

**Sent Via Electronic Mail**  
**Receipt Confirmation Requested**

March 4, 2026

JENNIFER MURPHY  
SOUTH CENTRAL IOWA SOLID WASTE AGENCY  
1736 HIGHWAY T17  
TRACY IOWA 50256  
[jmurphy@sciswa.org](mailto:jmurphy@sciswa.org)

RE: Letter of Noncompliance: Leachate Management [567 IAC 113.8(2)h & 113.4(1)]  
Sanitary Disposal Project Inspection  
South Central Iowa Solid Waste Agency Landfill, 1736 Highway T17, Tracy, IA  
Permit No. 63-SDP-02-77P-MLF

Dear Mr. Hurt:

Enclosed is the report completed by Bill Gross of the Field Office #5 staff following the inspection of your facility in Marion County on February 24, 2026.

The report should be self-explanatory. Please take note of the requirements, reminders, and recommendations listed near the end. By April 1, 2026, submit a response describing your plan to address these issues.

You may contact Mr. Gross (515-238-7871; [bill.gross@dnr.iowa.gov](mailto:bill.gross@dnr.iowa.gov)) or this office with any questions or comments. Thank you for your assistance during this inspection.

Sincerely,



Digitally signed by Ted Petersen  
Date: 2026.03.05 08:58:02  
-06'00'

Ted Petersen  
Supervisor, Field Office #5

c: [Mike Smith](#) / [Becky Jolly](#) - Land Quality Bureau, Iowa DNR (w/encl.)

**IOWA DEPARTMENT OF NATURAL RESOURCES  
Sanitary Disposal Project Inspection**

**Permit #: 63-SDP-02-77P**

**Facility Name:** South Central Iowa Solid Waste Agency Landfill

**County:** Marion

**Facility Operator:** Pat Flattery, Foreman

**Date Last Inspection:** 8/4/2025 (visit)

**Address :** 1736 Highway T17, Tracy, Iowa 50256

**Date This Inspection:** 2/24/2026

**Phone:** 641-828-8545  
641-216-3106; [jmurphy@sciswa.org](mailto:jmurphy@sciswa.org)

**Responsible Official:** Jennifer Murphy, Executive Director  
**Address:** 1736 Highway T17, Tracy, Iowa 50256

**Waste Amount:** 87,523 tons/yr.  
(2025)

**At the time of this Inspection:**

- **facility personnel present:** Pat Flattery  
Jennifer Murphy (by phone)
- **active unit(s):** second lift - NW1 & NW2
- **surface conditions:** dry
- **ambient temperature:** 47°F, sunny
- **wind direction and speed:** west @ 14 mph

**Yes** – compliance was being achieved; **No** – compliance was not being achieved,  
**N/A** – not applicable or not observed; **PND** – previously noted deficiency (PND).

**I. Documents and Record Keeping:**

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Permit/Amendment documents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9. Financial assurance
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2. Site exploration report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. Stormwater permit
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. Plans/Specs and QC&A Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11. SWA/SWAC documentation
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Waste screening inspection records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12. Operator Certification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Leachate recirculation authorization	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13. DOPs
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Gas monitoring/remediation results	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14. ERRAP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Groundwater monitoring results	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Other
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Closure/Postclosure plans/results					

**II. Operating Procedures:**

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. All weather access road to facility					10. Scavenging and Salvaging
				2. Controlled Access at facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. scavenging prohibited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. fencing or other perimeter barriers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. salvaging authorized
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. entrance gate with lock	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. salvaged material orderly
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. safe/proper on-site traffic patterns	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. salvage removal adequate
				3. Signage					11. Animal feeding and grazing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. facility name and permit number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. animal feeding prohibited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. days and hours of operation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. grazing on final cover limited
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. wastes accepted/not accepted					12. Survey controls and monuments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. telephone # of resp. official	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. facility and waste boundaries surveyed and marked
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. All weather access road in facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. survey monuments established
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Adequate vehicle queuing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. stakes clearly marked
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Certified scale used					13. Fill Sequencing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Waste Screening	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. liner system protected
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. random inspections performed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. slope failure controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. inspection records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. differential settlement controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. trained personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. run-on and runoff controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. EPA notification procedures					14. Control of Workface
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Prohibited materials listing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. size of area controlled
				9. Open Burning and Fire Hazards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. slope is stable
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. open burning prohibited	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. litter control devices used
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. vehicle fueling prohibited within 50 feet of workface	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. vectors controlled
					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. operator at workface

