November 25, 2025

DAVID RANDALL
REGIONAL ENVIRONMENTAL IMPROVEMENT COMMISSION OF IOWA COUNTY
3369 HWY 6 TRAIL
HOMESTEAD, IA 52236

RE: Iowa County Sanitary Landfill
Permit No. 48-SDP-02-79
Beneficial Use Determination for Alternative Daily Cover (Document No. 114836)
Permit Revision – Amendment No. 10

Dear Mr. Randall:

Enclosed is the permit revision for the permit originally issued on January 18, 2022, for the Iowa County Sanitary Landfill. The Iowa Department of Natural Resources (DNR) issues this permit revision for the use of boiler ash from the University of Iowa Power Plant in Iowa City, Iowa as alternative daily cover.

The permit must be kept with the approved plans at the sanitary disposal project in accordance with the recordkeeping and reporting requirements of Iowa Administrative Code 567 subparagraph 113.11(1) (567 IAC 113.11(1)). Please review this permit with your operators, as they must become familiar with it. Note that the permit contains conditions that require a response or action by you, which if not properly complied with, may prompt enforcement action by the DNR.

If you have any questions, please contact me at (515) 229-8356 or mike.smith@dnr.iowa.gov.

Sincerely,

Michael W. Smith

Digitally signed by Michael W. Smith
Date: 2025.11.25 09:30:57 -06'00'

Michael W. Smith, P.E.
Environmental Engineer Senior

Enclosure

cc: Douglas J. Luzbetak, P.E.
HLW Engineering Group
204 West Broad Street
P.O. Box 314
Story City, IA 50248

John Gahring
Regional Environmental Improvement Commission
3369 Hwy 6 Trail
Homestead, IA 52236

DNR Field Office #6, Washington

IOWA DEPARTMENT OF NATURAL RESOURCES
SANITARY DISPOSAL PROJECT PERMIT

I. Permit Number: 48-SDP-02-79P

II. Permitted Agency: Regional Environmental Improvement Commission of Iowa County

III. Project Location: The E 1/2 of the SE 1/4, the S 1/2 of the NW 1/4 of the SE 1/4, and the E 1/2 of the SW 1/4 of the SE 1/4; all in Section 1, T80N, R9W, Iowa County, Iowa;

With the exception of the parcel of land described as follows:

Commencing at the S 1/4 corner of Section 1, T80N, R9W, Iowa County, Iowa, thence N86°13'12"E, along the S line of the SE 1/4 of Section 1, a distance of 662.93 ft to the SW corner of the E 1/2 of the SW 1/4 of the SE 1/4 of said Section 1; thence N00°22'42"W, along the W line of said E 1/2 of the SW 1/4 of the SE 1/4, 682.79 ft. to the point of beginning; thence continuing N00°22'43"W, along said W line, 350 ft; thence N89°37'17"E, 350 ft; thence S00°22'43"E, 350 ft; thence S89°37'17"W, 350 ft to said point of beginning, containing 2.81 acres.

IV. Responsible Official

Name:	David Randall, Director
Address:	Regional Environmental Improvement Commission of Iowa County 3369 HWY 6 Trail Homestead, Iowa 52236
Phone:	319-828-4943
Email:	randall.iacolandfill@gmail.com

V. Licensed Design Engineer

Name:	Douglas J. Luzbetak, P.E.
Address:	HLW Engineering Group 204 West Broad Street P.O. Box 314 Story City, Iowa 50248
Phone:	515-733-4144
Email*:*	dluzbetak@hlwengineering.com
Iowa License Number:	12654

VI. **Date Permit Issued:** **January 18, 2022**
Date Permit Revised: **November 25, 2025, Amendment No. 10**

VII. **Permit Expiration Date:** **February 7, 2027**

VIII. **Issued by:** Michael W. Smith Digitally signed by Michael W. Smith Date: 2025.11.25 15:25:01 -06'00'

Iowa Department of Natural Resources

IX. **General Provisions**

The above named permitted agency is hereby authorized to operate a sanitary disposal project at the described location in conformance with Iowa Code section 455B, the rules pursuant thereto existing at the time of issuance, and any subsequent new rules which may be duly adopted, and any provisions contained in Section X of this permit.

The issuance of this permit in no way relieves the applicant of the responsibility for complying with all other local, state, and federal statutes, ordinances, and rules or other requirements applicable to the establishment and operation of this sanitary disposal project.

No legal or financial responsibility arising from the construction or operation of the approved project shall attach to the State of Iowa or the Department of Natural Resources (DNR) due to the issuance of this permit.

If title to this project is transferred, the new owner must apply to the DNR for a transfer of this permit within thirty days of the date of title transfer pursuant to subrule 113.4(3). This permit is void sixty days after the date of title transfer unless the DNR has transferred the permit.

