HALEY ALDRICH

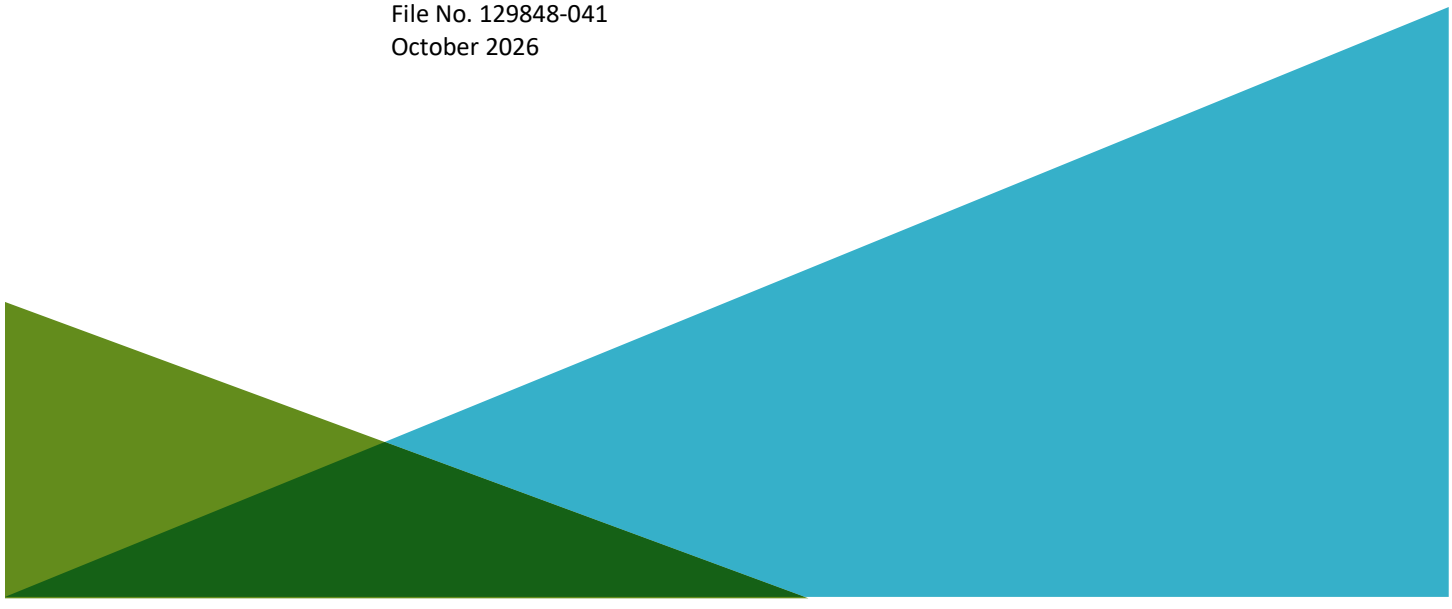
www.haleyaldrich.com

2026 FALL SEMIANNUAL INSPECTION REPORT
AMSTED RAIL FOUNDRY WASTE LANDFILL
416 CARBIDE LANE
KEOKUK, IOWA

by
Haley & Aldrich, Inc.
Miamisburg, Ohio

for
Amsted Rail Company, Inc.
Keokuk, Iowa

File No. 129848-041
October 2026



HALEY & ALDRICH, INC.
3601 Rigby Road
Suite 420
Miamisburg, OH 45342
937.384.9940

October 28, 2026
File No. 129848-041

Amsted Rail Company, Inc.
416 Carbide Lane
Keokuk, Iowa 52632

Attention: Paul Sheppard, Environmental Manager

Subject: 2026 Fall Semiannual Inspection Report
Amsted Rail Foundry Waste Landfill
Keokuk, Iowa
Permit No. 56-SDP-15-89-91C

Dear Mr. Sheppard:

Haley & Aldrich, Inc. (Haley & Aldrich) conducted the semiannual inspection of the Foundry Waste Landfill at the Amsted Rail Company, Inc. (Amsted) facility located at 416 Carbide Lane in Keokuk, Iowa. This letter and its enclosures meet the semiannual reporting requirements described in the closure permit.

Background

As required by Permit No. 56-SDP-15-89-91C, Haley & Aldrich conducted the semiannual inspection of the landfill at the Amsted facility located at 416 Carbide Lane in Keokuk, Iowa. The permit requires a brief report describing the site's conformance or non-conformance with the permit and the approved plans and specifications. The semiannual inspection reports must be submitted by May 1 and November 1 each year to the Iowa Department of Natural Resources' (IDNR's) main and local field offices.

In addition to submittal of the Semiannual Inspection Report, IDNR must be notified if the inspection reveals any non-conformance with the permit or approved plans and specifications.

IDNR issued the current permit for the Foundry Waste Landfill on January 24, 2019, with an expiration date of January 24, 2022. Amsted completed and signed the Municipal Solid Waste Landfill, Permit Application Form 50, as requested by IDNR (Attachment A). IDNR confirmed that the Form 50 received will supersede the permit expiration date of January 24, 2022, and the June 1, 2022 submittal date for the Closure Documentation Report. Amsted can operate the facility as it currently does under Form 50 and any IDNR correspondence received.

The Foundry Waste Landfill was developed and operates in accordance with the following plans and specifications:

1. Permit Renewal Application dated February 2010 and issued May 6, 2010.
2. *Hydrological Monitoring System Plan* contained in Appendix 4 of the 2006 Permit Renewal Application dated April 2006, recertified February 2010, amended (Amendment #2) September 2014, revision submitted January 2016, Notice of Appeal of Amendment (Amendment #3) dated February 9, 2016, and IDNR approval of permit Amendment #4 to supersede the appealed permit Amendments #2 and #3. A *Revised Hydrologic Monitoring System Plan* dated January 18, 2016, replaces the previous plan in its entirety.
3. *Leachate Control Plan* contained in Appendix 5 of the Permit Renewal Application dated April 2006 and recertified in February 2010.
4. *Emergency Response and Remedial Action Plan* contained in Appendix 6 of the Permit Renewal Application dated April 2006 and recertified in February 2010.
5. *Closure/Post-Closure Plan* dated April 1, 2019, and approved by IDNR on April 9, 2019.
6. *IDNR Municipal Solid Waste Landfill, Permit Application 50,* signed September 14, 2021, and other IDNR correspondence received.

The permit allows the Foundry Waste Landfill to accept foundry waste consisting of slag, sand, miscellaneous dust, clay graphite products, refractory brick, refractory tubes, and grinding stones for disposal.

The permit for the Foundry Waste Landfill allows for the development of a recovery and reuse area for slag located south of the slag disposal area and an exhumation plan for the sand and slag disposal areas. The recovery and reuse area is identified on Figure 1.

