



November 18, 2020

Kevin Richardson, Plant Manager
United States Gypsum Company
P.O. Box 878
Fort Dodge, Iowa 50501

Re: U.S. Gypsum Sanitary Landfill (Fort Dodge)(Closed)
Permit #94-SDP-08-89C

Dear Mr. Richardson:

Enclosed is Amendment #4 to the permit issued on November 1, 2004 for the U.S. Gypsum Sanitary Landfill (Fort Dodge). The permit amendment must be kept with the permit and the approved plan at the sanitary disposal project in accordance with solid waste rule 567 IAC 115.26(2)"c". Please review this amendment with your operators, as they must become familiar with it

The permit has been revised and includes all previous amendment updates since the permit issuance date on November 1, 2004. Permit amendment #1 has been superseded by amendment #'s 3 and 4.

The enclosed Amendment #4 approves the *Request for HMSP Revisions*, dated May 27, 2020, as submitted by HLW Engineering Group, and incorporates it as part of the permit documents.

Note that the amendment contains provisions that may require a response or action by you which, if not properly complied with, may prompt enforcement action by this department.

If you have any questions, please contact me at (515) 725-8309.

Sincerely,

A handwritten signature in blue ink that reads "Nina M. Booker". The signature is written in a cursive, flowing style.

Nina M. Booker
Environmental Engineer Senior
Land Quality Bureau

cc: DNR Field Office #2

HLW Engineering Group
204 West Broad Street
P O Box 314
Story City, IA 50248

IOWA DEPARTMENT OF NATURAL RESOURCES
SANITARY DISPOSAL PROJECT PERMIT

I. Permit Number: 94-SDP-08-89C

II. Permitted Agency: Unites States Gypsum Company

III.	Project Location:	The east ½ of Section 33; and the portion of the SW ¼ of Section 33 lying east of the right of way of the Fort Dodge, Des Moines and Southern Railroad, T89N, R28W, Webster County, Iowa
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IV. Responsible Official

Name: Kevin Richardson, Plant Manager
Address: United States Gypsum Company
P.O. Box 878
Fort Dodge, Iowa 50501
Phone: 515-576-4151

V. Licensed Design Engineer

Name: Douglas J. Luzbetak, P.E.
Address: HLW Engineering Group
204 West Broad Street
P.O. Box 314
Story City, IA 50248
Phone: 515-733-4144
FAX: 515-733-4146

Iowa License Number: 12654

VI. Date Permit Issued: November 1, 2004

Date Permit Amended: **November 18, 2020** **Amendment #4**

VII. Permit Expiration Date: November 1, 2034

VIII. Issued by:

Kuna M. Booker

Environmental Services Division
for the Director

IX. General Provisions

The above named permitted agency is hereby authorized to close 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 closed according to the engineering plans and specifications approved by the Department of Natural Resources 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 Department 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 Department of Natural Resources due to the issuance of this permit.

If title to this project is transferred, the new owner must apply to the Department 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 Department 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 Department. The Department shall be notified if any inspection reveals any nonconformance with the permit and approved plans and specifications.

The permit holder shall ensure that the sanitary disposal project does not (1) cause a discharge of pollutants into waters of the United States, including wetlands, that violates any requirements of the Clean Water Act, including, but not limited to, the National Pollutant Discharge Elimination System (NPDES) requirements, pursuant to Section 402 of the Clean Water Act, and (2) cause the discharge of a nonpoint source of pollution into waters of the United States, including wetlands, that violates any requirement of an areawide or statewide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act.

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 thirty-year postclosure period for this facility began on November 1, 2004 with issuance of this closure permit.
2. The closed site shall be maintained in accordance with the Closure/Post-Closure Plan (C/PCP) dated March 13, 1995, as prepared by Montgomery Watson and approved on April 14, 1995.
 - a. The Closure Certification Report dated November 26, 2003, as submitted by Fox Engineering and approved on November 1, 2004, is incorporated as part of the permit documents.
 - b. The final contour record drawings dated August 30, 2004, as submitted by Fox Engineering and approved on November 1, 2004, are incorporated as part of the permit documents.
3. Issuance of this closure permit prohibits any additional waste disposal and other related landfill activities unless they are specifically approved through an amendment to this permit.
4. Hydrologic monitoring at the site shall be conducted in accordance with the approved Hydrologic Monitoring System Plan (HMSP) and the following provisions:
 - a. The HMSP shall include:

Water Table upgradient monitoring points MW-4B, MW-11A, and MW-12; and downgradient monitoring points MW-2, MW-6R, and MW-13.

Bedrock upgradient monitoring points MW-5R, MW-7, and MW-9; and downgradient monitoring points MW-3B and MW-10.

Surface water monitoring points SW-1 and SW-2.
 - b. Abandonment of any monitoring point requires prior approval by the Department. Monitoring wells MW-1 and MW-14 shall remain as a groundwater monitoring points.
 - c. The well abandonment forms for monitoring wells MW-3A and MW-4A are incorporated as part of the permit documents.

