

May 4, 2026

Michael W. Smith, P.E.
Environmental Engineer Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – SPRING, 2026
RURAL IOWA SLF
IDNR PERMIT #42-SDP-1-72P
VERTICAL EXPANSION AREA - CLOSED
HORIZONTAL EXPANSION AREA - ACTIVE
HLW PN 6006-26A.750**

Dear Mr. Smith:

In accordance with Special Provision XI.8 of the SDP Permit, a semi-annual inspection of the Rural Iowa SLF was personally conducted the morning of April 30, 2026. Clint Reents, Director, was on site during the inspection and the results were discussed with Mr. Reents upon completion. Conditions at the time of the inspection were overcast with intermittent light rain, gusty winds, and temperatures in the 40's.

Sanitary Disposal Project Permit

The SDP Permit for the Rural Iowa SLF was renewed on November 29, 2022 (expires November 29, 2027). The facility has received the following revisions to the Permit to date:

- Permit Revision #1, June 2, 2023, approved reducing the frequency of leachate piezometer measurements in the Closed Landfilling area from monthly to quarterly.
- Permit Revision #2, October 31, 2023, approved the request to construct the Trench 3 Phase 2 Expansion area.
- Permit Revision #3, June 3, 2025, approved the Construction Certification Passive Gas Vent Installation and added the new gas vents to the Gas Monitoring System Plan.
- Permit Revision #4, December 8, 2025, approved storing and utilizing wood chips and added a provision regarding the steps needed to end or reduce postclosure care requirements.
- Permit Revision #5, January 22, 2026, removed MW-31R and MW-211 from the Hydrologic Monitoring System Plan (HMSP).

Office/Scale Area

The Rural Iowa Waste Management Association (RIWMA) shares scale operations with the Hardin County Solid Waste Disposal Commission (HCSWDC). The scale is operated by HCSWDC personnel.

RIWMA has an equipment and maintenance building located west of the closed west slope of the original landfilling area. This building is used to house staff offices, sanitary facilities, and to store supplies and maintain/store equipment. The building has a concrete parking area for the convenience of employees and customers.

Recycling Facilities/Material Stockpiles

RIWMA does not accept materials for recycling at the landfill. Member counties/communities are responsible for recycling activities. The HCSWDC has recycling operations at their location adjacent to the landfill property. The HCSWDC owns the compost pad and compost pad retention basin west of the original landfilling area.

Original Landfilling Area (Vertical Expansion Area) - CLOSED

All waste disposal operations were completed in the original landfilling area (vertical expansion area) in 2005. The entire original landfilling area is closed with a 4-foot cap (2-foot low hydraulic conductivity infiltration layer and 2-foot erosion layer) in accordance with the approved Closure/Postclosure Plan and applicable IDNR regulations. Construction Certification Reports and Record Drawings were submitted to IDNR and approved for each phase of the closure. As per Special Provision XI.1 of the SDP Permit the thirty year post closure period for the Original Landfilling Area/Vertical Expansion Area began on October 15, 2007.

Leachate collection laterals extending into the waste mass and leachate conveyance piping were installed on the north, east, and west perimeters of the Original Landfilling Area in 1995/1996.

Vegetation is established on the majority of the Original Landfilling Area; however, there are numerous areas on the cap where sparse vegetation/bare spots were noted. The approximate locations of the most significant stressed areas are shown on the attached figure.

A portion of the cap was mowed in 2024. Mowing improves site aesthetics and aids in the establishment of desirable vegetation by controlling weeds and tree growth on the cap. Mowing also makes potential problem areas, such as leachate seeps and erosion rills, easier to identify. Due to staffing shortages and staff turnover the cap was not mowed in 2025.

The vegetation and terraces have limited the formation of significant erosion rills

Staff is in the process of cleaning and regrading perimeter ditches to improve surface water flows and limit leachate generation. Ditches west and south of the Original Landfilling Area have been cleaned and regraded to date. The ditch checks east and west of the Original Landfilling Area were removed to allow work on the ditches to proceed.