The permit holder shall file a Quarterly Solid Waste Fee Schedule and Retained Fee Report utilizing the DNR's Form 542-3276 and remit tonnage fee payment, as applicable, for all wastes disposed at the sanitary disposal project in accordance with Iowa Code section 455B.310. The Reports will be due January 1, April 1, July 1 and October 1 for the quarters ending September 30, December 31, March 31 and June 30, respectively. The permit holder shall mail the completed report to the Solid Waste Section, Wallace State Office Building, 502 East Ninth Street, Des Moines, Iowa 50319. This reporting procedure supersedes any previous conflicting permit provisions.

The permit holder shall weigh all solid waste collection vehicles and solid waste transport vehicles on a scale certified by the Iowa Department of Agriculture and Land Stewardship. If conditions are such that make it impractical to provide an on-site scale, then off-site scale facilities may be used if justified and approved by the DNR. The permit holder shall comply with the waste weighing, record keeping and tonnage fee reporting requirements defined in rule 101.14(455B,455D). The scale weighing facilities shall comply with the certification and licensing requirements of the Iowa Department of Agriculture and Land Stewardship at all

times. The permit holder shall maintain a current copy of the weighing scale facility licensing certificate issued by the Iowa Department of Agriculture and Land Stewardship at all times.

The permit holder shall ensure that the sanitary disposal project does not (1) cause a discharge of pollutants into waters of the United States, including wetlands, that violates any requirements of the Clean Water Act, including, but not limited to, the National Pollutant Discharge Elimination System (NPDES) requirements, pursuant to Section 402 of the Clean Water Act, and (2) cause the discharge of a nonpoint source of pollution into waters of the United States, including wetlands, that violates any requirement of an areawide or statewide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act.

The permit holder shall submit an updated Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form no later than April 1st, annually, pursuant to rule 113.14(455B). Use of this form provides permit holders a uniform means of submitting all required documentation to ensure that closure and postclosure cost estimates and applicable financial assurance instruments are updated as required.

Failure to comply with Iowa Code section 455B, or any rule of order promulgated pursuant thereto, or any provisions of this permit may result in 1) a civil penalty of up to $5000 for each day of violation, pursuant to Iowa Code section 455B.307, or 2) the suspension or revocation of this permit, pursuant to Iowa Code section 455B.305.

X. Special Provisions

1. The permit holder is authorized to accept solid waste for disposal in accordance with the approved East Central Iowa Council of Governments (ECICOG) Comprehensive Plan. The Comprehensive Plan as approved by the Department on July 6, 2016; any approved amendments to the plan; and the latest plan update, are hereby incorporated as permit plan documents.

   The permitted service area includes: all cities, excluding Victor, and the unincorporated area in Iowa County.

   In accordance with subrule 101.13(2), the permit holder shall submit an updated Comprehensive Solid Waste Management Plan, to the Department by January 1, 2023.

2. The permit holder shall develop and operate the site in accordance with the SDP Permit Renewal, dated October 25, 2021, as submitted by HLW Engineering Group and approved on January 18, 2022, and the following:

   a. Waste disposal is limited to Phases A-1, A-2, A-3, and A-4 of Area A. Any further expansion beyond Phases A-1, A-2, A-3, and A-4 of Area A shall require prior Department approval.

b. The permit holder shall collect leachate from the leachate control system and properly dispose of the leachate either by treatment in an on-site facility, discharge with an NPDES permit; or by discharge to a publicly owned treatment works (POTW). If the discharge is to a POTW with a pretreatment program approved by the DNR, the discharge must comply with the terms and conditions of a local permit issued for the discharge by the POTW. If the discharge is to a POTW without an approved pretreatment program a completed treatment agreement form shall be submitted to the DNR's Wastewater Section. Copies of the local permit or treatment agreement shall be provided to the DNR's Solid Waste Section and the local Field office. The treatment agreement must be on DNR Form 31 (542-3221) and must comply with the requirements of subrule 64.3(5).

   Currently, treated leachate is discharged to a tributary to the Iowa River under NPDES permit number 4800904.

   In addition, the permit holder shall monthly measure leachate head levels and elevations at all piezometers and record the volume of leachate collected and transported to the treatment works. Records of leachate contaminants testing required by the treatment works and any NPDES permit for on-site treated leachate discharges shall be maintained.