Amsted submitted a Construction Documentation Report to IDNR, the *Foundry Waste Landfill Closure – Phase 1 Sand Area,* dated December 30, 2019. The Construction Documentation Report was approved by IDNR in a letter dated January 13, 2020, with a requirement for photographic documentation when vegetation is established. On July 7, 2020, photographic documentation was submitted to IDNR as required. IDNR issued a letter dated July 31, 2020, stating that IDNR considers the Phase 1 Sand Area closed. This completed the *Foundry Waste Landfill Closure – Phase 1 Sand Area*. The Phase 1 Sand Area is now in post-closure. Therefore, this area was no longer part of the semiannual inspections as of 2021.

Amsted submitted a Construction Documentation Report to IDNR, the *Foundry Waste Landfill Closure – Phase I & II Slag Area,* dated July 13, 2022. Part of the Construction Documentation Report was an Environmental Covenant for the Phase I and II Slag Areas. The Construction Documentation Report was approved by IDNR in a letter dated September 27, 2022. This completed the *Foundry Waste Landfill Closure – Phase I & II Slag Area*. The Phase I and II Slag Area is now in post-closure. Attachments A and B include the Griffin Wheel Company, Inc. – Sanitary Disposal Project Closure Permit and Iowa Solid Waste Program – Environmental Covenant, respectively.

As such, there will no longer be semiannual landfill inspections of Phase 1 Sand Area and Phase I and II Slag Areas. Instead of a formal inspection and a semiannual inspection report by a licensed Professional Engineer, the site will be inspected during semiannual groundwater monitoring events and a report will be submitted to IDNR for the duration of the post-closure period as described in the current closure permit 56-SDP-15-89-91C.

The Foundry Waste Landfill initiated the Five-Year Post-Closure period starting September 27, 2022. The Foundry Waste Landfill will operate, as required, under the IDNR Sanitary Disposal Project Closure Permit #56-SDP-15-89-91C and Environmental Covenant issued September 27, 2022.

Inspection Observations

The following summarizes observations from the September 14, 2026 inspection. The completed Summary of Landfill Inspection form is included in Attachment C.

WEATHER CONDITIONS

The weather was partly cloudy, with temperatures in the mid-70s degrees Fahrenheit.

ROADS

All access roads to the sand and slag disposal areas are constructed with slag. These roads were observed in overall good condition. Slight rutting was observed in the road near the northern edge of the Phase I Slag Area.

EQUIPMENT AND PERSONNEL

Slag is hauled by dump truck to the designated slag disposal area. A rubber-tired front-end loader and cleated CAT are readily available for use in spreading, leveling, and moving materials around the disposal area. The following individuals located at the Keokuk foundry are the certified operators and supervise the operations within these areas:

- Paul Sheppard, Environmental Manager
- Art Rickard, Mobile Equipment Operator
- Gary Henson, Mobile Equipment Operator

OPERATIONS

The northern portion of the slag recovery and storage area is used for recently deposited slag. Daily or intermediate soil cover is not required to be applied to the deposited waste unless problems develop from erosion control or air particulate emissions. Haley & Aldrich observed no erosion of waste materials from the landfill areas or air particulate emissions during the inspection.

Concrete barriers are located on the southeastern side of the slag disposal area to control erosion of the slag piles. These barriers were continuing to function properly, and all slag remained within the

boundary of the designated disposal area at the time of the inspection. Silt fencing was installed between the slag disposal area and Soap Creek. The silt fence was observed sagging in multiple spots to the north and east of the slag pile. Haley & Aldrich recommends that Amsted periodically inspect the silt fences for repairs and replace deteriorated materials. The slag area was surveyed, and polyvinyl chloride posts and pins were set at the boundary points of the slag and sand disposal areas. Corner post #3 southwest of the sand disposal area has fallen down. Haley & Aldrich recommends resetting the post.

Amsted anticipates that reclamation operations at the slag area will begin within the next two years. This operation is performed every five to seven years depending on market conditions. Amsted retains an outside contractor to perform this reclamation. All reclamation operations take place within the permitted slag area. During this process, the metal is removed from the deposited foundry material, which is then screened into three aggregate sizes. The reclaimed metal is moved back into the foundry for use in the manufacturing process. The segregated and sized aggregates are placed in stockpiles inside the permitted slag area.

Figure 1 and the attached photographs in Attachment D depict the Foundry Waste Landfill operations.

DRAINAGE STRUCTURES

Low flow was observed in Soap Creek during the inspection. The low flow was discharging into Soap Creek from SW-1 upstream and leaving the site through SW-2 at Carbide Lane.

Vegetation had overgrown the culvert outlet with riprap erosion protection between the slag storage area and the closed sand storage area. Haley & Aldrich recommends that Amsted periodically inspect site drainage outlets and remove the vegetation as necessary to maintain adequate drainage. All surface water drainage structures functioned properly.

Four staff gauges have been installed as shown on Figure 1 and in the photographs. The staff gauge at SW-4 is missing the gauge board and is surrounded by vegetation. Haley & Aldrich recommends replacing the gauge board and inspecting the staff gauges periodically to remove any debris that may be present.

All drainage structures leading to and from Soap Creek are functional.

LEACHATE CONTROL

Amsted (formerly Griffin Wheel) received a letter from the IDNR dated September 5, 1995, that conditionally exempts the Foundry Waste Landfill from leachate control requirements for the existing disposal areas. This conditional exemption was based upon results of a risk assessment prepared in July 1995. No leachate seepage from the site was observed during the inspection.

GROUNDWATER AND SURFACE WATER MONITORING SYSTEM

Groundwater and surface water sampling were performed during the week of September 14, 2026. Haley & Aldrich assessed the condition of each monitoring well during the sampling event and observed that the wells were in good working order. All wells were able to be accessed for well gauging and

groundwater sampling. Overgrown vegetation was observed in the vicinity of MW-11, MW-14, MW-15, MW-16, and MW-17; however, the area around the wells were clear. Haley & Aldrich recommends that Amsted periodically inspect the well network and remove the vegetation as necessary to maintain access to the wells.

Summary

Amsted submitted a Construction Documentation Report to IDNR, the *Foundry Waste Landfill Closure – Phase I & II Slag Area,* on July 13, 2022. Part of the Construction Documentation Report was an Environmental Covenant for the Phase I and II Slag Areas. The Construction Documentation Report was approved by IDNR by letter dated September 27, 2022. This completed the *Foundry Waste Landfill Closure – Phase I & II Slag Area*. The Phase I and II Slag Areas are now in post-closure.

There will no longer be semiannual landfill inspections by a licensed Professional Engineer; instead, a report will be submitted by May 1 and November 1 of each year during the post-closure period describing the site's conformance or non-conformance with the permit for the Phase 1 Sand Area and Phase I and II Slag Areas.

