

# Memorandum

October 23, 2024

<b>To</b>	Amer Safadi, United States Environmental Protection Agency		
<b>Copy to</b>	Diane Pals, MidAmerican Energy Company Andrew Carver, Iowa Department of Natural Resources		
<b>From</b>	Kevin G. Armstrong, C.P.G.	<b>Tel</b>	+1 515 414 3933
<b>Subject</b>	September 2024 – Notification of Performance Standard Exceedances Outside the Technical Impracticability Zone Waterloo Coal Gasification Plant Site, Waterloo, Iowa	<b>Project no.</b>	12572391

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 2024 monitoring event.

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

Sincerely,



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

**Table 1** *COPCs Exceeding Performance Standards in Compliance Wells  
Waterloo Coal Gasification Plant Site  
September 2024*

Monitoring Well	COPC Exceeding Performance Standard	COPC Concentration (µg/L)	Comments
MW-102	Manganese	2390	Has exceeded in 24 of 36 RA events.
MW-211	Manganese	2550	Has exceeded in 36 of 36 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.