



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

Re: 2024 AWQR - Muscatine Power and Water CCR Landfill - 70-SDP-06-82

1 message

Rath, Brian <brian.rath@dnr.iowa.gov>

Tue, Oct 14, 2025 at 3:44 PM

To: Jean Brewster <jbrewster@mpw.org>

Cc: "becky.jolly@dnr.iowa.gov" <becky.jolly@dnr.iowa.gov>, Michael Alowitz <Michael.Alowitz@ghd.com>, Brooke Wasson <brooke.wasson@ghd.com>, Sam Bennett <sbennett@mpw.org>, Neil Hoskins <Neil.Hoskins@mpw.org>

Good afternoon. The DNR has completed our review of the above-referenced report and has the following comments.

- Thank you for adding Lithium and TDS to the regular sampling parameters. The DNR acknowledges that due to the timing of this implementation, TDS was not able to be added to MW-24, 26, 27 for the fall 2024 sampling event. Furthermore, the DNR recognizes that a permit amendment was not issued to incorporate these changes into the permit as previously discussed. The DNR recommits to issuing the associated amendment.
- The DNR requests that a comparison of TSS and metals be conducted and reported upon in the upcoming AWQR. This shall include an analysis of the validity of the associated data. For example, the extreme TSS concentrations observed (i.e. compared to typical values the DNR sees and compared to other samples at this site) at MW-14A, along with the SSI for Zinc, indicates a potential bias in total metals analysis at this or other locations susceptible to high total suspended solids.
- The well depth discrepancies were addressed by resetting the total depths to current measurements as agreed upon. Thank you for doing this.
- The exceedances for arsenic at SW-26 have continued. Further, the report notes that arsenic may be naturally occurring. Please provide an action plan, including a schedule, to further assess this theory in the forthcoming AWQR. This assessment shall also include a receptor study (i.e. search for and discussion of water wells and public water intakes within 1 mile of the facility that may be impacted by the landfill).
- Previously it was noted that the facility is planning for ELG in your NPDES permits for the leachate discharge. Please provide an update on current and proposed permit(s) for the continued discharge of leachate in the forthcoming and subsequent AWQRs.
- It has previously been noted that the groundwater cutoff is likely intercepting leachate, and there continues to be a downward trend since irrigating from the stormwater pond was discontinued in 2010 and the area was subsequently closed. However, due to the elevated levels at SW-24, this should continue to be evaluated and discussed in each AWQR, including the forthcoming report.
- The DNR acknowledges the sampling of the leachate. It should be noted that it appears the maximum downgradient concentration was higher than the leachate concentration for Magnesium, Manganese, and Barium. Please elaborate on this in the forthcoming AWQR.
- Please provide a discussion in the forthcoming and future AWQRs as to whether or not the associated assessment monitoring wells continue to adequately bracket the impact for which they were installed. For example, multiple points continue to show Boron exceedances; however, the overall trend for Boron indicates stable or decreasing trends, but there is no discussion on whether are not these are adequately bracketed.

We recognize that after reviewing our comments that you may want to meet to discuss, which we encourage, so if you would like to see my availability you can do so at the following [link](#) and send me a meeting invite.

Thanks,
Brian

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On Tue, Feb 11, 2025 at 9:54 AM Brooke Wasson <Brooke.Wasson@ghd.com> wrote:

Brian,

Please find attached the latest AWQR covering 2024 monitoring events. No significant changes.

Thanks,

Brooke

Brooke Wasson

Graduate Scientist

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