

Memorandum

November 01, 2021

To	Amer Safadi, United States Environmental Protection Agency		
Copy to	Jenny Coughlin, MidAmerican Energy Company Matt Culp, Iowa Department of Natural Resources		
From	Kevin G. Armstrong, C.P.G./mk/8	Tel	515-414-3935
Subject	September 2021 – Notification of Performance Standard Exceedances Outside the Technical Impracticability Zone Waterloo Coal Gasification Plant Site, Waterloo, Iowa	Project no.	11215105

In accordance with Section V of the Statement of Work (SOW) attached to the Remedial Design/Remedial Action Consent Decree (Civil Action C07-2019), this memorandum has been prepared to notify the United States Environmental Protection Agency of exceedances of Performance Standards outside the Technical Impracticability (TI) Zone at the Waterloo Coal Gasification Plant site located in Waterloo, Iowa. As specified in Table 2-2 (revised September 23, 2013) of the Quality Assurance Project Plan (QAPP), this notification is being made within thirty days of MidAmerican Energy Company's receipt of the final laboratory analytical reports identifying the exceedances. The full analytical reports and summary tables will be provided along with the Quality Control Summary Report in accordance with the schedule specified in Table 2-2 of the QAPP. Table 1 provides the constituent of potential concern (COPC) exceedances of groundwater Performance Standards detected outside the TI Zone during the September 2021 monitoring event.

Attachment: Table 1 – COPCs Exceeding Performance Standards in Compliance Wells

Regards,



Kevin G. Armstrong, C.P.G.
Project Manager

Table 1 *COPCs Exceeding Performance Standards in Compliance Wells
Waterloo Coal Gasification Plant Site
September 2021*

Monitoring Well	COPC Exceeding Performance Standard	COPC Concentration (µg/L)	Comments
MW-102	Manganese	864	Has exceeded in 18 of 30 RA events.
MW-111	Chromium	148	Has exceeded in 1 of 30 RA events.
MW-211	Manganese	1,630	Has exceeded in 30 of 30 RA events.
MW-212	Naphthalene	1,620	Has exceeded in 2 of 30 RA events.

Notes:

COPC - Constituent of potential concern.

µg/L - Microgram(s) per liter.

RA - Remedial Action.

Compliance wells located outside of Technical Impracticability Zone consist of MW-102, MW 202R, MW-105, MW-108, MW-111, MW-211, MW-112, MW-212, MW-300, MW-307, and MW-310.