



June 5, 2026

Mr. Brian Rath
Senior Environmental Engineer
Landfill Permitting and Closed Landfills
Iowa Department of Natural Resources
6200 Park Ave, Suite 200
Des Moines, IA 50321

Re: Landfill Excavation Operations Plan
Iowa City Landfill & Recycling Center

Dear Mr. Rath:

HDR, on behalf of the City of Iowa City, is submitting a Landfill Excavation Operations Plan (Plan) in support of the ongoing Compost Facility Improvements and Expansion Project at the City of Iowa City Landfill & Recycling Center. Enclosed please find the required information and supporting documentation as outlined in Iowa Administrative Code (IAC) Agency 567, Chapter 102.16.

At the conclusion of excavation activities as described in this Plan, a report containing any necessary information related to changes to this Plan, test results, material removal quantities, and disposal documentation will be compiled and submitted to the IDNR.

Thank you in advance for your review of this information. Should you have any questions, please feel free to contact Brendan Bunker at (402) 548-5089 (Brendan.Bunker@hdrinc.com) or Will Nicholson at (402) 399-4876 (William.Nicholson@hdrinc.com).

Sincerely,
HDR Engineering, Inc.

Brendan Bunker, P.E.
Environmental Engineer

Will Nicholson, P.E.
Project Manager

Encl. Landfill Excavation Operations Plan (Electronic)
CC: Becky Jolly, Iowa Department of Natural Resources (Email)
Theresa Stiner, Iowa Department of Natural Resources (Email)
Jennifer Jordan, Iowa City Landfill and Recycling Center (Email)
Joe Welter, Senior Civil Engineer, City of Iowa City (Email)

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Landfill Excavation Operations Plan

Iowa City Landfill and Recycling Center
Permit No. 52-SDP-01-72P

City of Iowa City, Iowa

Submittal Date: June 5, 2026



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Attachments

Attachment A – City of Iowa City Landfill & Recycling Center Site Map

1 Introduction and Purpose

The City of Iowa City Landfill & Recycling Center (Landfill) is located approximately one mile west of Iowa City, within Section 14, Township 79 North, Range 7 West, in Johnson County, Iowa (Johnson County Parcels 1114426001, 1114301001, and 1114376001). The landfill area is legally described as being located in the SE 1/4; most of the E 1/2 and NW 1/4 of the SW 1/4; most of the SW 1/4 of the NE 1/4; the S 1/2 of the SE 1/4 of the NE 1/4; and an 80 rod by 6 rod parcel off the S side of the SE 1/4 of the NW 1/4; all in Section 14, T79N, R7W, Johnson County, Iowa.

The Site currently operates under a solid waste disposal permit (No. 52-SDP-01-72P and subsequent amendments) issued by the Iowa Department of Natural Resources (IDNR). Waste disposal at the site began in 1972. The Site contains Resource Conservation and Recovery Act (RCRA) Subtitle D lined and unlined cells. Currently, waste placement has occurred in cells FY72 through FY23, and cells FY72 through FY91 have been closed with a certified clay cap. A site map depicting the Landfill is attached to this Plan as **Attachment A**.

Pursuant to Iowa Administrative Code (IAC) 567 Rule 102.16, any activities intended to excavate, disrupt, or remove any deposited materials from any active or discontinued sanitary landfill shall be disclosed to the IDNR prior to the start of such activities. Rule 102.16(1) specifically states that:

“Notification shall include an operational plan stating the area involved, lines and grades defining limits of excavation, estimated number of cubic yards of material to be excavated, sanitary disposal project where material is to be disposed, and estimated time required for excavation procedures.”

This Landfill Excavation Operations Plan (Plan) has been prepared to demonstrate compliance with the above requirements and to outline the anticipated waste disturbance activities associated with the Compost Facility Improvements and Expansion Project.

2 Responsible Parties

Property Owner:

City of Iowa City
410 E Washington Street
Iowa City, Iowa 52240
(319) 356-5000

Facility Responsible Party:

Ron Knoche
410 E Washington Street
Iowa City, Iowa 52240
(319) 356-5138
RKnoche@iowa-city.org

Design Engineer:

Joe Welter, P.E.
Iowa License No. P19255
410 E Washington Street
Iowa City, Iowa 52240
(319) 356-5144
JWelter@iowa-city.org

3 Landfill Gas Control

In April 2001, the Landfill formally commenced operation of a landfill gas (LFG) collection and control system (GCCS) in order to comply with the New Source Performance Standards (NSPS) Subpart WWW regulations as applicable at that time. Since that time, the Landfill has been subsumed under the authority of Subpart XXX and remains compliant under these regulations.

