

May 14, 2026

Mary Klemesrud  
Program Planner 3  
Iowa Department of Natural Resources  
6200 Park Avenue Suite 200  
Des Moines, Iowa 50321



**RE: 2026 FINANCIAL ASSURANCE  
NEWTON SANITARY LANDFILL  
IDNR PERMIT NO. 50-SDP-01-75P  
HLW PN 6002-23A.360**

Dear Ms Klemesrud:

Included with this letter is financial assurance documentation for 2026 for the Newton Sanitary Landfill.

Documentation submitted with this letter includes the following:

1. Certified copy of the Closure/Postclosure Cost Estimate
2. Signed "Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form"

The FY 25 audit for the City of Newton is complete and is available on the City of Newton website at <https://www.newtongov.org/DocumentCenter/View/17461/FY25-City-of-Newton-Annual-Audit>.

The components of the Subtitle D Composite Closure cap were revised which has led to a one time reduction in the closure costs. The closure cap is still in compliance with EPA Subtitle D and IAC 567-113. The revisions to the composite closure cap were approved by IDNR in the March 2, 2026 Permit Revision.

Note that cost estimates have been calculated using actual costs; therefore, adjustments for inflation were determined not to be applicable to the 2026 Closure/Postclosure Cost Estimate.

Please contact me if you have any questions.

Respectfully submitted,  
**HLW Engineering Group**

  
Douglas J. Luzbetak, P.E.  
Project Manager

cc: Joe Grife, Public Works Director, City of Newton (electronic copy)  
Mike Ward, Public Works Operations Superintendent, City of Newton (electronic copy)

### Authority

The following calculations are based on rules published in 567 IAC Chapter 113.14, "Municipal solid waste landfill financial assurance". This analysis is based on assuming a worst case scenario regarding closure of the landfill and assuming all work associated with closure/postclosure is performed by a third party (i.e., not by landfill staff), as per Regulations.

### Landfill Areas

The Newton Sanitary Landfill is located in Jasper County south of the City of Newton. The SLF is divided into the areas listed below:

1945 SLF - closed*	34 acres
Area A - closed (1975 SLF and 1984 SLF)	36 acres
Areas B and C - active	21 acres
Cells D-1 and D-2 - active	6.4 acres
Cells D-3, D-4, and D-5 - future	8.6 acres
Area E - future	94 acres
	<hr/>
	200 acres

**\* The area of the 1945 SLF has been reduced over that used in financial assurance calculations prior to 2015. The waste deposition area of the 1945 SLF was determined to be 34 acres during closure activities in 2013 (in previous financial assurance calculations 42 acres was used), so this revision was made in the 2015 calculations to more accurately reflect site conditions.**

The active area of the site (Horizontal Expansion Area) is limited to Areas B and C and Cells D-1 and D-2. Future horizontal expansion is proposed for Areas D and E. This analysis is limited to closure costs for Areas B and C and Cells D-1 and D-2, and post closure costs for the 1945 SLF, Area A, Area B, Area C, Cell D-1, and Cell D-2.

Note that the IDNR has approved closure of the following areas: the 1984 SLF (approval date November 18, 1999), the 1945 SLF (approval date January 10, 2014) and the 1975 SLF (approval date January 10, 2014). At this point the Owner has chosen to continue to use a postclosure period of 30 years for these areas. The Owner reserves the right to change the postclosure period for these areas to reflect the actual closure date(s) in future financial assurance calculations.