The Foundry Waste Landfill initiated the Five-Year Post-Closure period starting September 27, 2022. The Foundry Waste Landfill will operate, as required, under the IDNR Sanitary Disposal Project Closure Permit #56-SDP-15-89-91C and the Environmental Covenant issued September 27, 2022.

If you have any questions regarding this inspection report, please contact me at 937.416.3779.

Sincerely yours,
HALEY & ALDRICH, INC.

Tom Vanage

Thomas M. Vanage
Senior Project Manager

Enclosures:

Figure 1 – September 2026 Engineering Inspection
Attachment A – Griffin Wheel Company, Inc. – Sanitary Disposal Project Closure Permit
Attachment B – Iowa Solid Waste Program – Environmental Covenant
Attachment C – Summary of Landfill Inspection
Attachment D – Site Photographs

c: Amsted Rail Company, Inc.; Attn: Paul Sheppard, Environmental Manager
Haley & Aldrich, Inc.; Attn: Nick Perrotta, P.E.

FIGURE

Saved by: SFISCHER Printed: 10/22/2026 6:22 PM Layout: SEPT_2026
\\HALEYALDRICH.COM\SHARE\COL_COMMON\129848 - AMSTED RAIL KEOKUK\015-LANDFILL DESIGN\CAD\FIGURES\ENGINEERING INSPECTION\129848-000_LANDFILL_INSPECTION_SEPT_2026-SF.DWG

EXISTING ELECTRIC SUBSTATION.
(AMSTED ACQUIRED PROPERTY, 2002)

FUTURE PHASE II STORAGE AND RECOVERY AREA BOUNDARY

CULVERT DISCHARGE RIP-RAP PLACED AT OUTLET. OVERGROWN VEGETATION REMOVAL RECOMMENDED.

IDNR ISSUED A LETTER DATED JULY 31, 2020 STATING PHASE 1 - SAND AREA CLOSED AND IS NOW IN POST-CLOSURE. THIS AREA WILL NO LONGER BE PART OF THE SEMI-ANNUAL INSPECTIONS STARTING IN 2021.

RECENTLY INSTALLED ELECTRIC TRANSMISSION POLES AND POWER LINES

EXISTING PHASE I SAND STORAGE AREA BOUNDARY

APPROXIMATE LOCATION OF NEW OVERHEAD ELECTRIC LINES

CULVERT DISCHARGE RIP-RAP PLACED AT OUTLET. OVERGROWN VEGETATION REMOVAL RECOMMENDED

SILT FENCE DAMAGE

CORNER POST #3 NEEDS TO BE RESET

EXISTING PHASE I SCREENED SLAG RECOVERY AND STORAGE AREA BOUNDARY

SILT FENCE DAMAGE

SILT FENCE PLACED

UPROCESSED FOUNDRY MATERIAL STOCKPILE

SOAP CREEK

SLAG AREA HAS COMPLETED METALS RECLAMATION OPERATIONS WITHIN THE AREA

CONCRETE BARRIER BLOCKS

SILT FENCE DAMAGE

RECOVERY AND REUSE AREA

VARIOUS PILES OF SEGREGATED/ SIZED SLAG

BURLINGTON NORTHERN R.R.

CARBIDE LANE

SW-1 632.02 N89° 18' 05.68"E 2360.92 N00° 19' 46.15"E 634.49 SW-2 SW-3 SW-4 MW-2 MW-3 MW-5 MW-6 MW-7 MW-10 MW-11 MW-12 MW-13 MW-14 MW-15 MW-16 MW-19 MW-20 MW-21 (REPAIR) MW-23 MW-24 MW-25 MW-26 MW-27 N88° 50' 22.49"E 2360.92

LEGEND

- APPROXIMATE PROPERTY LINE
- 740 EXISTING 10' CONTOUR
- EXISTING 2' CONTOUR
- SW-1 ▲ SURFACE WATER MONITORING LOCATION
- MW-5 ● MONITORING WELL (FOR WATER LEVEL MONITORING ONLY)
- MW-7 ⊕ UPPERMOST AQUIFER MONITORING WELL
- MW-5 ⊕ WATER TABLE MONITORING WELL

N

0 250 500
SCALE IN FEET

HALEY ALDRICH

AMSTED RAIL COMPANY
KEOKUK, IOWA

SEPTEMBER 2026 ENGINEERING INSPECTION

SCALE: AS SHOWN
SEPTEMBER 2026

FIGURE 1

ATTACHMENT A
Griffin Wheel Company, Inc. – Sanitary Disposal Project
Closure Permit

September 27, 2022

PAUL SHEPPARD
GRIFFIN WHEEL COMPANY
416 CARBIDE LANE
KEOKUK IA 52632

RE: Griffin Wheel Company Foundry Sand Landfill
Permit #56-SDP-15-89P
Closure Permit

Dear Mr. Sheppard:

Enclosed is the closure permit for the Griffin Wheel Company Foundry Waste Landfill.

The closure permit must be kept with the approved plans at the sanitary disposal project in accordance with solid waste rule 567 IAC 115.26(2)"c". Please review this permit with your operators, as they must become familiar with it.

Please contact me at (515) 689-6548 or email at mick.leat@dnr.iowa.gov with any questions.

Sincerely,

Michael B. "Mick" Leat
Land Quality Bureau

cc: Thomas Vanage and Nick Perrotta, P.E.
Haley & Aldrich, Inc.
8899 Gander Creek Drive
Miamisburg, OH 45342

DNR Field Office #6

Chad Stobbe, DNR

Bill Blum, DNR

IOWA DEPARTMENT OF NATURAL RESOURCES
SANITARY DISPOSAL PROJECT CLOSURE PERMIT

I. **Permit Number:** 56-SDP-15-89-91C
Griffin Wheel Foundry Waste Landfill

II. **Permitted Agency:** Amsted Rail Company, Inc. (Griffin Wheel)

III. **Project Location:** Part of the SE1/4, Section 15, T65N, R5W, 5th P.M., City of Keokuk, Lee County, Iowa, lying west of the Burlington Northern Railroad, East of U.S. Highway 61 By-Pass, and North of Carbide Lane (approximately 113.7 acres).

IV. **Responsible Official**

Name: Paul Sheppard
Amsted Rail Company, Inc.
Address: 416 Carbide Lane
Keokuk, IA 52632
Phone: (319) 795-0692

V. **Licensed Design Engineer**

Name: Nick Perrotta, P.E.
Address: Haley & Aldrich, Inc.
3899 Gander Creek Drive
Miamisburg, OH 45342
Phone: (937) 384-9940

Iowa License Number: 22717

VI. **Date Permit Issued:** **September 27, 2022**

VII. **Permit Expiration Date:** **September 27, 2027**

VIII. **Issued by:**_____
Iowa Department of Natural Resources

IX. **General Provisions**

The above named permitted agency is authorized to conduct and maintain postclosure activities at the sanitary landfill at the described location in conformance with Iowa Code Chapter 455B, the rules pursuant thereto existing at the time of issuance, and any subsequent new rules which may be duly adopted, and any provisions contained in Section X of this permit.

