0.9'
5/1/2023	14:39	0.4'	0.7'		0.9'
6/2/2025	8:55	0.6'	0.4'		0.8'
7/1/2025	14:15	*South lagoon being demo'd, underdrain pipes removed.			0.9'
8/1/2025	9:14				0.8'
9/8/2025	9:14				0.9'
10/1/2025	8:23				0.9'