

February 2, 2026

Mr. Brad Davison, Environmental Specialist
Land Quality Bureau
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**

Bremer County Sanitary Landfill, IDNR Permit #09-SDP-01-75C

Dear Mr. Davison:

Bremer County is requesting the termination of the Closure Permit for the Bremer County Sanitary Landfill (09-SDP-01-75C) issued September 5, 2008 (Doc #30574), 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 under paragraph 1.b. of the April 17, 2024(sic) IDNR Letter (Doc #112883)). Figure 1, Site Plan, is attached illustrating the site features, monitoring wells, and gas probes.

In lieu of regulation under IAC 567, Chapter 113, Bremer County proposes that the limited on-going maintenance items warranted at the facility can be appropriately supervised and managed by Bremer County. Bremer County 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

As per Special Provision X.11 of the Closure Permit (Doc #30574), the site is conditionally exempt from providing and operating a leachate collection system. A leachate collection or management system does not exist at this site.

As reported in past semi-annual Engineer's inspection reports, persistent leachate seeps have not been noted at the landfill.

Bremer County is both willing to and capable of effectively performing continued 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 2018 and the present, subsurface landfill gas has been monitored in the headspace of dedicated subsurface gas monitoring probes GP-1 through GP-5.

Since subsurface monitoring began in 2018 (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 the dedicated gas probe during each monitoring episode. Water level measurements collected at the time of gas monitoring indicate that all subsurface probes are open 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.

In 2022, sixteen (16) passive landfill gas vents were installed through the cap of the landfill to augment source control at the site and to improve landfill cap vegetation. Record information for the vent installations was submitted to the IDNR on July 15, 2022 (Doc #103616). The vents are documented as passively venting gas from the landfill and vegetation is improved

The potential for gas migration is mitigated based on the active venting of gas from the closed landfill and the absence of detectable gas concentrations in the subsurface around the perimeter of the site. Bremer County is both willing to and capable of effectively performing maintenance tasks on gas vents and 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 #115952) 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 Bremer County Sanitary Landfill, the following monitoring wells exist and are routinely monitored (currently on an annual frequency).

MW-1 (background)
MW-2A (background)
MW-105B (downgradient)
MW-108A (downgradient – supplemental well)
MW-110A (downgradient – supplemental well)
MW-3 (downgradient AZPOC to MW-108A)
MW-4 (downgradient AZPOC to MW-110A)

A groundwater quality assessment was performed near MW-108A and MW-110A and resulted in the establishment of MW-3 and MW-4 as step-out wells to MW-108A and MW-110A, respectively. The remedy, which was implemented in 2008, is natural attenuation.

On January 31, 2018 (Doc #91415) a comprehensive review of the record was performed, and an evaluation was completed to determine whether the 2008 remedy implemented under historic rules met current rule requirements. This study validated that the spirit of the current rule was met with regard to completion of an Assessment of Corrective Measures (ACM) and the selection and implementation of the remedy (natural attenuation). In 2022 the remedy was augmented by the addition of “source control” through the installation of sixteen (16) passive gas vents in the landfill cap.

The 2025 Annual Water Quality Report (AWQR), which was submitted to IDNR on January 30, 2026 (Doc #115952) includes common nomenclature conforming to the management of Monitored Natural Attenuation as the remedy and identifies the original impacted wells (MW-108A and MW-110A) as “Supplemental Wells” and the step-out wells (MW-3 and MW-4) as Attenuation Zone Points of Compliance (AZPOC) Wells. Table 1 and Table 2 from the 2025 AWQR are included in Attachment A.

Based on routine monitoring of water quality at the AZPOC wells MW-3 and MW-4, the remedy is considered complete since all 95% LCL and 95% UCL values at AZPOC wells MW-3 and MW-4 have been below GWPS for at least three (3) consecutive years (113.10(9)“e”(2)). Table 7 (for MW-3 and MW-4) from the 2025 AWQR are included in Attachment B.

The sixteen (16) passive gas vents constructed in the landfill area are documented as producing landfill gas and are deemed to be successful source control measure coupled with the completed natural attenuation remedy.