No leachate seeps were noted in the closed area.

Several areas of ponded water were noted in the closed area. The approximate locations of the ponded areas are shown on the attached figure.

Gas vents have been installed on the south slope to limit gas migration toward the agricultural fields to the south. The vents are included in the Gas Monitoring System Plan.

Subtitle D Compliant Horizontal Expansion Area

The initial cells of the horizontal expansion area, Phase A of Trench 1 and Phase A of Trench 2, were constructed in 2002. Phase B of Trench 1 was constructed in 2003. Phase C of Trench 1 and Phase C of Trench 2 were constructed in 2005. These areas were constructed with Subtitle D compliant alternative liner systems.

Phase 1 of Trench 1 and Trench 2 was constructed in 2008. Phase 2 of Trench 1 and Trench 2 was constructed in 2009. The Trench 3 Expansion project was completed in 2015. The Trench 3 Phase 2 project was completed in 2024. These areas were constructed with Subtitle D compliant composite liner systems.

The working face was located approximately 300' north of the south end of Trench 3 Phase 2 with the compactor being located at the working face. Soil or a tarp system are utilized as daily cover. The use of the tarp should be encouraged as it will help to reduce the amount of soil used for cover and save airspace to help maximize the life of the facility. Cover soils, when needed, are obtained from the soil stockpiles east of Trench 3. Mr. Reents said they are also considering the use of spray on alternative daily cover.

Litter was noted away from the working face during the inspection with the majority caught in on site vegetation and the perimeter fencing. Some litter was noted offsite at the southeast corner. Mr. Reents reported that a new employee will start May 4, 2026 to aid in litter collection. Net litter fencing has been installed on portions of the south and east perimeters of the site to limit litter movement off site. Portable litter fences are also used when practical to limit litter movement. RIWMA staff retrieve litter on an as needed basis, concentrating on off-site litter first. The RIWMA also has a litter vacuum to aid litter collection efforts. The litter log is maintained by Bruce Rewoldt, Hill Supervisor.

Intermediate cover is added to the north, east, and west slopes of the Horizontal Expansion Area as needed. The north and west intermediate cover was seeded in 2023, vegetation is spotty in these areas. The majority of the east intermediate cover will be covered with waste this year as operations in Trench 3 Phase 2 continue.

A few small seeps were noted during the inspection from the east slope of Trench 3. The seepage was migrating a short distance into the Trench 3 Phase 2 lined area and was being absorbed into the waste mass. Seeps were also noted from the west slope of Trench 1. Leachate was pooling at the bottom of the slope in these areas.

Leachate collected in the Horizontal Expansion Area flows to a pump station north of Trench 2. The leachate is then pumped through a force main to MH-3(N), at the northeast corner of the Original Landfilling Area. From MH-3(N), the leachate joins leachate collected from the Original Landfilling Area and flows to the underground leachate storage tanks.

Mr. Reents reported that both pumps in the leachate pumping station associated with the Horizontal Expansion Area are operational. A contractor has been hired to install an auto-dialer

system at this pump station. Quotes are also being obtained for two new pumps and a new control panel for this pump station.

The rubble ditch checks adjacent to Trench 1 have been removed to prepare for cleaning and regrading the ditch in this area. The waste boundary was also staked to ensure that the lined area is not impacted during work on the ditch.

Annual Water Quality Report

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on January 30, 2026 (Doc #115961). IDNR comments on the 2025 AWQR were received on April 9, 2026 (Doc #116812) and required a response regarding arsenic levels at ACM Tile-1. The required response was submitted to IDNR on May 1, 2026 (Doc #117024).

A Notification Letter - Alternate Source of Carbon Disulfide was submitted to IDNR on January 14, 2026 (Doc #115689). The letter contained documentation that linked the carbon disulfide detected at MW-7 and MW-49A during the Fall, 2025 sampling event to two (2) new brands of latex gloves utilized during the field sampling.