   The permit holder shall annually submit a Leachate Control System Performance Evaluation (LCSPE) Report pursuant to subparagraph 113.7(5)"b"(14) as a supplement to the facility Annual Water Quality Report, as defined in subrule 113.10(10).

c. The following shall be recorded by the permit holder and reported in the LCSPER for each leachate thickness measurement that equals or exceeds 12 inches In Phases A-1, A-2, A-3, and A-4:
   1) Date of original and any verification measurement.
   2) If 12 inch or greater leachate column is verified, specific actions taken by the certified operator to lower leachate thickness, or an explanation why specific actions were not necessary.
   3) Date and results of follow-up measurement.
   4) Repeat steps 2 and 3 as necessary until a compliant measurement is collected.

d. The construction documentation for leachate extraction wells, LW-6, LW-7, LW-8 and LW-9 dated July 24, 2001 as submitted by FOX Engineering Associates, Inc. and approved on August 6, 2001 is incorporated as part of the permit documents.

e. The boring logs and well construction documentation forms for installation of replacement extraction wells LW-7R and LW-9R, dated May 24, 2006 as submitted by FOX Engineering Associates, Inc. and approved September 14, 2006, are incorporated into the permit documents.

f. The review comments, dated October 23, 1998 from the Department's Conservation and Recreation Division relative to the comprehensive listing of plant and animal

species for the development and soil borrow areas included in the review and the preceding letter report of field reconnaissance findings dated October 2, 1998, and prepared by Paul Christiansen, Ph.D., are incorporated as part of the permit documents.

g. The review comments, dated April 21, 1998 from the State Historical Society relative to the determination of the presence of and assessment of the impact on any archaeological, historical, or architecturally significant properties for the development and soil borrow areas included in the review and the preceding Phase I cultural resource investigation (prepared by The Cultural Resource Group-Louis Berger & Associates, Inc. and dated April, 1998) and referenced therein, are incorporated as part of the permit documents.

h. The permit holder shall follow the approved Emergency Response and Remedial Action Plan (ERRAP) procedures during all emergencies pursuant to subrule 113.8(5). An updated ERRAP shall be submitted at the time of each permit renewal application. An updated ERRAP shall be included with any request for permit modification to incorporate a facility expansion or significant changes in facility operation that require modification of the currently approved ERRAP.

i. The permit holder shall conditionally cease leachate collection from leachate extraction wells LW-6, LW-7R, LW-8, and LW-9R based on the hereby approved Leachate Extraction Well Cessation Request, dated July 22, 2022, as submitted by HLW Engineering Group. The permit holder shall follow the operational, inspection and reporting procedures proposed in the request.

3. The permit holder is authorized to develop the site in accordance with the hereby approved SDP Permit Renewal, dated October 25, 2021, as submitted by HLW Engineering Group and approved on January 18, 2022, and the following:

a. The Iowa Professional Engineer Certification of Alternative Landfill Liner System dated January 9, 2001 and contained in the Iowa County Sanitary Landfill MULTIMEDIA Exposure Assessment Model for an Alternative Landfill Liner Design, dated January 2001, as submitted by FOX Engineering Associates, Inc. and approved on July 11, 2001, satisfies the requirements of subparagraph 113.7(5)“a”2. The approved alternative liner system for this facility is applicable to Phases A-1 and A-2 of Area A. This liner consists of a four (4) foot compacted soil liner with a coefficient of permeability of $1x10^{-7}$ cm/sec or less. Note that a 0.25” thick drainage net is required as part of the cap.

b. The Area A-1 Expansion Plans, dated April 14, 2003; the correspondence, dated May 30, 2003; and the correspondence dated June 12, 2003; all as submitted by FOX Engineering Associates, Inc. are incorporated as part of the permit documents. In accordance with the FOX correspondence dated June 12, 2003, the permit holder has approved a Change Order to the Area A-1 Expansion plans eliminating the constructed wetland, all associated supporting infrastructure, and all items covered in the bid and specifications

documents relative to the project. The wetland system is not approved and shall not be built.

c. The Construction Certification, dated October 31, 2003, as submitted by FOX Engineering Associates, Inc. and approved on January 12, 2004 for the Phase A-1 Expansion, is incorporated as part of the permit documents.

d. The As-Built drawings for the Phase A-1 Expansion, dated May 13, 2004, as submitted by FOX Engineering Associates, Inc., and approved on July 11, 2004, are incorporated as part of the permit documents.

e. The Construction Certification Report for cell Phase A-2, dated September 10, 2007, and additional information provided via email on September 20, 2007, both as prepared by FOX Engineering Associates, Inc. and approved on September 26, 2007, are incorporated as part of the permit documents.

f. The Phase A-3 Expansion QC&A report and Record Drawing, dated October 22, 2010; as submitted by HLW Engineering Group; and approved on November 2, 2010; are incorporated as part of the permit documents.

g. The Certification #1 of Additional Drainage Layer, Phase A-3 Expansion, dated December 23, 2010; and the Certification #2 of Additional Drainage Layer, Phase A-3 Expansion, dated August 12, 2011; both as submitted by HLW Engineering Group; are incorporated into the permit documents.