Moving forward there is no indication (based on stable and static site conditions) that water quality will change appreciably. More specifically, site data indicates that water quality changes over time at the supplemental wells located in the limited area of impact (MW-108A and MW-110A) will be slow, controlled, and positive (improving). The remedy is considered complete under rule (113.10(9)“e”(2)), since the AZPOC wells are all within limits for more than the minimum three (3) consecutive years. All other monitoring points on site already demonstrate compliance with water quality standards and demonstrate the highly controlled nature of the isolated impact at MW-108A and MW-110A.

Since water quality is within rule requirements and the remedy is documented as complete, there does not appear to be any rule requirement for on-going maintenance of monitoring wells by Bremer County 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. No leachate seeps are documented.

Stormwater impacts would be minimal, and surface water sampling ceased in 2015 (Doc # 83874 and Doc #84046).

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 conducted 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 cause of the bare and thinly vegetated areas were anticipated to be gas related. Since completion of the Passive Gas Venting project in 2022, the landfill cap vegetation is documented to demonstrate improvement.

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

Leachate Management

No actions are required as part of the PCC RTP. A leachate collection system does not exist at this site.

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 remedy and control are considered complete and are 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.

Bremer County understands that on-going inspection and maintenance of the cap, the diversion systems, the drainage systems, and the vegetation are necessary moving forward. These tasks are merely maintenance items necessary for the perpetuation of the well-established and enduring cap/cover features. Now established, these features do not warrant on-going regulation by the State, rather warrant management by Bremer County. Bremer County is both willing to and capable of effectively performing the required maintenance tasks moving forward.

Conclusions

Bremer County 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.

Bremer County 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 Bremer County a candidate to successfully file an Environmental Covenant in coordination with IDNR's participation.

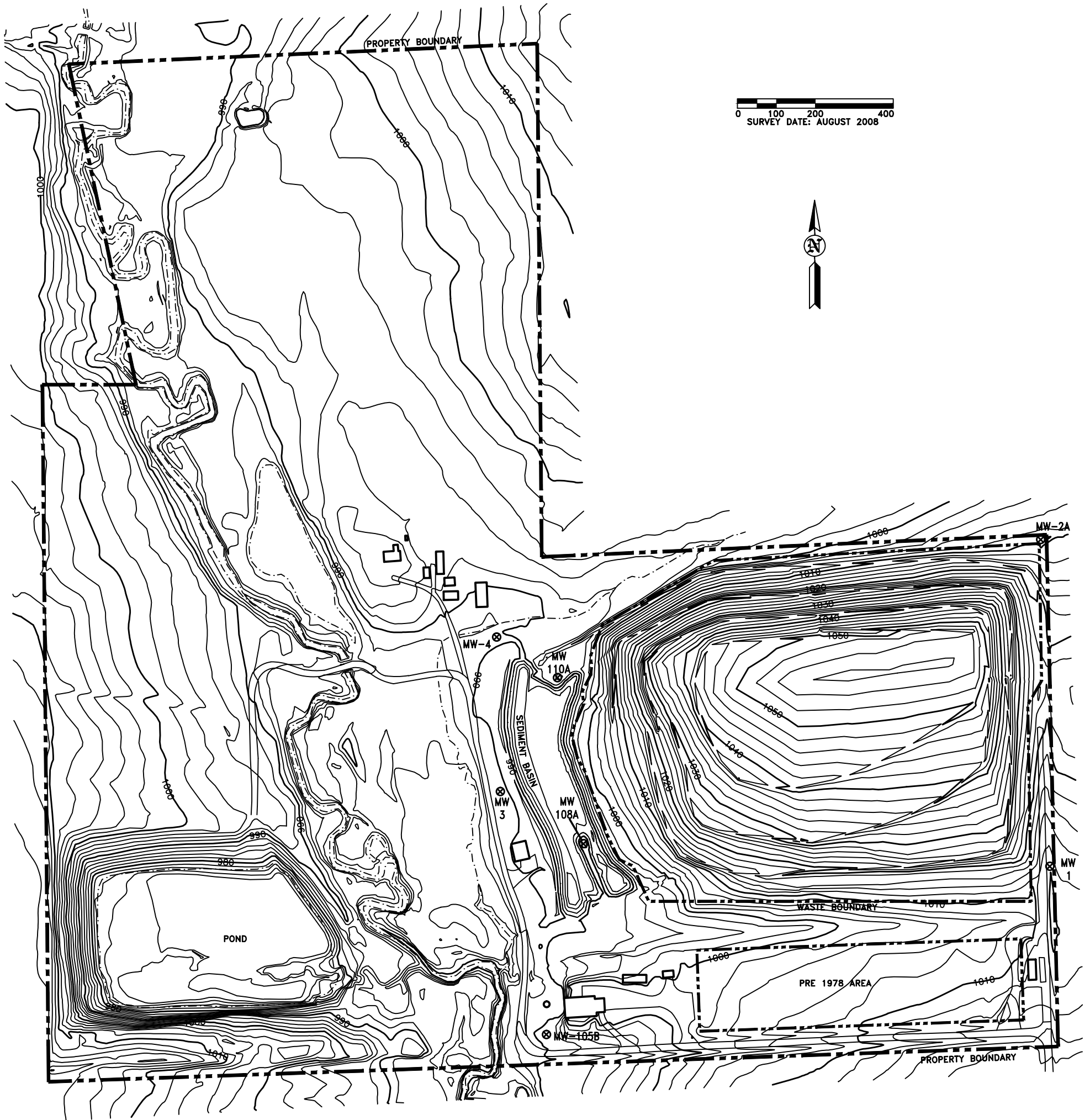
Please contact the HLW Engineering Group office at (515) 733-4144 with any questions you may have or to schedule and coordinate a site visit with Bremer County and HLW staff.

