

April 20, 2026

Mr. Brad Davison
Environmental Specialist
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, IA 50321



**RE: ANNUAL INSPECTION REPORT – 2026
GRUNDY COUNTY SANITARY LANDFILL (CLOSED)
IDNR PERMIT NO. 38-SDP-01-75P
HLW P.N. 6033-24A.750**

Dear Mr. Davison,

In accordance with the November 24, 2025 IDNR letter, an annual inspection of the Grundy County Sanitary Landfill was conducted the morning of April 9, 2026. The results of the inspection were discussed with Mr. Chad Brown, Manager, upon completion. Conditions at the time of the inspection were sunny with a light breeze and temperatures in the low 60's.

Status of the Permit

The Grundy County Sanitary Landfill Closure Permit was issued on August 27, 2008. The facility has received the following amendments to the Permit to date:

- Permit Amendment #1, November 18, 2011, approved the Landfill Closure Compliance Report (December 29, 2008 – Doc #35361) and the Landfill Closure Compliance Comments (November 2, 2011 – Doc #67468).
- Permit Amendment #2, August 28, 2012, approved the variance for changes to the HMSP to conduct groundwater monitoring in accordance with IAC 567-113.10(4) and 113.10(5).
- Permit Amendment #3, February 28, 2013, added MW-16, MW-17, MW-18, and MW-19 (which had been inadvertently omitted) to the HMSP.
- 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 on March 24, 2015 (Doc #82785). IDNR concurred with the TSS/field turbidity correlation in the letter dated May 20, 2015.
- Permit Amendment #4, May 20, 2015, approved the Monitoring Well Construction Documentation Form for MW-15A submitted on October 12, 2013 (Doc #78336) and sampling for the full Appendix II list once every five years at monitoring points that are in assessment monitoring and have had at least two rounds of analysis using the entire Appendix II list.
- Permit Amendment #5, June 6, 2017, incorporated the installation records of gas probes GP-1 and GP-2 which were submitted on May 22, 2017 (Doc #89537).
- In correspondence dated February 8, 2018 (Doc #91476), IDNR rescinded the requirement to prepare an Assessment of Corrective Measures (ACM) Report based on the water quality at the site.

- In correspondence dated February 8, 2018 (Doc #91476), IDNR approved the suspension of sampling at three (3) monitoring wells (MW-16, MW-17, and MW-19) based on the water quality at the site.
- Revised Closure Permit, May 16, 2022, approved annual monitoring well sampling.
- Revised Closure Permit, January 23, 2023, approved semi-annual gas monitoring at the subsurface gas points (GP-1 through GP-8) and at the Equipment Building and the Recycling Building.
- Revised Closure Permit, September 28, 2023 (Doc #107802), approved a reduced list of monitoring wells to sample (MW-15A (background), MW-9, MW-11, MW-13, and MW-14). The Revised Closure Permit also approved a semi-annual frequency of leachate well measurements. Note that the IDNR Comment Letter date November 24, 2025 (Doc #114844) revised the site sampling requirements to include only MW-14 on a semi-annual basis for chlorobenzene testing. In addition, the gas monitoring and the Engineering inspections were reduced to an annual frequency.

Special Provisions

1. The thirty (30) year post closure period began on August 27, 2008.
2. The site was closed in accordance with the approved Closure/Postclosure Plan. Closure construction activities were completed by August 2008.
3. All waste disposal ceased prior to October 1, 2007. Landfilling was replaced by direct haul to other approved facilities and an on-site Citizens Convenience Center. The Convenience Center was operational on October 1, 2007.
4. The closure documentation required by this Special Provision was submitted and approved by IDNR in Permit Amendment #1 dated November 18, 2011.
5. All of the monitoring wells observed during the inspection were locked and in good condition. The most recent semi-annual groundwater sampling was completed on April 9, 2026.
6. Formal inspections of the closed landfill are required to be completed annually, with a report submitted to IDNR.
7. All drainage and diversion systems on the landfill were observed to be in good condition.
8. Vegetative cover on the majority of the landfill cap is in excellent condition. A few areas with sparse vegetation were again noted on the west slope above the borrow pit pond during the inspection. The areas near PZ1 and PZ2 are bare to sparse vegetation, however no erosion is noted. The approximate locations of the sparse areas are shown on the attached Figure. Temporary gas probes have been installed adjacent to areas with sparse vegetation to determine if landfill gas is affecting vegetative growth in these areas. The approximate locations of the temporary gas probes are shown on the attached figure. Saplings have been mowed recently in the northwest, west side, and in the ditch on the east side

near the leachate loadout. Mr. Brown indicated he plans to continue mowing to control saplings.

Temporary gas probes (TGP) were installed in areas with thin vegetation to determine if the vegetation was impacted by landfill gas. Landfill gas was not detected at any of the TGP's. The approximate location of the TGP's is included on the attached figure.