h. The Phase A-4 construction, and slope stability evaluation included in the Quality Control and Assurance Report, dated September 22, 2016, and the Existing Slopes report, dated October 21, 2016, both submitted by HLW Engineering Group, are incorporated into the permit. The permit holder is approved to start placing waste in the south half of the Phase 4 Cell. Waste may not be placed until approval by the Iowa Department of Natural Resources is obtained after placement of the drainage layer is certified for the north half of Phase A-4 Cell.

i. The Pump Station Alarm System included in the Certification Report, dated December 21, 2016, submitted by HLW Engineering Group, is incorporated into the permit.

j. The Quality Control and Assurance Report Phase A-4 Expansion – Division 2, dated June 26, 2017, submitted by HLW Engineering Group is incorporated into the permit (approval by email dated July 3, 2017).

k. The Certification #1 of Additional Drainage Layer Phase A-4 Expansion, dated September 18, 2017, submitted by HLW Engineering Group is incorporated into the permit.

l. The closure design specifications in document no. 98227 entitled Phase A-1 and A-2 Closure Expansion, dated August 7, 2020, document no. 98228 entitled Bidding Requirements and Contract Documents for Phase A-1 and A-2 Closure, dated August 6,

2020, document no. 98330 entitled Phase A-1 and A-2 Closure Expansion, dated August 28, 2020, and document no. 98331 entitled Addendum No. 1, dated August 31, 2020, all as submitted by HLW Engineering Group, are hereby approved on September 1, 2020.

m. The variance request, document no. 98068, dated July 10, 2020, for a modified well abandonment procedure for monitoring wells located in a non-fill area is approved September 1, 2020 (MW-19, MW20-1, MW20-4, MW20-5, MW-21, MW-22, MW22-1, and MW22-5). If a waste cell is undertaken in the future at these well locations the variance is null and void and the wells will need to be abandoned following IAC 567 113.

n. The request to construct the Phase B-1 Expansion, dated August 10, 2023, as submitted by HLW Engineering Group, is hereby approved on September 26, 2023.

o. The Quality Control and Assurance Report Phase B-1 Expansion, dated September 23, 2024, submitted by HLW Engineering Group is hereby approved and incorporated into the permit.

4. Hydrologic monitoring at the site shall be conducted in accordance the hereby approved SDP Permit Renewal dated October 25, 2021, as submitted by HLW Engineering Group and approved on January 18, 2022, and the following:

   a. In accordance with the variance granted on January 31, 2012, the permit holder is authorized to implement the groundwater monitoring program for the unlined closed unit as follows:

      1) Conduct routine groundwater monitoring and statistical analysis in accordance with 113.10(5) and 113.10(4) rather than in accordance with 113.2(5)”d” and 113.2(5)”e”. The permit holder is required to conduct detection monitoring in accordance with 113.10(5) and 113.10(4) unless Department authorization to change the monitoring requirements is received.

      2) Collect background samples for detection monitoring during 5 semiannual events (2.5 years), rather than all five during the first year as required by 113.10(5)”b”.

      3) Retain the existing well spacing rather than implement the 300 ft. well spacing requirements of 113.10(2)”e”(2).

      4) Implement the Monitoring Well Maintenance and Performance Reevaluation Plan requirements of 113.10(2)”f” (effective 12/10/2007), rather than the requirements of 113.2(5) (effective 12/10/2007) which by reference requires implementation of 113.21 (effective 01/15/2003).

   b. The HMSP for Phase A and the unlined closed unit shall include upgradient groundwater monitoring points MW-11, MW-13, MW-27, MW-28, MW-29 and MW-32; downgradient groundwater monitoring points MW-15, MW-16, MW-18,, MW-20-2, MW-20-6 MW-22-2, MW-23, MW-29D, MW-30, MW-40, MW-42 and MW-43; leachate lagoon monitoring

point MW-41; and groundwater underdrain monitoring points GU-2, GU-4, GU-5 and GU-6.

Groundwater underdrain monitoring point GU-1 and GU-3 shall be omitted from the HMSP while they are permanently connected to the leachate collection system pursuant to 113.10(2)"a"(3). Upon disconnection of GU-1 and GU-3 from the leachate collection system, detection monitoring shall be resumed at the disconnected point(s).

c. The boring logs and well records for Monitoring wells MW-38, MW-39 and MW-41 and gas probes GP-1 through GP-6 in document entitled Boring Logs and Monitoring Well Records, dated February 3, 2012, as submitted by HLW Engineering Group, is incorporated into the permit.

d. The Monitoring Well Construction Documentation Form for MW-40, included in document entitled Permit Amendment #6 (ID #87735), dated December 1, 2016, as submitted by HLW Engineering Group is incorporated into the permit.

