

July 5, 2024

JOSHUA LOVE
MIDAMERICAN ENERGY COMPANY
2761 PORT NEAL CIRCLE
SALIX IA 51052

**Re: Mid-American Neal North CCR Landfill
2023 Annual Water Quality Report (Doc [#109111](#))
2023 Annual Water Quality Tables 7 and 9 (Doc [#109153](#))
Permit #97-SDP-12-95P**

Dear Mr. Love:

The Iowa Department of Natural Resources (DNR) has reviewed the 2023 Annual Water Quality Report (AWQR) for the active area of the Mid-American Neal North CCR Landfill, dated January 31, 2024, along with Tables 7 and 9 in the Iowa DNR AWQR format, dated February 2, 2024, both as submitted on your behalf by GHD. The DNR has the following comments:

Report Priority

No priorities were noted in the report.

Sampling Summary

Monitoring at the site includes:

1. Background monitoring points: MW-13R, MW-27, MW-29R, MW-223S, and MW-231SR.
2. Downgradient monitoring points: MW-5R, MW-11R, MW-19, MW-21, MW-23R, MW-25, MW-57R, MW-59S, and MW-60S.

Control Limit Exceedances

The cover letter states that the Maximum Contaminant Level (MCL) or Health Advisory Lifetime (HAL) as described in 567 Iowa Administrative Code Chapter 103, paragraph 103.1(4)d, which is what is stated in your permit. However, both Table 7 and Table 9 refer to 40 CFR 257.95(h). Please provide updated tables in accordance with the permit.

Further, Attachment 2 – MCL/HAL Comparison Table shows multiple MCL exceedances for Arsenic. Please clarify why these were excluded from Table 9.

The DNR is reserving further comment until the above items are resolved.

Monitoring Well Maintenance and Performance Reevaluation

Routine maintenance is performed at each sampling event per Section 2.2 of the AWQR. The DNR has no further comments.

Leachate Control System Performance Evaluation Report

Leachate head levels remained below 1 foot. The DNR has no further comments.

For any questions, contact me at [\(515\) 587-7638](tel:5155877638) or geoffrey.spain@dnr.iowa.gov.

Sincerely,

Geoffrey Spain
Environmental Engineer
Land Quality Bureau

cc: Michael Alowitz, P.E.
GHD
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