

July 28, 2026

Mr. Khalid Al gharrawi, Environmental Engineer
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



RE: Response to the IDNR Letter dated July 23, 2026
Adel Municipal Landfill and Recycling Center 25-SDP-01-75P
(formerly the South Dallas County Sanitary Landfill)

Dear Mr. Al gharrawi:

This information is provided in response to the July 23, 2026, IDNR comment letter regarding the 2025 Annual Water Quality Report (Doc #116243). Supplemental landfill gas information is provided in response to the request made in the last paragraph of the referenced July 23, 2026, IDNR Letter. Please consider this to be a supplement to the 2025 Annual Water Quality Report.

It is acknowledged that MW-4 and MW-22 (along with GP-3) typically demonstrate methane gas concentrations that are elevated relative to other site monitoring points. It is further acknowledged that the concentrations in the second semester of 2025 were higher than the concentrations recorded in the first one-half of calendar year 2025.

The observed fluctuations in observed gas readings in MW-4 and MW-22 have ranged above 100% Lower Explosive Limit (LEL) since at least 2012 (Doc # 75754, Appendix E & F) and at GP-3 since at least 2010 (Doc #63280). The attached Site Plan (Figure 1) is attached illustrating the locations of MW-4, MW-22, and GP-3 relative to the waste boundary.

In 2009 a vent trench was installed in the vicinity of MW-4, MW-22 and GP-3 to address the elevated gas readings. The vent trench was fitted with solar powered vent fans in 2011. The Quality Control and Assurance report for the gas venting system/venting trenches was submitted on March 13, 2012 (Doc #69304) and was approved by IDNR on May 20, 2012, and incorporated in Amendment #9 to the SDP Permit on October 4, 2012.

Step-Out Gas Probes GP-3R (2011) and GP-7 (2020) were installed on City of Adel property (the site) to document that the elevated gas concentrations were not migrating laterally to the north. The routine monitoring at GP-3R and GP-7 indicates that methane is not detected and that the probes do not detect landfill gas migration.

A detailed study has not been performed to determine the cause of the fluctuating gas concentrations, but the fluctuations in 2012 were anecdotally tied to weather conditions and soil moisture levels (Doc #69304).

Please feel free to contact our office at (515) 733-4144 with any questions you may have.

Sincerely,

HLW Engineering Group

A handwritten signature in blue ink, appearing to read "Todd Whipple", is written over the printed name.

Todd Whipple, CPG
Project Manager

cc: Mike Fountas, Adel Municipal Landfill and Recycling Center

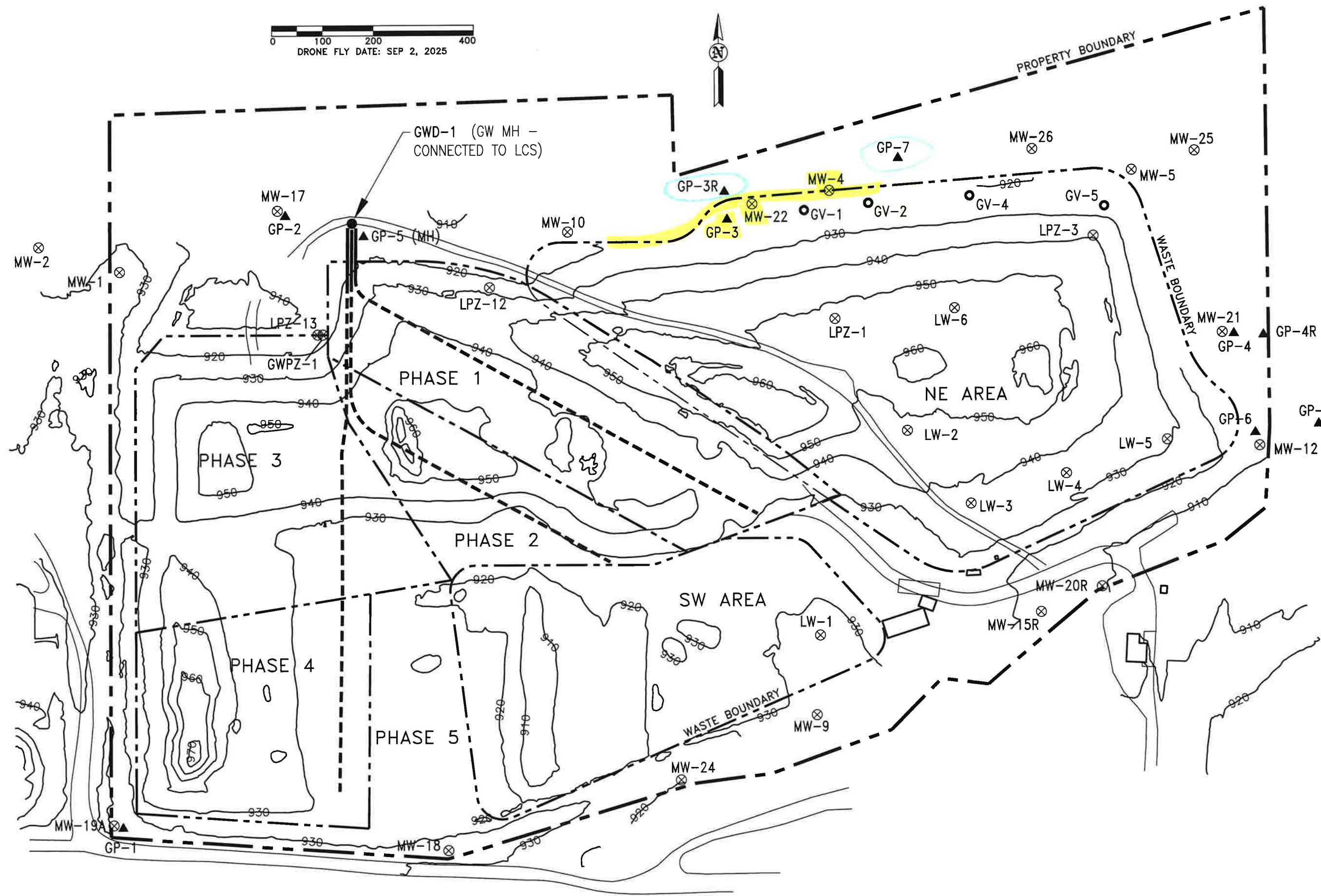


FIGURE: 1

SITE PLAN

SOUTH DALLAS COUNTY SANITARY LANDFILL
ADEL, IOWA

REVISION	NO.	DATE
DRAWN DRA	PROJECT NO. 6045	DATE 12-18-25

HLW Engineering Group
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