

September 30, 2026

Mr. Brad Davison
Environmental Specialist
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – FALL 2026
MONONA COUNTY SANITARY LANDFILL
IDNR PERMIT #67-SDP-01-75P
HLW PN 6036-25A.750**

Dear Mr. Davison:

In accordance with the General Provisions of the SDP Closure Permit dated January 19, 2016, a semi-annual inspection of the Monona County SLF was personally conducted the afternoon of September 25, 2026. Conditions at the time of the inspection were overcast with light rain and temperatures in the 60's.

The landfill stopped accepting waste as of November 1, 2014, and the landfill closed with a 4' soil cap in accordance with the approved closure/postclosure plan. Construction of the closure cap was completed on September 14, 2015. Terraces, letdown piping, and seeding were also included in the closure project. A Quality Control and Assurance Report/Closure Compliance Report was submitted to IDNR on September 23, 2015 (Doc #84296). This document was approved in Special Provision X.2.c of the SDP Closure Permit dated January 19, 2016. A notification was filed and recorded with the Monona County Recorder on September 9, 2015 to notify potential future purchasers of the property that the land was once used as a landfill facility. A copy of the notification was included in the report referenced above.

Status of the Permit

The Sanitary Disposal Project Closure Permit for the Monona County SLF was issued on January 19, 2016. The facility has received the following amendments to the Permit to date:

- Permit Amendment #1, May 3, 2016, incorporates the Construction Documentation Form and Boring Log for MW-3R, as well as the Well Plugging Record for MW-3 into the permit documents.
- Permit Amendment #2, July 13, 2017, incorporates the Abandoned Water Well Plugging Record forms for MW-2, PZ-2, MW-8, and PZ-8 into the permit documents. It also acknowledges the inability to locate temporary groundwater monitoring well TMW-1.
- Permit Amendment #3, March 26, 2019, 1) authorizes the permit holder to discontinue sampling and analysis as required by 567 IAC 114.26(4)"d" and conduct sampling and analysis for total recoverable metals; 2) authorizes the temporary suspension of sampling for indicator parameters in accordance with 114.26(4)"e" and "f"; 3) reduces the frequency of routine site inspections from monthly to semiannually; and 4) reduces the frequency of leachate head measurements from monthly to quarterly.

- Permit Amendment #4, August 2, 2019, 1) eliminates the requirement to install a third downgradient water table monitoring well; and 2) changes MW-3R and MW-4 from downgradient monitoring points to background monitoring points.
- Un-numbered Permit Amendment, January 16, 2020, required the Annual Water Quality Report (AWQR) to be submitted in the IDNR format.

IDNR approved a variance to IAC 114.26(4)d, e, and f on March 25, 2019 to discontinue collection of filtered samples and conduct sampling and analysis for total recoverable metal in its place. This variance was incorporated into the SDP Closure Permit in Permit Amendment #3.

IDNR approved a variance to IAC 567-114.22(2) on August 2, 2019 to reduce the number of downgradient monitoring wells required to two (three are required by rule). This variance was incorporated into the SDP Closure permit in Permit Amendment #4.

Annual Water Quality Report

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on November 24, 2025 (Doc #114872). IDNR comments on the AWQR were received on April 8, 2026 (Doc #116807). No response is required.

Monitoring Well Maintenance Performance Reevaluation Plan

The most recent Monitoring Well Maintenance Performance Reevaluation Plan (MWMPRP) was submitted to IDNR for review on May 10, 2024 (Doc #110033). The report recommended no changes to the monitoring well system or the Hydrologic Monitoring System Plan. As per IDNR Regulations, the MWMPRP is required every 5 years.

Financial Assurance

The 2026 Financial Assurance Documentation was received by IDNR on January 14, 2026 (Doc #115692) and approved on March 2, 2026 (Doc #116310).

Special Provisions

1. The 30 year closure/postclosure period began on January 19, 2016.
2. The site will be maintained in accordance with the closure permit.
3. The Fall groundwater sampling was completed on September 21, 2026.
 - a. Samples are collected from MW-1, MW-3R, MW-4, MW-5, and MW-7.
 - b. Water levels are measured at LW-1, PZ-1A, PZ-4, PZ-5, and PZ-7
 - c. Addressed by Permit Amendment #1 (Doc #86174)
 - d. Sampling is completed in accordance with Permit Amendment #4 and the AWQR comment letter dated March 16, 2023.
 - e. No change.
 - f. No change.

