

April 10, 2026

Alexis Slade  
Environmental Engineer  
Iowa Department of Natural Resources  
6200 Park Avenue, Suite 200  
Des Moines, Iowa 50321



RE: Cass County Sanitary Landfill  
Spring 2026 Semi-Annual Inspection  
IDNR Permit #15-SDP-01-75C

Dear Ms Slade,

This semi-annual inspection of the Cass County Landfill was conducted the morning of April 8, 2026. The results of the inspection were discussed with Chris Jahnke, Director, upon completion. Weather conditions were clear and very windy with temperatures in the 70's. Four to five inches of wet heavy snow fell late afternoon and evening the day before the inspection. Site conditions were still very wet at the time of the inspection.

### **Status of the Permit**

The Closure Permit was issued December 5, 2023 and expires December 5, 2053. The facility has received the following amendments to the Closure Permit to date:

- Permit Revision, May 14, 2024, approved the waiver associated with financial assurance “to fully fund post-closure over 10 years following the issuance of Landfill closure permit”.
- Permit Revision, October 31, 2024, approved the Environmental Covenant between the Cass County Environmental Control Agency and IDNR, approved the implementation of no-purge sampling.
- Permit Revision, January 16, 2025, reduced the frequency of leachate level measurement in PZ-1 R, PZ-2, PZ-3 R, PZ-4, and PZ-5 R from monthly to quarterly.

### **PERMIT PROVISION STATUS**

#### **General Provisions**

1. An extension request for submittal of the 2026 Financial Assurance documentation was submitted to and approved by IDNR on March 19, 2026 (Doc #116550). As a result, 2026 Financial Assurance documentation is due by May 31, 2026.
2. The site was staked and surveyed upon completion of the closure activities. Semi-annual inspections are being conducted and reports submitted as required.

#### **Special Provisions**

1. The 30 year closure and post closure period began December 5, 2023.
2. Closure of the Cass County Sanitary Landfill occurred in general accordance with the approved Closure and Post-Closure Plan.
3. No waste is being accepted. No recycling or composting is occurring on the landfill areas. Solid waste and recycling activities are being conducted under the Cass County Solid Waste Transfer Station permit.



4. A recorded Environmental Covenant was submitted to the IDNR on October 30, 2024 (Doc #111194).
5. Monitoring is being conducted as detailed in this Special Provision.
6. The site is inspected semi-annually by a consultant who provides a summary of the site conditions and reports any recommendations for corrective actions. Inspections in 2024 and 2025 were conducted on the following dates:
  - March 25, 2024 (SCS)
  - April 15, 2024 (SCS)
  - May 16, 2024 (SCS)
  - June 27, 2024 (SCS)
  - July 30, 2024 (HLW)
  - August 23, 2024 (HLW)
  - September 19, 2024 (HLW) – Semi-annual engineer’s inspection
  - October 14, 2024 (HLW)
  - November 25, 2024 (HLW)
  - December 27, 2024 (HLW)
  - April 16, 2025 (HLW) – Semi-annual engineer’s inspection
  - June 12, 2025 (HLW)
  - August 22, 2025 (HLW)
  - October 22, 2025 (HLW) – Semi-annual engineer’s inspection

This Special Provision requires monthly inspections until “the permit holder provides justification that monthly inspections are no longer necessary”. On January 2, 2025, IDNR received a request to suspend monthly inspections of the Subtitle D Closure Cap through the winter months and reduce the frequency to bimonthly beginning in April 2025 (Doc# 111600). IDNR approved the request on January 7, 2025 (Doc# 111726). On October 31, 2025 IDNR received a request to reduce the frequency from bimonthly to semi-annually (Doc #114616). On December 2, 2025 IDNR approved the request for semi-annual inspections (Doc #114898).

7. Diversion and drainage systems have been installed as detailed in the submitted plans. Ponded water was observed during this inspection, the approximate location of the ponding is shown on the attached figure. Repairs were made to erosion on site in 2025, including the erosion rill previously noted east of MW-31/MW-32 and an area of the Subtitle D Closure Cap north east of MW-39. No vegetation growth was noted in the repair areas.
8. Most of the closed unlined areas of the site demonstrate good vegetative growth with the exception of a few areas of stressed vegetation noted on the cap as well as some bare areas where repairs were completed in 2025 and areas disturbed during installation of the trench discussed in the “Other Comments” section below. These areas are shown on the attached figure. Numerous saplings were also noted on the cap of the closed unlined area. Trees noted within the lagoon fence in the October 2025 Inspection Report (Doc #114608) have been removed.

The cap of the closed lined areas completed in 2023 was reseeded in August of 2024 due to poor initial emergence of vegetation on the cap. The vegetation is continuing to improve although in some areas weeds appear to be prevalent. Mr. Jahnke is researching options for mowing the closure cap area. The slow establishment of vegetation has led to some erosion in the drop channels at each end of the terrace on the south slope.

