

July 20th, 2026

Mr. Mike Smith
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

RE: REQUEST FOR ALTERNATIVE DAILY COVER
Proposing aerated biosolids as an alternative daily cover
Dubuque Metropolitan Area Solid Waste Agency

Dubuque Metropolitan Area Solid Waste Agency (DMASWA) is requesting an Alternative Daily Cover (ADC). The proposed ADC are anaerobic biosolids that have been generated at Richland Center Renewable Energy. These biosolids are treated in a dairy industrial wastewater treatment facility by the utilization of aeration, dissolved air flotation, clarifiers, digester, and sand filter. The proposed ADC is to be used daily. Historically, DMASWA has accepted the biosolids as waste, as seen in **Attachment 1**. The purpose of this ADC application is to convert the biosolids from a waste product to an alternative daily cover by repurposing it for beneficial use.

The proposed ADC was tested by Pace Analytical Services, LLC. On December 24, 2025.

Attachment 2 contains the laboratory analysis of the biosolids, and the chemical characteristics are as follows:

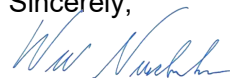
- Arsenic: <8.8 mg/kg dry
- Cadmium: <0.80 mg/kg dry
- Copper: 41.1 mg/kg dry
- Lead: <3.6 mg/kg dry
- Mercury: <0.12 mg/kg dry
- Molybdenum: 6.9 mg/kg dry
- Nickel: 42.8 mg/kg dry
- Selenium: <7.9 mg/kg dry
- Zinc: 212 mg/kg dry

The concentrations of the constituents detected are below the Iowa DNR statewide standards for soil.

Additionally, the biosolids were tested by The Probst Group on March 3, 2022, to determine the amount of free liquids present. It was determined that the biosolids contained 0% free liquids, as shown in **Attachment 3**. The biosolids are physically described as solid. Historically, this product arrived in a state that resulted in no odor or vector concerns. Incoming loads will be evaluated for odor prior to use as ADC. The biosolids are not intended to be mixed with soil; however, if loads exhibit strong odor or are shown to attract vectors, then the loads will be farmed to volatilize odors and mixed with soils accordingly.

Thank you for your consideration regarding this request. Should you have any questions, please contact me at (402) 399-4876 or William.Nicholson@hdrinc.com.

