

October 31, 2025

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



**RE: REDUCTION OF INSPECTION FREQUENCY – SPECIAL PROVISION
X.6
CASS COUNTY SANITARY LANDFILL - CLOSED
PERMIT NO. 15-SDP-01-75C
HLW PN 6055-24A.200**

Dear Mr. Davison:

By virtue of this letter, HLW Engineering on behalf of the Cass County Environmental Control Agency is requesting a permit amendment to reduce the frequency of inspections required by Special Provision X.6 of the Closure Permit.

Construction of the Subtitle D Composite cap at the Cass County Sanitary Landfill was completed in 2023 with issuance of the Closure Permit on December 5, 2023. As noted in past inspection reports by IDNR Field Office #4 and HLW Engineering, vegetation emergence was poor on the Subtitle D Composite cap. The cap was reseeded in August of 2024 and the vegetation showed marked improvement during 2025. As detailed in the Fall, 2025 inspection report, repairs of vegetation and erosion on the Subtitle D Composite cap (as well as the cap in the unlined closed area) have been completed over the past two years and conditions on the majority of the closure cap are now relatively stable.

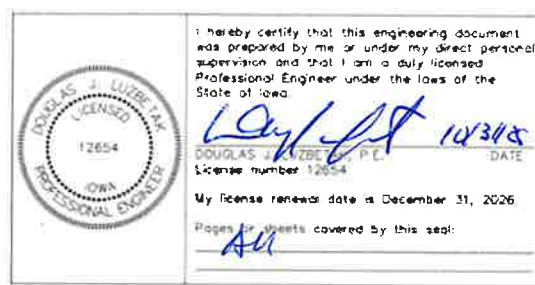
Due to the reseeding operations and the continued improvement of vegetation on the Subtitle D Closure Cap, a request was submitted to IDNR on January 2, 2025 (Doc #111600) to suspend monthly inspections of the Subtitle D Closure Cap through the winter months and reduce the frequency to bimonthly beginning in April 2025. IDNR approved the request on January 7, 2025 (Doc# 111726).

The site has been inspected either monthly or bimonthly since issuance of the closure permit (Special Provision X.6 requires monthly inspections for the first year after issuance of the closure permit) with a few exceptions. The dates of the site visits have been documented in past semi-annual engineering inspection reports.

HLW Engineering personnel will continue to conduct semi-annual inspections at the facility. A report will be generated from each inspection containing general observations about the site with the submittal of the semi-annual inspection reports to IDNR as per the General Provisions of the Closure Permit. The results of the inspections will also be discussed with Cass County Environmental Control Agency personnel during the site visits. Agency personnel will continue to provide site maintenance or will retain outside contractors as needed.

Special Provision X.6 of the Closure Permit allows a reduction in the frequency of inspections if the permit holder “provides justification that the monthly inspections are no longer necessary to ensure proper maintenance of the site.” In accordance with Special Provision X.6 of the Closure Permit, the information provided in this letter, observations in the semi-annual inspection reports, and the improving stability and condition of the cap provide justification that monthly or bimonthly inspections are no longer needed at the Cass County SLF.

Thank you for your consideration of this request, and please let me know if you have any questions or need any additional information.



cc: Chris Jahnke, Director, Cass County Environmental Control Agency (electronic copy)