

October 15, 2026

Alexis Slade
Environmental Engineer
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



RE: Cass County Sanitary Landfill
Fall 2026 Semi-Annual Inspection
IDNR Permit #15-SDP-01-75C

Dear Ms Slade,

This semi-annual inspection of the Cass County Landfill was personally conducted the morning of October 2, 2026. The results of the inspection were discussed with Chris Jahnke, Director, upon completion. Weather conditions were clear with light winds and temperatures in the 50's. Site conditions were wetter than normal due to the amount of rain received in September.

Status of the Permit

The Closure Permit was issued December 5, 2023 and expires December 5, 2053. The facility has received the following amendments to the Closure Permit to date:

- Permit Revision, May 14, 2024, approved the waiver associated with financial assurance "to fully fund post-closure over 10 years following the issuance of Landfill closure permit".
- Permit Revision, October 31, 2024, approved the Environmental Covenant between the Cass County Environmental Control Agency and IDNR, approved the implementation of no-purge sampling.
- Permit Revision, January 16, 2025, reduced the frequency of leachate level measurement in PZ-1 R, PZ-2, PZ-3 R, PZ-4, and PZ-5 R from monthly to quarterly.
- Permit Revision, August 3, 2026, revised the Hydrologic Monitoring System Plan (HMPS) by eliminating the testing of monitoring wells in the Dakota Formation with the exception of MW-11.

PERMIT PROVISION STATUS

General Provisions

1. Extension requests for submitting the 2026 Financial Assurance documentation were submitted to and approved by IDNR on March 19, 2026 (Doc #116550), May 26, 2026 (Docs #117201 and 117212), and July 30, 2026 (Doc #117713). 2026 Financial Assurance documentation was submitted to IDNR on August 10, 2026 (Doc #117800) and approved by IDNR on August 17, 2026 (Doc #117819).
2. The site was staked and surveyed upon completion of the closure activities. Semi-annual inspections are being conducted and reports submitted as required.

Special Provisions

1. The 30 year closure and post closure period began December 5, 2023.
2. Closure of the Cass County Sanitary Landfill occurred in general accordance with the approved Closure and Post-Closure Plan.
3. No waste is being accepted. No recycling or composting is occurring on the landfill areas. Solid waste and recycling activities are being conducted under the Cass County Solid Waste Transfer Station

permit.

4. A recorded Environmental Covenant was submitted to the IDNR on October 30, 2024 (Doc #111194).
5. This Special Provision was revised in the August 3, 2026 Permit Revision. Monitoring is being conducted as detailed in this Special Provision.
6. The site is inspected semi-annually by a consultant who provides a summary of the site conditions and reports any recommendations for corrective actions.
7. Diversion and drainage systems have been installed as detailed in the submitted plans. Ponded water was observed during this inspection, the approximate locations of the ponding are shown on the attached figure. Repairs were made to erosion on site in 2025, including the erosion rill previously noted east of MW-31/MW-32 and an area of the Subtitle D Closure Cap northeast of MW-39. It appears that additional erosion has occurred in the repair area northeast of MW-39.
8. Most of the closed unlined areas of the site demonstrate good vegetative growth with the exception of a few areas of stressed vegetation noted on the cap as well as some bare areas disturbed during installation of the trench and leachate pumping system discussed in the "Other Comments" section below. These areas are shown on the attached figure. Trees have been removed but numerous saplings remain on the cap of the closed unlined area. Trees noted within the lagoon fence in the October 2025 Inspection Report (Doc #114608) were removed but some regrowth was noted during the inspection.

Mr. Janke reported that the facility has purchased a mower and portions of the cap were moved in 2026.

The cap of the closed lined areas completed in 2023 was reseeded in August of 2024 due to poor initial emergence of vegetation on the cap. The vegetation is continuing to improve although in some areas weeds appear to be prevalent. The slow establishment of vegetation has led to some erosion in the drop channels at each end of the terrace on the south slope.