Sincerely,

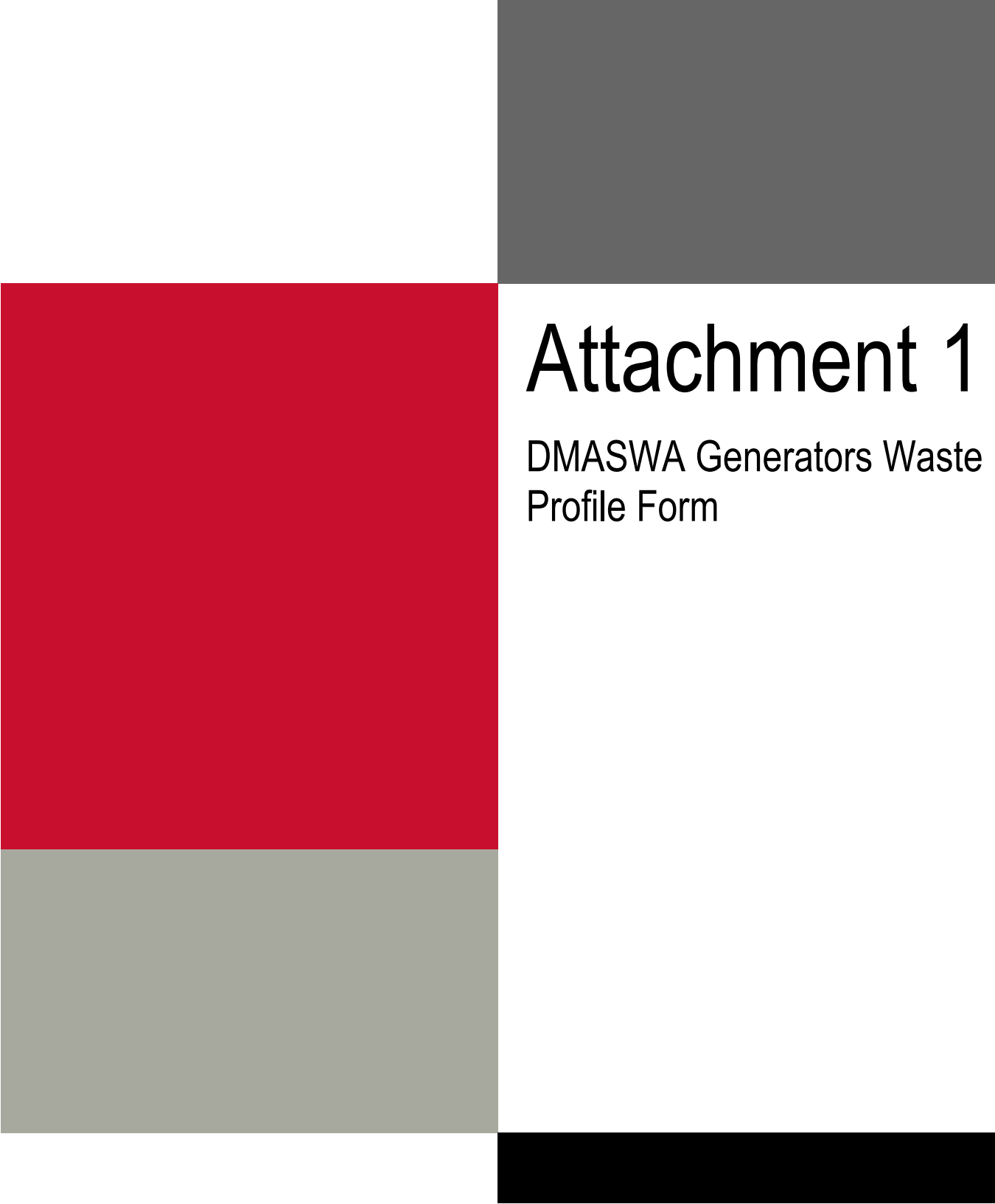


Will Nicholson, P.E.
Project Manager



Michael Schauers, EIT
Solid Waste EIT

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Attachment 1

DMASWA Generators Waste
Profile Form



DUBUQUE METROPOLITAN AREA SOLID WASTE AGENCY
GENERATORS WASTE PROFILE FORM

Profile ID and/or SWA:
RCR-002

PROGRAM CONDITIONS: The intent of a Generators Waste Profile authorization is ensure safe and proper disposal of non-hazardous industrial process wastes or those wastes which may otherwise present a threat to human health or the environment. If a generator wishes to utilize the Agency's landfill facility, it is the Agency's right to require that an identified waste stream be managed as a special waste. A waste may be declared a special waste if it has inherent properties that make safe disposal in a sanitary landfill difficult to manage. We require that special wastes delivered to our landfill be pre-approved and conform to the Special Waste Acceptance Criteria (SWAC) as required by the Iowa Department of Natural Resources (IDNR). It is the generator's responsibility to ensure that their wastes are declared to the Agency by their hauler, and to confirm that any waste delivered to the Agency's landfill be non-hazardous, and lawfully landfilled under current regulations.

INSTRUCTIONS: Fill out form completely and sign. Attach supporting documentation: Documentation includes lab analytical results and for certain waste streams an Iowa Department of Natural Resources Request for Special Waste Authorization form. Submit completed form to: DMASWA@cityofdubuque.org

Questions about the form or need assistance with the form? Call 563-557-8220 or email us at DMASWA@cityofdubuque.org.

Please check one: ☐ NEW APPLICATION ☒ RENEWAL

SECTION 1: WASTE GENERATOR INFORMATION

GENERATOR INFORMATION

CONTACT PERSON	ORGANIZATION/COMPANY NAME		
Bryan Gatzke	Richland Center Renewable Energy		
ADDRESS	CITY	STATE	ZIP
24520 County RC	Richland Center	WI	53581
PHONE NUMBER	EMAIL ADDRESS		
(262) 297-6048	bgatzke@probstgroup.com		

WASTE SITE LOCATION INFORMATION

☒ CHECK IF SAME AS ABOVE

CONTACT PERSON	ORGANIZATION/COMPANY NAME		
ADDRESS	CITY	STATE	ZIP
PHONE NUMBER	EMAIL ADDRESS		

CONTRACTOR/HAULER INFORMATION

☐ CHECK IF SAME AS ABOVE

CONTACT PERSON	ORGANIZATION/COMPANY NAME		
Gary Waldvogel	Michael J Waldvogel Trucking		
ADDRESS	CITY	STATE	ZIP
W7622 State Hwy 47	Antigo	WI	54409
PHONE NUMBER	EMAIL ADDRESS		
(715) 489-3338	kwaldvogel@mjlwtrucking.com		