The GCCS is intended to extract, collect, and combust LFG. LFG is withdrawn from extraction wells under vacuum (negative pressure) and then conveyed through a network of collection laterals and headers to the flare station for destruction. In accordance with applicable NSPS criteria, the system collects LFG from each area of the Landfill in which MSW has been placed according to the 2-year/5-year rule (i.e. closed areas with waste 2 years or older and active areas with waste 5 years or older).

The area affected by anticipated excavation activities encompasses approximately 10.6-acres and is located on the north side of the Landfill within unlined Cells FY73, FY74, and FY75. LFG is currently collected from these areas, though interactions with uncollected LFG are likely. Excavation can disturb gas pathways and release trapped pockets of gas which increases the risk of fire, explosion, or exposure to high concentrations of hazardous compounds. Continuous gas monitoring instruments capable of measuring methane, oxygen, and hydrogen sulfide will be utilized while in and around excavation areas.

4 Proposed Excavation

It is estimated that development of the Compost Facility Improvements and Expansion Project will generate approximately 16,900 cubic yards of excavated material. The material will be generated through site grading and installation of utilities. The excavated material may consist of native soils, fill soils, waste debris, or a mix, depending on the subsurface conditions within the limits of excavation. The proposed development area, including excavation and grading limits, are shown in the **green** shaded area presented in **Figure 1**.

Waste material that is excavated as part of construction activities will be loaded into trucks or containers and transported to the active face of the Landfill. Clean soils without deleterious materials that are excavated as part of the development will be relocated on-site and used as fill or otherwise removed from the Site, as needed.

Figure 1. Proposed Limits of Excavation



5 Hazardous Waste Management Procedures

5.1 Asbestos Containing Materials (ACMs)

If encountered, potential asbestos containing materials (ACMs) waste will be evaluated, and if determined by the inspector to be potential ACM, will be handled in accordance with IAC requirements as a part of this waste disturbance project. These procedures will be followed if ACM waste is encountered with intact packaging or if ACM waste is identified without packaging or if the packaging is found damaged.

5.2 Hazardous Waste

Liquids and solids in non-empty containers will be considered non-hazardous waste unless the container bears clear identification that the product originally in the container was a hazardous material that when disposed of, would be a hazardous waste, and the material currently in the container closely resembles the original product. Labels will not be the only identifier used to make a hazardous waste determination but will be a mandatory precursor for examining potentially hazardous waste. If visual or odor characteristics indicate that the material is suspected as being hazardous, the material will be segregated for further waste characterization, as necessary.

If hazardous waste is confirmed at the Landfill, these materials will be packaged, manifested, characterized, transported, and disposed of in compliance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) / Resource Conservation and Recovery Act (RCRA) and Department of Transportation (DOT) regulations. Hazardous waste shipped from the landfill will be packaged in accordance with DOT regulations per 49 Code of Federal Regulations (CFR) Part 173, 49 CFR Part 178 (DOT, 2015), 49 CFR Part 179 (DOT, 2011), and IAC requirements; hazardous waste accumulation containers will be labeled as “Hazardous Waste”.

5.3 Hazardous Waste Segregation and Handling

- Non-empty suspect hazardous waste containers will be segregated, numbered, and labeled for temporary storage.
- If the original contents are adequately described on exterior labeling and the original contents, once disposed, would be considered a “Listed” hazardous waste as defined by RCRA, AND the current contents closely resemble the original contents, the container will be set aside on a pallet dedicated to undergo a waste characterization relative to the original contents’ characteristics. Only containers verified to be hazardous waste will be labeled appropriately, segregated, and staged according to its hazardous identification.
- If the contents are not adequately labeled on the exterior, the contents will be considered non-hazardous, unless the physical (visual or odor) characteristics of the current contents warrants further segregation and verification. In the event this prudent characterization is warranted, the current contents will be sampled to verify they are not hazardous by the characteristics of ignitability, corrosivity, or reactivity. Characterization will include Toxic Characteristic Leaching Procedure (TCLP) analyses to determine waste identities and concentrations that could lead to a hazardous waste determination. If the contents are hazardous for one or more of these characteristics, the container will be moved to a dedicated temporary hazardous waste storage area.
- If the contents are not hazardous by “Listing” or the above-described characteristics, the container will be disposed of at the active face of the Landfill. Liquids will be solidified prior to disposal.
- Materials confirmed to be hazardous based on “Listing” or the above-described characteristics, will be appropriately containerized, labeled, manifested, transported, and disposed of in accordance with the hazardous waste regulations.
- Sampling of suspected hazardous material, handling, transportation, and disposal of confirmed hazardous waste will be done in accordance with all local, state, and federal laws.

6 Excavated Cover Materials

Areas that encounter disturbed waste materials designed for a pervious cover (i.e., vegetative cover), will be excavated to approximately 2 feet below final grade. Clean soils will be placed above the disturbed waste materials and compacted to create a 2-foot-thick soil cap that inhibits waste materials from surface exposure and limits surface water infiltration.

