



December 22, 2025

PA010152

VIA ELECTRONIC MAIL

Mr. Brad Davison
Environmental Engineer
Solid Waste and Contaminated Sites Section
Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA

Subject: Wellman Dynamics Corporation Landfill
Closure Permit #88-SDP-04-86

Dear Mr. Davison:

On behalf of WDC Acquisition LLC (WDC), Penn Environmental & Remediation, Inc. (Penn E&R) has prepared this certification in accordance with the WDC Landfill Closure Permit #88-SDP-04-86.

I am certifying the twelve monthly landfill inspections completed by WDC in 2025. The landfill cover has been established and monitored and maintained appropriately. WDC will continue inspections per the Permit and as directed by IDNR. Please let us know if you should require anything additional or have any questions.

Respectfully Submitted,
PENN ENVIRONMENTAL & REMEDIATION, INC.

A handwritten signature in blue ink that reads "Robert J. Roach".

Robert J. Roach, P.E.
Senior Project Engineer



Attachments

S:\PROJECT FILES\4000-PA010152 WDC 2025 Consulting Services\Landfill\WDC Landfill Inspection Certification.docx

ATTACHMENT A



WDC Acquisition LLC
1746 Commerce Road, Creston, Iowa 50801

February 12, 2025

Via Electronic Mail

Michael B. "Mick" Leat
Solid Waste Section
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

Subject: Monthly Landfill Inspection Report – January 2025
WDC Acquisition LLC Landfill
Permit No. 88-SDP-04-86

Dear Mr. Leat,

Enclosed please find the Monthly Landfill Inspection Report for the WDC Acquisition LLC (WDC) Landfill in Creston, Iowa. This report is being submitted in accordance with Section X., Special Provision 3. of the Sanitary Disposal Project Closure Permit No. 88-SDP-04-86. This report summarizes the results of the landfill inspection performed by WDC personnel on January 17, 2025.

If you have any questions regarding this inspection report, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Matt Thelen".

Matt Thelen
Environmental Engineer
Phone: (641) 782-0283
Email: matt.thelen@wellmandynamics.com

Cc: Robert Roach, Penn E&R
Patricia Murrow, USEPA

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 1/17/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 45°F, calm winds, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

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N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection was completed after construction of the landfill's IDNR-approved cap was completed and is the 1st monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC is planning to establish and execute an Environmental Covenant with the IDNR within the next couple of months.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The new seeding had a good month of growth establishment prior to going into winter dormancy. The seeding and vegetative growth will be monitored during the spring and summer to determine if additional seeding is required.
- (5) The final cover has endured a couple of heavy rainfall events after being completed and has held up well. The integrity of the cover has not been impacted and there has not been any noticeable settling or erosions issues on the cover. Some settling on drainage tile lines outside the landfill cover system was observed and will be monitored and repaired as needed in the Spring/Summer 2025.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: SE corner looking West



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: SE corner looking North



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: East side looking West



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: SE corner looking West



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: NE corner looking SW



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: NE corner looking South



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: NW corner looking SE



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: NW corner looking East



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: West side looking NE



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: West side looking SE



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: West side looking East



Date: 1/17/2025 Photo Taken by: Matt Thelen
Location: East side looking South

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 2/27/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 50°F, calm winds, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

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Title and Date: WDC Acquisition, LLC
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WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

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N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

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N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 2nd monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC is planning to establish and execute an Environmental Covenant with the IDNR within the next couple of months.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The new seeding had a good month of growth establishment prior to going into winter dormancy. The seeding and vegetative growth will be monitored during the spring and summer to determine if additional seeding is required.
- (5) The final cover has endured a couple of heavy rainfall and snowfall events after being completed and has held up well. The integrity of the cover has not been impacted and there has not been any noticeable settling or erosions issues on the cover. Some settling on drainage tile lines outside the landfill cover system was observed and will be monitored and repaired as needed in the Spring/Summer 2025.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: SW corner on West side corner looking SE

Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: SW corner of West side looking North



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: NW corner of West side looking East

Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: North side looking SE



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: North side looking South

Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: NE corner looking South



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: NE corner looking SW



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: SE corner looking NW



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: SE corner looking West



Date: 2/27/2025 Photo Taken by: Matt Thelen
Location: SE corner looking North

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 3/13/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 70°F, calm winds, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit

Issued: December 16, 2024

Expires December 16, 2054

Revision: No. _____ Issued: _____

 No. _____ Issued: _____

 No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC

Landfill Permit Application dated June 2021

WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.