### Closure Cost Estimate

Areas B and C and Cells D-1 and D-2 have been constructed with a composite FML liner and are active. Closure costs for Areas B and C and Cells D-1 and D-2 include cost of designing and constructing the composite FML cap, erosion and surface water control structures, and seeding. Estimated quantities and prices for the closure of Areas B and C and Cells D-1 and D-2 are as follows:

Composite Cap	27.4 acres	\$136,000 /acre	\$3,726,400
(for derivation of cost, see Attachment A)			
Seeding and Mulching	27.4 acres	\$2,500 /acre	\$68,500
Erosion Control Structures	27.4 acres	\$1,250 /acre	\$34,250
Total Construction Cost			<u>\$3,829,150</u>
Add 10% of construction cost for mobilization/contingency			\$382,900
Engineering fees for design, bid process, and administration			\$143,600
Engineering fees for staking, inspection, and testing			<u>\$143,600</u>
Total Closure Cost			<u><u>\$4,499,250</u></u>

**Postclosure Cost Estimate**

Postclosure costs include any costs anticipated during the postclosure period, based upon current landfill operations and current IDNR regulations. All of the areas, closed and active, listed on Page 1 will require postclosure care and are included in this analysis. The area needing postclosure care is 97.4 acres. The soil cap, FML composite cap, erosion control structures, vegetation, etc. must be maintained during the postclosure period. Costs associated with this maintenance are:

Maintenance/Repair Soil Cap	70 acres	\$50 /acre	\$3,500
Maintenance/Repair FML	27.4 acres	\$250 /acre	\$6,900
Reseeding (2% of area annually)	2 acres	\$1,200 /acre	\$2,300
Maintenance of Erosion Control	97.4 acres	\$50 /acre	\$4,900
Mowing			<u>\$1,000</u>
			<u><u>\$18,600</u></u>

Inspections, reporting, monitoring well sampling, and monitoring well testing will be continued throughout the postclosure period. Assume these will be of the type and method as at present time. Costs associated with inspections, reporting, monitoring well sampling, and monitoring well testing are:

Semi-annual inspections and an annual report for the closed areas, and semi annual notifications and an annual report for the Horizontal Expansion Area are required as per regulations.

Inspections	\$1,200 each	2 per year	\$2,400
Reporting	\$6,800		<u>\$6,800</u>
			<u><u>\$9,200</u></u>

Explosive gas monitoring is required quarterly.

Gas monitoring	\$500 each	4 per year	<u><u>\$2,000</u></u>
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Monitoring Well Sampling and Testing

Monitoring well sampling will be as per the approved HMSP and applicable permit amendments/revisions. Estimated testing costs are as follows:

March	25 tests*	\$300 /test	\$7,500
Sept.	25 tests*	\$300 /test	\$7,500

\* 24 sampling points and one duplicate

Sampling costs are:

March		\$2,400
Sept.		\$2,400
		<u>\$19,800</u>

Monitoring wells at the SLF are to be either re-evaluated every 2 years (under current regulations) or every 5 years (under past regulations). Areas A, B, C, and D are monitored under current regulations. Cost of monitoring well re-evaluation every 2 years in Areas A, B, C, and D is included in the well sampling and annual reporting costs for these areas. The 1945 SLF is monitored under previous regulations. The cost for the monitoring well re-evaluation every 5 years for the 1945 SLF is estimated at:

\$3,000	Annual Equivalent Cost is	<u>\$600</u>
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The postclosure costs must be adjusted annually as a basis for Financial Assurance.

Financial Assurance postclosure cost estimate	<u>\$1,700</u>
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Leachate is currently pumped to the Newton POTW on an as needed basis or stored in the Subtitle D compliant leachate storage lagoon and pumped to the POTW for treatment and disposal. Assume leachate will continue to be collected and treated in same manner during the postclosure period as it is now. The Newton SLF pumped approximately 3,375,000 gallons of leachate to the Newton POTW in 2025.