The facility shall be maintained according to the engineering plans and specifications approved by the Department of Natural Resources (DNR) and these shall become a part of this permit. Any modifications or deviations from the engineering plans and specifications must have prior approval by the DNR and an amendment to this permit issued.

The issuance of this permit in no way relieves the applicant of the responsibility for complying with all other local, state, and federal statutes, ordinances, and rules or other requirements applicable to the closure and maintenance of this closed sanitary landfill.

No legal or financial responsibility arising from the closure and postclosure of the approved project shall attach to the State of Iowa or the DNR due to the issuance of this permit.

If title to this project is transferred, the new owner must apply to the DNR for a transfer of this permit within thirty days of the date of title transfer. This transfer is void sixty days after the date of title conveyance unless the DNR has transferred the permit.

This facility shall be surveyed as necessary and inspected as described in the special provisions of this permit. Semiannual reports shall be prepared containing a brief report describing the site's conformance and nonconformance with the permit and the approved plans and specifications during the inspections. These reports shall be submitted by May 1 and November 1 each year to both the Field and Main offices of the DNR. The DNR shall be notified if any inspection reveals any nonconformance with the permit and approved plans and specifications.

Failure to comply with Iowa Code Chapter 455B, or any rule of order promulgated pursuant thereto, or any or all provisions of this permit may result in a civil penalty of up to $5000 for each day of violation, pursuant to Iowa Code section 455B.307.

X. Special Provisions

1. The five-year postclosure period for this facility begins on the issuance date of this permit.

2. Issuance of this closure permit prohibits the disposal of any additional foundry wastes within the Phase 1 Landfill Sand Area boundaries shown on plan sheet C-101, located in Appendix D of document #96671, or the Phase I or II Landfill Slag Area boundaries shown on plan sheet C-300, located in Appendix C of document #103590.

   Previously-placed slag, emplaced to the elevations shown within the Phase I and II Slag Areas on plan sheet C-300 located in Appendix C of document #103590, are approved as a basal working surface for the ongoing slag recovery operations at the site. The Phase I and II Slag Area will continue to be used for storage of spent foundry materials from the facility awaiting recycling operations in accordance with their Solid By-Product Management Plan. These materials are unprocessed and comingled foundry slag and refractory materials in a stockpile; processed and sized foundry slag/refractory aggregate in separate stockpiles; and processed foundry refractories in stockpiles.

3. Clean closure activities for the Phase 1 Sand Area are documented in the Construction Documentation Report for the Foundry Waste Landfill Closure – Phase 1 Sand Area (doc #96671), dated December 30, 2019, and the supplement to the Construction Documentation Report (doc #98039), dated July 7, 2020, both submitted by Haley & Aldrich, which was approved on July 31, 2020. This area was closed on July 31, 2020.

4. Clean closure activities for the Phase I and II Slag Area are documented in the Construction Documentation Report for the Foundry Waste Landfill Closure – Phase I and II Slag Area (doc #103590), dated July 13, 2022, as submitted by Haley & Aldrich and approved on September 27, 2022. The Phase I and II Slag Area was closed on the date of this closure permit.

5. An Environmental Covenant (doc#104167), dated September 19, 2022, has been placed on the property. The covenant places permanent restrictions on the construction of drinking water wells and residences on the property, and requires the biennial submission of engineering reports that verify that the property restrictions have been complied with.

6. The permit holder shall conduct post-closure care for the closed Phase 1 Sand Storage and the Phase I and II Slag Areas in accordance with the Closure/Post-Closure Plan for Clean Closure (doc #94768), dated April 1, 2019, as submitted by Haley & Aldrich, and approved on April 9, 2019.

   Groundwater and surface water monitoring in accordance with special provision #7 shall continue for a minimum duration of five years after the date of this closure permit.

   Following completion of the April 2027 groundwater and surface water monitoring event, the permit holder shall submit the results to the DNR for review. If the DNR determines that all monitored parameters are exhibiting stable or declining concentrations, this permit will expire and all groundwater monitoring wells shall be abandoned with documentation submitted to DNR. If the monitoring results exceed applicable health-based standards and do not exhibit stable or declining concentrations, DNR may extend the monitoring period if any environmental or human health concerns remain that are not addressed by the Environmental Covenant placed on the property.

7. Hydrologic monitoring at the site shall be conducted in accordance with the Revised Hydrologic Monitoring System Plan (doc #85182), dated January 19, 2016, as submitted by Haley & Aldrich, Inc. and approved on April 25, 2016, and the following:

   a. The HMSP shall include upgradient groundwater monitoring points MW-12, MW-16, MW-20, and MW-21; downgradient groundwater monitoring points MW-5, MW-6, MW-7, MW-25, MW-26, and MW-27; upgradient surface water monitoring point SW-1 and downgradient surface water monitoring point SW-2.

   b. Monitoring points that are not sampled may be retained as water level measuring points.

c. Semiannual sampling shall take place with analyses for the parameters listed in 567 IAC 115.26(4)“e”; the supplemental parameters boron, lithium, sodium, strontium, fluoride, sulfate; and any parameters deemed necessary by DNR. Routine annual testing for the parameters listed in 567 IAC 115.26(4)“f” shall be conducted during October of each year.

d. The Method Detection Limit (MDL) for the test parameters shall not exceed action levels as defined in 567 IAC Chapter 133. If the action levels cannot be feasibly achieved using procedures described in 567 IAC 115.26(5), then the MDL shall not exceed the lowest feasible level.

e. Samples collected for dissolved metals analysis shall be field filtered, preserved, and promptly transferred to a certified laboratory for analysis. Samples collected for total recoverable analysis shall **not** be field-filtered prior to laboratory analysis.

f. Surface monitoring points must be clearly marked in the field and a method for measuring the flow rate at each sampling point shall be devised.

g. An Annual Water Quality Report (AWQR) summarizing the effects the facility is having on groundwater and surface water quality shall be submitted to the DNR’s Main and local Field offices by November 30 each year. The AWQR shall include the results of the groundwater measurements conducted at the monitoring points and all analyses and the associated DNR sampling Forms 542-1322 and 542-1324.

8. The permit holder shall comply with the legitimate recycling provisions in 455D.4a of the Iowa Code. Ongoing beneficial use projects shall comply with the state’s solid waste by-product beneficial use determination rules (Iowa Administrative Code 567 Chapter 108) and be tracked and reported with each Quarterly Solid Waste Fee Schedule and Retained Fees Report.

9. The permit holder shall provide dust control using a watering truck or other acceptable method as needed to control nuisance dusts.