Silt fence posts should be removed in areas where vegetation is well established to make mowing of the cap easier.

9. See Items 7 and 8 above.
10. Methane gas monitoring is being conducted quarterly. Results of gas monitoring will be included in the Annual Water Quality Report (AWQR).
11. Leachate is collected in the storage lagoon and when levels require transported to the Atlantic POTW for treatment in accordance with the approved treatment agreement. Leachate was hauled from the lagoon in 2024 and over 3 feet of freeboard was observed in the lagoon during this inspection. A Leachate Control System Performance Evaluation Report is included in the Annual Water Quality Report each year.

On January 10, 2025 IDNR received a request to reduce leachate head level measurements in the unlined landfilling area from monthly to quarterly to coincide with quarterly methane gas measurements (Doc #111787). IDNR issued a permit revision on January 16, 2025 (Doc #111872) approving the request. Leachate head level measurements in the leachate piezometers in the Subtitle D compliant lined areas are still required monthly.

GWPZ-1 was noted as damaged during the April, 2025 semi-annual sampling event. This point was repaired in August, 2025 and was able to be measured during the October, 2025 and April, 2026 sampling events.

12. Based on a risk assessment a leachate control plan is not required for areas that received waste prior to July 1, 1992.
13. Staff regularly reviews the Transfer Station Emergency Response and Remedial Action Plan (ERRAP). The ERRAP for the Transfer Station was included in the 2022 Permit Renewal documentation (Doc #103459).
14. Approved the financial assurance waiver.
15. Approved the Environmental Covenant between the Cass County Environmental Control Agency and IDNR.

### **Annual Water Quality Report**

A Notification Letter - Alternate Source of Carbon Disulfide was submitted to IDNR on January 23, 2026 (Doc #115799). The letter contained documentation that linked the carbon disulfide detected at MW-13, MW-19, MW-20, MW-21, MW-36, and MW-37R during the Fall, 2025 sampling event to two (2) new brands of latex gloves utilized during the field sampling.

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on January 30, 2026 (Doc #115968). A request to modify the HMSP to eliminate testing of monitoring wells in the Dakota Formation with the exception of MW-11 was submitted to IDNR on February 9, 2026 (Doc #116093). IDNR has not yet commented on either submittal.

### **Other Comments**

To control persistent seepage noted east of PZ-5R, the seepage areas were cored out and backfilled during terrace repairs in 2024 with limited success. A trench was excavated upgradient of the seepage areas on August 22, 2025. The location of the trench is shown on the attached figure. The trench had a width of approximately 3' and was excavated to a depth of approximately 12' to 15' to "dry" waste. The trench was then backfilled with clean pea gravel and covered with 2' of soil. The purpose of the trench is to promote vertical migration of the leachate into the existing waste mass to limit potential seepage. Waste excavated

during the trench installation was hauled off site for disposal. Two leachate seeps were noted east of PZ-5R during the Fall, 2025 inspection at the approximate locations shown on the attached figure. Some discolored water was noted in the terrace channel during this inspection. The discolored water appeared to be reabsorbed through the cap. The seep areas show heavy wildlife activity.

The landfill and transfer station facilities currently operate under NPDES General Permit No. 1 (expires March 10, 2028). The NPDES Permit Discharge Authorization Number is 5825-5645.

IDNR Field Office #4 inspected the site on June 11, 2025. The inspection noted the following:

- ***“Some small trees were noted on the closed cell” and “along the inner berm of the leachate lagoon”*** Trees were still noted on the cap during this inspection, the trees on the berm of the leachate lagoon have been removed.
- ***“leachate seep near PZ-5R...appears to be seeping again”*** Minor seepage was noted during this inspection. The seepage was being reabsorbed back into the cap (additional discussion above).
- ***“multiple areas of poor vegetative cover of no vegetative cover”*** These areas were still present during this inspection.
- ***“vegetation on the newer closed cell appears to consist mostly of rye grass”*** The vegetation on this portion of the site continues to improve. While rye grass was still noted, other vegetation is also becoming established in the areas reseeded in 2024.