9. No significant erosion rills were noted. The vegetation in the terrace channels does not show signs of long-term ponding. The historic area of erosion along the service road to the top of the landfill (repaired) has been monitored routinely for several years and is now considered stable. A narrow (8 inches wide by 8 inches deep) rill was observed at the top of slope immediately west of the leachate holding tank in October, 2022. Mr. Brown repaired the rill in late 2022 by filling the rill with 1-inch diameter gravel. Vegetation adjacent to the rock is in excellent condition. The approximate location of each of these repaired areas is shown on the attached Figure.
10. The integrity of the final cover is being maintained.
11. Methane monitoring in the site buildings and the eight subsurface probes is conducted annually in accordance with the IDNR Comment Letter date November 24, 2025 (Doc #114844). Results will be included with the Annual Water Quality Report.
12. The permit holder is conditionally exempt from providing a leachate collection system.
13. The retrofit water collection system was installed in 1994 and 1995 to eliminate leachate seeps. The system appears to be performing as designed. Improvements were made to the leachate loadout system in 2018.

The September 23, 2025 IDNR Field Office Inspection Report (Doc #113800) included a Notice of Violation related to compliance with the Grundy Center Treatment Agreement for leachate treatment. The referenced IDNR Letter required some changes to the site operations related to leachate sample collection and hauling. The response to the Inspection are discussed further in the Additional Comments Section of this report.

A Leachate Control System Performance Evaluation Report will be included with the Annual Water Quality Report.

The leachate lines were cleaned on August 17, 2023. As per IDNR regulations, the lines should be cleaned every 3 years (Mr. Brown indicated that he will schedule the next cleaning to occur this year).

14. Maintenance on the landfill Ecolotree Cap is continuing. Maintenance includes removing dead trees and volunteer tree removal. Three (3) trees remain on the Ecolotree Cap. This portion of the cap was mowed in 2025 to control saplings.

Mr. Brown is planning to remove the southernmost tree himself and indicated he would will remove the other two trees using a tree service.

15. The site has closed since the Emergency Response and Remedial Action Plan (ERRAP) was completed; however, the majority of the ERRAP is still applicable to the closed landfill. The Citizens Convenience Center, which is located on the closed landfill property, also has an ERRAP.

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

Annual Water Quality Report

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on January 30, 2026 (Doc #115959). Sampling and reporting is in conformance with the IDNR Comment Letter dated November 24, 2025 (Doc #114844)

Financial Assurance

Documentation for 2026 Financial Assurance was received by IDNR on March 17, 2026 (Doc #116541). The 2026 Financial Assurance documentation was approved by IDNR on March 25, 2026 (Doc #116641).

Additional Comments

As a result of an inspection on August 21, 2025, IDNR Field Office (FO) #2 issued a Notice of Violation (NOV) – Leachate Overflow on September 3, 2025. Mr. Brown responded to the NOV via email on September 26, 2025. The status of the items noted in the NOV are below:

Recommendations:

1. Install a high-water alarm or other automated system on the south manhole to prevent future overflows. Staff has looked into high-level alarm systems but have been unable to find a cost effective system to date.
2. Request an increase in the current limits with the City of Grundy Center or obtain a treatment agreement with a second City for additional flexibility in leachate disposal. Waterloo has agreed to accept leachate during high flow events.

Requirements:

1. Remove the tress from the landfill cap to prevent damage to the cap... Staff is planning to remove trees with the exception of two larger trees that are located closer to landfill infrastructure. A tree removal service will be contacted for the removal of those trees. This is planned for 2026.
2. Take action to prevent additional overflows of the leachate collection system... Waterloo has agreed to accept leachate during high flow events.
3. Ensure that the monthly leachate sample is measured for biochemical oxygen demand... This has been corrected.

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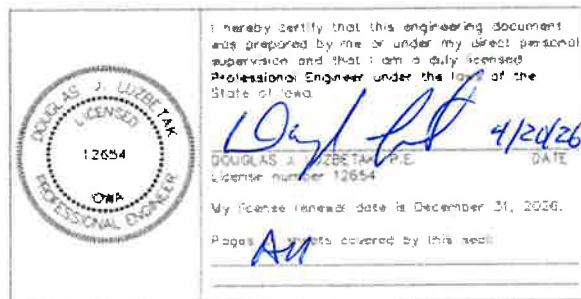
4. Ensure that the monthly leachate sample is taken on a day that leachate is hauled to the City Staff will take the monthly leachate sample on a day that leachate is being hauled.
5. Ensure that the pH of the leachate sample is measured within 15 minutes of collection... A pH meter has been purchased to allow immediate pH measurement at the landfill when the monthly sample is obtained.

The SDP Permit for the Citizens Convenience Center was renewed August 29, 2025 (Doc #113764).

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 dead trees from the Ecolotree project at north end of landfill cap. Also continue to mow saplings in the Ecolotree project when necessary.
2. Continue to routinely mow the willow saplings located on the cap in the southwest corner of the site north of MW-5, and along the east side of the landfill near the leachate loadout area.
3. Monitor the areas where vegetation is noted as sparse. If vegetation continues to decline in these areas or erosion occurs, take other action to improve the areas.
4. Continue to monitor the former erosion repairs along the service road and at the top of slope located west of the leachate tank.
5. Continue to monitor vegetation and erosion and repair as necessary.
6. Continue to monitor diversion and drainage systems and repair as necessary.



cc: Karl Strohhahn, Chair, Grundy County Landfill Commission (electronic copy)
 Chad Brown, Grundy County Landfill (electronic copy)