10. The foundry waste landfill sign on Carbide Lane is approved for removal.

11. A certified landfill operator must be maintained during the duration of this closure permit.

ATTACHMENT B

Iowa Solid Waste Program – Environmental Covenant

Book 2022 Page 4208

Document 2022 4208 Type 06 024 Pages 15
Date 9/19/2022 Time 8:45 AM
Rec Amt $77.00

NANCY L. BOOTEN, RECORDER
LEE COUNTY Iowa

Indexed_____Scanned_____

Index Check_____ Scan Check_____

Red Ind. C____Bk.____Notes_____

Amsted Rail Co INC. EC

[Document Title]

Recorder's Cover Sheet

Preparer Information: **(Individual's name, address and phone number)**

Tom Vanagic 937-530-1412
455E Eisenhower Parkway
Suite 210
Ann Arbor Michigan

Taxpayer Information: **(Taxpayer's name and full mailing address)**

Return Document To: **(Name and full mailing address)**

Paul Sheppard
4116 Carbide Lane
Keokuk Iowa 52632

Grantors:

Amsted Rail.

Grantees:

Iowa DNR

Parcel Identification Number: **(If required or applicable)**

Legal Description:

Document or instrument number of associated documents previously recorded:

IOWA SOLID WASTE PROGRAM
ENVIRONMENTAL COVENANT

This environmental covenant is established pursuant to Iowa Code (IC) chapter 455I entitled Uniform Environmental Covenants Act.

Amsted Rail Company Inc. of fee title owners of affected property, hereinafter "grantor(s)," Amsted Rail Company Inc. of all holder(s), hereinafter "holder(s)," and the Iowa Department of Natural Resources (DNR) in its capacity as an agency of Iowa state government, enters into this environmental covenant for the purpose of subjecting the affected property described below to certain activity and use limitations in accordance with the terms and conditions as specified and the authorities granted the DNR in Iowa Code (IC) chapter 455I, §455B.103(7), and DNR rules in 567 Iowa Administrative Code.

1. **Affected Property**.
   The grantor(s) is/are the fee title owner(s) of the property located at 416 Carbide Lane, Keokuk, Iowa 52632. The affected property is legally described as: The legal description of the affected property is attached in Exhibit A.

   The legal description of the activity and use limitation restrictions is attached in Exhibit B, including a map of the affected property and the slag management boundary.

   Hereinafter, the affected property will be referred to as "the property."

2. **Risk Management and Institutional Controls.**
   In accordance with IC Chapter 455B, DNR permitted industrial solid wastes to be disposed on the affected property under solid waste disposal project Permit #56-SDP-15-89P issued to Griffin Wheel Company Foundry Sand Landfill.

   Permit, investigations, and reports are available for review in the DNR Solid Waste files under Permit #56-SDP-15-89P.

   The presence of buried industrial solid wastes on the property may present a risk to public health and the environment if certain activities occur on the property. As such, the Director, pursuant to her authority under IC §455B.103(7), has determined that an environmental covenant is necessary to manage risk of future exposure by limiting specified activities on the property and establishing affirmative obligations.

3. **Reopening**.
   The signatories acknowledge that in the event that activity and use limitations provided in this environmental covenant fail to serve their intended purpose – including prevention of exposure to contamination – DNR may reopen its review and regulatory oversight of the contaminant condition on the property as provided under the terms of this covenant, IC chapter 455I, and applicable DNR administrative rules.

4. **Identity of Grantor(s) and Holder(s).**

   GRANTOR(S): Amsted Rail Company Inc.
   HOLDERS: Not Applicable
   AGENCY: Iowa Department of Natural Resources

5. **Representations and Warranties.**
   a. The grantor(s) warrants to the other signatories to this covenant the following:
   b. The grantor(s) is/are the sole fee title owner(s) of the property;
   c. The grantor(s) holds sufficient fee title to the property to grant the rights and interests described in this covenant free of any conflicting legal and equitable claims;
   The grantor(s) has/have identified all other persons holding legal or equitable interests, including, but not limited to contract buyers, mortgage holders, other consensual lienholders and lessees, and secured their consent either by signatures on this covenant or by a separate subordination and consent agreement attached as an Exhibit.

6. **Running with the Land.**
   This environmental covenant is perpetual and runs with the land as provided in IC §455I.9 until modified or terminated. The terms of this environmental covenant are binding on the grantors and all successors in interest, assigns, and all transferees acquiring or owning any right, title, lien, or interest in the property and their heirs, successors, assigns, grantees, executors, administrators, and devisees. The term "transferee," as used in this environmental covenant, shall mean any future owner of any interest in the property or any portion thereof, including, but not limited to owners of an interest in fee simple, contract buyers, mortgagees, easement holders, and/or lessees.

7. **Activity and Use Limitations and Terms.**
   The property is subject to the following activity and use limitations:
   a. Construction of drinking water wells within the boundaries of the property shall require approval by DNR. "Drinking water wells" are defined as any groundwater wells used as a source of drinking water by humans and groundwater wells used primarily for production of food or medicine for human consumption in facilities characterized with standard industrial codes group 283 for drugs and 20 for foods.
   b. Construction of residences within the boundaries of the property must be approved by DNR.
   c. On a biennial basis, after closure of the landfill the site shall be inspected by a professional engineer licensed in the State of Iowa to verify that the property activity and use limitations enumerated in this covenant have been complied with. A report of this inspection shall be sent to the DNR's Solid Waste Section within 30 days of completion.

8. **Notice of Non-Compliance.**
   Any property owner or subsequent transferee of an interest in the property shall notify DNR as soon as possible of conditions which would constitute a breach of the activity and use limitations in paragraph seven (7) if they have actual knowledge of these conditions or would reasonably be deemed to have knowledge within the normal course of administration of their property interest.

9. **Notice to Lessees.**
   Grantor, any holder with a property interest sufficient to grant a lease of the property, and any subsequent transferee shall incorporate the activity and use limitations of this covenant either in full or by reference to this instrument in any lease, license, or other instrument granting a right to possession of the property.

10. **Access to Property.**
    Reasonable access to the property is granted to DNR or any authorized representative of DNR, public or private, for the purpose of implementation, monitoring, and enforcement of the terms of

this environmental covenant. DNR, its authorized representatives, or other persons entitled to access shall provide the current owner of the property with reasonable notice, an explanation of the reasons for entry, and the scope of on-site activities prior to access. Right of access includes, but is not limited to the following activities:

a. repair and maintenance of remedial action equipment, soil caps, groundwater monitoring wells, and associated aboveground or subsurface structures;

b. fencing and other technological controls;

c. groundwater sampling and monitoring;

d. additional drilling;

e. construction of soil boring and/or groundwater monitoring wells; and

f. other activities authorized or otherwise directed by DNR.