Areas that do not encounter disturbed waste are not required to have a prescriptive cover installed for the capping of waste.

7 Decontamination Procedures

Decontamination is required for personnel and equipment that come in to contact with ACMs and disturbed waste to prevent cross contamination and shall follow the following procedures:

- Personnel shall remove their disposable personal protective equipment (PPE) (i.e., booties, gloves, Tyvek suits) before exiting the contamination zone and dispose of PPE as waste or ACM, as applicable.
- Machines and equipment that encounter disturbed waste materials, or liquids that are known to have contacted waste, will be thoroughly cleaned after use. Decontamination procedures will be conducted prior to use in non-waste areas to minimize the potential for cross contamination. Decontamination procedures will be conducted in the field after each shift, or prior to removal from the contaminated zone.
- Equipment, if it leaves the contamination zone, shall be wet decontaminated on an established decontamination pad. The decontamination pad, if needed, will be located at the contamination zone exit and will consist of a gravel pad with soil perimeter berms. Wet decontamination liquids and solids shall be fully contained. Run-on and run-off will be prevented using soil perimeter berms. After completion of the work, the decontamination pad shall be removed and disposed of as waste material.

8 Project Schedule

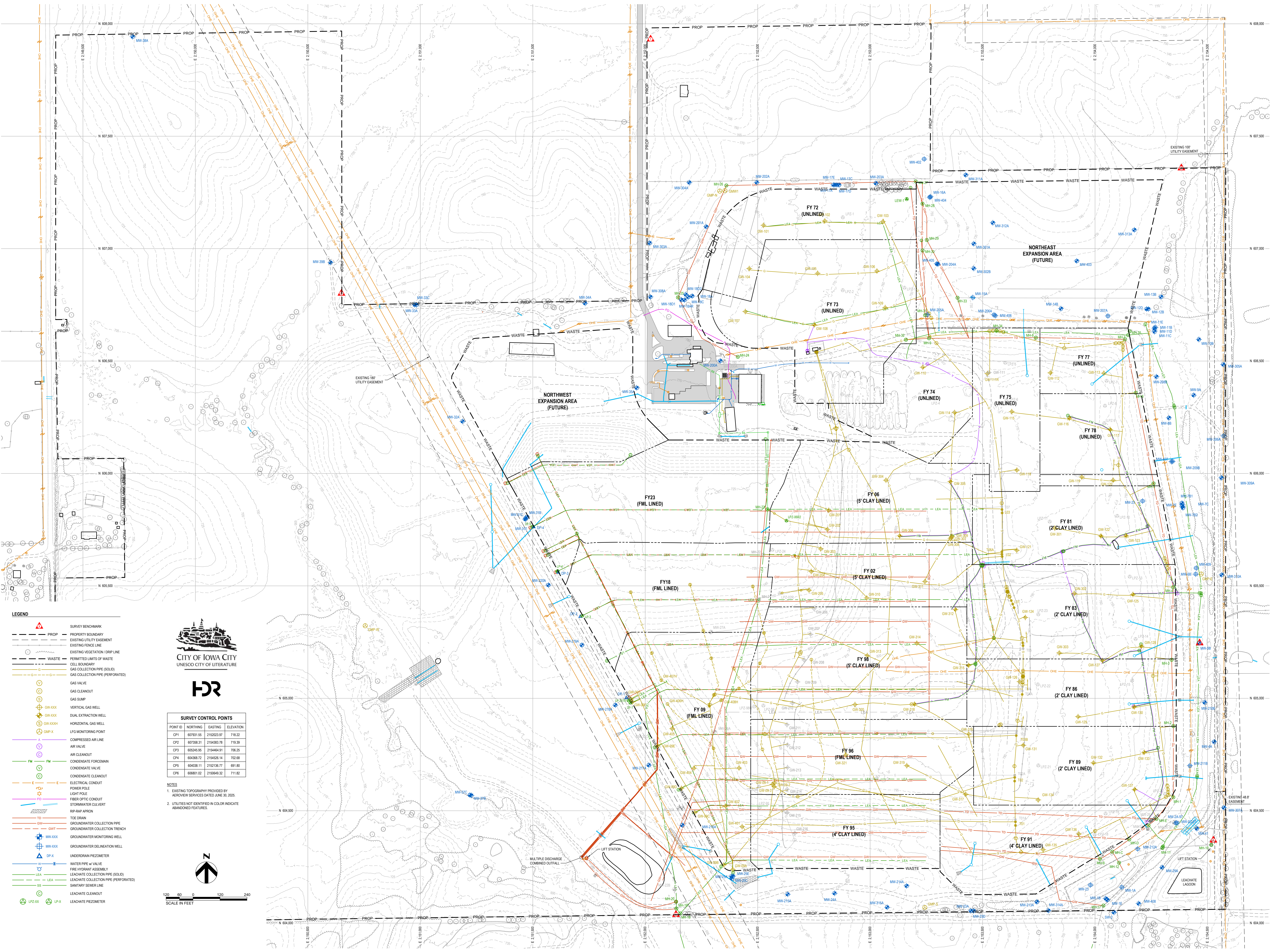
Excavation activities commenced in April 2026, with waste materials encountered in May and June. Excavation is expected to conclude in late August or early September, with overall project completion anticipated in early fall, pending contractor schedules and weather conditions.