Sincerely,
HLW Engineering Group



Todd D. Whipple, CPG.
Project Manager

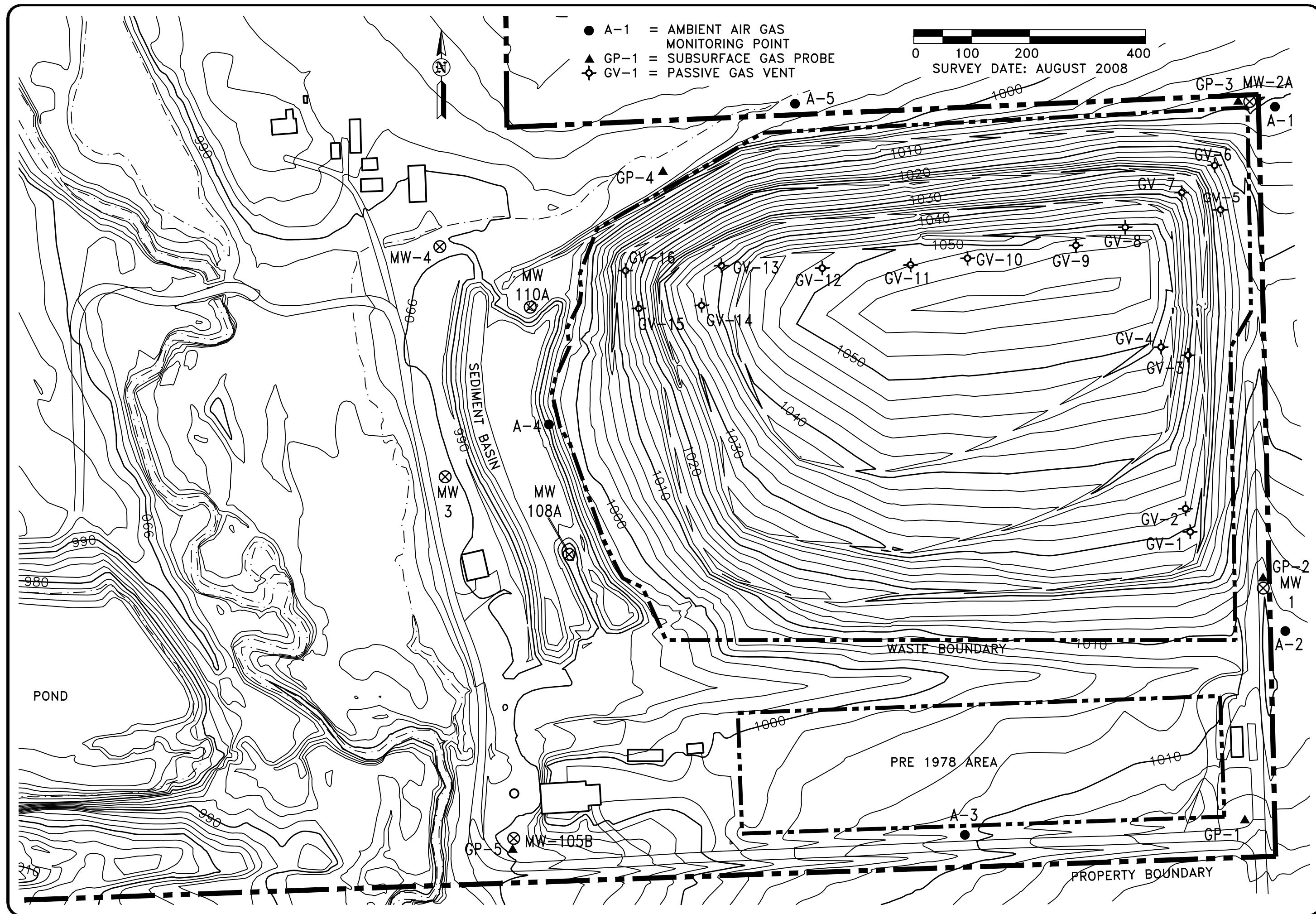
cc: Bob Brunkhorst, Chair, Bremer County Supervisor
Tim Meeker, Manager, Bremer County Landfill