11. **Groundwater Hazard Statement Notice.**
IC § 558.69 requires submission of a groundwater hazard statement and disclosure if "hazardous waste" exists on the property as defined in IC §455B.411(3) or if the DNR determines that solid waste exists on the property that is potentially hazardous. If hazardous waste is present, the groundwater hazard statement must state that the condition is being managed in accordance with DNR rules. The signatories and all subsequent transferees required to submit a groundwater hazard statement under IC § 558.69 shall make reference to this environmental covenant in substantially the following form - filling in the blanks with the relevant and applicable details:

THE INTEREST CONVEYED IS SUBJECT TO AN ENVIRONMENTAL COVENANT, DATED {date}, RECORDED IN THE DEED OR OFFICIAL RECORDS OF THE LEE COUNTY RECORDER ON {date} IN {document, book and page, or parcel number}.

THE ENVIRONMENTAL COVENANT CONTAINS THE FOLLOWING ACTIVITY AND USE LIMITATIONS:

a. Construction of drinking water wells within the boundaries of the property shall require approval by DNR. "Drinking water wells" are defined as any groundwater wells used as a source of drinking water by humans and groundwater wells used primarily for production of food or medicine for human consumption in facilities characterized with standard industrial codes group 283 for drugs and 20 for foods.

b. Construction of residences within the boundaries of the property must be approved by DNR.

c. On a biennial basis, after closure of the landfill the site shall be inspected by a professional engineer licensed in the State of Iowa to verify that the property activity and use limitations enumerated in this covenant have been complied with. A report of this inspection shall be sent to the DNR's Solid Waste Section within 30 days of completion.

12. **Modification and Termination.**
Modification or termination of terms of this covenant shall comply with standards in IC chapter 455I and applicable DNR administrative rules. Terms of this environmental covenant may be modified or terminated by written consent of the Director of the DNR, the then-current fee simple title owner, and all original signatories (unless exempted under the provisions of IC §455I.10(1)"c" in accordance with and subject to the provisions of IC §455I.10). The termination or modification is not effective until the document evidencing consent of all necessary persons is properly recorded. If not by consent, any modification or termination of this environmental covenant shall be in accordance with IC §455I.9 and such additional terms as specified in this covenant.

13. **Enforcement.**
Terms of this environmental covenant may be enforced in a civil action for injunctive or other equitable relief by the signatories and those persons authorized by and in accordance with IC § 455I.11.

14. **Severability.**
If any provision of this environmental covenant is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.

15. **Governing Law.**
This environmental covenant shall be governed by and interpreted in accordance with the laws of the State of Iowa.

16. **Recordation.**
Within thirty (30) days after DNR approval of this environmental covenant, the grantor(s) shall record the environmental covenant in the same manner as a deed to the property with the Lee County Recorder's Office.

17. **Effective Date.**
The effective date of this environmental covenant shall be the date upon which the fully executed environmental covenant has been properly recorded with the Lee County Recorder's Office.

18. **Notice.**
Unless otherwise notified in writing by the DNR, any document or communication required by this environmental covenant shall be submitted to:

Iowa Department of Natural Resources
Solid Waste Section Supervisor
Wallace State Office Building
502 E 9th Street
Des Moines, IA 50319

19. **Subordination and Consent.**
By signing this environmental covenant, the signatories knowingly and intelligently acknowledge their consent to the terms of this agreement and agree to subordinate their interest in the property. The following persons have expressly consented and subordinated interests:

ACKNOWLEDGMENTS

GRANTORS

Amsted Rail Company Inc.

By: _____
(Authorized Signature)

Printed Name: Michal K St.Clair

Title: V.P. Amsted Rail

Date: 9/19/2022

By: _____
(Authorized Signature)

Printed Name: _____

Title: _____

Date: _____

AGENCY:

_____ Signed this 30th day of August, 2022

Kayla Lyon
Director, Iowa Department of Natural Resources

State of Iowa

County of Polk §

On this 30th day of August, 2022, before me personally appeared Kayla Lyon, Director, known to me to be the Director of the Iowa Department of Natural Resources or the lawful designee of the Director who executed the foregoing instrument, and acknowledge that this person executed the same as his/her/their voluntary act and deed.

_____
Notary Public for State of Iowa

NOTARIAL SEAL IOWA
JENNIFER MILLER
Commission Number 839456
My Commission Expires
May 17, 2025

Attachments:

Exhibit A – Deed with Legal Description

Exhibit B – Retracement Survey with Plot Map and Legal Description of Slag Management Boundary

EXHIBIT A

Deed with Legal Description

Document 2005 2742
Book 055 Page 2742 Type 03 008 Pages 4
Date 11/04/2005 Time 12:46 PM
Rec Amt $22.00 Aud Amt $5.00

LARRY HOLTKAMP, RECORDER
SOUTH LEE COUNTY, IA AT KEOKUK

A Indexed /// Scanned ___
D Scan Check ___ Checked ___
G Red Index ___ Notes ___

QUITCLAIM DEED - 8

Prepared by: Helmut Gerlach
Schiff Hardin LLP
6600 Sears Tower
Chicago, Illinois 60606
312/258-5500

Taxpayer: Griffin Wheel Company
200 West Monroe
Chicago, Illinois 60603

~~After recording, return to~~: AFTER RECORDING MAIL TO:
CHICAGO TITLE INS. CO.
ATTN: LISA CHRISTMAS
171 N. CLARK STREET
CHICAGO, IL. 60601

GRANTOR	GRANTEE:
AMSTED INDUSTRIES INCORPORATED:	GRIFFIN WHEEL COMPANY

LEGAL DESCRIPTION: SEE EXHIBIT A ATTACHED HERETO

BOOK & PAGE REFERENCE: _____

CONSIDERATION IS LESS THAN $100

Dated this 1st day of October, 2005

AMSTED INDUSTRIES INCORPORATED **a Delaware corporation** By: Thomas C Berg Name: Thomas C. Berg Title: Vice President	

STATE OF ILLINOIS)
)SS
COUNTY OF COOK)

I, the undersigned, at notary public in and for said county and state aforesaid, do hereby certify that Thomas C. Berg, personally known to me to be the Vice President of AMSTED INDUSTRIES INCORPORATED, a Delaware corporation, and personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that as such Vice President he signed, sealed and delivered the said instrument as his own free and voluntary act and as the free and voluntary act of said corporation, for the uses and purposes therein set forth.

Given under my hand and official seal this 1st day of October, 2005.