Stormwater Pollution Prevention Plan

The facility operates under NPDES General Permit No. 1 (expires June 16, 2026).

Many of the activities discussed in this inspection report are to insure continued compliance with the Storm Water Pollution Prevention Plan (SPPP). The annual stormwater sample required by the NPDES Permit was collected on April 24, 2026.

Runoff from the horizontal expansion area drains into several sediment control structures located northeast of Trench 3. Staff removed a portion of the sediment and willow trees from the upper sediment basin in 2024 to restore sediment capacity. This basin is full and additional sediment removal is needed. Accumulated sediment was removed from the lower sediment basin in 2023 and landfill staff replaced the outlet pipe in 2024. The lower sediment basin has adequate sediment storage capacity available and the inlet appears to be free flowing.

The sediment basin located in the northwest corner of the landfill property had accumulated sediment removed in 1999 and has accumulated minimal additional sediment to date. This sediment basin is generally dry, and has an excellent stand of vegetation established. The vegetation helps to slow water flow and trap sediment in the basin. Ditch cleanout and regrading has also been conducted in this area.

The southeast detention basin had the sediment storage capacity increased, outlet pipe replaced, and a stoplog structure installed on the outlet pipe during the Trench 3 Phase 2 Expansion project in 2024. Litter was noted in this area and flow from the stoplog structure is restricted due to trash in the stoplog structure.

The SPPP and mapping was updated in January 2025 to reflect the completion of the Trench 3, Phase 2 project as well as the improvements to the sediment basins. The SPPP was also updated in October 2025 to reflect changes in site personnel.

A separate “Stormwater Industrial Routine Facility Inspection Report” was completed during this inspection to satisfy the annual inspection requirement in accordance with the SPPP. The stormwater inspection report is attached to this inspection report and will be filed in the SPPP.

Spill Prevention, Control, and Countermeasures Plan

Due to the amount of petroleum products stored on site, the Rural Iowa Sanitary Landfill operates under a Spill Prevention, Control, and Countermeasures Plan (SPCC). It appears that all petroleum products are being stored as designated in the SPCC. Oil dry is available in the equipment and maintenance building.

The exterior of the tanks and secondary containment systems were visually observed during the inspection with forms documenting the visual inspection completed and provided to Mr. Reents.

Leachate Collection, Storage, and Loadout

Leachate is stored in two dual walled underground leachate storage tanks, each with a capacity of 25,000 gallons. Leachate was not being aerated during the inspection – Mr. Reents reported that the seals in the loadout pumps were replaced the day before the inspection and the aerators were inadvertently left off. The tanks are equipped with a monitoring and alarm system. The tank monitoring system in the loadout building (adjacent to the tanks) was working during the inspection.

The RIWMA has a leachate treatment agreement with the City of Alden as the primary method of leachate disposal. A contractor has been hired to install a flow meter on the leachate loadout to help maintain compliance with the leachate treatment agreement with the City of Alden. The RIWMA also has a leachate treatment agreement with the Des Moines Metropolitan Wastewater Reclamation Authority as a backup disposal option if needed. Leachate is also recirculated. Additional information on leachate disposal/recirculation volumes will be provided in the AWQR.

The leachate loadout has a concrete spill pad to capture leachate that may be spilled during tank truck loading and direct it back to the leachate storage tanks. No sign of spillage was noted on the pad.

Financial Assurance

The 2025 Financial Assurance documentation was submitted to IDNR on November 19, 2025 (Doc #114783) and approved by IDNR on December 30, 2025 (Doc #115308). An extension request for submittal of the 2026 Financial Assurance documentation was submitted to IDNR on March 20, 2026 (Doc #116598). IDNR approved the extension request on March 25, 2026 (Doc #116626). As a result, 2026 Financial Assurance documentation is due by July 31, 2026.