4. As per this provision, monthly inspections of the site are required for the first year after issuance of the Closure Permit at a minimum. Permit Amendment #3 reduced the inspection frequency from monthly to semi-annually.
5. Diversion and drainage systems were damaged by a large rain event shortly after completion of the closure cap. Repairs to the cap and the ditch checks east of the closure area were made after the initial damage. Cap repairs have been documented in past inspection reports. There is still some erosion present in the upper ditch checks, but the ditch between the ditch checks appears stable with no active erosion noted. Erosion repair will continue as needed. Diversion and drainage systems are also discussed under “Additional Comments” below.
6. The vegetative cover is continuing to improve. Staff continue to re-seed portions of the cap where vegetation was previously damaged or where erosion repairs have been made and vegetation is becoming established. Volunteer tree removal is on-going with no trees noted on the cap during the inspection. Vegetative cover is discussed in more detail under “Additional Comments” below.
7. Refer to Items 5 and 6.
8. The frequency of explosive gas monitoring was reduced to semi-annually in accordance with the June 13, 2024 IDNR letter. Explosive gas monitoring is conducted by HLW during the April and October groundwater sampling events. Results will be included in the AWQR.
9.
 - a. The facility does not have a leachate control system.
 - b. Leachate was measured by HLW staff in LW-1 on September 21, 2026. The measured leachate thickness was 0.05 ft. LW-1 will be measured next during the Spring, 2027 sampling event.
 - c. The frequency of leachate level measurements has been reduced to semi-annually in accordance with the June 13, 2024 IDNR letter.
 - d. No change.
10. The ERRAP submitted and dated November 2011 is still generally applicable to the closed facility.

Based on observations during the inspection the facility appears to be operating in general conformance with the closure permit.

Additional Comments

Settlement was noted at the intake of the lowest terrace on the northwest slope of the cap.

The tile blowout just below the crest of the northernmost terrace southwest of LW-1, noted during the Spring, 2025 inspection, has been repaired by staff. The repair area was reviewed during the inspection with no additional damage observed.

Fill was added to a rill south of the southernmost terrace (see approximate location on attached figure). The fill should be seeded.

A small area of apparent temporary ponding was evident in the terrace channel (see figure) on the terrace immediately north of the southernmost terrace. It appears that minor grading of the terrace channel toward the intake to the west will alleviate the temporary ponding.

The landfill staff continues to make repairs to erosion rills in the erosive layer as needed.

Well vegetated historic rills were noted at several areas of the cap at the approximate locations shown on the attached figure. The rills are well vegetated and based on the condition of vegetation the rills do not appear to be active. No waste is exposed in any of the rills.

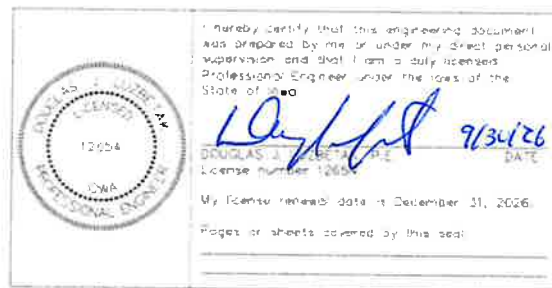
Ditches were free of debris and were draining as intended.

Portions of the landfill cap are routinely mowed to control tree growth.

IDNR conducted a permit compliance inspection of the landfill on October 29, 2024. The site was described as having no ponded water and strong vegetation. No deficiencies were noted. A letter was issued to the facility on November 6, 2024 (Doc #111297).

Recommendations

1. Repair settlement at terrace intake.
2. Grade terrace channel to restore flow toward the intake.
3. Continue to remove trees and saplings on the cap and in the drainage ways.
4. Continue to seed areas of past repairs and sparse seeding as needed.
5. Continue to monitor vegetative rills and repair as necessary.
6. Continue to remove accumulated sediment from sediment basin, terrace channels, and drainage ways as needed.
7. Continue to monitor diversion and drainage systems and repair as necessary.



cc: Logan Persinger, Manager, Monona County Landfill (*electronic copy*)

LEGEND

PROPERTY BOUNDARY

WASTE BOUNDARY

BORROW AREA BOUNDARY

TERRACE

TERRACE TILE

PIEZOMETER/MONITORING WELL

TERRACE INTAKE

AERIAL PROVIDED BY THE IOWA STATE UNIVERSITY GEOGRAPHIC INFORMATION SYSTEMS SUPPORT AND RESEARCH FACILITY IN COOPERATION WITH THE IOWA DEPARTMENT OF NATURAL RESOURCES, THE USDA NATURAL RESOURCES CONSERVATION SERVICES, AND THE MASSACHUSETTS INSTITUTE OF TECHNOLOGY



AERIAL DATED JULY 28, 2025

PONDED WATER

SPARSE VEGETATION



HLW Engineering Group
 204 West Broad Street, P.O. Box 314
 Story City, Iowa 50248
 Phone: (515) 733-4144
 FAX: (515) 733-4146

FALL 2026 INSPECTION

MONONA COUNTY SANITARY LANDFILL
 MONONA COUNTY, IOWA

FIGURE: 1

REVISION	NO.	DATE
DRAWN	JGH	
PROJECT NO.	6036-26A	DATE
		9/29/26