4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

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N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

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N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 3rd monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC is planning to establish and execute an Environmental Covenant with the IDNR within the next couple of months.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The new seeding had a good month of growth establishment prior to going into winter dormancy. The seeding and vegetative growth will be monitored during the spring and summer to determine if additional seeding is required.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: SW corner on West side corner looking SE



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: SW corner of West side looking North



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Northwest corner of West side looking East



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: South looking Northeast



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: North side looking Southeast



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Southside looking West



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Northeast corner looking Southwest



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Northeast corner looking South



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Northwest looking Southwest



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: North looking West



Date: 3/13/2025 Photo Taken by: Matt Thelen
Location: Southeast looking Northeast

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 4/17/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 72°F, windy, overcast

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
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CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

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CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

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N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 4th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC is planning to establish and execute an Environmental Covenant with the IDNR within the next couple of months.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The new seeding had a good month of growth establishment prior to going into winter dormancy. The winter rye and cool season grasses seeded in the fall are off to a good growth start.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

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Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: SE corner looking West



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: SE corner looking North



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: South looking NE



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: South looking East



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: NE corner looking South



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: North looking West



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: North looking SW



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: SW looking East



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: West looking SE



Date: 4/17/2025 Photo Taken by: Matt Thelen
Location: SW looking NE

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 5/13/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 79°F, slight breeze, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 5th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC is planning to establish and execute an Environmental Covenant with the IDNR within the next couple of months.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The new seeding had a good month of growth establishment prior to going into winter dormancy. The winter rye is well established and setting seed heads. Interseeding a cool season versagrass blend is planned after the rye fully matures to further establish the perennial vegetative cover.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: West looking SE



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: West looking NE



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: North looking SW



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: North looking SE



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: NE looking SE



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: SE looking West



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: SE looking NW



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: SE looking North

Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: SW looking North



Date: 5/13/2025 Photo Taken by: Matt Thelen
Location: SW looking East

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 6/23/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 85°F, slight breeze, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 6th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye is now fully mature and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: West looking NE



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: West looking SE



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: Middle



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: West



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: North looking SW



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: NW looking South



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: Ground level



Date: 6/23/2025 Photo Taken by: Matt Thelen
Location: East drive looking North

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 7/16/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 79°F, breezy, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 7th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye is now fully mature and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: NW looking South



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: NW looking East



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle looking South



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: NE looking SW



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle looking NE



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle looking SW



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: Middle



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: SE looking West



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 7/16/2025 Photo Taken by: Matt Thelen
Location: West looking East

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 8/22/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 87°F, calm, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

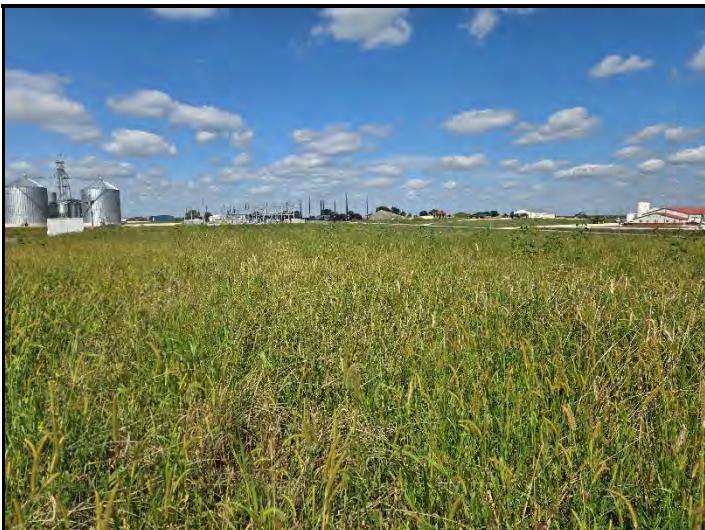
Observation Notes and Photos

This landfill inspection is the 8th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye is now fully mature and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: SW looking North



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: NW looking South



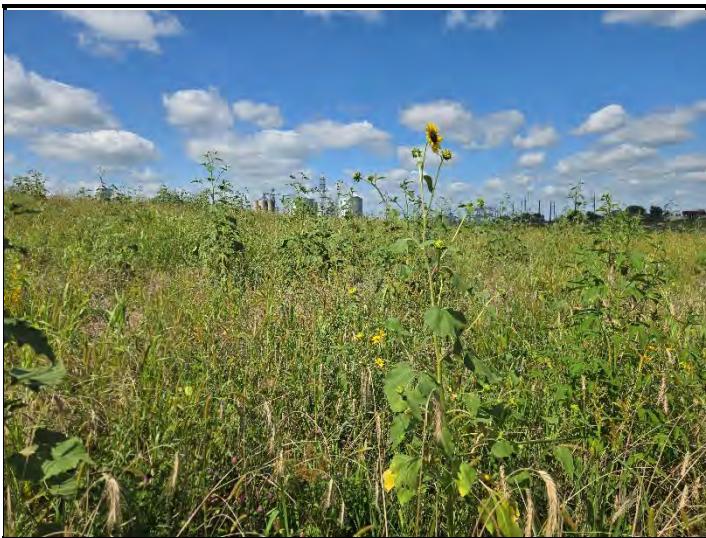
Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: West looking East



