



Jolly, Becky <becky.jolly@dnr.iowa.gov>

RE: [EXT]: 2023 AWQR Comments - Muscatine Power and Water CCR Landfill - 70-SDP-06-82

1 message

Sam Bennett <sbennett@mpw.org>

Mon, Oct 14, 2024 at 2:06 PM

To: "Rath, Brian" <brian.rath@dnr.iowa.gov>, Michael Alowitz <Michael.Alowitz@ghd.com>, Jean Brewster <jbrewster@mpw.org>, Neil Hoskins <Neil.Hoskins@mpw.org>

Cc: Becky Jolly <becky.jolly@dnr.iowa.gov>

Hi Brian,

I have added our comments to your email below in red.

- The addition of lithium to the sampling parameters as well as the detection in the leachate as well as assessment monitoring well MW-26 confirms that lithium should be included as part of regular sampling parameters. Thus a permit amendment will be issued soon. It should be noted that we will add total dissolved solids as well to be aligned with what other facilities are sampling for. If your fall sampling event has not yet occurred, please include these parameters.
 - **Noted: Lithium and TDS will be included in the fall sampling results.**
- Table 4 continues to show well-depth discrepancies. Per our discussions relating to the 2022 report and our [comment letter](#), this information was going to be verified and updated in the 2023 report. However, there was no discussion in this report. Please provide clarification of what was determined from the requested analysis on or before October 15, 2024.
 - **We reviewed available data and don't see evidence of sediment accumulation in the wells via purging and suspect that some elevations or well construction diagrams were not properly documented at construction. We propose to re-set TDs to current measurements.**
- A consistent exceedance of the HAL at SW-24 for boron is noted. However, the DNR recognizes that a significant decreasing trend is noted. A similar exceedance for sulfate is noted that is also accompanied by a visually decreasing trend.
 - **Noted: SW-24 was dry this fall sampling event.**
- The frequent MCL exceedance at SW-26 for arsenic did not occur in the past reporting period. However, that point was dry during the fall sampling event. Therefore, it is unknown if the discussed changes in sampling techniques (i.e. only sample if the point is flowing) had any impact on the lab results.
 - **All but SW-26 surface water samples were dry this sampling event.**
- Further, we recommend you consider sampling for total suspended solids, which can help identify potentially skewed metal results due to sediment being present in the samples - especially for surface water samples or wells in formations susceptible to silting. If your fall sampling event has not yet occurred and you wish to include this parameter, please reply to this email indicating your intentions. In either case, please include a discussion in the forthcoming 2024 report.
 - **Sampling occurred between 9/10 and 9/12. The laboratory was contacted and there was enough sample to add TSS to all samples except MW-24, 26, 27.**

Thanks,

Sam Bennett

Muscatine Power and Water

Direct: 563-262-3583

From: Rath, Brian <brian.rath@dnr.iowa.gov>
Sent: Friday, September 13, 2024 1:23 PM
To: Michael Alowitz <Michael.Alowitz@ghd.com>; Jean Brewster <jbrewster@mpw.org>; Neil Hoskins <Neil.Hoskins@mpw.org>; Sam Bennett <sbennett@mpw.org>
Cc: Becky Jolly <becky.jolly@dnr.iowa.gov>
Subject: [EXT]: 2023 AWQR Comments - Muscatine Power and Water CCR Landfill - 70-SDP-06-82

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Good afternoon. First off, my apologies for the slow turnaround on reviewing this [report](#). Considering that, I am keeping my comments informal at this point.

- The addition of lithium to the sampling parameters as well as the detection in the leachate as well as assessment monitoring well MW-26 confirms that lithium should be included as part of regular sampling parameters. Thus a permit amendment will be issued soon. It should be noted that we will add total dissolved solids as well to be aligned with what other facilities are sampling for. If your fall sampling event has not yet occurred, please include these parameters.
- Table 4 continues to show well-depth discrepancies. Per our discussions relating to the 2022 report and our [comment letter](#), this information was going to be verified and updated in the 2023 report. However, there was no discussion in this report. Please provide clarification of what was determined from the requested analysis on or before October 15, 2024.
- A consistent exceedance of the HAL at SW-24 for boron is noted. However, the DNR recognizes that a significant decreasing trend is noted. A similar exceedance for sulfate is noted that is also accompanied by a visually decreasing trend.
- The frequent MCL exceedance at SW-26 for arsenic did not occur in the past reporting period. However, that point was dry during the fall sampling event. Therefore, it is unknown if the discussed changes in sampling techniques (i.e. only sample if the point is flowing) had any impact on the lab results.
- Further, we recommend you consider sampling for total suspended solids, which can help identify potentially skewed metal results due to sediment being present in the samples - especially for surface water samples or wells in formations susceptible to silting. If your fall sampling event has not yet occurred and you wish to include this parameter, please reply to this email indicating your intentions. In either case, please include a discussion in the forthcoming 2024 report.

As previously noted, although elevated concentrations of certain constituents are reported, the associated plumes appear to be adequately defined on the property and are limited in the extent and nature of the impact. Therefore, please continue semiannual sampling at all Hydrologic Monitoring System Plan monitoring points and assessment wells MW-24, MW-26, and MW-27 in accordance with permit special provision #4.h and as directed above.

Meanwhile, please let me know if you have any questions.

Thanks,

Brian

Brian Rath, P.E.
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IOWA DEPARTMENT OF NATURAL RESOURCES

On Wed, Feb 14, 2024 at 9:42 AM Michael Alowitz <Michael.Alowitz@ghd.com> wrote:

Brian,

Please find attached the latest AWQR covering 2023 monitoring events. No significant changes. Happy to discuss if there are questions.

Mike

Michael Alowitz, P.E. | A GHD Associate

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10/15/24, 7:16 AM

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