Area A is exempted from leachate collection as a result of the risk assessment for this site; however, leachate collection was added along the west perimeter of Area A in 2009. Leachate collection is also provided in the 1945 SLF, Areas B and C and Cells D-1 and D-2. HELP model analysis indicates that the peak daily leachate generation rate from Areas B and C and Cells D-1 and D-2 will fall to less than 1 gpd/acre upon closure. This results in an estimated generation rate during postclosure from Areas B and C and Cells D-1 and D-2 of 10,000 gallons per year. Note, however, that portions of the 1945 SLF and Area A also have leachate collection and contribute to the leachate generation rate at the landfill and the groundwater diversion system under the Subtitle D composite area is also connected to the leachate collection system. Assume that the generation from the 1945 SLF, Area A, and the groundwater diversion system will not change appreciably during the postclosure period. Past financial assurance calculations have used October, 2001 - September, 2002 (1,404,600 gallons) as a typical leachate generation year when exposed drainage layer in the horizontal expansion area was not contributing to the leachate volume. Continue to use that time period for consistency. For this analysis, assume that the 1945 SLF, Area A, and the groundwater diversion system contributed half of the leachate volume during the "typical" year and will continue to contribute this volume during the postclosure period.

Therefore, total annual leachate generation expected during postclosure is:

$$702,300 \text{ gallons (1945 SLF/Area A) + 10,000 gallons (Areas B/C, Cell D-1/D-2) = 712,300 gallons}$$

Calculate leachate system costs during postclosure based on historical cost information.

Electricity cost to run pump stations estimated to be approximately \$500/year	
Pump station utilities	\$500

Leachate treatment and testing costs at the Newton POTW are estimated to be approximately \$4,200/year	
Leachate treatment and testing	\$4,200

There needs to be a cost for maintaining the leachate system during the postclosure period. Costs are anticipated to be repairing the lagoon liner and maintenance on the pumps and leachate force main.

Annual maintenance of leachate system	\$4,000
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Total yearly cost of leachate system:

Electricity	\$500
Testing/sampling	\$4,200
Maintenance	\$4,000
	\$8,700

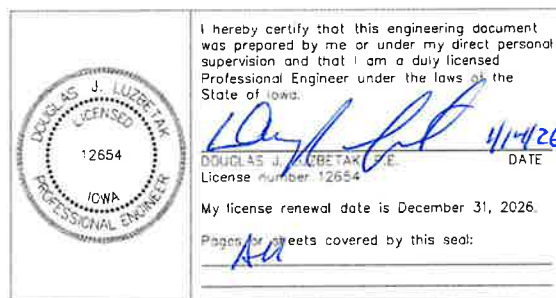
As per IDNR regulations, the leachate collection system is to be cleaned once every three years.

Estimated cost of cleaning leachate collection system is \$6,000 every three years.

\$6,000	Annual Equivalent Cost is	\$2,000
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**Financial Assurance Calculations**

<b><u>Closure</u></b>		<b><u>\$4,499,250</u></b>
<b><u>Postclosure (annual)</u></b>		
Maintenance of cap, erosion control, etc.		\$18,600
Inspections/Reports		\$9,200
Explosive Gas Monitoring		\$2,000
Monitoring Well Sampling and Testing		\$19,800
Monitoring Well Re-evaluation (annual cost)		\$600
Financial Assurance		\$1,700
Leachate Treatment, Testing, etc.		\$8,700
Cleaning Collection System (annual cost)		<u>\$2,000</u>
		<u>\$62,600</u>
Total cost during postclosure period		<u>\$1,878,000</u>



## ATTACHMENT A

OPINION OF PROBABLE COST  
 NEWTON SLF  
 FML COMPOSITE CAP, cost per acre  
 HLW PN 6002-23A.360  
 January 13, 2026

<b>Item</b>	<b>Quantity</b>	<b>Unit</b>	<b>Unit Price</b>	<b>Amount</b>
Surface Preparation	4,840	Sq. Yd.	\$0.50	\$2,420.00
Geonet Gas Collection Layer	4,840	Sq. Yd.	\$6.25	\$30,250.00
4" Perforated Gas Collection Piping	600	Lin. Ft.	\$20.00	\$12,000.00
Gas Vents	1	Each	\$5,000.00	\$5,000.00
Compacted Clay Cap (1.5' thick)	2,420	Cu. Yd.	\$4.00	\$9,680.00
Flexible Membrane Liner	4,840	Sq. Yd.	\$6.25	\$30,250.00
Geonet Drainage Layer	4,840	Sq. Yd.	\$6.25	\$30,250.00
Geonet Drainage Layer Outlet	1	Each	\$4,000.00	\$4,000.00
Vegetative Layer (2' thick)	3,230	Cu. Yd.	\$3.75	\$12,112.50
Total Construction Cost				\$135,962.50