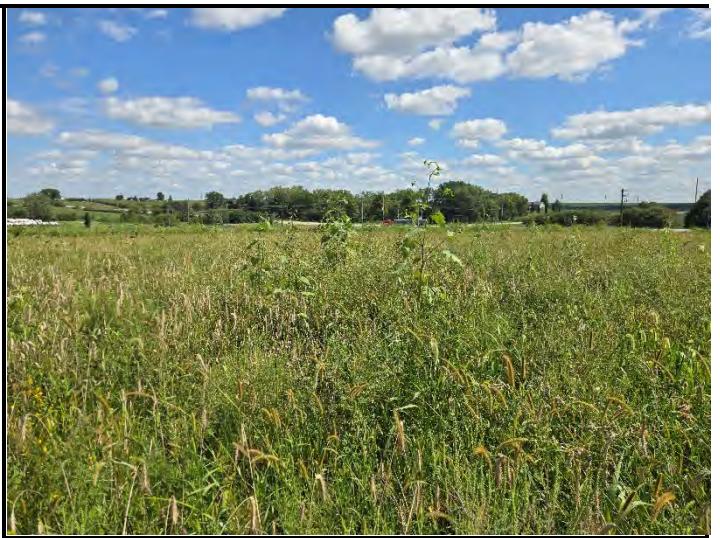
Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking North



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking SE



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 8/22/2025 Photo Taken by: Matt Thelen
Location: East looking West

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 9/22/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 87°F, slight breeze, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 9th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye is now fully mature and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover. The landfill was mowed early September to promote perennial cover growth.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: SW looking NE



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: West looking NE



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: NW looking East



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: North looking South

Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: NE looking South



Date: 9/22/2025 Photo Taken by: Matt Thelen
Location: SE looking West

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 10/16/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 81°F, slight breeze, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 10th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye is now fully mature and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover. The landfill was mowed early September to promote perennial cover growth.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: West looking east



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: SW looking NE



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: NW looking East



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: Middle looking SE



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: South looking North



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: NW looking South



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: NW looking SE



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: East looking West



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: East looking West



Date: 10/16/2025 Photo Taken by: Matt Thelen
Location: North looking South

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 11/25/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 49°F, slight breeze, overcast

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
Landfill Permit Application dated June 2021
WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 11th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye fully matured and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover. The landfill was mowed early September to promote perennial cover growth.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. WDC has been sampling and reporting to the City accordingly during and after landfill cover construction.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: West looking SE



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: NW looking SW



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: North looking SE



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: SW looking NE



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: South looking NE



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: Middle looking SW



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: Middle looking SE



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 11/25/2025 Photo Taken by: Matt Thelen
Location: Middle looking East

FIELD OBSERVATION CHECKLIST
IOWA SANITARY LANDFILLS

Facility: WDC Acquisition LLC; Creston, Iowa

Observation Date: 12/17/2025

Operator: Matt Thelen

Persons Present: Matt Thelen

Weather: 41°F, slight breeze, sunny

A. Documents Used to Review Conformance

1. Iowa Department of Natural Resources
Sanitary Disposal Project Closure Permit

No. 88-SDP-04-86 Operational Permit to Closure Permit
Issued: December 16, 2024
Expires December 16, 2054
Revision: No. _____ Issued: _____
No. _____ Issued: _____
No. _____ Issued: _____

2. Plans and Specifications

Title and Date: WDC Acquisition, LLC
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WDC Landfill Closure Report dated December 2024

3. IAC Rule 567, Chapter 102, effective 5/23/23, last published 02/05/25.
4. IAC Rule 567, Chapter 115, effective 5/24/23, last published 02/05/25.

