

March 6, 2026

Mr. Michael W. Smith, P.E.  
Environmental Engineer Senior  
Iowa Department of Natural Resources  
6200 Park Avenue, Suite 200  
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – SPRING 2026  
DELAWARE COUNTY SANITARY LANDFILL  
IDNR PERMIT #28-SDP-01-74C - CLOSED  
HLW PN 6039-25A.750**

Dear Mr. Smith:

In accordance with the General Provisions of the SDP Closure Permit, a semi-annual inspection of the Delaware County SLF was conducted the morning of March 2, 2026. Conditions at the time of the inspection were overcast and calm with temperatures in the upper 30's.

**Status of the Permit**

The Closure Permit was issued on June 30, 2000. The facility has received the following amendments to the Permit to date:

- Permit Amendment #1, August 24, 2000, extended the landfill operating date from September 1, 2000 to December 31, 2000.
- Permit Amendment #2, October 29, 2001, revised Special Provision X.8 of the Closure Permit regarding financial assurance requirements.
- Permit Amendment #3, January 9, 2002, approved the Emergency Response and Remedial Action Plan (ERRAP).
- Permit Amendment #4, November 20, 2006, incorporated the Landfill Closure Compliance Report (June 12, 2006) into the permit documents.
- Permit Amendment #5, March 15, 2012, modified the sampling requirements by removing bedrock wells MW-16 and MW-18 from the Hydrologic Monitoring System Plan (HMSP).
- Permit Amendment #6, September 4, 2012, approved the variance and changes to the HMSP to conduct groundwater monitoring in accordance with IAC 567-113.10(4) and 113.10(5). Updated Special Provision X.6 of the Closure Permit.
- Unnumbered Permit Amendment, May 22, 2013, eliminated the requirement to submit a Semiannual Water Quality Report.
- Unnumbered Permit Amendment, July 10, 2014, required a review of total suspended solids (TSS) and turbidity testing. Sampling procedures have been modified to address this amendment, and a letter discussing TSS and field turbidity measurements was submitted to IDNR on August 19, 2015 (Doc #84118) and approved September 1, 2015.
- Permit Amendment #7, August 13, 2015, approved the use of MW-11 as a background well and approved a five (5) year frequency for Appendix II sampling at Assessment Monitoring Wells in accordance with IAC 567-113.10(4) and 113.10(5). Updated Special Provision X.6 of the Closure Permit.
- Permit Amendment #8, March 4, 2016, removed surface water monitoring points SW-1 and SW-2 from the HMSP.

- Permit Amendment #9, May 10, 2016, required the physical location of the waste boundary to be determined and installation of two (2) additional monitoring wells.
- Permit Amendment #10, February 7, 2017, approved the well construction documentation for MW-24 and MW-25 and incorporated the documentation into the Closure Permit.
- Permit Amendment #11, April 2, 2018, required the use of the IDNR Annual Water Quality Report (AWQR) format for the AWQR and changed the submittal date from January 31 to November 30.
- Permit Amendment #12, April 18, 2018, changed the submittal date from November 30 to January 31 for the AWQR.
- Permit Amendment #13, May 9, 2018, removed MW-21 and MW-22 from the HMSP. Also, the Gas Monitoring System Plan (GMSP) was changed and required the installation of three (3) subsurface gas probes and monitoring of the well headspace from select monitoring wells on the site. The frequency of gas monitoring in the GMSP was also changed from quarterly to semi-annually.
- Permit Amendment #14, June 21, 2018, approved construction documentation for three (3) subsurface gas monitoring probes (GP-1, GP-2, and GP-3) and incorporated them into the Closure Permit.
- Permit Amendment #15, June 15, 2023, approved replacing MW-3 with MW-21 in the HMSP.
- Permit Amendment #16, April 18, 2025, added Special Provision X.9 to the Closure Permit requiring the completion of a Reduction/Termination Plan (RTP). The RTP is to plan a demonstration that allows the post-closure period to cease, the Closure Permit to be rescinded, and the site to then be managed under an environmental covenant, rather than through a State-issued Permit. This Amendment also incorporated previous permit amendments, as applicable, into the Closure Permit and renumbered the Special Provisions.