BILL TO:	☒ GENERATOR	☐ HAULER	☐ OTHER
PAYMENT METHOD:	☒ PRE-APPROVED ACCOUNT	☒ OTHER FORM OF PAYMENT (CREDIT CARD, CASH, CHECK)	

SECTION 2: WASTE CHARACTERIZATION INFORMATION

WASTE CHARACTERIZATION: Hazardous waste may not be landfilled in Iowa. To demonstrate that waste is not hazardous, the generator must submit a written waste determination, to include Toxicity Characteristic Leaching Procedure (TCLP) test results; safety data sheets (SDS), and/or documentation of knowledge of process to demonstrate that the waste is not a listed or characteristic hazardous waste nor exhibiting the properties of flammability, corrosivity, reactivity or toxicity as defined in 40 CFR Part 261, Subpart D. For raw or virgin materials being disposed of, in lieu of a TCLP analysis, an SDS that indicates the waste is not hazardous may be submitted. The Agency reserves the right to require analytical data and may take confirmatory samples, as necessary. The generator must provide accurate waste determination information to the Agency, and update the Agency in the event of any process changes that alter the nature of the waste.

COMMON WASTE NAME

Anaerobic Biosolids

WASTE DESCRIPTION INCLUDING THE GENERATION PROCESS AND/OR SOURCE OF CONTAMINATION (Space limited to the size of the text box)

Dairy industrial wastewater treatment facility including wastewater treatment utilizing aeration, DAF, clarifiers, digester, and sand filters. Final clean water discharges to the local river and biosolids generated are either land applied or land filled.

PHYSICAL CONSTITUENTS (e.g. SOIL 0-55%, WOOD 0-45%)

CONSTITUENT		%	CONSTITUENT		%
1	Solids	16.00	4		
2			5		
3			6		

Has any pretreatment been utilized (i.e. Solidification, Neutralization, etc.)?



YES

NO

IF SO PLEASE DESCRIBE THE PROCESS (INCLUDE SDS SHEET FOR PRETREATMENT MATERIALS) (Space limited to the size of the text box)

aeration, dissolved air flotation, clarifiers, digester and sand filter

Was this waste generated through waste water treatment, air handling, pollution or emissions control equipment?



YES

NO

PHYSICAL STATE AT ROOM TEMPERATURE

☒	SOLID	☐	SEMI-SOLID	☐	LIQUID	☐	POWDER	☐	SLUDGE	☐	OTHER:
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PERCENT (%) SOLID	COLOR	pH	FLASHPOINT
16.00	Black		n/a

Odor present?

YES

NO

DESCRIBE THE ODOR (Space limited to the size of the text box):

Does the waste pass the paint filter test? Free liquids are prohibited from landfill disposal. The Agency reserves the right to require a paint filter test be conducted.



YES

NO

SECTION 3: WASTE REGULATORY STATUS INFORMATION

Is this waste a listed hazardous waste as identified in 40 CFR 261 or by state regulations? Find listed hazardous wastes at: https://www.epa.gov		YES	✓	NO
Does this waste exhibit the property of ignitability as defined in 40 CFR 261?		YES	✓	NO
Does this waste exhibit the property of corrosivity as defined in 40 CFR 261?		YES	✓	NO
Does this waste exhibit the property of reactivity as defined in 40 CFR 261?		YES	✓	NO
Does this waste exhibit the property of toxicity as defined in 40 CFR 261?		YES	✓	NO
Is the waste a Delisted Hazardous Waste?		YES	✓	NO
Is the waste an Excluded Waste (40 CFR 261.4)?		YES	✓	NO
Is the waste Treated Hazardous Waste Debris?		YES	✓	NO
Is the waste Treated Characteristic Hazardous Waste?		YES	✓	NO
Is the waste from a Federal or State mandated clean-up?		YES	✓	NO
Does the waste contain radioactive material < 12 urads?		YES	✓	NO
Does the waste contain concentrations of regulated PCBs?		YES	✓	NO
Does the waste contain untreated, regulated, medical or infectious waste?		YES	✓	NO
Does the waste contain asbestos?		YES	✓	NO
Does the waste contain concentrations of regulated PFAS constituents?		YES	✓	NO

