



Jolly, Becky <becky.jolly@dnr.iowa.gov>

Ankeny Sanitation Inc. Citizen Convenience Center (CCC) - Permit Review Comments

1 message

Stobbe, Chad <chad.stobbe@dnr.iowa.gov>

Thu, Feb 5, 2026 at 10:54 AM

To: Dave Massey <dave@ankenysanitation.com>

Cc: "Gross, Bill" <bill.gross@dnr.iowa.gov>, Malia Schepers <malia.schepers@dnr.iowa.gov>, "Jolly, Becky" <becky.jolly@dnr.iowa.gov>

Dave -

The DNR has completed its review of the 2026 Citizen Convenience Center (CCC) renewal submittal ([Doc #116067](#), received 2-4-26) for the above-referenced facility. To expedite the renewal process, I am providing a list of items that require clarification or action.

The DNR's comments are as follows:

- 1) Section 2 of Permit Application: Please include the date of the last approved solid waste comprehensive plan. The 9th round approval for the Metro Waste Authority Planning Area was issued on September 20, 2024 (approval attached).
- 2) Section 3 of Permit Application: Please include an updated Executive Summary. The submitted Executive Summary is dated January 2023 and makes reference to a 2023 financial assurance cost estimate that is no longer accurate.
- 3) Section 3 of Permit Application: Please note that as part of the DNR's truncated permit renewal process (as noted in the December 17, 2025 Notice of Expiration ([Doc #115221](#))), entities may claim that nothing has changed and rely upon a prior submittal(s) as justification.

The application form has an area where the prior Doc ID# can be noted if you're attesting that a prior submission remains accurate. If you're submitting a new/revised document, then you'd select the checkbox and attach the associated document. What occurred is that each checkbox was selected as if a new document was being attached, as well as indicating that a prior submittal remains current. Only select the checkbox if a document is being submitted with this renewal application.

- 4) Section 3 of Permit Application: With regard to financial assurance, there are three primary components: (a) Submittal of an updated closure cost estimate certified by a P.E. licensed within Iowa, (b) Documentation that an eligible financial instrument has been established, and (c) Proof of the selected instrument being maintained in an amount that covers the closure cost estimate. To meet this obligation, a closure cost estimate and an Irrevocable Standby Letter of Credit (LOC) were submitted.

For LOCs, [106.18\(5\)"d"](#) requires:

d. Letter of credit. The issuing institution must be an entity which has the authority to issue letters of credit and whose letter-of-credit operations are regulated and examined by a federal or state agency.

(1) The owner or operator must submit to the department a copy of the letter of credit and place a copy in the facility's official files.

(2) A letter from the owner or operator referring to the letter of credit by number, issuing institution, and date, and providing the name and address of the facility and the amount of funds assured, must be included with the letter of credit submitted to the department and placed in the facility's files.

(3) The letter of credit must be irrevocable and must be issued for a period of at least one year. The letter of credit must provide that the expiration date will be automatically extended for a period of at least one year unless the issuing institution has canceled the letter of credit by sending notice of cancellation by certified mail to the owner or operator and to the department 90 days in advance of cancellation. When such notice is provided, the owner or operator shall, within 60 days, provide to the department adequate proof of alternative financial assurance, notice of withdrawal of cancellation, or proof of a deposit of a sum equal to the amount of the letter of credit into a secured trust fund that meets the requirements of paragraph 106.18(5)"a." If the owner or operator has not complied with this subrule within the 60-day time period, the issuer of the letter of credit shall deposit a sum equal to the amount of the letter of credit into the secured trust fund established by the owner or operator. The provision of funds by the issuer of the letter of credit shall be considered an issuance of a loan to

the owner or operator, and the terms of that loan shall be governed by the letter of credit or subsequent agreement between those parties. The state shall not be considered a party to this credit transaction.

The submitted LOC addresses the criteria in 106.18(5)"d"(2), but does not address the criteria in 106.18(5)"d"(1) or 106.18(5)"d"(3). This issue was previously addressed as part of the 2023 permit issuance. The executed LOC ([Doc #105859](#)) was submitted as a supplement to the 2023 permit application submission (see pp. 2-3). Given the executed LOC limits the amount to \$1,010.00 and the updated closure cost estimate is \$1,757.00, this LOC will need to be updated, executed, and resubmitted.