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements	C	NC	N.O.	N.A.
• No title transfer has been made without application within 30 days to transfer permit (Section IX, Page 2).	X			
• The facility is surveyed as necessary (Section IX, Page 2).	X ⁽¹⁾			
• The facility is inspected as described in the Special Provisions of the permit (Section IX, Page 2).	X			
• Annual water quality and engineering reports are prepared containing a summary describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections (Section IX, Page 2).	X ⁽²⁾			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

CONFORMANCE WITH PERMIT, PLANS, AND SPECIFICATIONS				
B. Permit Requirements (Continued)	C	NC	N.O.	N.A.
• No waste disposal or other related landfill activities are authorized. (Section X, Special Provision No. 1).	X			
• The site is closed and is maintained in accordance with the permit and the Closure and Postclosure Plan as contained in Appendix 9 of the Permit Application dated June 3, 2021 and the September 2, 2021 Revision to the Application. (Section X, Special Provision No. 2).	X			
• The permit holder shall execute an Environmental Covenant with the Department in lieu of the county recorder notification required in 567 IAC 115.27(9)"d", and as required in Appendices B and C of the Amended and Restated Settlement Agreement dated April 28, 2020 (Section X, Special Provision No. 2.b.).	X ⁽³⁾			
• The site shall be inspected monthly for the first year (Section X, Special Provision No. 3).	X			
• All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. (Section X, Special Provision No. 4).	X			
• The vegetative cover shall be reseeded as necessary to maintain good vegetative growth. Any invading vegetation whose root system could damage the compacted layer shall be removed or destroyed immediately (Section X, Special Provision 5).	X ⁽⁴⁾			
• The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. (Section X, Special Provision No. 6).	X ⁽⁵⁾			
• The permit holder has an agreement with the local POTW for discharging collected leachate from the leachate control system (Section X, Special Provision No. 7).	X ⁽⁶⁾			
• Leachate elevations and volume of leachate collected and discharged are recorded monthly (Section X, Special Provision No. 7).	X			
• The leachate collection system is effective and documented in annual LCSPE Reports (Section X, Special Provision No. 7),	X ⁽⁶⁾			
• Hydrologic monitoring conforms to the Hydrologic Monitoring System Plan and all monitoring wells are in place, maintained, sampled, and reported (Section X, Special Provision No. 8).	X			
• Permit holder shall submit an updated Financial Assurance Report Form by April 1 st annually (Section X, Special Provision No. 9).	X			

C = Conformance

NC = Nonconformance

N.O. = Not Observed

N.A. = Not Applicable

Observation Notes and Photos

This landfill inspection is the 12th monthly inspection after the Closure Permit was issued in December 2024.

- (1) Garden & Associates, LTD completed site topographic surveys during and after final landfill cover construction in the Fall of 2024. These surveys were included in the Landfill Closure Report submitted in December 2024 and used to verify the compacted clay layer and uncompacted topsoil layer met the IDNR required thickness.
- (2) On behalf of WDC, Penn E&R submitted the 2024 AWQR to IDNR and USEPA on January 31, 2025. This report summarizes the effect that the landfill is having on groundwater and surface water quality.
- (3) WDC submitted a Draft Environmental Covenant to IDNR and EPA on 6/16/25 for review and comment.
- (4) The final landfill cover was seeded in October 2024 with a cool season grass blend along with a cover crop of annual winter cereal rye. The winter rye fully matured and a cool season versagrass blend was interseeded with a no-till drill on 6/6/2025 into the existing vegetative stand to further establish the perennial cover. The landfill was mowed early September to promote perennial cover growth. A good stand of vegetative growth has been established and will be monitored in the Spring 2026 for regrowth and permanent establishment.
- (5) No noticeable settling, subsidence, or erosion observed on the final landfill cover.
- (6) A Treatment Agreement with the City of Creston for discharging landfill leachate remains in force as of the effective date of December 22, 2021. WDC monitors, samples, and reports the discharge to the City to ensure compliance with terms and conditions of the Agreement.

A Temporary Supplemental Agreement for Wastewater Services was issued to WDC by the City of Creston in September 2023. The Agreement is dated September 5, 2023, and was executed by WDC. It states WDC shall conduct additional leachate sampling during and after the landfill closure construction. The term of the temporary supplemental agreement with the City of Creston has expired and the required supplemental sampling has concluded.

Reference should be made to the 2024 Leachate Control System Performance Evaluation Report regarding the effectiveness of the leachate collection system. This report was submitted to IDNR on January 27, 2025.



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: West looking NE



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: West looking East



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: SW looking NE



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: West looking SE



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: NW looking East



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: Middle looking East



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: North looking South



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: NE looking SW



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: NE looking South



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: East looking West



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: SE looking West



Date: 12/17/2025 Photo Taken by: Matt Thelen
Location: East looking South