SECTION 4: PERSONAL PROTECTIVE EQUIPMENT INFORMATION

DESCRIBE PPE REQUIREMENT IF NECESSARY (Space limited to the size of the text box)

SECTION 5: WASTE DISPOSAL INFORMATION

IS THIS REQUEST FOR AN: ☐ EVENT ☒ ONGOING/ANNUAL DISPOSAL

ESTIMATED EVENT QUANTITY: 25 ☒ Tons ☐ Cubic Yards ☐ Gallons ☐ Other

ESTIMATED ANNUAL QUANTITY: 1000 ☒ Tons ☐ Cubic Yards ☐ Gallons ☐ Other

SHIPPING FREQUENCY: ☐ One time ☐ Monthly ☒ Quarterly ☐ Yearly

DELIVERY REQUIREMENTS: All profiled waste loads must be delivered to the landfill before 3:00 PM, Monday - Friday, unless other delivery criteria are pre-established between generator and Agency. The hauler or driver of the waste is required to identify the load by the Profile ID number to the scale operators each and every time a load is delivered at the landfill. Failure to properly identify the waste by the Profile ID to the scale house operator may result in loads being rejected.

SECTION 5: WASTE GENERATOR CERTIFICATION INFORMATION

By signing this Generator's Waste Profile and Disposal Request, I hereby certify that all information submitted in this profile and all attached documents contain true and accurate descriptions of the waste material; Relevant information within the possession of the Generator regarding known or suspected hazards pertaining to this waste has been disclosed to the Agency/the Contractor; Analytical data attached pertaining to the profiled waste was derived from testing a representative sample in accordance with 40 CFR 261.20 or equivalent rules; and Changes that occur in the character of the waste (i.e. changes in the process or new analytical) will be identified by the Generator and disclosed to the Agency (and the Contractor if applicable) prior to providing the waste to the Agency (and the Contractor if applicable).

I am an agent signing on behalf of the generator, and the delegation of authority to me from the Generator for this signature is available upon request.	
SIGNATURE	DATE
 PRINT NAME	02/04/2026
TITLE	TITLE
Bryan Gatzke	Permitting and Compliance Manager

FOR DMASWA USE ONLY

APPROVAL DECISION: ☐ Request is approved ☐ Request is denied	
Waste Code:	Account Number:
Management Method: ☐ Landfill	Job Number: ☐ ADC ☐ Composting ☐ Referral
Supporting documents: ☐ Analytical Results	☐ SDS Sheet(s) ☐ SWA ☐ SWAC
DATE RECEIVED:	DATE APPROVED: EXPIRATION DATE:
PROFILE ID:	IDNR SWA (if applicable):
SIGNATURE	DATE
PRINT NAME	TITLE

Generators Waste Profile and Disposal Request Supplemental

Table 1 - Recommended Testing Methods for Profiled Wastes													
Testing Method	PFAS	Gas	Motor			Hydraulic		Other	Metals	Solvents	Acid	Pesticide	Tar or Asphalt
			Diesel	Oil	Oil	Oil/Fuel							
OA-1 (total extractable hydrocarbons)		X	X	X	X		X			X			
OA-2 (total extractable hydrocarbons)		X	X	X	X		X			X			
Paint filter (if soil is sludgy)		X	X	X	X		X		X	X	X	X	X
TCLP RCRA metals									X			X	
TCLP volatiles										X		X	
Total PAHs (SVOCs)												X	X
TCLP pesticides												X	

Table 2 – Recommended Sampling Frequencies		
Analytical Parameter(As Required by Table 1)	Sample Type	Minimum Sample Frequency
Extractable Total Petroleum Hydrocarbons (ETPH)	Composite	One per 100 cubic yards
Volatile Organic Compounds (VOCs)	Discrete	One per 300 cubic yards
Semi-Volatile Organic Compounds	Discrete	One per 300 cubic yards
Lead. TCLP	Composite	One per 300 cubic yards
Arsenic, TCLP	Composite	One per 300 cubic yards
Barium, TCLP	Composite	One per 300 cubic yards
Cadmium, TCLP	Composite	One per 300 cubic yards
Chromium, TCLP	Composite	One per 300 cubic yards
Mercury, TCLP	Composite	One per 300 cubic yards
Selenium, TCLP	Composite	One per 300 cubic yards
Silver, TCLP,	Composite	One per 300 cubic yards
Polychlorinated Biphenyls (PCBs)	Discrete	One per 300 cubic yards
Ignitability	Composite	One per 600 cubic yards
Paint Filter Test	Composite	One per 600 cubic yards