5) Please ensure the referenced 2020 ERRAP (Doc #97503) is current. Please note in "Emergency and Release Notifications and Reporting" that U.S. EPA [Region #7 Office](#) is located at [11201 Renner Boulevard](#), Lenexa, KS 66219, not [901 N 5th St., Kansas City, KS 66101](#). Please also note that the [DNR Central Office](#) and [Field Office #5](#) are located at 6200 Park Avenue, Suite 200, Des Moines, IA 50321, not [502 E. 9th St. Des Moines, IA 50319](#) (moved in 2024). Given the ERRAP is to be used during times of emergency response, it is imperative that the contact information is current. Please review all contacts, update accordingly, and resubmit.

Note: Any ancillary solid waste management activities (e.g., appliances, CRT collection, waste tires) are subject to separate regulations and are not part of the CCC permit under 567 IAC 106.

We appreciate your cooperation in addressing these items. Once all the requirements are completed, and Ankeny Sanitation Inc. has reviewed and approved the draft permit documents (to be sent separately), the DNR field office with jurisdiction will conduct a facility inspection. Any necessary corrective measures identified during the inspection must be completed before the permit renewal can be issued.

Should you have any questions, please feel free to contact me.

Chad A. Stobbe

Environmental Specialist Senior

Solid Waste and Contaminated Sites Section

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SDCLA of MWA_Plan Update Approval_9-20-2024.pdf
134K



Rasmus, Laurie <laurie.rasmus@dnr.iowa.gov>

Approval _SDCLA within MWA_Comprehensive Plan Update

1 message

Rasmus, Laurie <laurie.rasmus@dnr.iowa.gov>

Fri, Sep 20, 2024 at 11:36 AM

To: Glenn Hunter <ghunter@hlwengineering.com>, Mike Fountas <mikesdclandfill@gmail.com>, "smcadon@adeliowa.org" <smcadon@adeliowa.org>

Cc: "Jolly, Becky" <becky.jolly@dnr.iowa.gov>, Jennifer Wright <jennifer.wright@dnr.iowa.gov>, Shelene Codner <shelly@netins.net>, Ted Petersen <ted.petersen@dnr.iowa.gov>, Geoffrey Spain <geoffrey.spain@dnr.iowa.gov>, Michael McCoy <mmc@mwatoday.com>, Leslie Irlbeck <lir@mwatoday.com>

GOVERNOR KIM REYNOLDS
LT. GOVERNOR ADAM GREGG
DIRECTOR KAYLA LYON**South Dallas County Landfill Agency Service Area
within the Metro Waste Authority Planning Area
9th Round Solid Waste Comprehensive Plan Update
NOTICE OF APPROVAL**

The above-referenced agency submitted their plan update regarding integrated solid waste programs and activities. Information was included regarding proposed activities that represent an action plan for the next five years.

The official Goal Progress determination for the Metro Waste Authority planning area is 21.73% for Fiscal Year 2023. This figure was determined using the Base-Year Adjustment Method. Goal Progress may be recalculated annually, once new data is available and upon request by the planning area.

The tonnage fees for the South Dallas County Landfill Agency will change due to the drop in the diversion rate to less than 25%. The new fee structure, as outlined in the [Tonnage Fee Distribution Fact Sheet](#), will begin on October 1, 2024. Questions regarding tonnage fee submission may be directed to Becky Jolly at 515-249-1482 or becky.jolly@dnr.iowa.gov.

The DNR's [Financial and Business Assistance \(FABA\) Section](#) has resources available to assist communities, businesses, and solid waste planning areas with programs. Waste reduction, pollution prevention and financial assistance are all areas of emphasis. In addition, the voluntary [Environmental Management System \(EMS\) program](#) provides benefits for efforts beyond waste reduction.

Should you have any questions or concerns, please do not hesitate to contact me at Laurie.Rasmus@dnr.iowa.gov or 515-474-4921.

Sincerely,

Laurie Rasmus

Land Quality Bureau, Financial and Business Assistance

2 attachments **Rnd9 Update_SDCSLF_pkg.pdf**
18080K **cklst_S Dallas_Final 9-20-2024.pdf**
725K