- d. The construction documentation forms and boring logs for monitoring wells MW-3B and MW-4B, dated August 30, 2004, as submitted by Fox Engineering and approved on November 1, 2004, are incorporated as part of the permit documents.
- e. In accordance with the variance, dated May 26, 2017, the permit holder is authorized to conduct annual groundwater sampling and analysis in lieu of semiannual sampling as required by 115.26(4)"e". (Amendment #3 issued on May 30, 2017)

In accordance with the variance, dated May 26, 2017, the permit holder shall conduct annual sampling and analysis of the following parameters until otherwise directed by the Department:

Arsenic (As)	Ammonia (N)
Barium (Ba)	Chloride
Boron (B)	COD
Cadmium (Cd)	Sulfate
Cobalt (Co)	Field Turbidity (NTU)
Copper (Cu)	
Iron (Fe)	
Magnesium (Mg)	
Manganese (Mn)	
Mercury (Hg)	
Molybdenum (Mb)	
Nickel (Ni)	
Phosphorus (P)	
Selenium (Se)	
Zinc (Zn)	

(Amendment #3 issued on May 30, 2017)

Per the letter dated October 11, 2004 the permit holder was directed to sample for total metals in all wells in the monitoring system in the Spring 2005 sampling event.

- f. The elevation of water in each monitoring well shall be measured and recorded on an annual basis.
- g. 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 115.2(5), then the MDL shall not exceed the lowest feasible level.
- h. In accordance with the variance, dated May 26, 2017, the permit holder is authorized to conduct sampling and analysis of total recoverable metals in lieu of sampling for dissolved metals as required by 115.26(4)"d" and "e". (Amendment #3 issued on May 30, 2017)

- i. The permit holder is authorized to perform higher order statistical evaluations for the groundwater data in lieu of the upgradient mean plus two standard deviations as required by 115.26(6).
 - j. Results of all analysis and the associated Department sampling forms 542-1322 and 542-1324 shall be submitted to the Department's Main and local Field offices within 45 days of the sample collection.
 - k. An Annual Water Quality Report (AWQR) summarizing the effects the facility is having on groundwater and surface water quality shall be submitted to the Department's Main and local Field offices by January 31 each year. This report shall be prepared in accordance with 567 IAC 115.2(8)"d" by a Professional Engineer licensed in the State of Iowa. The AWQR shall include the results of the annual groundwater measurements and the routine groundwater analyses conducted at the monitoring points.
5. All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or otherwise damage to the final cover. These diversion and drainage structures must be designed and maintained to meet a 25-year, 24-hour rainfall event.
 6. This site shall be inspected on a semiannual basis, or more frequently, as necessary, to ensure proper maintenance of the site. The permit holder shall summarize all inspection data in the semiannual report defined in the General Provisions.
(Amendment #2 issued December 29, 2016)
 7. The final cover shall be re-seeded as necessary to maintain proper non-eroding vegetative growth. Any invading vegetation whose root system could damage the base layer shall be removed or destroyed immediately. The permit holder shall seek and follow the recommendations of the Webster County Soil Conservation District Commissioner in the deployment of erosion control measures and selection of vegetation necessary for reseeded and remediating erosion.
 8. All diversion and drainage systems must be maintained to the approved specifications to prevent run-on and runoff erosion, or other damage to the final cover. These diversion and drainage structures must be designed to meet a 25-year, 24 hour rainfall event.
 9. The integrity and effectiveness of the final cover must be maintained by making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events. If damage to the final cover compacted soil layer occurs, repairs shall be made to correct the damage and return it to original specifications.
 10. In accordance with the variance approval of April 3, 1995, the permit holder is not required to monitor or report site methane gas concentrations in accordance with 567 IAC 115.2(15).

11. Based on a completed and certified site risk assessment meeting the requirements outlined in Iowa Code section 455B.305(6), the permit holder was conditionally exempted under the Department letter dated January 25, 1995 from providing and implementing a leachate control plan for disposal areas that received wastes prior to July 1, 1992. Continued exemption is subject to compliance with water quality standards, statistical limits per 567 IAC 115.26(3) through 115.26(8), and the control of leachate at the site. In the event that these conditions are violated, the permit holder shall be required to submit a groundwater quality assessment plan in accordance with 567 IAC 115.2(9).
 - a. The construction documentation forms and boring logs for leachate piezometers PZ-1, PZ-2, and PZ-3, dated August 30, 2004, as submitted by Fox Engineering and approved on November 1, 2004, are incorporated as part of the permit documents.
 - b. Leachate head levels and elevations shall be measured and recorded semi-annually at all piezometers.
12. The Emergency Response and Remedial Action Plan (ERRAP) submitted by Foth & VanDyke, and dated January 31, 2002 for the U.S. Gypsum Sanitary Landfill (Fort Dodge) in compliance with 567 IAC 115.30(455B) was approved by the Department on February 1, 2002. An updated ERRAP shall be submitted at the time of any significant changes in facility closure operations that require modification of the currently approved ERRAP.