

February 2, 2026

Mr. Brad Davison, Environmental Specialist  
Iowa Department of Natural Resources  
6200 Park Avenue, Suite 200  
Des Moines, Iowa 50321



**RE: Post-Closure Care - Reduction Termination Plan  
Proposed End to Regulation under IAC 567, Chapter 113  
and Proposed End to the Closure Permit**

**Audubon County Sanitary Landfill, IDNR Permit #05-SDP-01-75C**

Dear Mr. Davison:

The Audubon County Solid Waste Management Commission (ACSWMC) is requesting the termination of the Closure Permit for the Audubon County Sanitary Landfill (05-SDP-01-75C) issued July 3, 2008 (Doc #25740), and the end of regulation of the facility under historic Iowa Administrative Code (IAC) 567, Chapter 113 (published 12/11/2002 and effective 1/15/2003).

This Post-Closure Care Reduction-Termination Plan (PCC RTP) is offered to satisfy the requirements presented under Preparation of Post-Closure Care Reduction/Termination Plan Guidelines by IDNR. Figure 1, Site Plan, is attached illustrating the site features, monitoring wells, and gas probes.

In lieu of regulation under IAC 567, Chapter 113, The ACSWMC proposes that the limited on-going maintenance items warranted at the facility can be appropriately supervised and managed by the ACSWMC. The ACSWMC understands that certain legal instruments will be required to facilitate the end of IDNR regulation of the facility.

The basis of this proposal is rooted in the observed condition of the facility and the lack of perceived risk-based concerns associated with the facility as it exists in its current condition.

### ***CURRENT CONDITIONS***

#### **Leachate Management**

Portions of the landfill have a retrofitted leachate collection system which is operated in accordance with Special Provision X.11 of the Closure Permit (Doc #25740). The collected leachate is conveyed to and stored in an onsite leachate holding lagoon. As necessary, the lagoon is pumped to tanker trucks and hauled to treatment in accordance with the treatment agreement with the City of Audubon.

The ACSWMC is both willing to and capable of operating the leachate control system under a future environmental covenant. The ACSWMC staff will also continue cap maintenance tasks related to infiltration and erosion control and thereby controlling leachate generation and potential seeps.

## Gas Control

Landfill gas was historically monitored in the breathing zone at the site perimeter. Between 2015 and the present, subsurface landfill gas has been monitored in the headspace of the site monitoring wells.

Since subsurface monitoring began in 2015 (as percent of the lower explosive limit) no explosive gas has been detected to date at any subsurface monitoring point at the site. The concentrations of subsurface gas monitoring are all reported as 0% LEL in each point during each monitoring episode. Water level measurements collected at the time of gas monitoring indicate that monitoring wells MW90-4, MW90-7, MW90-14, and MW91-19 typically have screen to the vadose zone.

Gas generation curves typically illustrate gas generation peaking in the second or third decade of waste burial (e.g. EPA LMOP studies), it is anticipated that landfill gas generation will decrease with time.

The potential for gas migration is interpreted as being minimal based on the absence of detectable gas concentrations in the subsurface around the perimeter of the site. The ACSWMC is both willing to and capable of effectively performing maintenance tasks on the landfill cap/vegetation in order to provide long-term control over subsurface landfill gas migration.

## Ground Water Quality

The 2025 Annual Water Quality Report (AWQR), which was submitted to IDNR on January 30, 2026 (Doc #115949) is cited in support of the interpretation of the water quality.

Groundwater has been monitored at perimeter monitoring wells at the site since at least the early 2000's. At the Audubon County Sanitary Landfill, the following monitoring wells exist and are routinely monitored (currently on a semi-annual frequency).

MW90-17 (background)  
MW90-4 (downgradient)  
MW90-7 (downgradient)  
MW90-14 (downgradient)  
MW91-19 (downgradient)  
MW91-20 (downgradient)  
SW-3 (downgradient)

In the past five (5) years statistically significant increases (SSI) have been detected at:

MW90-4 (barium)  
MW90-7 (cobalt, nickel)  
MW90-14 (cadmium, nickel)  
MW91-19 (barium, nickel)



There have been no statistically significant levels (SSL) reported at the site and no assessment of corrective measures is required.