Tree Removal/Stump Monitoring

IDNR FO #2 issued an NOV on September 30, 2019 regarding tree growth on the closure cap. This section of the report has been added as required by the NOV. The majority of the trees were previously removed from the cap; however, regrowth is occurring and numerous saplings were noted on the cap during this inspection.

Additional Comments

Hardin County Integrated Roadside Vegetation Management (IRVM) staff were on site during the inspection to review areas needing seeding. Current plans are for the IRVM to seed areas disturbed during ditch improvement work as well as portions of the intermediate cover this spring.

IDNR Field Office (FO) #2 conducted a “Wastewater Significant Industrial User Inspection” on November 3, 2025. The December 2, 2025 report documenting this inspection contains the following Required Actions:

1. Comply with all treatment agreement limits with the City of Alden per Subrule 567 IAC 62.1(4). A contractor has been hired to install a flow meter on the leachate loadout to ensure compliance with the loading limits.
2. Ensure that leachate sampling for the treatment agreement occurs on a day that leachate is being hauled to the City of Alden per Subrule 567 IAC 60.3(1). Staff is complying with this requirement.
3. Contain and plug all leachate seeps as they are identified per Paragraph 567 IAC 113.8(2)g. A few small seeps were noted during the inspection from the east slope of Trench 3 and west slope of Trench 1. Mr. Reents is aware of these seep areas and the need for repairs.
4. Repair auto-dialer alarm system on leachate lift station per Subparagraph 567 IAC 113.7(5)“b”. A contractor has been hired to install an auto-dialer alarm system at the leachate lift station.
5. Send annual leachate sample result to npdes.mail@dnr.iowa.gov. The 2025 annual sample was submitted 12/03/25. The annual sample for 2026 is scheduled for October and results will be submitted as required.

IDNR FO #2 issued a Notice of Violation (NOV) – Exceedance of Treatment Agreement Limits on February 10, 2026. The violations noted in the NOV occurred in August, October, and November of 2025. The steps outlined above should aid in compliance with the Treatment Agreement.

Documentation on Random Load Inspections is maintained by Mr. Rewoldt.

The leachate lines were cleaned in 2023. As per IDNR regulations leachate lines must be cleaned every 3 years so the next cleaning should be scheduled for 2026.

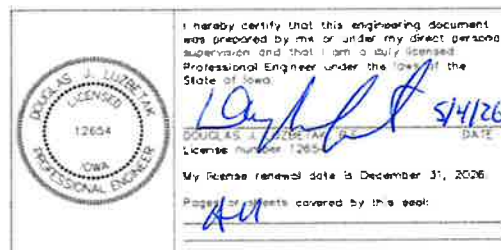
All access roads on site were in good condition; well graded and free of depressions and ruts.

The landfill currently has 4 certified landfill operators.

This report is based on observations made at the site at the time of the inspection and the sources referenced in the report and 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. Repair leachate seeps.
2. Install auto-dialer alarm system at leachate pump station.
3. Install flow meter at leachate loadout station.
4. Replace pumps and control panel at leachate loadout station.
5. Remove sediment from upper sediment basin.
6. Retrieve litter at the southeast corner of the site, from the intake in the southeast detention basin, and from the southeast detention basin.
7. Regrade cap as needed to eliminate ponded areas.
8. Seed the sparse/bare areas on the closure cap and on the intermediate cover.
9. Continue to retrieve windblown litter.
10. Continue tree removal as needed, monitor stumps for regrowth, and treat stumps as needed.
11. Monitor level of sediment in sediment basins, other sediment control structures, and ditches and remove sediment as needed to maintain capacity.

