

April 24, 2026

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



**RE: ANNUAL INSPECTION – 2026
BREMER COUNTY SANITARY LANDFILL
IDNR PERMIT #09-SDP-01-75C – CLOSED
HLW PN 6035**

Dear Mr. Davison:

In accordance the SDP Permit Amendment dated May 17, 2024 (Doc #110105), the Annual Inspection of the Bremer County Sanitary Landfill was completed on April 23, 2026.

The following also attended the inspection to review the facility to determine eligibility to start the Environmental Covenant process:

Mike Smith, P.E., Environmental Engineer Senior, IDNR Central Office
Brad Davison, Environmental Specialist, IDNR Central Office
Amber Sauser, Environmental Specialist Senior, IDNR Field Office #1
Bob Brunkhorst, Chair, Bremer County Board of Supervisors.
Tim Meeker, Landfill Manager, Bremer County Sanitary Landfill
Doug Luzbetak, P.E., HLW Engineering

Conditions at the time of the inspection were overcast with strong winds and temperatures in the 70's.

Status of the Permit

The Closure Permit was issued on September 5, 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 #35356) and the Landfill Closure Report Comments (November 3, 2011 – Doc #67466).
- Permit Amendment #2, August 28, 2012, approved changes to the Hydrologic Monitoring System Plan (HMSP) to conduct groundwater monitoring in accordance with IAC 567-113.10(4) and 113.10(5).
- Permit Amendment #3, July 14, 2014, approved the construction of MW-2A and abandonment of MW-2.
- 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 2, 2015 (Doc #82594) and approved by IDNR on July 14, 2015.

- Permit Amendment #4, July 14, 2015, approved the five (5) year frequency of full Appendix II Assessment Monitoring at wells where two (2) consecutive annual episodes have been completed.
- Permit Amendment #5, April 18, 2016, amends the HMSP regarding the resampling/retesting scheme upon initial indication of a statistically significant increase (SSI).
- Permit Amendment #6, April 2, 2018, requires that the format of the Annual Water Quality Report (AWQR) be revised to meet the new IDNR AWQR format. Requires that the AWQR be submitted by November 30th of each year.
- Permit Amendment #7, April 18, 2018, requires that the AWQR be submitted by January 31 of each year.
- Permit Amendment #8, July 31, 2018, approved the construction documentation for subsurface gas probes GP-1 through GP-5 and modified the Gas Monitoring System Plan (GMSP).
- Permit Amendment #9, July 22, 2020, approved the semi-annual frequency of gas monitoring from site structures and from subsurface gas probes GP-1 through GP-5 thereby modifying the GMSP.
- Permit Amendment #9 (sic), May 17, 2024 (herein referred to as Permit #10), approved the annual frequency of landfill inspections, the annual frequency of gas monitoring from site structures and from subsurface gas probes GP-1 through GP-5, and the annual frequency (in alternating seasons) for monitoring well sampling.

Special Provisions

1. The thirty-year post closure period started September 5, 2008.
2. The closed landfill is being maintained in general accordance with the approved Closure and Post Closure Plan.
3. All waste disposal ceased prior to October 1, 2007. There are no activities on the closed landfill.
4. The closure documentation required by this Special Provision was submitted and approved by IDNR in Permit Amendment #1 dated November 18, 2011.
5. The annual water sampling for 2025 was completed on October 13, 2025. Monitoring was performed in accordance with the Permit Amendment #10, May 17, 2024 (Doc #110105).
6. Formal inspections of the closed area are now completed annually, with a report submitted to IDNR.
7. The diversion and drainage systems are maintained and are in generally good condition. Ditches, culverts, and terrace intakes and outlets were free of debris and appeared to be draining as designed.

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8. The vegetation on the cap is in excellent condition. Mowing is performed annually to control weed and tree growth. The site was mowed in 2025. Observation indicates that the regular mowing is effective for tree/sapling control.
9. The final cover over the closed area is in good condition.
10. Explosive gas monitoring is performed annually in accordance with Permit Amendment #10, May 17, 2024 (Doc #110105). Explosive gas monitoring results will be included in the AWQR. The vents installed in 2022 during the gas venting project (discussed later in this report) are included in the GMSP. The interior of the scale house and the gas vents located under the scale house were monitored during the inspection with no explosive gas detected.
11. Based on a risk assessment, the closed landfill does not require a leachate control plan.
12. 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.

Annual Water Quality Report

The 2025 AWQR for the Bremer County Sanitary Landfill was submitted to IDNR on January 30, 2026 (Doc #115952). A Post-Closure Care – Reduction Termination Plan (PCCRTP) was submitted to IDNR on February 2, 2026 (Doc #116000), IDNR comments on the these documents were received on March 12, 2026 (Doc #116506). A conference call between Bremer County, IDNR, and HLW personnel was held on April 2, 2026 to discuss the IDNR response. IDNR issued a follow up to the review of the 2025 AWQR and the PCCRTP on April 6, 2026 (Doc #116781).

Financial Assurance

IDNR granted Bremer County an extension to the deadline for the submission of 2026 Financial Assurance documentation to April 30, 2026 (Doc #116617). The 2026 Financial Assurance documentation was submitted to IDNR on March 31, 2026 (Doc #116727) with additional documentation submitted on April 15, 2026 (Doc #116864). IDNR approved the 2026 Financial Assurance documentation on April 16, 2026 (Doc #116881).

Additional Comments

The last IDNR Field Office #1 inspection recorded on Document DNA was on September 25, 2025. The report noted trees in two locations, “on the lower berms on the north side” and “on the west side of the landfill cap by the tile inlet”. The trees referenced in the inspection have been removed.

A project to install gas vents through the cap in areas where stressed vegetation was noted during past inspections was completed in May, 2022. Sixteen gas vents were drilled through the cap into

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the waste mass. Each vent was backfilled with clean river rock and a perforated pipe with wind turbine vent on top was installed in the rock to aid in gas removal from the waste mass. A Construction Certification Report was submitted to IDNR on July 15, 2022 (Doc #103616). Erosion was also repaired during this project.

Observation of past erosion repairs indicates that the repairs appear to be successful. Areas disturbed during the gas venting project were seeded upon completion. The vegetation over the majority of the previously disturbed areas is well established.

Based on observations during the inspection the facility appears to be in general conformance with the closure permit.

The SDP Permit (09-SDP-10-07 CCC) for the Citizens Convenience Center expires on October 13, 2028.

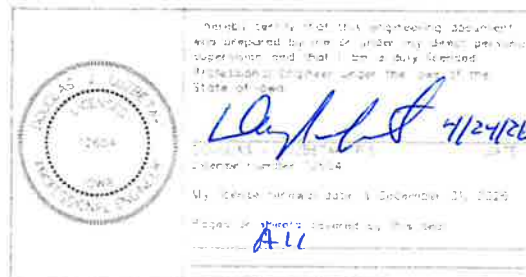
This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

Environmental Covenant Process

At the completion of the inspection IDNR indicated that the site is eligible to begin the Environmental Covenant (EC) process. It is understood that if the EC is not in place by this fall the annual groundwater sampling for 2026 will need to be conducted.

Recommendations

1. The cap should continue to be mowed and saplings should continue to be removed from the cap.
2. Continue to monitor vegetation and repair as necessary.
3. Continue to monitor diversion and drainage systems and repair as necessary.



cc: Tim Meeker, Landfill Manager, Bremer County Sanitary Landfill (electronic copy)
Bob Brunkhorst, Chair, Bremer County Board of Supervisors (electronic copy)

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