Moving forward there is no indication (based on stable and static site conditions) that water quality will change appreciably. Since water quality is within rule requirements, there does not appear to be any need for on-going maintenance of monitoring wells by the ACSWMC once an environmental covenant has been established.

### **Storm Water Quality**

The site closure (completed 2008) has well established vegetation, well maintained erosion controls, and maintained diversion structures in place. Stormwater impacts will be minimal, and surface water sampling ceased in 2007 and the Closure Permit dated July 3, 2008 (Doc #25740) did not include surface water monitoring points in the Hydrologic Monitoring System Plan (HMSP).

A potential leachate seep has been noted below an erosion rill in the central portion of the site during recent landfill inspection reports (most recent is October 24, 2025 (Doc #114599). The potential seep does not appear to flow, but manifests as a wet area that attracts wildlife. Monitoring of the condition, and/or repair of the wet area and the erosion rill can be managed by ACSWMC staff.

### **Final Cover Condition (settlement/ponding/slope stability) and Maintenance**

The final cover and site closure were completed in 2008 in accordance with the approved plans. Landfill Inspections have been performed since the closure permit was issued. Settlement over the past 20 years has not resulted in undue ponding, terrace flow line failures, or diversion let-down failures. Diversion and drainage systems are in good shape with no evidence of erosion.

### **Vegetation**

The landfill vegetation is in good condition and is mowed annually to control the growth of undesirable vegetation and saplings. Some bare spots and thin vegetation were noted in previous inspections. The bare and thinly vegetated areas are monitored by Audubon County staff and the areas are amended with organic-rich materials (ditch cleanings and compost), are repaired, and are seeded as necessary. Vegetation is notably improved following the soil amendment activities.

## ***POST-CLOSURE CARE REDUCTION-TERMINATION PLAN (PCC RTP)***

### **Leachate Management**

No actions are required as part of the PCC RTP. It is desired that the leachate collection system continues to be operated in the future under an Environmental Covenant.



## **Gas Control**

No actions are required as part of the PCC RTP. Gas control is considered complete.

## **Ground Water Quality**

No actions are required as part of the PCC RTP. Water Quality control is considered complete and in compliance.

## **Storm Water Quality**

No actions are required as part of the PCC RTP.

## **Final Cover Condition (settlement/ponding/slope stability) and Maintenance**

No actions are required as part of the PCC RTP.

## **Vegetation**

No actions are required as part of the PCC RTP.

### ***ENVIRONMENTAL COVENANT DEVELOPMENT***

Based on observations recorded during the recent inspections, the facility is in general conformance with the expectations of the Closure Permit and conditions at the site continue to improve. The site can be managed under an Environmental Covenant.

The ACSWMC understands that on-going inspection and maintenance of the cap, the diversion systems, the drainage systems, and the vegetation is necessary moving forward. Also, ACSWMC desires to continue operation of the leachate collection system moving forward. These tasks are merely maintenance items necessary for the perpetuation of the well-established and enduring cap/cover features and leachate control. Now established, these items do not warrant ongoing regulation by the State, rather warrant management by the ACSWMC. The ACSWMC is both willing to and capable of effectively performing the required operation and maintenance tasks moving forward.

## **Conclusions**

The ACSWMC seeks a pathway to end regulation of the facility under IAC 567, Chapter 113, while providing the IDNR the appropriate assurances that the facility maintenance tasks will be on-going, as appropriate, to maintain the facility in conformance with the risk-based decision to end IDNR oversight.

The ACSWMC appreciates your consideration of the PCC RTP, and we look forward to your reply. Please consider whether you believe the proposed PCC RTP is sufficient and whether



completion of the PCC RTP will make the ACSWMC a candidate to successfully file an Environmental Covenant in coordination with IDNR's participation.