Silt fence posts should be removed in areas where vegetation is well established to make mowing of the cap easier.

9. See Items 7 and 8 above.
10. Methane gas monitoring is being conducted quarterly. Results of gas monitoring will be included in the Annual Water Quality Report (AWQR).
11. Leachate is collected in the storage lagoon and when levels require hauled for treatment. Leachate was being hauled from the lagoon during the inspection and the lagoon had approximately 1 foot of freeboard. Leachate in 2026 has been hauled to the City of Council Bluffs POTW and the Des Moines WRA, a separate request will be submitted to IDNR to add leachate treatment at both of these facilities to the SDP Permit. A Leachate Control System Performance Evaluation Report is included in the Annual Water Quality Report each year.

On January 10, 2025 IDNR received a request to reduce leachate head level measurements in the unlined landfilling area from monthly to quarterly to coincide with quarterly methane gas measurements (Doc #111787). IDNR issued a permit revision on January 16, 2025 (Doc #111872) approving the request. Leachate head level measurements in the leachate piezometers in the Subtitle D compliant lined areas are still required monthly.

12. Based on a risk assessment a leachate control plan is not required for areas that received waste prior to July 1, 1992.
13. Staff regularly reviews the Transfer Station Emergency Response and Remedial Action Plan (ERRAP). The ERRAP for the Transfer Station was included in the 2022 Permit Renewal documentation (Doc #103459).
14. Approved the financial assurance waiver.
15. Approved the Environmental Covenant between the Cass County Environmental Control Agency and IDNR.

Annual Water Quality Report

A Notification Letter - Alternate Source of Carbon Disulfide was submitted to IDNR on January 23, 2026 (Doc #115799). The letter contained documentation that linked the carbon disulfide detected at MW-13, MW-19, MW-20, MW-21, MW-36, and MW-37R during the Fall, 2025 sampling event to two (2) new brands of latex gloves utilized during the field sampling.

The 2025 Annual Water Quality Report (AWQR) was received by IDNR on January 30, 2026 (Doc #115968). IDNR requested additional information on the GWPS used in the AWQR on July 31, 2026 (Doc #117648). The requested information was submitted to IDNR on August 10, 2026 (Doc #117776).

A request to modify the HMSP to eliminate testing of monitoring wells in the Dakota Formation with the exception of MW-11 was submitted to IDNR on February 9, 2026 (Doc #116093). This request was approved in the August 3, 2026 Permit Revision

The 2026 Spring Water Quality Notification letter was submitted to IDNR on May 27, 2026 (Doc #117216).

Other Comments

To control persistent seepage noted east of PZ-5R, the seepage areas were cored out and backfilled during terrace repairs in 2024 with limited success. A trench was excavated upgradient of the seepage areas on August 22, 2025. The location of the trench is shown on the attached figure. The trench had a width of approximately 3' and was excavated to a depth of approximately 12' to 15' to "dry" waste. The trench was then backfilled with clean pea gravel and covered with 2' of soil. The intent of the trench was to promote vertical migration of the leachate into the existing waste mass to limit potential seepage. Waste excavated during the trench installation was hauled off site for disposal. Additional seepage was noted during the Spring, 2026 inspection. As a result, a solar leachate pump system that would operate seasonally was proposed for this area. A request to install the system was submitted to IDNR on June 5, 2026 (Doc #117292). IDNR approved the installation of the system on June 17, 2026 (Doc #117352). IDNR was notified that the system was operational on August 11, 2026 (Doc #117805). The system removed two totes of leachate upon installation; however, the tractor that was going to be used to haul the leachate to the lagoon broke down so the totes remain adjacent to the pump and the pumping system was not operating during the inspection. Since the pumps were not operational seepage was noted north of the pump and east of PZ-5R during this inspection with some discolored water was noted in the terrace channel north of the pump. The discolored water appeared to be reabsorbed through the cap. The seep areas show heavy wildlife activity.