HLW Engineering Group
204 West Broad Street, P.O. Box 314
Story City, Iowa 50248
Phone: (515) 733-4144
FAX: (515) 733-4146

SITE PLAN
BREMER COUNTY SANITARY LANDFILL
WAVERLY, IOWA

FIGURE: 1		
REVISION	NO.	DATE
DRAWN DRA	PROJECT NO. 6035	DATE 10-25-25



HLW Engineering Group
 204 West Broad Street, P.O. Box 314
 Story City, Iowa 50248
 Phone: (515) 733-4144
 FAX: (515) 733-4146

FIGURE: 2

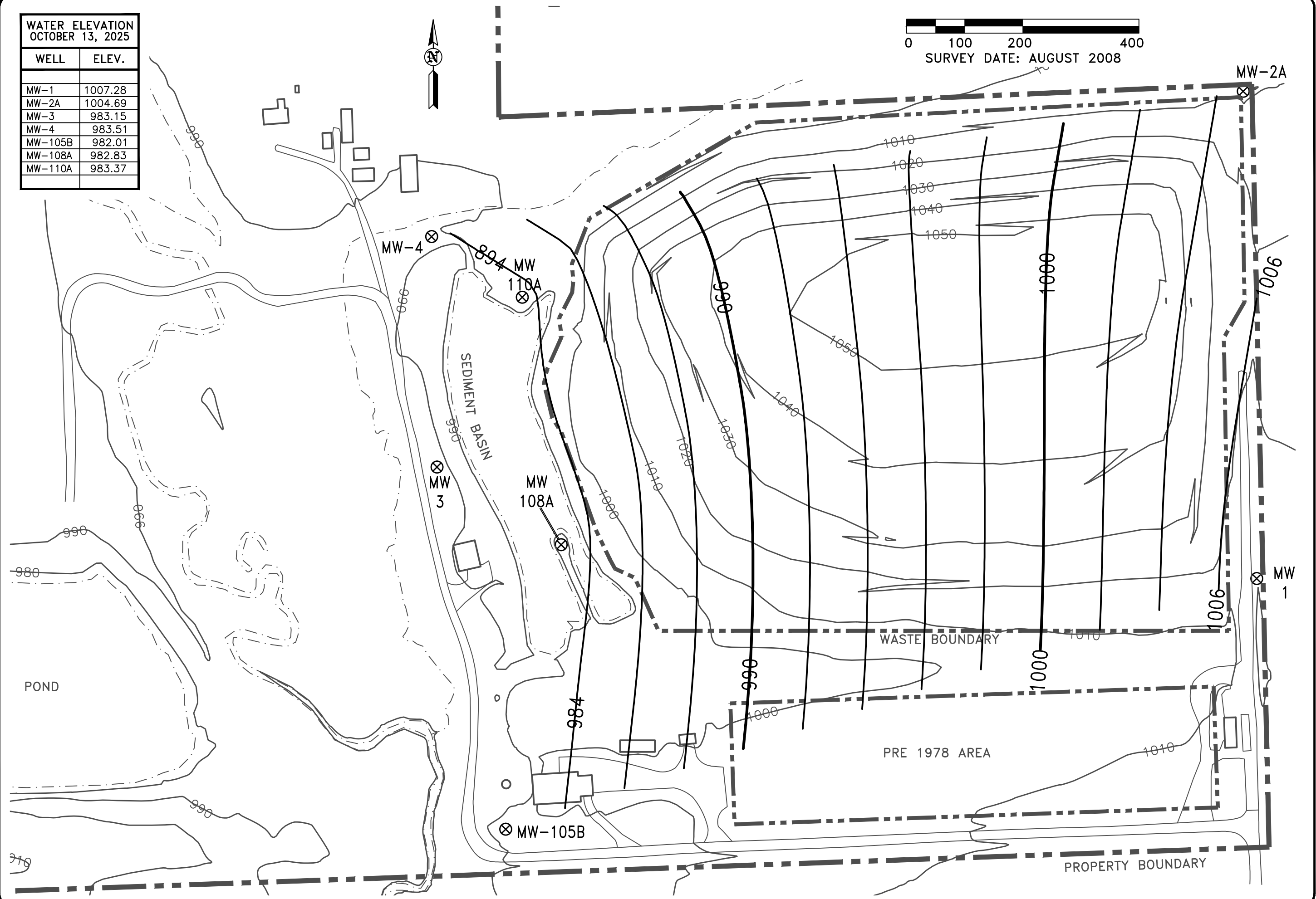
REVISION	NO.	DATE
DRAWN	PROJECT NO. 6035	DATE 10-25-25
DRA		


**SITE PLAN WITH
 GAS MONITORING LOCATIONS**

BREMER COUNTY SANITARY LANDFILL
 WAVERLY, IOWA

HLW Engineering Group

WATER ELEVATION OCTOBER 13, 2025	
WELL	ELEV.
MW-1	1007.28
MW-2A	1004.69
MW-3	983.15
MW-4	983.51
MW-105B	982.01
MW-108A	982.83
MW-110A	983.37





HLW Engineering Group
204 West Broad Street, P.O. Box 314
Story City, Iowa 50248
Phone: (515) 733-4144
FAX: (515) 733-4146

FIGURE: 3

GROUNDWATER CONTOURS

BREMER COUNTY SANITARY LANDFILL
WAVERLY, IOWA

REVISION	NO.	DATE
DRAWN	PROJECT NO.	DATE
DRA	6035	10-25-25

Attachment A