e. Groundwater monitoring points not used for water quality monitoring may be retained as water level measuring points, except that MW-9 shall be retained for water level monitoring purposes unless prior authorization for its removal is granted by the Department.

f. Department construction documentation form 542-1277 and boring logs for all monitoring wells and piezometers shall be submitted within 30 days of installation. Department construction documentation form 542-1323 shall be submitted within 30 days of establishing surface water monitoring points.

g. The permit holder shall conduct background and routine semiannual groundwater sampling and analysis; as well as perform statistical tests for the approved monitoring points for the Appendix I parameters and total suspended solids (TSS) or field turbidity (ntu) in accordance with rule 113.10(455B). Groundwater samples shall **not** be field-filtered prior to laboratory analysis and total suspended solids shall be analyzed using Method 1376585, with a reporting limit goal of <= 2 mg/l). TSS and Field Turbidity report, dated February 14, 2015, submitted by HLW Engineering Group is incorporated into the permit.

h. The permit holder may implement a five (5) year frequency for full Appendix II analysis at monitoring points that are in assessment monitoring and have had at least two (2) rounds of analysis using the entire Appendix II list. If monitoring points exit assessment monitoring and later return to assessment monitoring an additional two (2) rounds of analysis using the entire Appendix II list is required.

i. The permit holder shall semiannually measure groundwater elevations within 1/100 of a foot in each well and immediately prior to purging, each time groundwater is sampled.

j. The permit holder shall collect semiannual groundwater elevation measurements from the groundwater diversion monitoring points in Phases A-3 and A-4 in order to measure the separation of the base of the MSWLF unit from the groundwater table as required in paragraph 113.6(2)"i". This data shall be included in the facilities' AWQR.

k. An Annual Water Quality Report (AWQR) summarizing the effects the facility is having on groundwater quality shall be submitted to the Department's Solid Waste Section by January 31 each year. This report shall be prepared in accordance with subrule 113.10(10) by a qualified groundwater scientist pursuant to paragraph 113.10(1)"d" and by using the DNR Annual Water Quality Report Format.

l. The Assessment of Corrective Measures – Response to IDNR Letter dated June 28, 2018, dated January 30, 2019, is approved on February 14, 2019, and incorporated into the permit.

m. Well abandonment information dated November 20, 2020 (Document No. 98975), submitted by HLW Engineeering Group, is approved November 24, 2020, and is incorporated into the permit.

n. Well installation information for monitoring well MW-42, dated October 6, 2022 (Document No. 104252), submitted by HLW Engineering Group, is approved October 19, 2022, and is incorporated into the permit.

o. Well abandonment information in the Quality Control and Assurance Report Phase B-1 Expansion, dated September 23, 2024, for monitoring wells MW-38 and MW-39, submitted by HLW Engineering Group is hereby approved and incorporated into the permit.

p. Well installation information in the Quality Control and Assurance Report Phase B-1 Expansion, dated September 23, 2024, for monitoring well MW-43, submitted by HLW Engineering Group is hereby approved and incorporated into the permit.

5. The permit holder shall conduct subsurface gas monitoring in accordance with the hereby approved HMSP/GMSP, dated February 29, 2008, as submitted by FOX Engineering Associates, Inc., the Environmental Monitoring Plan included in the SDP Permit Renewal, dated October 25, 2021, and Response to IDNR Letter, dated May 13, 2024, all as submitted by HLW Engineering Group and the following:

   a. The permit holder shall quarterly monitor and annually report site methane concentrations in accordance with rule 113.9(455B). Specific actions, as defined in the rules, shall be taken in the event of methane gas level limit exceedances.

   b. The permit holder shall annually submit a report by January 31 summarizing the methane gas monitoring results and any action taken resulting from gas levels exceeding the specified limits during the previous 12 months as a supplement to the facility Annual Water Quality Report, as defined in subrule 113.10(10).

c. Gas monitoring points include UD-1, UD-2, UD-3, UD-4, UD-5, UD-6 [GU-6], GP-1, GP-2, GP-3, GP-5, GP-6, GP-7, GP-9, Water Service Pit, Scale House, Scale Pit, HHM Building, Shop, Storage Building, and Recycle Building.

6. The permit holder is authorized to collect, process, grind, or chip trees, limbs, brush, and clean wood wastes free of coatings and preservatives, for the purposes of reuse as bedding material, mulch, compost bulking material; or for other beneficial reuses, in accordance with the following:

   a. Trees, limbs, brush, and clean wood wastes shall not be stored for a period exceeding twelve (12) months before processing.

   b. Ground or chipped materials shall not be allowed to accumulate such that the stockpiles are not completely reused within twelve (12) months of initial stockpiling.

   c. The processed materials may be used as mulch for off-site purposes and on landfill areas with intermediate and final cover and on soil borrow areas.

   d. Mulch applied to existing vegetated landfill areas shall be applied at a rate such that established vegetation is not adversely impacted by its use.

