

October 15, 2026

Brian L. Rath, P.E.
Environmental Engineer Senior
IDNR – Land Quality Bureau
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



**RE: SEMI-ANNUAL INSPECTION – FALL, 2026
CEDAR RAPIDS WPCF ASH MONOFILL
IDNR PERMIT #57-SDP-07-85P
HLW PN 3422-24A.750**

Dear Mr. Rath:

In accordance with the General Provisions of the SDP Permit dated January 23, 2025, a semi-annual inspection of the Cedar Rapids WPCF Ash Monofill was personally conducted the morning of October 14, 2026. Margaret Nelson, Environmental Compliance Program Manager, and Alec Matthew, Environmental Compliance Specialist, both with the City of Cedar Rapids, accompanied me on the inspection. Conditions at the time of the inspection were clear and calm with temperatures in the 50's.

The monofill consists of two approved ash sludge disposal areas: the North 1 Disposal Area and the North 2 Disposal Area.

The South Disposal Area was closed in 2025 in accordance with the Closure/Post Closure Plan. Documentation on the closure was included in the Construction Quality Assurance Report – North 2 Lagoon Construction, North 1 Lagoon Repairs, and South Disposal Area Removal that was submitted to IDNR on September 25, 2025 (Doc #114440).

As per WPCF staff, since the beginning of 2026 ash disposal has been directed into the disposal areas as follows:

- North 2 Disposal Area from November 14, 2025 to June 1, 2026.
- North 1 Disposal Area from June 1, 2026 to October 1, 2026.
- North 2 Disposal Area from October 1, 2026 to present.

Ash removal since the beginning of 2026 has been as follows:

- Approximately 956 dry tons of ash removed, North 2 Disposal Area, July-August, 2026.

The ash in the North 1 Disposal Area is being allowed to dewater prior to removal. Adequate capacity remains in the North Disposal Areas for current operations.

Dewatered ash is hauled to the Lee Crawford Quarry for beneficial use under Beneficial Use Determination (BUD) Authorization No. 57-BUD-23-97. This BUD is effective through January 2, 2027.

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



(515) 733-4146 Fax

Status of the Permit

The Sanitary Disposal Project Permit for the Cedar Rapids WPCF Ash Monofill was renewed on January 9, 2025 and expires on January 9, 2028. The site has received the following permit amendments to date:

- Permit Revision #1, January 23, 2025, updated General Provision IX of the permit to require online submittal of tonnage reports.

Annual Water Quality Report

The 2025 Annual Water Quality Report (AWQR) was submitted to IDNR on January 8, 2026 (Doc #115551). The AWQR contained a request to revise the Hydrologic Monitoring System Plan (HMSP) as follows:

- background, MW-21 and MW-29, MW-1 (historic data) and MW-4 (historic data)
- downgradient, MW-30, MW-31, and MW-32

IDNR comments on the 2026 AWQR were received in an email dated June 5, 2026 (Doc #117301). The response denied the requested revisions to the HMSP discussed above without “further supporting data”.

Final construction documentation for the monitoring wells installed in 2025 (MW-29, MW-30, MW-31, and MW-32) was submitted to IDNR on June 5, 2026 (Doc #117287) and approved by IDNR on June 17, 2026 (Doc #117454).

Monitoring Well Maintenance Performance Reevaluation Plan

The most recent Monitoring Well Maintenance Performance Reevaluation Plan (MWMPRP) was included in the 2024 AWQR submitted to IDNR on December 16, 2024 (Doc #111490). As per IDNR Regulations, the MWMPRP is required every 5 years.

Financial Assurance

2026 Financial Assurance documentation was submitted to IDNR on January 22, 2026 (Doc #115882) and approved by IDNR on March 3, 2026 (Doc #116325).

Special Provisions of the SDP Permit

1. The permit holder is authorized to accept sewage sludge incinerator ash slurry from the Cedar Rapids WPCF for storage and dewatering prior to disposal.