2025 AWQR Report Table 1 and Table 2

Table 1
Monitoring Program Summary
Annual Water Quality Report
Bremer County Sanitary Landfill
Permit No. 09-SDP-01-75C

Monitoring Well	Formation	Current Monitoring Program	Change for next sampling event	Constituents w/ SSI	Constituents w/ SSL	Total # of Samples in each monitoring program since October 15, 2014		
						Detection	Assessment	Corrective Action
MW-1	Weathered Till	Background	NC	None	None	24	0	0
MW-2A	Weathered Till	Background	NC	None	None	24	0	0
MW-3	Weathered Till	Detection & AZPOC	NC	None	None	24	0	0
MW-4	Weathered Till	Assessment & AZPOC	NC	None	None	0	24	0
MW-105B	Weathered Till	Assessment	NC	bis (2-ethylhexyl)phthalate	None	0	24	0
MW-108A	Weathered Till	Supplemental	NC	arsenic, cadmium, cobalt, nickel	arsenic	0	0	24
MW-110A	Weathered Till	Supplemental	NC	arsenic, barium, cobalt, 1,4-dichlorobenzene, benzene, chlorobenzene, chloroethane	arsenic, cobalt	0	0	24

AZPOC = Attenuation Zone Point of Compliance

Supplemental = Impacted Well located in the area impacted.