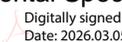
**IOWA DEPARTMENT OF NATURAL RESOURCES  
Sanitary Disposal Project Inspection**

**Permit #: 63-SDP-02-77P**

Yes	No	N/A	PND	Item	Yes	No	N/A	PND	Item
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Special Waste Handling a. operator familiar with SWAC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	23. Run-on/Runoff Control Systems a. ponding controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	16. Waste Fill Cover a. daily cover adequate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. dikes, ditches, berms & terraces intact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. alternative cover authorized	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. tile lines maintained
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. scarification of daily cover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	24. Landfill Equipment a. working properly
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. intermediate cover adequate (30/180 day)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. backup equipment available
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. final cover maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	25. Groundwater Monitoring Wells a. wells intact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17. Leachate seeps a. seeps identified and controlled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. caps and locks
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Leachate recirculation a. composite liner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	26. Gas Monitoring Wells/Points
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	b. RD&D authorization	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	27. Emergency Procedures a. ERRAP available to staff
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. personnel protected	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. emergency numbers posted
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. erosion controlled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	28. Final Cover System a. final cover over completed areas
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	e. vegetation maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. seeded
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	19. Site Litter Control a. on-site litter picked up daily	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. vegetation established
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. offsite litter picked up daily	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. run-on, runoff, and ponding controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. record of why litter not picked up	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. differential settlement controlled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	20. Dust Control a. dust controlled as vehicles enter/exit facility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	29. Other
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. dust controlled on internal roads					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. dust controlled at the workface					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	21. Mud Control a. mud controlled as vehicles enter/exit facility					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	22. Leachate Control and Treatment a. system operational					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. head measurement device					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. seeps controlled					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. leachate tank maintained					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	e. leachate lagoon maintained					
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	f. POTW agreement					
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	g. sanitary sewer discharge					
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	h. NPDES discharge permit					
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	i. NPDES on-site treatment					

**Comments:** I arrived at the landfill site unannounced. Pat Flattery showed me around the landfill. I talked to Jennifer Murphy by phone. She agreed to send me landfill records by email since she was not on-site at the time. The site entrance was clean and presentable to the public.

**AUTHENTICATION**

<b>INSPECTOR</b>	Bill Gross, Environmental Specialist Senior  Digitally signed by Bill Gross Date: 2026.03.04 16:18:00 -06'00'	Date: 3/2/2026
<b>REVIEWER</b>	Janet Gastineau, Environmental Specialist Senior Janet Gastineau  Digitally signed by Janet Gastineau Date: 2026.03.05 08:15:27 -06'00'	Date: 3/4/2026

### **General Description:**

South Central Iowa Solid Waste Agency (SCISWA) landfill is located on approximately 600 acres three miles east of Pershing in Marion County (parts of Sections 20, 21, 28, & 29; T75N, R18W) in an abandoned coal mining area. The service area for the landfill includes all cities and unincorporated areas of Marion, Poweshiek, Monroe, and Lucas Counties, and the city of Victor in Iowa County. SCISWA operates a transfer station in Poweshiek County. Rathbun Area Solid Waste Agency (RASWA) (Appanoose County and a portion of Wayne County) is contracted to bring waste to this landfill from its transfer station in Centerville. The facility operates daily from 7:30 AM to 4:00 PM Monday through Friday, and 7:30 to noon on Saturday.

### **I. Record Keeping:**

1. **Permit application, permit renewal and permit modifications application materials pursuant to rule 113.5(455B).** [See 113.11 (1) "a"]: The current permit was issued April 4, 2024, and has an expiration date of April 4, 2029. The permit has had two revisions since issuance.
10. **Stormwater permit [See 64.3(455B)]:** The current stormwater discharge authorization (No. 5863-5677) has a March 10, 2027, expiration date. Annual stormwater sample analysis results for the past several years were being maintained for trend analysis. The last sampling event was on May 22, 2025. A review of lab results for the past several years does not indicate negative water quality trends. However, COD results show "ND," for the past few years. This is not an expected result for this analyte.
12. **Operator certification [See 113.8(6)]:** There are six certified landfill operators at this facility.