### **Special Provisions**

1. The thirty-year post closure period began on June 30, 2000.
2. The closed landfill is being maintained in general accordance with the approved Closure/Post-Closure Plan. The site was mowed in 2025 and vegetation is in excellent condition across the majority of the site. Diversion and drainage structures are being maintained. Additional discussion on the condition of the cap is included in the “Additional Comments” section below.

3. The Spring semi-annual water sampling was completed March 2, 2026.

All monitoring wells viewed during the inspection were locked.

4. The Spring semi-annual methane gas monitoring was completed March 2, 2026. Methane gas monitoring results will be included in the Annual Water Quality Report.
5. The 2025 Financial Assurance documentation was submitted to IDNR on July 18, 2025 (Doc #113478) and approved by IDNR on July 22, 2025 (Doc #113495). 2026 Financial Assurance documentation has not been completed to date.
6. No changes.

7. No changes.
8. No changes.
9. A Post-Closure Care Reduction/Termination Plan was submitted February 10, 2026 (Doc #116101).

### **Annual Water Quality Report**

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on January 30, 2026 (Doc #115958). An IDNR comment letter on the 2025 AWQR has not yet been received.

### **Additional Comments**

HLW submitted a request to delay delineation of arsenic, cobalt, and nickel near MW-8 until 2027 (Doc #110483). IDNR approved the request on July 16, 2024. An initial phase of delineation work is underway and will be reported in mid-2026.

The IDNR Document DNA website was reviewed and found no recent site visits by IDNR Field Office #1. The last record HLW Engineering has of an IDNR Field Office #1 visit was on October 4, 2010.

The intakes at numerous terrace letdowns have saplings growing in the terrace channel, but all intakes are open and functioning as intended. The saplings should be removed.

The site is in excellent condition overall. Minor issues are corrected in a timely manner. Numerous areas have been repaired during the past several years as reported below.

The majority of small bare spots noted in previous inspection reports on the cap had additional soil placed and were seeded on August 17-19, 2022. Vegetation is evident in most of the distinct areas and is greatly improved from 2021 observations. These areas will continue to be observed and assessed during future inspections.

Terraces are in good condition. The terrace channel immediately upgradient from the 1<sup>st</sup> intake south of the former landfill entrance was regraded, filled, and seeded on August 17-19, 2022. Vegetation is established on the repair. No ponding water was noted.

The apparent leachate seep formerly noted just west of MW-25 was repaired and seeded on August 17-19, 2022 and no seepage was noted in the repair area during this inspection. Vegetation is improving on the repair.

The former erosion rill between terraces east of MW-24 has been repaired and reseeded. Vegetation in this area is improved.

The former stressed vegetation northeast of MW-6 has been repaired and reseeded and the vegetation continues to improve on the repair.

A few bare spots are noted across the very top of the cap with no evidence of any erosion of the cap. Two repair spots with minimal vegetation are noted on the third terrace up from the bottom in the southeast corner of the landfill.

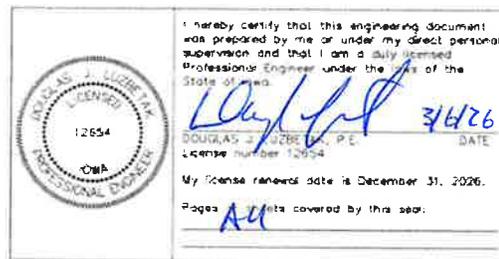
The soil borrow area was observed and has good vegetation.

Based on observations during the inspection, the facility appears to be in general conformance with the Closure Permit.

This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

### Recommendations

1. Remove the saplings from the terrace channels near the letdown pipe intakes.
2. Continue to monitor the repairs and seeding.
3. Continue to monitor the condition of the terraces and repair/improve as needed.
4. Continue to monitor vegetation and erosion and repair as needed.



cc: Michael Schmitz, Chair, Delaware County Solid Waste Commission (electronic copy)  
Erin Learn, Delaware County Solid Waste Commission (electronic copy)  
David Sands, Delaware County Landfill Maintenance Contractor