

December 9, 2025

Michael W. Smith, P.E.
Environmental Engineer Senior
Iowa Department of Natural Resources
6200 Park Avenue Suite 200
Des Moines, Iowa 50321



**RE: SOIL/TIRE CHIP MIXTURE AS ALTERNATIVE COVER
PLYMOUTH COUNTY SLF
PLYMOUTH COUNTY SLF, IDNR PERMIT NO. 75-SDP-01-74P
HLW PROJECT NO. 6052-25A.200**

Dear Mr. Smith:

This letter is being submitted to request a revision to the SDP Permit for the Plymouth County Sanitary Landfill in Plymouth County, Iowa to allow the use of tire chips mixed with soil as an Alternate Weekly Cover material.

IAC 567-108.8 "Universally approved beneficial use determinations for alternative cover material." approves the use of tire chips mixed with soil for Alternative Cover in IAC 567-108.8(11). The facility accepts tires from residents and businesses in Plymouth County, previously the tires were stockpiled on site and hauled off site for disposal. In 2024, 66.14 tons of tires were hauled off site. Upon issuance of the permit revision, accumulated tires will be ground on site, the chips stockpiled near the working face, and then the chips will be mixed with soil prior to use as alternative weekly cover.

Thank you in advance for your prompt review and response, and please contact me if you have any questions.

Respectfully submitted,
HLW ENGINEERING GROUP


Douglas J. Lutzbetak, P.E.
Project Manager

cc: Kent Herbold, Manager, Plymouth County SLF (electronic copy)