My commission expires: 1/20/06

Pamela S. Curatolo
Notary Public

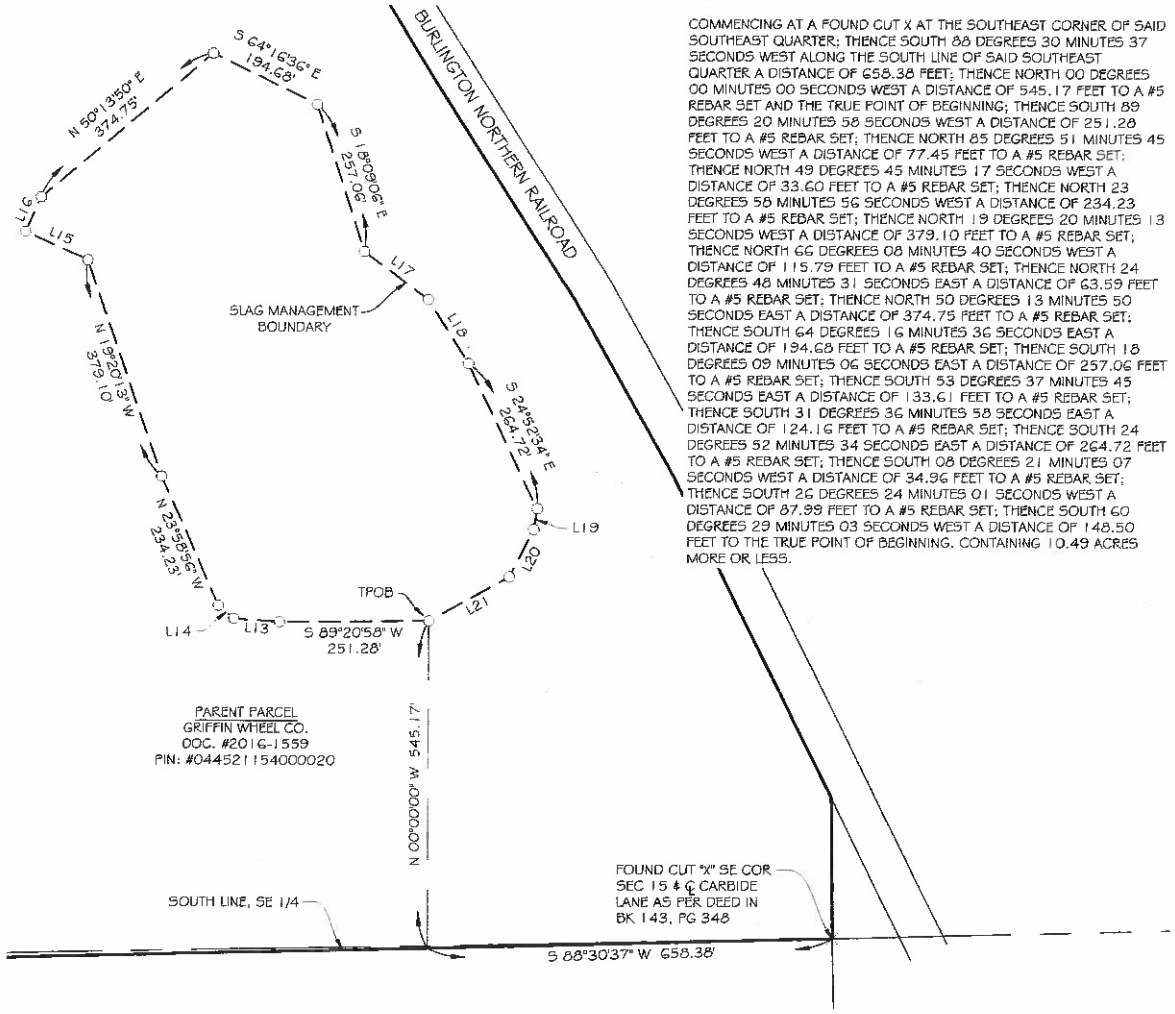
OFFICIAL SEAL
PAMELA S CURATOLO
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES:01/20/06

INDEX LEGEND

LOCATION:	SE 1/4, SEC15, T65N, R5W
CITY:	N/A
COUNTY:	LEE
REQUESTOR:	AMSTEAD RAIL COMPANY, INC.
PROPRIETOR:	AMSTEAD RAIL COMPANY, INC.
SURVEYOR:	NORMAN D. ELLERBROCK
PREPARED BY & RETURN TO:	FOUR POINTS LAND SURVEYING & ENGINEERING, INC. 17 NORTHPORT PLAZA HANNIBAL, MO. 63401 573-406-5533

PLAT OF SURVEY

A TRACT BEING PART OF THE SOUTHEAST QUARTER, SECTION 15, TOWNSHIP 65 NORTH, RANGE 5 WEST, LEE COUNTY, IOWA



SLAG MANAGEMENT BOUNDARY
10.49 ACRE TRACT

A TRACT OF LAND LYING IN PART OF THE SOUTHEAST QUARTER OF SECTION 15, TOWNSHIP 65 NORTH, RANGE 5 WEST OF THE FIFTH PRINCIPAL MERIDIAN, LEE COUNTY, IOWA BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS;

COMMENCING AT A FOUND CUT X AT THE SOUTHEAST CORNER OF SAID SOUTHEAST QUARTER; THENCE SOUTH 88 DEGREES 30 MINUTES 37 SECONDS WEST ALONG THE SOUTH LINE OF SAID SOUTHEAST QUARTER A DISTANCE OF 658.38 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS WEST A DISTANCE OF 545.17 FEET TO A #5 REBAR SET AND THE TRUE POINT OF BEGINNING; THENCE SOUTH 89 DEGREES 20 MINUTES 58 SECONDS WEST A DISTANCE OF 251.28 FEET TO A #5 REBAR SET; THENCE NORTH 85 DEGREES 51 MINUTES 45 SECONDS WEST A DISTANCE OF 77.45 FEET TO A #5 REBAR SET; THENCE NORTH 49 DEGREES 45 MINUTES 17 SECONDS WEST A DISTANCE OF 33.60 FEET TO A #5 REBAR SET; THENCE NORTH 23 DEGREES 58 MINUTES 56 SECONDS WEST A DISTANCE OF 234.23 FEET TO A #5 REBAR SET; THENCE NORTH 19 DEGREES 20 MINUTES 13 SECONDS WEST A DISTANCE OF 379.10 FEET TO A #5 REBAR SET; THENCE NORTH 66 DEGREES 08 MINUTES 40 SECONDS WEST A DISTANCE OF 115.79 FEET TO A #5 REBAR SET; THENCE NORTH 24 DEGREES 48 MINUTES 31 SECONDS EAST A DISTANCE OF 63.59 FEET TO A #5 REBAR SET; THENCE NORTH 50 DEGREES 13 MINUTES 50 SECONDS EAST A DISTANCE OF 374.75 FEET TO A #5 REBAR SET; THENCE SOUTH 64 DEGREES 16 MINUTES 36 SECONDS EAST A DISTANCE OF 194.68 FEET TO A #5 REBAR SET; THENCE SOUTH 18 DEGREES 09 MINUTES 06 SECONDS EAST A DISTANCE OF 257.06 FEET TO A #5 REBAR SET; THENCE SOUTH 53 DEGREES 37 MINUTES 45 SECONDS EAST A DISTANCE OF 133.61 FEET TO A #5 REBAR SET; THENCE SOUTH 31 DEGREES 36 MINUTES 58 SECONDS EAST A DISTANCE OF 124.16 FEET TO A #5 REBAR SET; THENCE SOUTH 24 DEGREES 52 MINUTES 34 SECONDS EAST A DISTANCE OF 264.72 FEET TO A #5 REBAR SET; THENCE SOUTH 08 DEGREES 21 MINUTES 07 SECONDS WEST A DISTANCE OF 34.96 FEET TO A #5 REBAR SET; THENCE SOUTH 26 DEGREES 24 MINUTES 01 SECONDS WEST A DISTANCE OF 87.99 FEET TO A #5 REBAR SET; THENCE SOUTH 60 DEGREES 29 MINUTES 03 SECONDS WEST A DISTANCE OF 148.50 FEET TO THE TRUE POINT OF BEGINNING. CONTAINING 10.49 ACRES MORE OR LESS.