Table 2
Monitoring Program Implementation Schedule
Annual Water Quality Report
Bremer County Sanitary Landfill
Permit No. 09-SDP-01-75C

Monitoring Well	Recent Sampling Dates and Constituents	Upcoming Sampling Dates and Constituents		Full Appendix II Sample Dates	
		April, 2026	October, 2026	Previously Collected	Next Event
MW-1	See Table 2A	Appendix I	---	4/4/2009	N/A
MW-2A		Appendix I	---	N/A	N/A
MW-3		Appendix I	---	4/4/2009	N/A
MW-4		Appendix I	---	4/4/2009, 10/25/2022	Fall of 2027
MW-105B		Appendix I	---	4/4/2009, 10/15/2014, 9/22/2015, 10/15/2020, 10/13/2025	Fall of 2030
MW-108A		Appendix I	---	4/4/2009, 10/15/2014, 9/22/2015, 10/15/2020	N/A
MW-110A		Appendix I	---	4/4/2009, 10/7/2013, 4/17/2014, 4/8/2019, 4/9/2024	N/A

Attachment B

2025 AWQR Report Table 7 for MW-3 and MW-4

Table 7
Summary of Ongoing & Newly Identified SSI
Annual Water Quality Report
Bremer County Sanitary Landfill
Permit No. 09-SDP-01-75C

KEY:	SSI	SSL LCL>GWPS
------	-----	--------------

Note: The absence of shading indicates that the condition does not exist.

Monitoring Well	Compound	Sample Date	Each Result (ug/L)	Prediction Limit (ug/L)	95% LCL (ug/L)	GWPS Limit (ug/L)	SSI Initial Exceedance	Resamples Due	5th Background Sample
MW-3	4/11/2016	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/12/2016	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/13/2017	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/25/2017	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/12/2018	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/16/2018	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/18/2019	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/15/2019	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/6/2020	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/15/2020	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/12/2021	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/6/2021	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/14/2022	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/25/2022	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/19/2023	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/23/2023	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/9/2024	Arsenic	<4.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	10/13/2025	Arsenic	<2.0	4.0	2.000	10	NA	NA	9/22/2015
MW-3	4/11/2016	Cobalt	<0.8	0.9	0.400	2.8	NA	NA	9/22/2015
MW-3	10/12/2016	Cobalt	<0.8	0.9	0.400	2.8	NA	NA	9/22/2015
MW-3	4/13/2017	Cobalt	<0.8	0.9	0.400	2.8	NA	NA	9/22/2015
MW-3	10/25/2017	Cobalt	<0.8	0.9	0.400	2.8	NA	NA	9/22/2015
MW-3	4/12/2018	Cobalt	<0.8	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	10/16/2018	Cobalt	<0.8	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	4/18/2019	Cobalt	<0.8	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	10/15/2019	Cobalt	<0.8	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	4/6/2020	Cobalt	<0.4	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	10/15/2020	Cobalt	<0.4	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	4/12/2021	Cobalt	<0.4	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	10/6/2021	Cobalt	<0.4	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	4/14/2022	Cobalt	0.4	0.9	0.400	2.1	NA	NA	9/22/2015
MW-3	10/25/2022	Cobalt	1.6*	0.9	0.000	2.1	NA	NA	9/22/2015
MW-3	1/9/2023	Cobalt	<2.0	0.9	0.000	2.1	NA	NA	9/22/2015
MW-3	4/19/2023	Cobalt	<0.4	0.9	0.000	2.1	NA	NA	9/22/2015
MW-3	10/23/2023	Cobalt	<0.4	0.9	0.000	2.1	NA	NA	9/22/2015
MW-3	4/9/2024	Cobalt	<0.4	0.9	0.200	2.1	NA	NA	9/22/2015
MW-3	10/13/2025	Cobalt	<0.5	0.9	0.200	2.1	NA	NA	9/22/2015

* Not verified

Bold GWPS = A Site Specific GWPS that is equal to the Prediction Limit. All other GWPS are IAC 567-137
 Statewide Standards for Protected Groundwater.

Table 7

KEY:

SSI

SSL LCL>GWPS

Summary of Ongoing & Newly Identified SSI

Note: The absence of shading indicates that the condition does not exist.

