



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

Continental Cement - CKD Waste Exhumation Inquiry

1 message

Rath, Brian <brian.rath@dnr.iowa.gov>

Thu, Apr 16, 2026 at 9:48 AM

To: Bill Hilger <Bill.Hilger@quikrete-cement.com>

Cc: "Stobbe, Chad" <chad.stobbe@dnr.iowa.gov>, Becky Jolly <becky.jolly@dnr.iowa.gov>

Bill,

As we have discussed, exhuming waste from Continental Cement's active CKD monofill for beneficial use is allowed. However, we need an operations plan for waste exhumation. Once approved, this plan will be added to your landfill permit.

Similar to your waste placement operations plan, this plan shall address the means and methods for removing, loading, and hauling the waste, including the necessary equipment. Additionally, the plan shall address stormwater runoff and runoff, dust control, leachate management, and other operational items such as updating your ERRAP. The plan shall also address liner protection, particularly protecting it during excavation and other activities, such as traffic loading, that may impact the liner.

This project will also overlap with the BUD portion (see Chad's email below), requiring upfront information such as the schedule and estimated quantities over the project's life. We will also need acceptable documentation procedures for your quarterly tonnage reports.

Lastly, as you proceed with developing this project, we recommend continued communication and meetings to help ensure we are all on the same page. With that said, please reach out with any questions.

Thanks,
Brian

Brian Rath, P.E.**Environmental Engineer Senior**

Solid Waste and Contaminated Sites Section

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IOWA DEPARTMENT OF NATURAL RESOURCES

On Mon, Apr 13, 2026 at 4:15 PM Bill Hilger <Bill.Hilger@quikrete-cement.com> wrote:

Sounds good, Thank you



Bill Hilger
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'Don't let the hard days win.'

From: Rath, Brian <brian.rath@dnr.iowa.gov>
Sent: Monday, April 13, 2026 4:07 PM
To: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
Cc: Bill Hilger <Bill.Hilger@quikrete-cement.com>
Subject: [EXTERNAL] Re: Continental Cement - CKD Beneficial Use inquiry

CAUTION: This email originated from outside of the organization. Exercise caution when opening attachments or clicking links, especially from *UNKNOWN* senders.

Bill - I wanted to let you know that I haven't forgotten about this. I plan to get something to you this week.

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On Thu, Mar 26, 2026 at 3:35 PM Rath, Brian <brian.rath@dnr.iowa.gov> wrote:

Bill - As we discussed on the phon, we will need an operations plan for excavating waste from the landfill under that permit. I'm at a conference this week, so I will get you more specifics next week

Thanks,
 Brian

Brian L. Rath
 Iowa DNR Solid Waste
 Sent from mobile device

On Wed, Mar 25, 2026 at 5:32 PM Stobbe, Chad <chad.stobbe@dnr.iowa.gov> wrote:

Mr. Hilger -

Thank you for your inquiry regarding the potential beneficial use of Cement Kiln Dust (CKD) exhumed from Continental Cement's active CKD monofill. Because these efforts touch on your industrial monofill operating permit,

I've copied Brian Rath on this correspondence.

Background

The DNR's beneficial use determination (BUD) program encourages environmentally sound materials management practices to maximize the use of recoverable materials. This is accomplished through the utilization of solid by-products, consistent with accepted engineering practices, when that utilization improves, or at a minimum does not adversely affect human health and the environment. Solid by-products must provide a functional benefit (not solely disposal cost avoidance). If that benefit cannot be adequately demonstrated, the proposed project is merely disposal under the guise of reuse and would not be approved.

Proposed Project

Per our conversation, the DNR understands that Continental Cement is interested in partnering with Midwestern BioAg Inc. to exhume, transport, and secure reuse projects for using its CKD as a soil stabilizer at cattle feedlots.

Pursuant to rule 567—108.5(455B,455D), and given this is not a universally approved application (see below), the BUD would be issued to Continental Cement as the solid by-product generator. You may choose to subcontract activities to Midwestern BioAg Inc, however that is a private business decision outside of the DNR's involvement. Information regarding the CKD excavation and onsite stockpiling process at the monofill will need to be addressed within the application. This aspect will require additional discussion with Brian to coordinate and codify these activities within your monofill operating permit.

Please complete and submit the attached BUD application and supporting documentation to initiate this process.

Universally-Approved Applications

108.4(3) Cement kiln dust. Cement kiln dust may be used as follows:

- a. Raw material in the manufacture of absorbents.
- b. Raw material in the manufacture of cement or concrete products.
- c. Subbase for hard-surface road construction.
- d. A soil amendment pursuant to 567—Chapter 121 and the rules of the Iowa department of agriculture and land stewardship or a compost amendment.
- e. A stabilizer for manure and waste sludge.
- f. A soil stabilizer for construction purposes.
- g. Fill material pursuant to 108.6(1).

Periodic Testing

As we discussed, given the ongoing nature and ground placement of this proposed project, quarterly testing (for at least the following parameters and methods) of a representative sample of the exhumed CKD must be conducted to assess the potential for contaminants to pose a risk to human health and the environment. A solid by-product shall never exhibit free liquids or toxic or hazardous properties, nor shall it contain any hazardous waste, as defined by [Iowa Code section 455B.411](#).

- a. Toxicity Characteristics Leaching Procedure (TCLP - EPA Method 1311): Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver. Since this inquiry concerns CKD, TCLP testing of Pesticides, Herbicides, VOCs and Semi-VOCs can be excluded.
- b. Synthetic Precipitation Leaching Procedure (SPLP - EPA Method 1312): Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Copper, Fluoride, Lead, Mercury, Selenium and Thallium.
- c. Resource Conservation and Recovery Act (RCRA) Total Metals (EPA Methods 6010, 6020, 7470, 7471): Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Chromium (Note: If Total Chromium \geq 210 mg/kg, further analysis shall be conducted for speciation), Cobalt, Copper, Fluoride, Lead, Lithium, Manganese, Mercury, Molybdenum, Nickel, Selenium, Silver, Thallium, Vanadium and Zinc.

Solid by-products must not exceed the TCLP and SPLP regulatory levels, nor shall their Resource Conservation and Recovery Act (RCRA) Total Metals contaminant levels exceed the [Iowa Statewide Standards for Contaminants in Soil](#).

I've attached the Analytical Testing Report Form, which identifies the applicable parameters and associated regulatory limits. Please note that Iowa law (i.e., [567 IAC 83](#), [Iowa Code section 455B.113](#)) requires laboratories reporting environmental data to the DNR be certified for the methods and parameters being measured. This certification process is in cooperation with the State Hygienic Laboratory ([SHL](#)) at the University of Iowa.

Outreach

At this time, the individual reuse locations have not yet been disclosed. I encourage you and Midwestern BioAg Inc. to reach out to the applicable [DNR Field Office](#) to introduce yourselves and notify them of the proposed reuse projects. They may have additional guidance and will be the first point of contact for any complaints the DNR receives.

Thank you for your commitment to complying with Iowa's environmental requirements. Should you have any additional questions, please feel free to contact me.

Chad A. Stobbe**Environmental Specialist Senior**

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