1" = 200'
GRAPHIC SCALE
0 100 200 400

N

Legend
- #5 REBAR SET
- IRON PIN/PIPE FOUND
- CUT X FOUND
- POST W/PVC

TPOB TRUE POINT OF BEGINNING

LINE	BEARING	DISTANCE
L13	N 85°51'45" W	77.45'
L14	N 49°45'17" W	33.60'
L15	N 66°08'40" W	115.79'
L16	N 24°48'31" E	63.59'
L17	S 53°37'45" E	133.61'
L18	S 31°36'58" E	124.16'
L19	S 08°21'07" W	34.96'
L20	S 26°24'01" W	87.99'
L21	S 60°29'03" W	148.50'

SURVEYED DISTANCES

SURVEYORS NOTES:
1) BASIS OF BEARINGS IS BASED UPON THE IOWA STATE PLANE COORDINATE SYSTEM OF 1983, SOUTH ZONE.
2) DISTANCES ARE IN FEET AND DECIMAL PARTS THEREOF.

PROFESSIONAL LAND SURVEYOR
NORMAN D. ELLERBROCK
No. 25035
IOWA

I HEREBY CERTIFY THAT THIS LAND SURVEYING DOCUMENT WAS PREPARED AND THE RELATED SURVEY WORK WAS PERFORMED BY ME OR UNDER MY DIRECT PERSONAL SUPERVISION AND THAT I AM A DULY LICENSED LAND SURVEYOR UNDER THE LAWS OF THE STATE OF IOWA:

Norman D Ellerbrock 4/19/2022

NORMAN D. ELLERBROCK,
LICENSE NUMBER: 25035
MY LICENSE RENEWAL DATE IS DECEMBER 31, 2023
PAGES OR SHEETS COVERED BY THIS SEAL: 2 OF 2

PROJECT NO.	DRAWING NAME	DRAWN	SURVEY	CHECKED
19-0059	190059bdry	PWS	NDE	NDE

FOUR POINTS LAND SURVEYING AND ENGINEERING, INC.
17 NORTHPORT PLAZA
HANNIBAL, MO. 63401
573-406-5533

LEE COUNTY RECORDER
933 AVENUE H
FORT MADISON, IA 52627
319 376 1070

Merchant ID: 019717735
Term ID: 8000

Sale

Application Label: MASTERCARD
CAPITAL ONE
MASTERCARD
XXXXXXXXXXXX2544
AID: A0000000041010
Entry Method: Chip Read
Apprvd: Online BatchN: 000009
09/19/22 08:27:57

InvN: 00000001 Appr Code: 06908P

Amount:	$	77.00
Fee:	$	2.31
Total: USD$		79.31

Mode: Issuer
TVR: 0000008000
IAD: 01106070012200004F870000000
U0000000FF
TSI: E800
ARC: 00

I agree to pay above total amount
according to card issuer agreement
(Merchant agreement if credit voucher)

X_____

SHEPPARD/PAUL

Customer Copy

THANK YOU

ATTACHMENT C
Summary of Landfill Inspection

SUMMARY OF LANDFILL INSPECTION

Site:	Griffin Wheel Foundry Waste Landfill
Address:	416 Carbide Lane, Keokuk, Iowa 52632
Operator:	Paul Sheppard
Phone No.:	319.524.2962
Responsible Official:	Paul Sheppard
Company:	Amsted Rail Company, Inc. (Griffin Wheel)
Address:	416 Carbide Lane, Keokuk, Iowa 52632
Phone No.:	319.524.2962
IDNR Permit No.	56-SDP-15-89-91C
IDNR Region:	6
Permit Expiration Date:	September 27, 2027; September 14, 2021 Permit Application Form 50 (Issued and accepted)
	Sanitary Disposal Project Closure Permit 56-SDP-15-89-91C (Issued)
Inspection Date:	August 14, 2026
Date of Last Inspection:	April 13, 2026
Average Daily Waste Tonnage:	Varies

	Problems Noted	
	Yes	No
Weather Conditions		X
Permit and Plans		X
Roads		X
Equipment/Manpower		X
Operations		X
Drainage Structures		X
Leachate Control		X
GW and SW Monitoring System		X

See accompanying report for details

Francis Reed 9/14/2026

Inspector Date

ATTACHMENT D
Site Photographs

AMSTED RAIL COMPANY
KEOKUK, IOWA
File No. 129848-041
Date Photographs Taken: September 14, 2026



Photo 1: SW-1 outfall



Photo 2: SW-1 staff gauge



Photo 3: SW-2 outfall



Photo 4: SW-2 staff gauge



Photo 5: SW-3 staff gauge



Photo 6: The staff gauge board is missing from SW-4



Photo 7: Looking south from Corner Post #5 at the foundry sand stockpile



Photo 8: Looking west-northwest from Corner Post #4 toward the foundry sand stockpile



Photo 9: Looking east-northeast at the extent of the foundry slag pile from the top of the ramp



Photo 10: Looking east-southeast at the extent of the foundry slag pile from the top of the ramp



Photo 91: Looking west at the extent of the foundry slag from the top of the slag pile



Photo 102: Looking south along the access road from the base of the foundry slag pile ramp



Photo 113: ***Looking southwest at the eastern side of the Phase 1 slag pile***



Photo 124: ***Looking west at the eastern side of the Phase 1 slag pile***



Photo 135: BM-1



Photo 146: BM-2



Photo 17: BM-3



Photo 18: Heavy vegetation around the culvert outlet with riprap erosion protection between the slag storage area and the closed sand storage area



Photo 159: The culvert outlet with riprap erosion protection north of the closed sand storage area



Photo 20: Corner post #3, southwest of the sand pile has fallen down



Photo 21: Looking northeast at the silt fence sag near 16 T-Post



Photo 22: Silt fence sag due to wash out at the bottom of the access road on north side of the slag pile



Photo 23: Looking east at the silt fence sag near MW-6/MW-7



Photo 24*: Looking south-southeast at the silt fence sag and vegetation overgrowth near MW-5/MW-27*