Annual Water Quality Report

Bremer County Sanitary Landfill

Permit No. 09-SDP-01-75C

Monitoring Well	Compound	Sample Date	Each Result (ug/L)	Prediction Limit (ug/L)	95% LCL (ug/L)	GWPS Limit (ug/L)	SSI		5th Background Sample
							Initial Exceedance	Resamples Due	
MW-4	4/11/2016	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/12/2016	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/13/2017	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/25/2017	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/12/2018	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/16/2018	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/18/2019	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/15/2019	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/6/2020	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/15/2020	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/12/2021	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/6/2021	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/14/2022	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/25/2022	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/19/2023	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/23/2023	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	4/9/2024	Arsenic	<4.0	4.000	2.000	10	NA	NA	9/22/2015
MW-4	10/13/2025	Arsenic	<2.0	4.000	2.000	10	NA	NA	9/22/2015

Table 7
Summary of Ongoing & Newly Identified SSI
Annual Water Quality Report
Bremer County Sanitary Landfill
Permit No. 09-SDP-01-75C

KEY:	SSI	SSL LCL>GWPS
------	-----	--------------

Note: The absence of shading indicates that the condition does not exist.

Monitoring Well	Compound	Sample Date	Each Result (ug/L)	Prediction Limit (ug/L)	95% LCL (ug/L)	GWPS Limit (ug/L)	SSI Initial Exceedance	Resamples Due	5th Background Sample
MW-4	4/11/2016	Cobalt	1.6	0.900	0	2.8	NA	NA	9/22/2015
MW-4	10/12/2016	Cobalt	<0.8	0.900	0	2.8	NA	NA	9/22/2015
MW-4	4/13/2017	Cobalt	<0.8	0.900	1.665	2.8	NA	NA	9/22/2015
MW-4	10/25/2017	Cobalt	<0.8	0.900	1.665	2.8	NA	NA	9/22/2015
MW-4	4/12/2018	Cobalt	<0.8	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	10/16/2018	Cobalt	<0.8	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	4/18/2019	Cobalt	<0.8	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	10/15/2019	Cobalt	<0.8	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	4/6/2020	Cobalt	<0.4	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	10/15/2020	Cobalt	<0.4	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	4/12/2021	Cobalt	<0.4	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	7/1/2021	Cobalt	1.0	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	10/6/2021	Cobalt	<0.4	0.900	0.4	2.1	NA	NA	9/22/2015
MW-4	4/14/2022	Cobalt	2.1	0.900	0.032	2.1	NA	NA	9/22/2015
MW-4	7/13/2022	Cobalt	1.8	0.900	0.032	2.1	NA	NA	9/22/2015
MW-4	10/25/2022	Cobalt	<0.4	0.900	0.113	2.1	NA	NA	9/22/2015
MW-4	4/19/2023	Cobalt	<0.4	0.900	0.113	2.1	NA	NA	9/22/2015
MW-4	10/23/2023	Cobalt	<0.4	0.900	0.000	2.1	NA	NA	9/22/2015
MW-4	4/9/2024	Cobalt	<0.4	0.900	0.200	2.1	NA	NA	9/22/2015
MW-4	10/13/2025	Cobalt	0.8	0.900	0.265	2.1	NA	NA	9/22/2015

Table 7

KEY:

SSI

SSL LCL>GWPS

Summary of Ongoing & Newly Identified SSI
Note: The absence of shading indicates that the condition does not exist.

Annual Water Quality Report
Bremer County Sanitary Landfill
Permit No. 09-SDP-01-75C

Monitoring Well	Compound	Sample Date	Each Result (ug/L)	Prediction Limit (ug/L)	95% LCL (ug/L)	GWPS Limit (ug/L)	SSI Initial Exceedance	Resamples Due	5th Background Sample
MW-4	10/25/2022	Bis(2-ethylhexyl)phthalate	10.0*	6.000	---	6	NA	NA	9/22/2015
MW-4	1/9/2023	Bis(2-ethylhexyl)phthalate	<6	6.000	---	6	NA	NA	9/22/2015
MW-4	4/19/2023	Bis(2-ethylhexyl)phthalate	NT	6.000	---	6	NA	NA	9/22/2015
MW-4	10/23/2023	Bis(2-ethylhexyl)phthalate	NT	6.000	---	6	NA	NA	9/22/2015
MW-4	4/9/2024	Bis(2-ethylhexyl)phthalate	NT	6.000	---	6	NA	NA	9/22/2015
MW-4	10/13/2025	Bis(2-ethylhexyl)phthalate	NT	6.000	---	6	NA	NA	9/22/2015

* Not verified

Bold GWPS = A Site Specific GWPS that is equal to the Prediction Limit. All other GWPS are IAC 567-137 Statewide Standards for Protected Groundwater.