

June 2, 2026

Ms Alexis Slade
Environmental Engineer
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: Beneficial Use Determination for Alternative Daily Cover (IAC 567-108.9)
Tama County Sanitary Landfill
IDNR Permit No. 86-SDP-01-72P**

Dear Ms Slade:

A request was submitted to IDNR on August 31, 2023 (Doc #107624) for approval for the Tama County SLF to accept impacted soil from a flood control project in Cedar Rapids, Iowa for Beneficial Use as Alternative Daily Cover (ADC). IDNR approved the request in the SDP Permit Revision dated September 20, 2023. The approval remains in the SDP Permit as Special Provision X.14. Special Provision X.14.a requires that “The stockpile must be contained in a Subtitle D compliant disposal area...”.

The request for the Beneficial Use of the material as ADC at the Tama County SLF was based on a request for the Beneficial Use of the same material as ADC at the Benton County SLF (IDNR Permit No. 06-SDP-02-81P) dated October 19, 2022 (Doc #104433). This request was approved in the SDP Permit Revision dated November 20, 2022 for the Benton County SLF.

Upon approval of the Beneficial Use request, the Tama County SLF accepted approximately 50,000 cubic yards of the impacted soil material. As per the requirements of the SDP Permit, the material was stockpiled within the Subtitle D compliant lined disposal area at the landfill.


A request was submitted to IDNR on March 11, 2024 (Doc #109461) to allow the impacted soil material that was previously approved for Beneficial Use as ADC at the Benton County SLF to be stockpiled within a borrow area instead of within the Subtitle D compliant lined areas at the Benton County SLF. As stated in the March 11, 2024 request “The material is from the same project and has similar characteristics to the material previously approved for use as ADC...”. The March 11, 2024 request stated that the “soil will be stockpiled in the current borrow area”. IDNR approved this request in the SDP Permit Revision for the Benton County SLF dated March 11, 2024.

By virtue of this letter, the Tama County Solid Waste Disposal Commission is requesting approval to relocate approximately 20,000 cubic yards of the impacted soil material stockpiled within the Subtitle D compliant lined disposal area the Tama County SLF. The material will be moved by landfill staff and stockpiled in the current landfill borrow area/future solid waste disposal area located south of the scalehouse and will continue to be utilized as ADC in compliance with the previously approved Beneficial Use request. At this time the facility is not requesting to accept any more of this material, the material that will be stockpiled in this area is already on site hence the “Beneficial use determination application requirements” (108.9(1) through 108.9(5)) detailed in the August 31, 2023 request are unchanged and have not been resubmitted in this request.

If approved, the proposed activities will occur as detailed below:

- 1) The stockpile will be relocated from the Subtitle D composite lined area to the current landfill borrow area.
- 2) Surface water will be diverted away from the stockpile area as much as practical.
- 3) The stockpile will be constructed with sideslopes suitable for future maintenance.
- 4) The stockpile will be seeded upon completion.
- 5) The stockpiled material will be incrementally removed and used as ADC during future landfilling operations.
- 6) Upon completion of stockpile removal, a minimum of 1' of soil from under the footprint of the stockpile will be removed and also utilized as ADC.

Thank you in advance for your prompt review of this request. Please let me know if you have any questions or require any additional information.

Respectfully Submitted,
HLW Engineering Group

Douglas J. Lutzbetak, PE
Project Manager

cc: Dave Sherwood, Administrator, Tama County SLF (electronic copy)