

January 13, 2026

Michael W. Smith, P.E.
Land Quality Bureau
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: Proposed Modification to the Gas Monitoring System Plan (GMSP)
Iowa County Sanitary Landfill - 48-SDP-02-79P**

Mr. Smith:

On behalf of the Regional Environmental Improvement Commission (REIC) of Iowa County, we are requesting modification of the Gas Monitoring System Plan (GMSP) for the facility.

The most recent Permit dated November 25, 2025 (Doc #114852) includes the required gas monitoring points in Special Provision X.5.c. The listed gas monitoring points include the former groundwater underdrain discharge points UD-1 and UD-3 (also known as GU-1 and GU-3, respectively).

In June 2012, the underdrain pipe UD-1 was connected to the leachate collection system manhole. Construction documentation was submitted June 28, 2012 (Doc #72810). The cut end of the pipe was capped and the truncated section of the underdrain pipe was left in-place. Gas monitoring continued to be performed quarterly at UD-1 at the end of the truncated and capped pipe section.

In October 2013, the underdrain pipe UD-3 was connected to the leachate collection system manhole piping. Construction documentation was submitted November 6, 2013 (Doc #78537). The cut end of the pipe was capped and the truncated section of the underdrain pipe was left in-place. Gas monitoring continued to be performed quarterly at UD-3 at the end of the truncated and capped pipe section.

Gas concentrations have not been detected at UD-1 or UD-3 (GU-1 and GU-3, respectively).

There is significant end-of-pipe maintenance required at UD-1 or UD-3 (GU-1 and GU-3, respectively) to keep the dry pipe end from being buried in sediment along the intermittent drainage ditch. In 2025, UD-3 (GU-3) was recorded as buried during each of the quarterly monitoring episodes.

Review of the Site Plan (Figure 2, attached) illustrates the location of UD-1 through UD-6 (GU-1 through GU-6). All underdrain discharge points are in the central portion of the site, not near a property line.

We request that UD-1 and UD-3 (also known as GU-1 and GU-3, respectively) be removed from the GMSP. We anticipate that the remaining and functioning underdrain pipes UD-2, UD-4, UD-5, and UD-6 (GU-2, GU-4, GU-5, and GU-6, respectively) will remain in the GMSP and are sufficient in number to monitor gas concentrations in the interior portion of the site.

Please respond at your earliest convenience.

Sincerely,
HLW Engineering Group

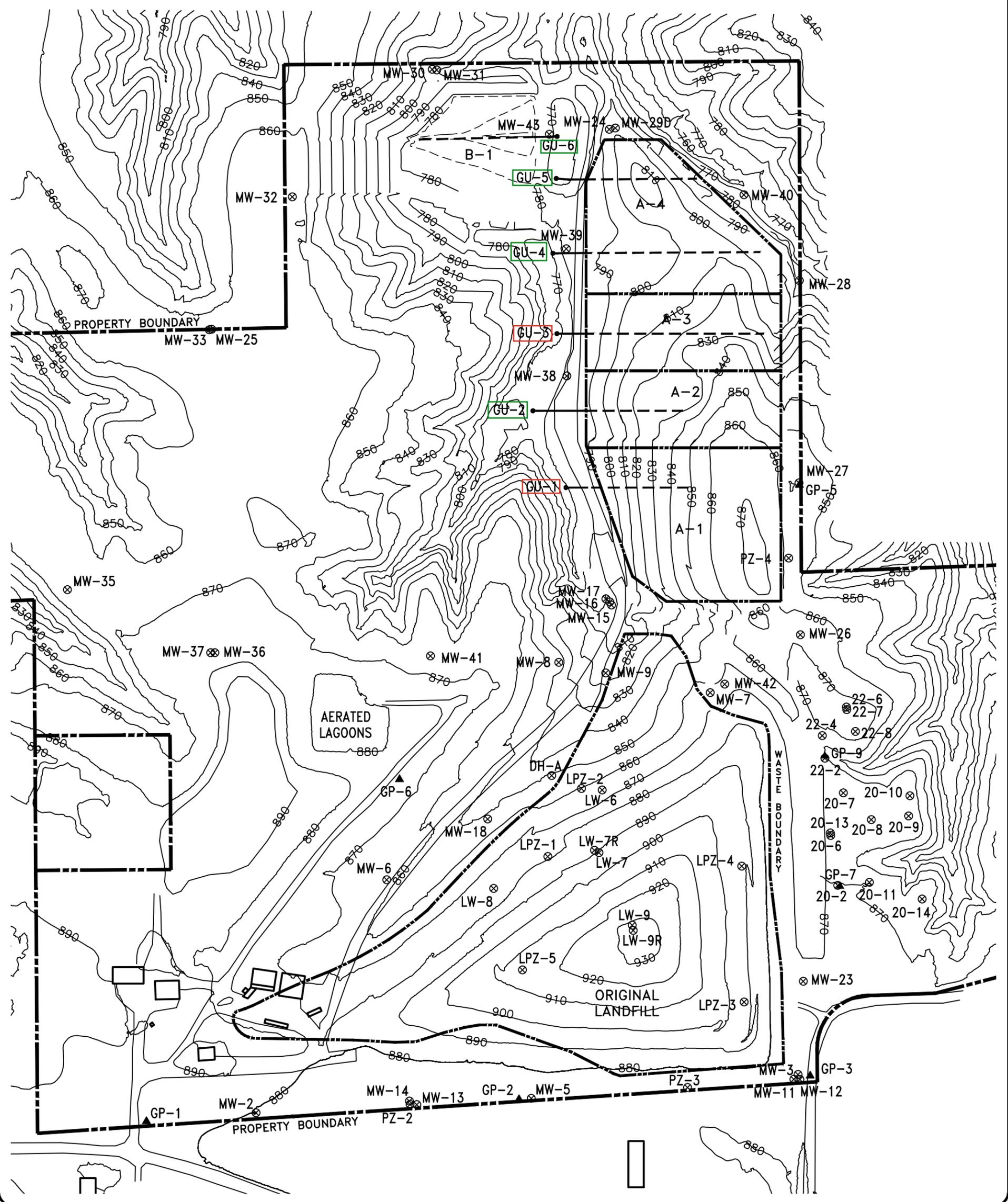
A handwritten signature in blue ink, appearing to read "Todd Whipple", is written over the printed name.

Todd Whipple, CPG
Project Manager

cc: David Randall, Director, Iowa County Landfill



0 50 100 200 400
 LIDAR FLY DATE: 5-12-2009
 PH A1, A2, A3 SURVEY: OCT 2016
 PHASE A4 SURVEY: MAR 2015



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 204 West Broad Street, P.O. Box 314
 Story City, Iowa 50248
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SITE PLAN
LANDFILL AREA
 IOWA COUNTY SANITARY LANDFILL
 AMANA, IOWA

FIGURE:		2
REVISION	NO.	DATE
DRAWN DRA	PROJECT NO. 6005	DATE 1-9-26