

March 9, 2026  
File No. 27225425.00

Mr. Mike Smith, P.E.  
Iowa Department of Natural Resources  
Land Quality Bureau  
6200 Park Avenue  
Des Moines, Iowa 50321

Subject: Trial Period for Cessation of Leachate Extraction  
City of Fort Madison Sanitary Landfill/Rodeo Park Dump  
Permit No. 56-SDP-05-88C

Dear Mike:

SCS Engineers, on behalf of the City of Fort Madison (City), is submitting a plan to cease leachate extraction for a trial period at the closed City of Fort Madison Sanitary Landfill and Rodeo Park Dump municipal solid waste landfill units (City Landfill and Rodeo Park MSWLF units, respectively). An evaluation of the leachate collection system at the MSWLF units was submitted on December 9, 2025 (Doc #115160). In correspondence dated December 11, 2025 (Doc #115174), the Iowa Department of Natural Resources (DNR) agreed to a two-year trial period to shut down the leachate collection system and requested a detailed plan for the trial shutdown. This document presents that plan.

### **INTRODUCTION**

The City is pursuing data collection to support an eventual request to end or reduce post-closure care for the City Landfill and Rodeo Park MSWLF units, and to support a permit rescission after the establishment of an environmental covenant. Permanent cessation of leachate extraction from the landfilled areas is a desired component of the eventual permit rescission. This document presents a plan for a trial period to evaluate cap conditions in the absence of leachate extraction, so that, if appropriate, continuous leachate extraction will not be an on-going requirement of the environmental covenant.

### **TRIAL PERIOD PLAN**

The leachate extraction pumps will be removed from Leachate Manholes #1 through #5 for cleaning and storage during the trial period. The City suspects the pumps will become inoperable if left in place without operation. The electrical wiring in the manholes for the pumps will be de-energized and properly secured for potential future use.

The leachate pipes draining into the leachate manholes will be sealed with screw-in pipe plugs. If the plugs are removed later, the plugs will be drilled so that built-up leachate, if present, can be safely released.

Once leachate collection is paused, City staff will conduct weekly reconnaissance of the MSWLF units to identify areas of leachate at or near the surface, such as seeps or unusually saturated soils, as well as other cap conditions, such as areas of erosion or lack of vegetation with the focus areas being the steeper sloped areas of the ravine fills. If areas of leachate reaching the surface are identified, the reconnaissance will determine whether the leachate is persistent or transient, likely including observations over multiple weeks. If it is determined that the leachate at the surface is



persistent, the DNR will be notified, and the City will comply with DNR guidance, including, if required, restarting leachate extraction. Restarting the system would include inspecting the pump wiring, removing the plugs, pumping out built-up leachate, if present, and reinstalling the pumps.

After three months of weekly inspections, if no leachate is identified at the surface, the inspection frequency will be reduced to monthly and following major precipitation events. A record of the inspections and noted cap conditions will be maintained at the City Public Works office.

The leachate manholes will also be checked during the inspections to determine if any plugs have failed. If a plug or plugs fail, the manholes will be pumped, if needed, to prevent overtopping before the plug(s) are repaired or replaced.

Annual engineering inspections will continue to evaluate the MSWLF unit's general conformance with the closure permit and the approved plans and specifications.

The shut-off date will be set within 60 days of the DNR's review and approval of this plan, and will start at the first of the month. If no leachate has been identified at the ground surface at the end of two years following this date, the DNR will be contacted to discuss the future disposition of the leachate collection system and remaining activities to be completed, if any, before drafting an environmental covenant.

If you have any questions regarding this plan, please contact Nathan Ohrt at (319) 331-9613.

Sincerely,



Nathan Ohrt  
Senior Project Professional  
SCS Engineers



Timothy C. Buelow, P.E.  
VP – Senior Project Advisor  
SCS Engineers

NPO/TCB

Copies: Mr. Mark Boussetot, City of Fort Madison Public Works