### Summary

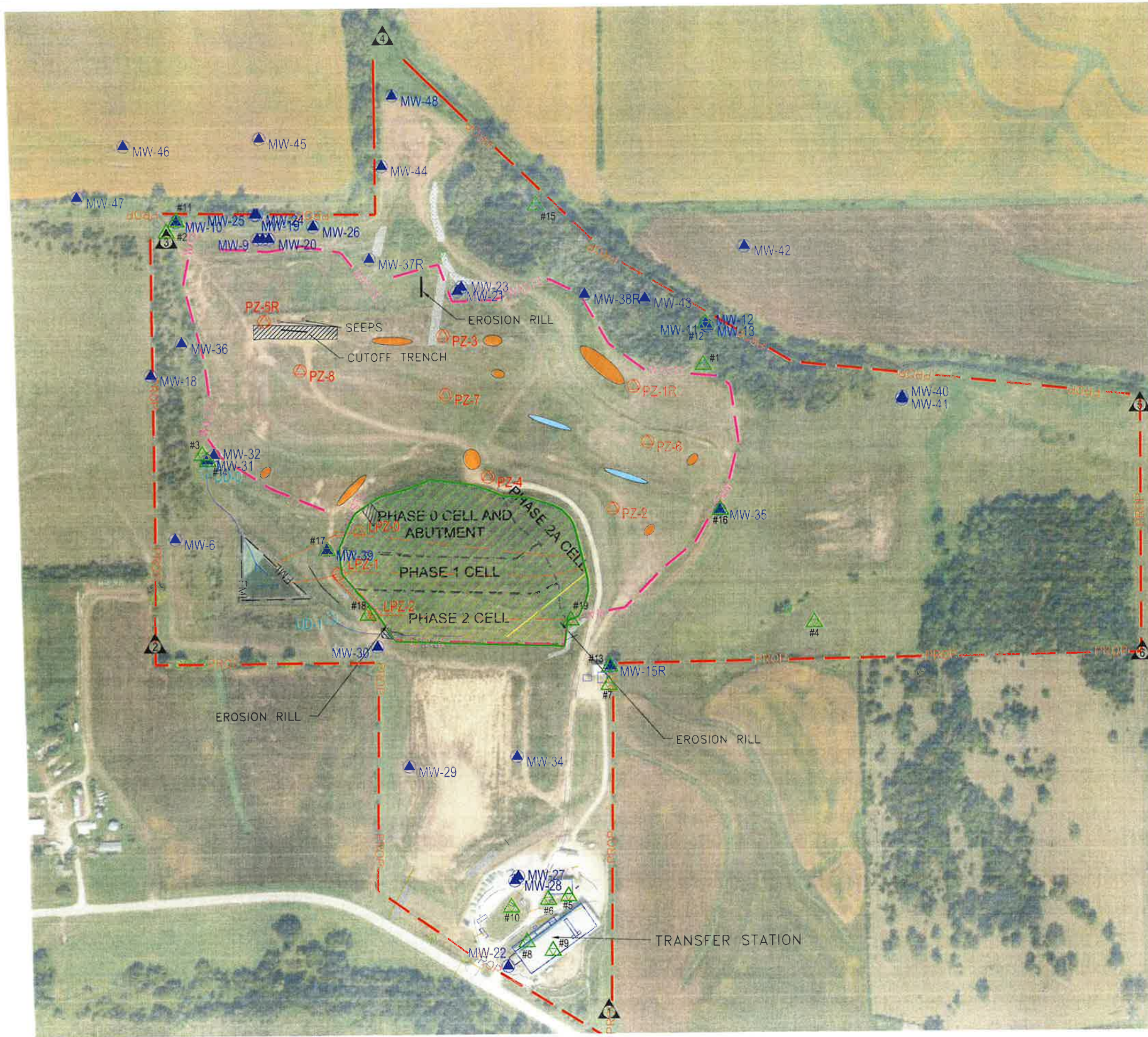
This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.



### Recommendations

1. Seed repair areas and areas with thin vegetation.
2. Monitor seepage near PZ-5R
3. Continue with tree removal operations.
4. Continue to remove silt fence posts in areas where vegetation is well established.
5. Continue to monitor site vegetation and repair/reseed as necessary.
6. Continue to monitor site erosion, drainage, and diversion systems and repair as necessary.



cc: Chris Jahnke, Director, Cass County Environmental Control Agency (*electronic copy*)



  
  
**AERIAL DATED SEPTEMBER 9, 2025**

AERIAL PROVIDED BY THE IOWA STATE UNIVERSITY GEOGRAPHIC INFORMATION SYSTEMS SUPPORT AND RESEARCH FACILITY IN COOPERATION WITH THE IOWA DEPARTMENT OF NATURAL RESOURCES, THE USDA NATURAL RESOURCES CONSERVATION SERVICE, AND THE MASSACHUSETTS INSTITUTE OF TECHNOLOGY.

-  2023 CLOSURE AREA
-  MINIMAL TO NO VEGETATION
-  THIN VEGETATION
-  PONDED WATER
-  LEACHATE SEEP

**FIGURE: 1**

REVISION NO.	DATE
DRAWN JGH	PROJECT NO. 6055-24A
	DATE 4/09/26

**SPRING 2026 INSPECTION**

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