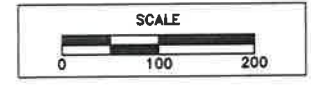


cc: Clint Reents, Director, Rural Iowa SLF (electronic copy)
Madelynn Austin, IDNR Field Office #2 (electronic copy)

LEGEND

	PROPERTY BOUNDARY
	WASTE BOUNDARY
	EXISTING 10 FT CONTOUR
	EXISTING 2 FT CONTOUR
	GROUNDWATER DIVERSION PIPE
	LEACHATE COLLECTION SYSTEM
	TILE/STORMWATER PIPE
	INTAKE

- BARE/STRESSED VEGETATION AREA
- PONDED WATER
- 4" GAS VENT



AERIAL DATED 8/23/25

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 SERVICES, AND THE MASSACHUSETTS INSTITUTE OF TECHNOLOGY.

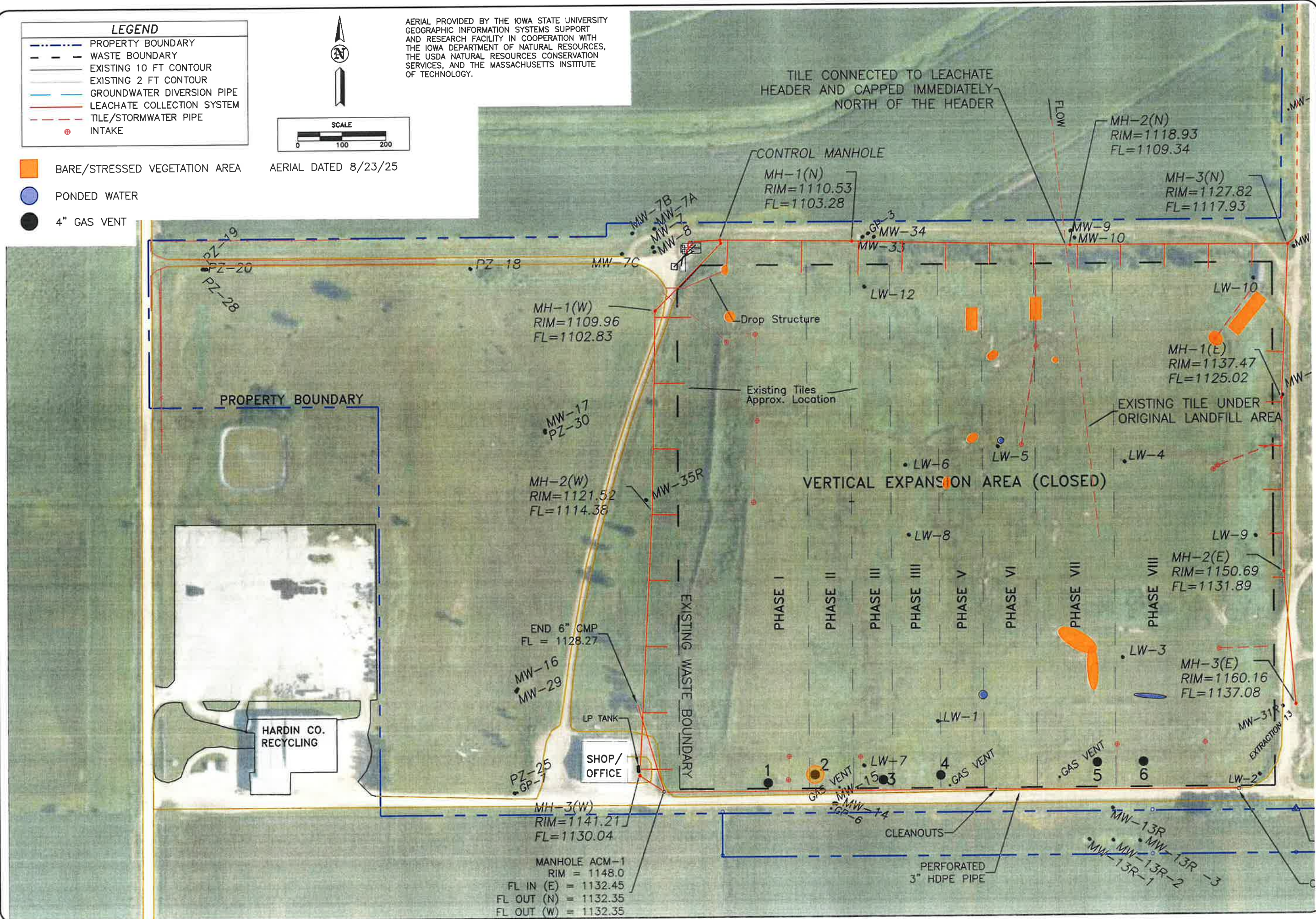


FIGURE: 1

REVISION	NO.	DATE
DRAWN	JGH	
PROJECT NO.	6006-26A	DATE
		5/04/26

SPRING 2026 INSPECTION

RURAL IOWA SANITARY LANDFILL
ELDORA, IOWA

HLW Engineering Group
204 West Broad Street, P.O. Box 314
Story City, Iowa 50248
Phone: (515) 733-4144
FAX: (515) 733-4146



Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Rural Iowa Sanitary Landfill		
NPDES Tracking No.	Authorization # 20269-20041		
Date of Inspection	April 30, 2026	Start/End Time	8:30 AM/11:00 AM
Inspector's Name(s)	Douglas J. Luzbetak, P.E.		
Inspector's Title(s)	Project Manager		
Inspector's Contact Information	HLW Group, PO Box 314, Story City, IA 50248, (515)733-4144		
Inspector's Qualifications	Professional Engineer, project manager at the site since 1995		
Weather Information			
Weather at time of this inspection?			
<input type="checkbox"/> Clear <input checked="" type="checkbox"/> Cloudy <input checked="" type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: 40's			
Have any previously unidentified discharges of pollutants occurred since the last inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe: _____			
Are there any discharges occurring at the time of inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Minimal discharge of clear water from lower sediment basin and southeast detention basin.			

Control Measures

#	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Terrace system on closed landfill	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
2	Lower Sediment Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Accumulated sediment was removed in 2023. Outlet pipe was replaced by landfill staff in 2024.
3	Upper Sediment Basin	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	A portion of the accumulated sediment was removed in 2024. Basin full of sediment – sediment removal needed.