# Municipal Solid Waste Sanitary Landfill Financial Assurance Report Form

## SECTION 1: FACILITY INFORMATION

(please print or type)

### Information Requested

Facility Name: Newton Sanitary Landfill Permit Number: 50-SDP-01-75P  
Permitted Agency/Entity: City of Newton

## SECTION 2: CLOSURE/POSTCLOSURE OR CORRECTIVE ACTION COST ESTIMATES

Information Requested	Cost Estimate	Date of Cost Estimate
Updated Closure Cost Estimate	\$4,499,250	January 14, 2026
Updated Postclosure Cost Estimate	\$1,878,000	January 14, 2026
Initial or Updated Corrective Action Cost Estimate	Not Applicable	Not Applicable

\*Attach closure/postclosure cost estimate(s) signed and certified by an Iowa-licensed professional engineer. Cost estimates shall include, at a minimum, each of the cost line items defined in 113.14(3)"c" for closure and 113.14(4)"c" for postclosure. Please provide closure and/or postclosure site area acreage information with the estimates.

Provide a cost estimate for corrective action only if corrective action is required and a corrective action plan has been approved by the Department. Attach the corrective action cost estimate signed and certified by an Iowa-licensed professional engineer. The cost estimate shall account for total costs of the activities described in the approved corrective action plan for the corrective action period.

## SECTION 3: FACILITY WASTE TONNAGE INFORMATION

Information Requested	Tons
Remaining permitted capacity as of the beginning of permit holder's current fiscal year	3,530,262
Amount of waste disposed of at the facility during the prior year	29,197

## SECTION 4: PROOF OF COMPLIANCE

### Publicly Owned Municipal Solid Waste Landfills

(ATTACH AUDIT REPORT)

Owner's Most Recent Annual Audit Report

Prepared by: Anderson, Larkin and Co. P.C.

For fiscal year ending: June 30, 2025

### Privately Owned Municipal Solid Waste Landfills

(ATTACH AFFIDAVIT)

Attach owner/operator's affidavit indicating that an annual review has been performed by a certified public accountant to determine whether the privately owned landfill is in compliance with IAC 567 Chapter 113. The affidavit shall state the name of the certified public accountant, the dates and conclusions of the review, and the steps taken to rectify any deficiencies identified by the accountant.

**SECTION 5: FINANCIAL ASSURANCE INSTRUMENT**

**Type and Value of Financial Assurance Instrument(s)** (ATTACH INSTRUMENT(S))

Assurance Instrument	Establishment Date	Mechanism Covers	Instrument Value*
Trust Fund 567 IAC 113.14(6)“a”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Surety Bond 567 IAC 113.14(6)“b”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Letter of Credit 567 IAC 113.14(6)“c”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Insurance 567 IAC 113.14(6)“d”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Financial Test 567 IAC 113.14(6)“e”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Financial Test 567 IAC 113.14(6)“f”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Corporate Guarantee 567 IAC 113.14(6)“g”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t Guarantee 567 IAC 113.14(6)“h”		Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Corrective Action <input type="checkbox"/>	\$
Local Gov’t. Dedicated Fund 567 IAC 113.14(6)“i”		Closure <input checked="" type="checkbox"/> Postclosure <input checked="" type="checkbox"/> Corrective Action <input type="checkbox"/>	\$ 6,726,434

\*Pursuant to IAC 567 113.14(9), if account(s) are restricted/reserved to pay for closure, postclosure or corrective action costs, then the amount of the financial assurance instrument may be reduced by the sum of the cash balance of the account(s) established to comply with subrule 113.14(8).