7. The permit holder is authorized to collect grass clippings, leaves and garden wastes for the purposes of land application reuse as mulch, or for other beneficial reuses.

   a. Non-composted yard waste shall not be stored for more than two (2) weeks before land application.

   b. All non-biodegradable bags and containers shall be removed prior to land application.

   c. The wastes may be used as mulch for off-site purposes and on landfill areas with intermediate and final cover and on soil borrow areas.

   d. Yard waste shall be land applied at a rate not to exceed 2 tons per year per acre.

   e. Mulch applied to existing vegetated landfill areas shall be applied at a rate such that established vegetation is not adversely impacted by its use.

8. In accordance with the Direct Burial of Petroleum Contaminated Soils approved variance dated November 3, 2017, as submitted by HLW Engineering Group, the permit holder is authorized to directly, and immediately upon receipt, dispose of untreated petroleum contaminated soils (PCS) at the working; and the following:

   a. The PCS must be determined to be not hazardous (via federal exemption and/or analytical testing) and immediately buried at the working face.

b. The untreated PCS must not contain free liquids as determined by the paint filter liquids test (EPA Method 9095), nor exhibit one of the four characteristics of a hazardous waste defined in 40 CFR Part 261 Subpart C for ignitability (DOO1), corrosivity (D002), reactivity (D003) and toxicity (D004-D0043).

c. PCS resulting from the cleanup of petroleum underground storage tanks are exempt from RCRA hazardous water management if the media and debris 1) exhibit the TC for D018-D043, and 2) are subject to the corrective action requirements in 40 CFR Part 280 of the UST regulations. This exemption does not apply to petroleum contaminated media resulting from spills or releases from aboveground storage tanks, other surface spills, or if the PCS become contaminated with a listed hazardous waste.

d. PCS meeting the above-referenced criteria is deemed a "solid waste" and therefore applicable waste flow and tonnage fee requirements will need to be adhered. PCS may continue to be received for remediation pursuant to subrule 109.11(2), or accepted from outside the planning area for disposal as long as the provisions of IAC 567 Chapter 101.4 are followed (i.e. maintain written approvals).

9. The permit holder is authorized to use an alternative daily cover by the trade names Topcoat or VERDac, as a substitute for the six-inch daily soil cover requirement. Use of this material is subject to the following:

a. This product shall not be used as a substitute for intermediate or final soil cover.

b. All landfill operations personnel shall be trained by the alternative cover material manufacturer, or by an operator that has been trained by the manufacturer. The operator shall ensure that the product slurry is prepared according to the manufacturer's nominal slurry mix specifications.

c. The waste shall be compacted, before this product is applied, to provide an even surface to minimize ponding, prevent pockets, and to maximize uniform surface drainage.

d. This product shall be applied to the active waste face at the end of each day of operations and more frequently if necessary to control fire or fire hazards, blowing litter, scavenging, odors, insects, rodents, birds and other vectors. This product shall be cross applied when necessary to provide effective cover.

e. If this product does not set within **one hour** of application, the workface shall be covered with six inches of compacted soil or a fresh application of this product. The term set means form a cohesive barrier layer that adheres to the waste and resists washing off by precipitation. This product shall not be exposed for more than **five (5) days**. After five days, any area exposed with this product shall be either covered with a new lift of waste, a fresh application of this product, or six inches of compacted soil.

f. The operator shall inspect each application of this product for thorough coverage and cover integrity. If operational problems arise from the use of this product or its method

of application, the use of this product shall be suspended until proper corrections are made by the operator, with six inches of compacted daily cover being utilized during this interim period.

g. If, at any time, the Department or permit holder deems this product to be ineffective or otherwise unsatisfactory, the permit holder shall immediately revert to soil or another previously approved alternative daily cover. The permit holder shall immediately notify the Department's Main and local Field office through both written and verbal notification of this action. This notification is not necessary if use of this product ceases only on a temporary basis, such as during adverse operational or weather conditions.

h. Nothing in this provision shall be construed to authorize any waiver from the requirements of any other applicable state solid waste laws or regulations, or any deviations from permit provisions.

i. This provision shall not be interpreted to release the permit holder from responsibility under the Groundwater Protection Act for remedying conditions resulting from any release of contaminants to the environment.