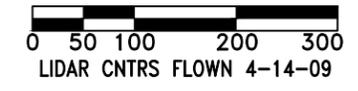
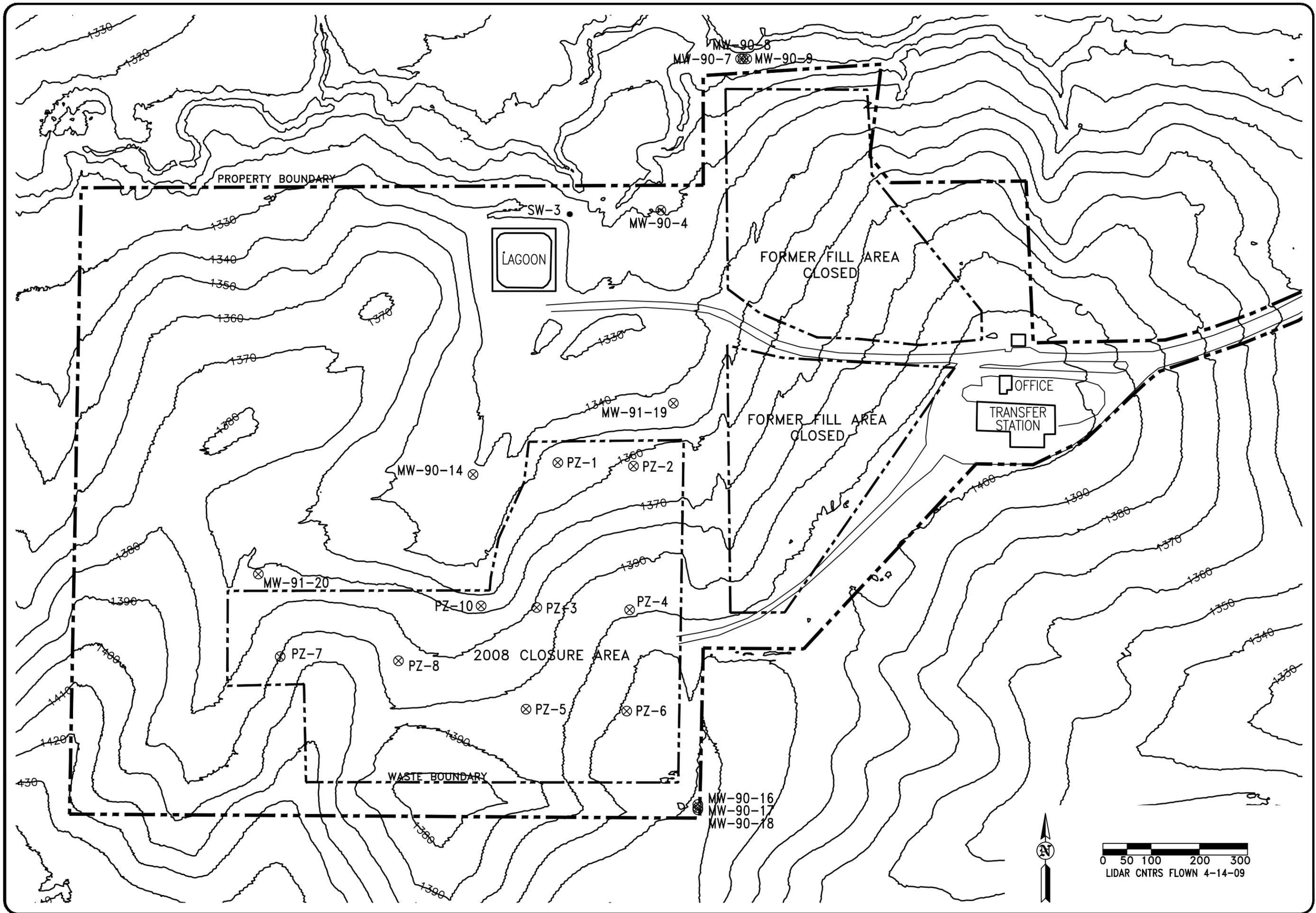
Please contact the HLW Engineering Group office at (515) 733-4144 with any questions you may have or to schedule and coordinate a site visit with the ACSWMC and HLW staff.

Sincerely,  
**HLW Engineering Group**



Todd D. Whipple, CPG.  
Project Manager

cc: Tami Anderson, Manager, ACSWMC



**FIGURE: 1**

REVISION	NO.	DATE
DRAWN	PROJECT NO. 6050	DATE 12-8-25
DRA		

**SITE PLAN**  
**AUDUBON COUNTY SANITARY LANDFILL**  
**AUDUBON, IOWA**

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