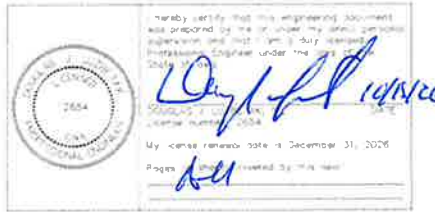
The landfill and transfer station facilities currently operate under NPDES General Permit No. 1 (expires March 10, 2028). The NPDES Permit Discharge Authorization Number is 5825-5645. A separate "Stormwater Industrial Routine Facility Inspection Report" was completed during this inspection and is attached.

Summary

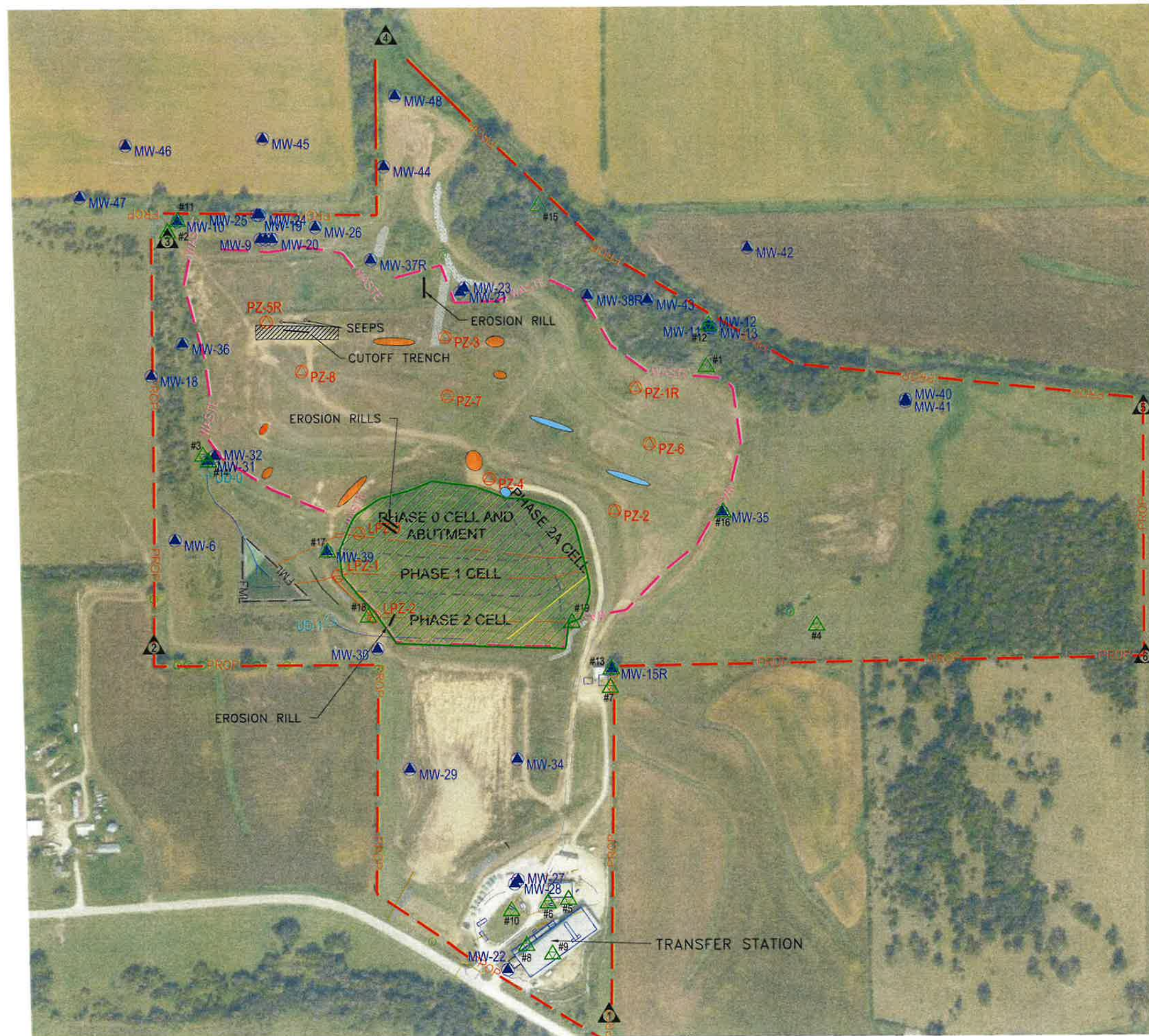
This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