10. The permit holder is authorized to accept Automobile Shredder Residue (ASR) from Alter Trading Corporation in Des Moines, Iowa. The permit holder is authorized to use an ASR/Soil combination as an alternative cover material, subject to the following:

    a. The permit holder shall remove all materials exceeding 1.5 inches in size before mixing with soil on a 50% by volume basis and using as an alternative daily cover material. The ratio of ASR to soil shall not exceed 50% ASR by volume. Quantities exceeding 1-week usage shall be disposed in the workface area. Only ASR placed at a ratio of 6:1 (6 tons of waste to 1 ton of approved ASR) will be considered alternative daily cover. Any material used in excess of that ratio shall be reported as waste. Any excess waste materials shall be returned to the planning area in which it was generated for disposal; or the amount shall be reported in the Quarterly Solid Waste Fee Schedule and Retained Fee Report as waste accepted outside of the planning area and the tonnage fee payment remitted, as applicable, for all wastes disposed. Therefore, quantities accepted shall not exceed the amount needed to provide daily cover from the first day to the last day of the business workweek. As such, quantities accepted shall be adjusted on a regular basis, accordingly, so that subsequent amounts accepted do not exceed a business workweek's usage at a time.

    b. The ASR/Soil may be used in lieu of the 6-inch daily cover requirement. ASR/Soil shall not be used as a substitute for intermediate or final soil cover.

    c. The waste must be compacted, before the ASR/Soil is applied, to provide an even surface to minimize ponding, prevent pockets, and to maximize uniform surface drainage.

d. ASR/Soil shall be applied to the active waste face at the end of each day of operations and more frequently if necessary to control fire or fire hazards, blowing litter, odors, insects, and rodents.

e. The soil ratio shall be increased, if necessary, to optimize cover performance relative to the criteria stated in items “c” and “d” above.

f. The permit holder shall scarify the ASR/Soil cover material over the working face area on which it is applied prior to each day’s use of that area as a working face.

g. The permit holder shall maintain in the landfill files appropriate quarterly laboratory analytical documentation that demonstrates that the ASR is not hazardous by TCLP metals test, contains no PCBs that equal or exceed 50 ppm, is not ignitable, and has certification from the generator that the material was processed according to the above noted specifications. Documentation reporting of such testing shall be submitted to both the Department’s Main and local Field office.

h. The use of ASR/Soil for daily cover usage by any other generator than the one approved above shall be subject to specifications approval by the Department.

i. If the ASR/Soil is found by the Department not to be performing satisfactorily, its use shall be discontinued and the remaining materials shall be disposed in the working face.

11. The permit holder is authorized to accept ground construction and demolition (C&D fines) from the demolition of the Wasserbahn Hotel. The permit holder is authorized to use the C&D fines as an alternative cover material, subject to the following:

    a. The permit holder shall follow the plan entitled Beneficial Use Determination for Alternative Daily Cover, dated December 5, 2022, as submitted by HLW Engineeing Group. Only C&D fines placed at a ratio of 3:1 (3 tons of waste to 1 ton of approved C&D fines) will be considered alternative daily cover.

    b. The C&D fines may be used in lieu of the 6-inch daily cover requirement. C&D fines shall not be used as a substitute for intermediate or final soil cover.

    c. The waste must be compacted, before the C&D fines are applied, to provide an even surface to minimize ponding, prevent pockets, and to maximize uniform surface drainage.

    d. C&D fines shall be applied to the active waste face at the end of each day of operations and more frequently if necessary to control fire or fire hazards, blowing litter, odors, insects, and rodents.

    e. The soil shall be added, if necessary, to optimize cover performance relative to the criteria stated in items “c” and “d” above.

f. The use of C&D fines for daily cover usage by any other generator than the one approved above shall be subject to specifications approval by the Department.

g. If the C&D fines is found by the Department not to be performing satisfactorily, its use shall be discontinued and the remaining materials shall be disposed in the working face.

12. The permit holder is authorized to accept boiler ash from the University of Iowa Power Plant in Iowa City, Iowa. The permit holder is authorized to use the ash as an alternative cover material, subject to the following:

a. Only ash, mixed 50% - 50% with soil placed at a ratio of 6:1 (6 tons of waste to 1 ton of ash) will be considered alternative daily cover.

b. The ash will be stockpiled over the footprint of the active fill area. Stormwater in contact (contact water) with the stockpile shall be collected and managed as leachate. Interception trenches shall be placed under the direction of a licensed State of Iowa professional engineer to accommodate the capture of the contact water up to and including a 24-hour, 25-year storm event. The professional engineer shall inspect the interception trenches at least every 3 months. As an alternative the stockpile may be covered with 6 inches of soil when not in use.

c. Ash/soil mix shall not be used as a substitute for intermediate or final soil cover.

d. The waste must be compacted, before the ash/soil mix is applied, to provide an even surface to minimize ponding, to prevent pockets, and to maximize uniform surface drainage.

e. Ash/soil mix shall be applied to the active waste face at the end of each day of operations and more frequently if necessary to control fire or fire hazards, blowing litter, odors, insects, and rodents.

f. The use of ash/soil mix for daily cover by any other generator than the one approved above shall be subject to specifications approval by the Department.

g. If the ash/soil mix is found by the Department to be performing unsatisfactorily, its use shall be discontinued and the remaining materials shall be disposed of in the working face.