**SECTION 6: INITIAL PROOF OF ESTABLISHMENT OF ACCOUNTS**

**Check Which Applies:**  New Mechanism  Previously Submitted

Pursuant to IAC 567 Chapter 113.14(8)“f”, documentation of the establishment of accounts is to be submitted to the department by April 1, 2003 for currently permitted MSWLFs. Permit holders for MSWLFs permitted after April 1, 2003, shall submit documentation of the establishment of accounts prior to the MSWLF’s initial receipt of waste.

Please attach documentation indicating accounts/fund have been established for closure and postclosure care and if the account(s) are restricted/reserved for closure or postclosure care. Examples of documentation include bank statements for closure/postclosure accounts, letter signed by the chief financial officer, letter from certified public accountant, etc.

Accounts established pursuant to paragraph 113.14(6)“a” for trust funds or paragraph 113.14(6)“i” for local government dedicated funds also satisfies the requirements of this subrule, and the permit holder shall not be required to establish additional closure and postclosure accounts.

**SECTION 7: CLOSURE AND POSTCLOSURE ACCOUNTS**

Completion of the following closure and postclosure account information complies with the annual financial statement requirements of IAC 567 113.14(3)“a” and 113.14(4)“a” by indicating the current balance(s) of the closure/postclosure account(s) or dedicated/trust fund and the projected amount(s) to be deposited in the account(s).

Under “Beginning Balance”, please state the account/fund balance 30 days after the start of the previous fiscal year, for “Ending Balance”, indicate the account balance 30 days after the close of the previous fiscal year, and for “Projected Deposit”, indicate the amount to be deposited within 30 days of the close of the permit holder’s fiscal year.

Information Requested	Beginning Balance	Ending Balance	Projected Deposit
Closure Account Balance <i>(see formula below)</i>	\$	\$	\$
Postclosure Account Balance <i>(see formula below)</i>	\$	\$	\$
<b>Or</b>			
Dedicated Fund Balance <i>(see formula below)</i>	\$ 6,487,424	\$ 6,726,434	\$ NA
Trust Fund Balance <i>(see formula below)</i>	\$	\$	\$

**Formula for Projected Deposits**

Closure or Postclosure Account

$$\frac{CE - CB}{RPC} \times TR$$

Where “CE” is the closure or postclosure cost estimate, “CB” is the balance 30 days after close of the previous fiscal year, “RPC” is the remaining permitted capacity in tons, of the landfill from the beginning of the current fiscal year, and “TR” is the total number of tons of solid waste disposed in the prior year.

Dedicated/Trust Fund

$$\frac{CE - CB}{Y}$$

Where “CE” is the closure or postclosure cost estimate, “CB” is the balance 30 days after close of the previous fiscal year, and “Y” is number of years remaining in the pay-in period.

If needed, the space below can be used to show calculations for projected deposits

*Combine balance of dedicated fund and trust fund for these calculations*

CE (Closure and Postclosure) = \$6,377,250  
 CB (Closure and Postclosure) = \$6,726,434

The dedicated fund balance (\$6,726,434) is greater than the sum of the closure and postclosure cost estimates (\$6,377,250). Financial assurance is fully funded – no additional funds need to be restricted for closure/postclosure at this time.

**SECTION 8: PERMIT HOLDER ENDORSEMENT**

Submittal of this completed and endorsed form along with all required documentation establishes Notification and Proof of Permit Holder Compliance with IAC 567 Chapter 113.

Name of Official: Joe Grife Title: Public Works Director

Agency/Entity: City of Newton

Address: 303 West 4<sup>th</sup> Street North, Suite 501

City: Newton State: IA Zip: 50208

Telephone: 641-792-6622 Fax: NA

Email Address: joeg@newtongov.org

Signature of Official: *Joe Grife* Date: 5/14/26

Questions? Contact Bill Blum at (515) 240-6048 or [Bill.Blum@dnr.iowa.gov](mailto:Bill.Blum@dnr.iowa.gov)