Recommendations

1. Operate leachate pumping system and monitor seepage near PZ-5R
2. Seed repair areas and areas with thin vegetation.
3. Continue with tree removal operations.
4. Continue to remove silt fence posts in areas where vegetation is well established.
5. Continue to monitor site vegetation and repair/reseed as necessary.
6. Continue to monitor site erosion, drainage, and diversion systems and repair as necessary.



cc: Chris Jahnke, Director, Cass County Environmental Control Agency (*electronic copy*)



AERIAL DATED SEPTEMBER 9, 2025

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.

- 2023 CLOSURE AREA
- MINIMAL TO NO VEGETATION
- THIN VEGETATION
- PONDED WATER
- LEACHATE SEEP



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

FIGURE: 1

REVISION	NO.	DATE
DRAWN	JGH	10/09/26
PROJECT NO.	6055-24A	

CASS COUNTY SANITARY LANDFILL
ATLANTIC, IOWA

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Cass County Sanitary Landfill		
NPDES Tracking No.	Authorization # 5825-5645		
Date of Inspection	October 2, 2026	Start/End Time	8:00 AM/10:30 AM
Inspector's Name(s)	Douglas J. Luzbetak, P.E.		
Inspector's Title(s)	Project Manager		
Inspector's Contact Information	HLW Group, PO Box 314, Story City, IA 50248, (515)733-4144		
Inspector's Qualifications	Professional Engineer, project manager at the site		
Weather Information			
Weather at time of this inspection?			
☒ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snow ☐ High Winds ☐ Other: _____ Temperature: 50's			
Have any previously unidentified discharges of pollutants occurred since the last inspection? ☐ Yes ☒ No If yes, describe: _____			
Are there any discharges occurring at the time of inspection? ☐ Yes ☒ No If yes, describe: _____			

Control Measures

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Terrace System (closed unlined area)	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
2	Terrace System (closed lined area)	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	Continue to monitor erosion in terrace outlets.
3	Freon containing appliances	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	All appliances were being stored in a roll off during the inspection.
4	Diesel fuel tank	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	Tank is dual walled.

Areas of Industrial Materials or Activities exposed to stormwater

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Solid waste is unloaded in the interior of the building. The interior of the building was very neat and orderly.
2	Equipment operations and maintenance areas	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
3	Fueling areas	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Diesel tank is dual walled.
4	Freon containing appliances storage area	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Appliances are stored in a roll off.
5	Erodible areas/construction	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Monitor vegetation for emergence/establishment
6	Dust generation and vehicle tracking	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Dust was not noted during the inspection. No tracked litter or mud was noted at transfer station entrance/exit

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

None.

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

The closure cap completed in 2023 was reseeded in August of 2024 due to poor initial emergence of vegetation on the cap. The vegetation is becoming established across the reseeded area although there were a few areas where weeds are prevalent.

Erosion rills were noted at several locations on the cap. These areas should continue to be monitored and repairs initiated if the erosion continues.

Continue tree removal from the cap.

Monitor site erosion and repair as necessary.

Monitor site vegetation and repair as necessary.

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Douglas J. Luzbetak, P.E.

Signature:  **Date:** 10/15/26