13. The permit holder is authorized to accept and temporarily store a maximum of 1500 waste tire equivalents for the purpose of reclamation processing or disposal. Tire storage and processing shall be conducted at approved plan locations. The tires shall be removed at least once every 120 days and transported to the appropriate reclaimer/processor, or disposed of at the site. All operations shall be in accordance with subrule 109.10(3), IAC 567 Chapter 117 and the current local fire code.

14. The permit holder is authorized to temporarily store white goods and scrap metal in an area designated by the operator. No discarded appliance may be stored for more than 270 days without being demanufactured. No scrap metal or discarded appliance may be stored for more than a total of twelve (12) months, including demanufacturing processing, prior to being recycled/salvaged. The operator and salvaging contractor shall comply with applicable provisions of IAC 567 Chapter 118 and the General Provisions of this permit. No scavenging shall be allowed.

15. The permit holder shall close the landfill site in accordance with the hereby approved SDP Permit Renewal dated October 25, 2022, as submitted by HLW Engineering Group; and the following:

    a. As noted in the Closure and Postclosure Plan, the permit holder shall submit to the department for review and approval a detailed Quality Control and Assurance (QC&A) Plan prior to any closure activities in Area A.

    b. The Construction Report, Leachate and Erosion Control Project [Phase I], dated January 3, 1994, as submitted by FOX Engineering Associates Inc., is incorporated into the permit.

    c. The “East Side Closure Project” (Phase II) Construction Certification Report and Record Drawings dated, July 16, 1996, as submitted by FOX Engineering Associates Inc., and approved on March 19, 1997, are incorporated as part of the permit documents.

    d. The Construction Certification Report and Record Drawings for the Phase 3 Closure Project - North Side, dated July 7, 1998, as submitted by FOX Engineering Associates Inc., and approved on August 26, 1998, are incorporated as part of the permit documents.

    e. The Phase IV Closure Project Plans, dated May 12, 2004, as submitted by FOX Engineering Associates, Inc. and approved on July 11, 2004, are incorporated as part of the permit documents.

    f. The Construction Certification Report and Record Drawings for the Phase IV Closure, both dated November 19, 2004 as submitted by FOX Engineering Associates, Inc. and approved on December 3, 2004, are incorporated as part of the permit documents.

    g. The Construction Certification Report for Phase V, dated June 11, 2008, as submitted by FOX Engineering Associates Inc., is hereby approved and incorporated as part of the permit documents.

    h. The Phase A-1/A-2 Closure report, dated September 20, 2021, as submitted by HLW Engineering, is hereby approved and incorporated as part of the permit documents,

i. Effective control of leachate in unlined units shall be evaluated on a case-by-case basis to determine how to achieve the lowest possible leachate head; and by complying with the environmental monitoring and corrective action requirements for groundwater and surface water.

j. The review comments, dated June 18, 2002 from the Iowa County Soil & Water Conservation District relative to compliance with wind and soil loss limit regulations for the development and soil borrow areas included in the review, are incorporated as part of the permit documents.

XI. Permit Renewal and Revision History

Date	Comment
01/18/22	Permit Renewed
07/25/22	Added X.2.i. for changes on leachate extraction from the Original Landfill area.
10/19/22	Added MW-42 installation and inclusion into the monitoring network see X.4.b. and n.
12/6/22	Removed X.8. regarding composting of yard waste from the permit as composting is not being performed at the site. Renumbered subsequent special provisions. Added X. 11. To allow for the use of C&D fines as alternative daily cover.
9/25/23	Added X.3.n. to approve start of construction of Phase B-1 Expansion.
9/27/23	Added X.12. to approve use of contaminated soil for alternative daily cover. Renumbered following provisions.
6/13/24	X.5. Added Monitoring Wells MW-30 and MW-32 and groundwater underdrain UD-6 [GU-6] to the gas monitoring plan.
9/5/24	X.13. Approves the use of class 2 sewage sludge from Whirlpool. Subsequent provisions are re-numbered.
9/24/24	X.3.o. Approves new cell Phase B-1. X.4.b. Adds MW-30, MW-32, MW-43 and GU-6 to the HMSP. X.4.o. Approves abandonment of MW-38 and MW-39. X.4.p. Approves installation of MW-43.
9/12/25	X.9. Added the spray on daily cover VERDac.
11/25/25	X.12. Approved an ash/soil mix for alternative daily cover. Deleted expired items (X.12. and X.13. as numbered in previous permit).