Attachment 2

Pace Analytical Services:
Laboratory Analysis Report

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ANALYTICAL RESULTS

Project: RCRE PERMIT
Pace Project No.: 40305826

Sample: 002-SLUDGE (CAKE) Lab ID: 40305826002 Collected: 12/02/25 08:00 Received: 12/03/25 09:40 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Percent Moisture Analytical Method: ASTM D2974 Pace Analytical Services - Green Bay									
Percent Moisture	84.4	%	0.10	0.10	1		12/03/25 14:58		
2540G Total Percent Solids Analytical Method: SM 2540G Pace Analytical Services - Green Bay									
Total Solids	15.5	%	0.10	0.10	1		12/05/25 10:15		
300.0 IC Anions Analytical Method: EPA 300.0 Preparation Method: EPA 300.0 Pace Analytical Services - Green Bay									
Chloride	0.32	% (w/w)	0.13	0.038	10	12/15/25 13:32	12/16/25 15:38	16887-00-6	C4
351.2 Total Kjeldahl Nitrogen Analytical Method: EPA 351.2 Preparation Method: EPA 351.2 Pace Analytical Services - Green Bay									
Nitrogen, Kjeldahl, Total	7.8	% (w/w)	6.1	1.3	100	12/09/25 08:50	12/09/25 14:17	7727-37-9	C4
365.4 Total Phosphorus Analytical Method: EPA 365.4 Preparation Method: EPA 365.4 Pace Analytical Services - Green Bay									
Phosphorus	4.0	% (w/w)	0.61	0.15	50	12/09/25 08:50	12/10/25 10:31	7723-14-0	C4

REPORT OF LABORATORY ANALYSIS

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Date: 12/24/2025 12:56 PM



ANALYTICAL RESULTS

Project: Weekly Cake 12-3-25
Pace Project No.: 40305892

Sample: Sludge Cake Lab ID: 40305892001 Collected: 12/03/25 08:00 Received: 12/04/25 09:30 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010D MET ICP Analytical Method: EPA 6010D Preparation Method: EPA 3050B Pace Analytical Services - Green Bay									
Arsenic	<8.8	mg/kg	15.1	8.8	1	12/08/25 10:00	12/09/25 21:09	7440-38-2	C4
Cadmium	<0.80	mg/kg	3.0	0.80	1	12/08/25 10:00	12/09/25 21:09	7440-43-9	
Copper	41.4	mg/kg	6.0	1.7	1	12/08/25 10:00	12/09/25 21:09	7440-50-8	
Lead	<3.6	mg/kg	12.1	3.6	1	12/08/25 10:00	12/09/25 21:09	7439-92-1	
Molybdenum	6.9	mg/kg	6.0	0.84	1	12/08/25 10:00	12/09/25 21:09	7439-98-7	
Nickel	42.8	mg/kg	6.0	1.6	1	12/08/25 10:00	12/09/25 21:09	7440-02-0	
Selenium	<7.9	mg/kg	24.1	7.9	1	12/08/25 10:00	12/09/25 21:09	7782-49-2	
Zinc	212	mg/kg	24.1	7.2	1	12/08/25 10:00	12/09/25 21:09	7440-66-6	

7471 Mercury

Analytical Method: EPA 7471 Preparation Method: EPA 7471
Pace Analytical Services - Green Bay

Mercury	<0.12	mg/kg	0.20	0.12	1	12/08/25 13:29	12/09/25 13:53	7439-97-6	C4
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Percent Moisture

Analytical Method: ASTM D2974
Pace Analytical Services - Green Bay

Percent Moisture	84.2	%	0.10	0.10	1		12/10/25 09:54		
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4500 Chloride in Soil