Attachment A

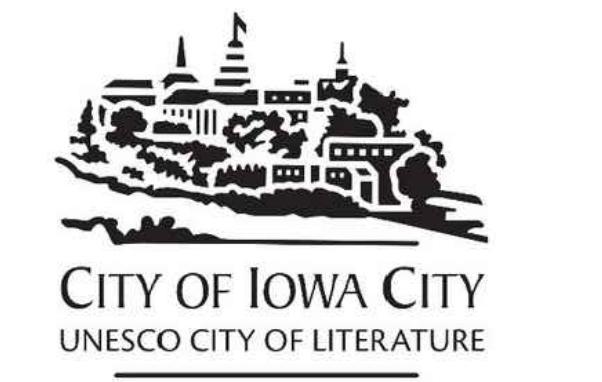
City of Iowa City Landfill &
Recycling Center Site Map

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LEGEND

- SURVEY BENCHMARK
- PROPERTY BOUNDARY
- EXISTING UTILITY EASEMENT
- EXISTING FENCE LINE
- EXISTING VEGETATION / DRIVEWAY
- PERMITTED LIMITS OF WASTE
- CELL BOUNDARY
- GAS COLLECTION PIPE (SOLID)
- GAS COLLECTION PIPE (PERFORATED)
- GAS VALVE
- GAS CLEANOUT
- GAS SUMP
- VERTICAL GAS WELL
- DUAL EXTRACTION WELL
- HORIZONTAL GAS WELL
- LFG MONITORING POINT
- COMPRESSED AIR LINE
- AIR VALVE
- AIR CLEANOUT
- CONDENSATE FOREMAN
- CONDENSATE VALVE
- CONDENSATE CLEANOUT
- ELECTRICAL CONDUIT
- POWER POLE
- LIGHT POLE
- FIBER OPTIC CONDUIT
- STORMWATER CULVERT
- RIP-RAP APRON
- TIE DRAIN
- GROUNDWATER COLLECTION PIPE
- GROUNDWATER COLLECTION TRENCH
- GROUNDWATER MONITORING WELL
- GROUNDWATER DELINEATION WELL
- UNDERDRAIN PIEZOMETER
- WATER PIPE w/ VALVE
- FIRE HYDRANT ASSEMBLY
- LEACHATE COLLECTION PIPE (SOLID)
- LEACHATE COLLECTION PIPE (PERFORATED)
- SANITARY SEWER LINE
- LEACHATE CLEANOUT
- LEACHATE PIEZOMETER

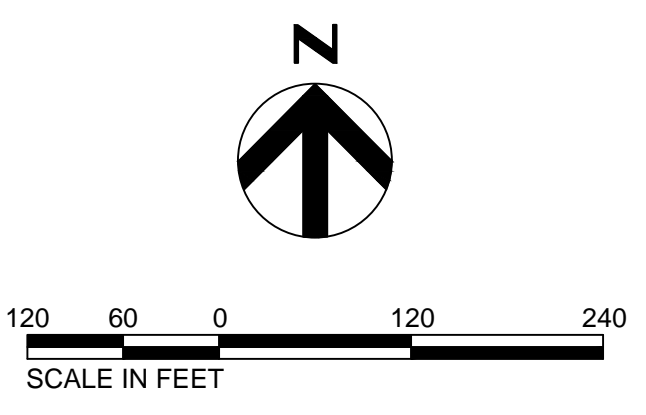


SURVEY CONTROL POINTS

POINT ID	NORTHING	EASTING	ELEVATION
CP1	607931.55	2152023.97	718.22
CP2	607358.31	2154383.78	719.39
CP3	60245.95	2154464.91	706.25
CP4	604369.72	2154206.14	702.68
CP5	604038.11	2152136.77	691.80
CP6	606801.02	2156549.32	711.82

NOTES

- EXISTING TOPOGRAPHY PROVIDED BY AEROSURV SERVICES DATED JUNE 30, 2025.
- UTILITIES NOT IDENTIFIED IN COLOR INDICATE ABANDONED FEATURES.



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