2.
 - a) Revise to remove disposal approval for South Disposal Area, add approval of disposal in North 2 Disposal Area.
 - b) No changes.
 - c) Results from TCLP testing of the ash in accordance with this provision were included in the 2024 SDP Permit Renewal documentation submitted to IDNR on July 14, 2024 (Doc #110268). TCLP test results for the ash are also submitted to IDNR in accordance with the BUD Authorization.
 - d)-j) No changes.
3. No changes.
4. MW's 1, 2, 3R1, 4, 22, 23, 24, and 26 have been abandoned and should be removed from the HMSP at this time. MW's 29, 30, 31, and 32 should be added to the HMSP.
5. No changes.
6. No changes.
7. Revise to add closure documentation for the South Disposal Area.

Based on observations during the inspection, along with discussions with Ms Nelson and Mr. Matthew, the facility appears to be in general conformance with the SDP Permit.

Additional Comments

The flexible membrane liner (FML) and geonet drainage layer were noted as exposed at several locations on the perimeter of the North 1 Disposal Area during the Spring, 2026 inspection. These areas were repaired in June, 2026 with City staff providing pictures of the repairs at that time. These areas were reviewed with no additional damage noted.

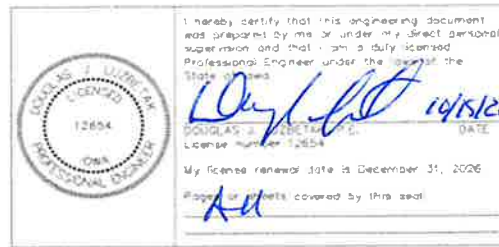
Depressions were noted under the leachate and seepage cleanout pipes at the top of the slope on the west side of the North 2 Disposal area during the Spring, 2026 inspection. These areas were repaired in June, 2026 with City staff providing pictures of the repairs at that time.

Leachate lines were cleaned in July, 2024 (North 1 Disposal Area). As per the 3 year cleaning frequency required by IDNR the lines should be cleaned in 2027.

As reported in past AWQR's, elevated levels in the leachate head monitoring point in the North 1 Disposal Area have historically been recorded. All measurements in the leachate head monitoring points for the North 1 and North 2 Disposal Areas in 2026 have been less than 12". The 2026 measurements are attached.

Recommendations

1. Continue operations in accordance with the SDP Permit.



cc: Margaret Nelson, Environmental Compliance Program Manager, Cedar Rapids WPCF (electronic copy)

Ash Lagoon Underdrain Level Measurements

City of Cedar Rapids Water Pollution Control Facilities

Instructions: Complete these measurements once every calendar month for both the N1 and N2 ash lagoons.

In Column A, record the date and time measurements were taken.

In Columns B and D, enter the length of well tape at the cleanout line when water was detected (or the length of the leachate cleanout line measured if no water is detected).

For Columns C and E:

The N1 leachate line is 39.2 feet; if measurement is ≥ 39.2 ft., leachate head is 0.0 ft. If measurement is < 39.2 ft., determine leachate head using "N1_Reference"

The N2 leachate line is 43.7 feet; if measurement is ≥ 43.7 ft., leachate head is 0.0 ft. If measurement is < 43.7 ft., determine leachate head using "N2_Reference"

Notes may be recorded in Column F.

Date Time	North Ash Lagoon 1 Distance to Water (ft.) If $\geq 39.2'$, put 0 in Column C	North Ash Lagoon 1 Leachate Head (ft.)	North Ash Lagoon 2 Distance to Water (ft.) If $\geq 43.7'$, put 0 in Column E	North Ash Lagoon 2 Leachate Head (ft.)	Note
1/2/26 10:29	ND @ 45.1	0	ND @ 50.9'	0	
2/2/26 10:58	ND @ 44.2'	0	ND @ 50.9'	0	
3/2/26 10:36	ND @ 45.05'	0	ND @ 50.9'	0	
4/6/26 10:41	ND @ 45.3'	0	ND @ 50.9'	0	
5/4/26 9:49	44.47'	0	ND @ 50.9'	0	
6/15/26 11:59	44.3'	0	ND @ 50.9'	0	
7/6/26 13:24	44.24'	0	ND @ 51.4'	0	
8/27/26 10:40	44.75'	0	ND @ 49.9'	0	
9/1/26 12:02	44.5'	0	ND @ 51.08'	0	
10/6/26 10:04	43.8'	0	49.87'	0	