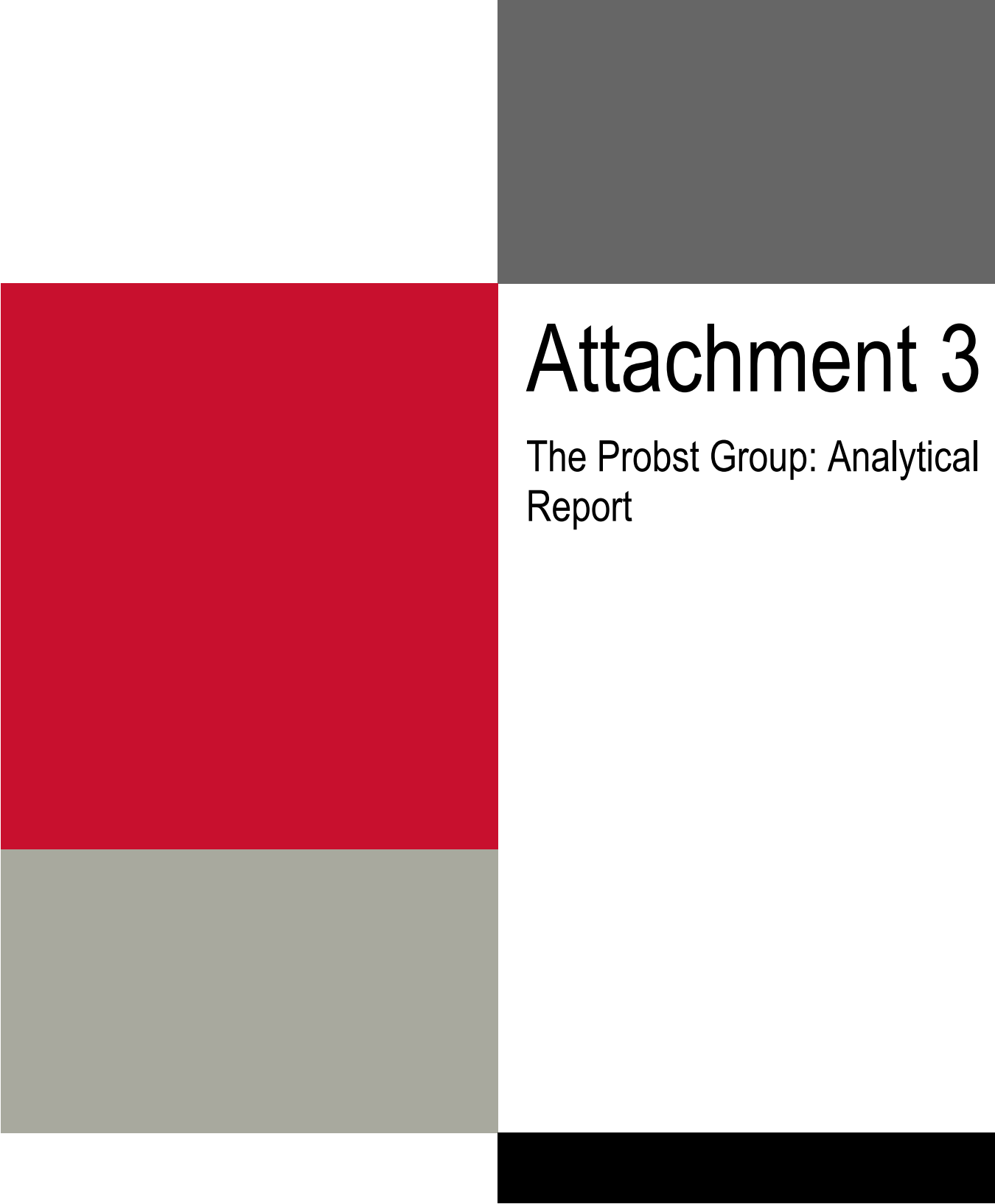
Analytical Method: SM 4500-Cl-E Preparation Method: SM 4500-Cl-E
Pace Analytical Services - Green Bay

Chloride	3630	mg/kg	306	105	1	12/05/25 14:26	12/08/25 12:06	16887-00-6	C4
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REPORT OF LABORATORY ANALYSIS

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Date: 12/11/2025 05:07 PM

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Attachment 3

The Probst Group: Analytical
Report

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Technology-Driven Wastewater Solutions.
Your Partner. Today and Tomorrow.

Report Number: 20220303

Report Date: 3/3/2022

ANALYTICAL REPORT

Richland Center Renewable Energy
24520 County Highway RC
Richland Center, WI 53581

Sample ID	Parameter	Units	Results	Method	Date Analyzed
Solid Waste Sludge	Free Liquids	%	0 %	Method 9095 EPA 846	3/2/2022

Approved by:
The Probst Group

Dustin Odden
WW Operator - Laboratory
WDNR Certification # 37879

262.264.5665
Main Line

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