### **II. Operating Procedures:**

6. **Certified Scale Used:** The annual scale certificate is up to date.
7. **Waste screening for prohibited materials [See 113.8(1) "a"]:** Records show that loads were being randomly checked weekly.
10. **Scavenging and salvaging [See 113.8(1) "d" and 113.8(3)"d"]:** The recycling area (for tires, oil, metal, appliances, CRT's, etc.) contained many appliances, but was in good order. Recycled material goes to the following outlets:
  - Appliances: Car Country
  - E-Waste: Midwest Electronics
  - Scrap Metal and Batteries: Sam Berman & Sons
  - Tires: Liberty Tire
  - Residential Household Recycling: Midwest Sanitation
  - Glass: Ripple Glass
  - Used Oil, Rubble, Remediated Soil: on-site use
14. **Working face controlled [See 113.8(2) "d"]:** As mentioned during recent Iowa DNR inspections, the working face was large. This requires more daily cover than if it were better confined. Earthen berms should be used to confine the working face, and this soil could then be used for daily cover.
16. **Cover/Alternative cover material adequate [See 113.8(2) "f"]:** Daily cover was being accomplished in the winter using soil and tarps. Deficient daily cover was noted during recent Iowa DNR inspections. I observed that some improvement could still be made, I recommended soil be used for daily cover on the top of the lift and alternative cover be used on the face where waste will be deposited the next day.

Some waste was exposed in the wet weather area atop Area 4. It was reported a customer improperly went past a barricade and dumped waste in this area recently. Also, waste piles excavated for leachate trench recirculation in Area 4 were not covered (sprayed on material had reportedly worn off).

**18. Leachate Recirculation in composite cell [See 113.8(2) “h”]:** Leachate recirculation was not occurring at the time of this inspection. Leachate recirculation last occurred on February 12, 2026 (220,000 gallons so far in 2026). A leachate recirculation trench in Area 4 was open, 15-20 ft. deep, and partially bermed with the excavated waste. Leachate was pooled at the bottom of the trench. The approved recirculation trench plan includes the following:

- The trench will be 6-8 ft. wide, 35-50 ft. long, and 8-10 feet deep.
- Excavated waste must be buried in the working face.
- Trench protection must be provided with combination of a clean soil berm, litter fences, and equipment.
- The trench must be backfilled when absorption slows.

In November 2025, leachate head measurements were reported to be well above the 12-inch limit (56 inches). The most recent measurements in 2026 showed January and February with 12.6 and 11.2 inches of liquid in LW-479, respectively, and 15.0 and 14.6 inches in LW-477, respectively. Leachate recirculation must not be done when the leachate head is more the 12 inches or infiltration slows.

**22. Leachate collection [See 113.7(5)“b”] and treatment [See 113.8(3) “i”]:** It was reported that no leachate had recently been transported to a wastewater treatment plant (Des Moines WRA), and there was no active treatment agreement.

### **SUMMARY OF REQUIREMENTS**

1. Comply with the 12-inch leachate head limit. [567 IAC 113.7(5)b]
2. Comply with leachate recirculation requirements including not recirculating leachate while the 12-inch head limit is exceeded or when the waste is saturated, limiting the depth of the trench to 8-10 ft., placing a barrier around the entire trench site, and burying excavated waste in the working face (do not use waste for barrier). [567 IAC 113.8(2)h & 113.4(1)]

### **SUMMARY OF REMINDERS**

- Minimized the size of the working face. [567 IAC 113.8(2)d]
- Apply at least six inches of soil or other approved alternate waste cover after each day of operation, including in the wet weather area. [567 IAC 113.8(2)f]
- Obtain a treatment agreement with an approved wastewater treatment facility. [567 113.8(3)i]
- Backfill the current leachate recirculation trench. [567 IAC 113.8(2)h & 113.4(1)]

### **SUMMARY OF RECOMMENDATIONS**

- Use soil for daily cover on the top of the waste lift and use alternative cover on the outer face where waste will be deposited the next day.
- Use earthen berms to better confine the working face.
- Investigate the persistent “ND” lab result for COD in stormwater runoff to ensure its accuracy.



wet weather area



active area facing north



leachate trench waste berm



active area facing north



leachate recirculation trench



active area facing SE



active area facing SE



gas flare (north slope)