4	SE Detention Basin	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Sediment storage area was enlarged, outlet pipe replaced, and stoplog structure installed on the outlet pipe in 2024. Flow in stoplog structure restricted due to trash in inlet.
5	Tile and intakes (S of Trench 1 and 2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	One intake removed during Trench 3 Expansion project and tile outlet rerouted to SE Detention Basin (Item 4).
6	W Sediment Basin	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2	Equipment operations and maintenance areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3	Fueling areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4	Waste handling and disposal areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Retrieve windblown litter
5	Erodible areas/construction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Monitor intermediate cover and soil stockpiles for erosion
6	Dust generation and vehicle tracking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	No tracked litter or mud was noted at landfill entrance/exit
7	Leachate Tank Loadout	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Repair leachate seeps.

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Continue to seed stressed/bare areas on the closure cap in the Original Landfilling Area and on the intermediate cover of the Horizontal Expansion Area as needed.

Monitor site erosion and repair as necessary.

Monitor site vegetation and repair as necessary.

Notes

Use this space for any additional notes or observations from the inspection:
The annual stormwater sample for 2026 was collected on 04/24/26.

Staff has removed the majority of the rubble ditch checks to allow the ditches to be cleaned and regraded to improve surface water drainage.

We discussed sediment removal from the upper sediment basin and litter retrieval in SE corner detention basin area.

The SPPP and mapping was updated in January 2025 to reflect the completion of the Trench 3, Phase 2 project and personnel changes on site. The SPPP was updated to reflect additional changes in site personnel in October 2025.

CERTIFICATION STATEMENT

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Print name and title: Douglas J. Luzbetak, P.E.

Signature:  Date: 5/4/26