



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

Re: Grain Processing Corporation - Annual Water Quality Report 2025

1 message

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

Thu, Nov 6, 2025 at 11:56 AM

To: brian_peters <brian_peters@grainprocessing.com>

Cc: Becky Jolly <becky.jolly@dnr.iowa.gov>, Chris Hage <Christopher.Hage@grainprocessing.com>, Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>, ocosta@all4inc.com, phagerty@all4inc.com, rkuklantz@all4inc.com

The DNR has completed its review of the 2025 AWQR for the above-referenced facility.

There are multiple action level exceedances (arsenic, boron, lithium, sodium, and sulfate) at several downgradient monitoring wells, with the majority occurring at MW-10. However, similar exceedances of action levels are not noted in the background wells. In addition, there are numerous statistical exceedances of two times the standard deviation.

Considering the above, the DNR could require additional sampling or site assessment per Chapter 103. However, we believe that may be premature and instead are concerned that the current statistical methodology may be inadequate. Specifically, the current methodology assumes data is parametric when many times groundwater data is not, but this hasn't been addressed for this site. Further, there is no or limited consideration of statistical power and outliers. Therefore, the DNR requests a review of the current methodology that addresses the above concerns and takes into consideration the EPA's Unified Guidance. If these concerns cannot be adequately addressed using the current methodology, we request a more robust methodology be proposed for our consideration.

In conjunction with the above review, please perform a receptor survey (i.e. water wells, drinking water intakes, etc.). For potential receptors downgradient from or side gradient of the landfill, include a discussion of the potential impacts the landfill may be having or could have in the future on these receptors.

As noted in the report, MW-5 has not been sampled due to the point being dry. Therefore, the DNR requests that the HMSP be reviewed to determine a location for a replacement well, if applicable.

The leachate liquid levels appear to be within historical levels and trends. Therefore, please continue to monitor per the permit and regulations.

Please provide the above requested items on or before March 31, 2026.

Meanwhile, we acknowledge that the change in DNR project officers for this site may result in more questions or comments than you have been used to. Therefore, we are open to and encourage you to contact us to discuss these further with you.

Thanks,
Brian

Brian Rath, P.E.**Environmental Engineer Senior**

Solid Waste and Contaminated Sites Section

Iowa Department of Natural Resources

6200 Park Ave, Suite 200

Des Moines, IA 50321

515-537-4051

brian.rath@dnr.iowa.govwww.iowadnr.gov

On Tue, Oct 14, 2025 at 4:04 PM Rath, Brian <brian.rath@dnr.iowa.gov> wrote:

Good afternoon, Mackenzie. Thank you for asking your question again as I missed that the first time around. As noted in Doc [107756](#), please continue to sample in accordance with your permit.

I would be happy to meet with you, your staff, and consultant. You can see my availability at the following [link](#) and send me a meeting invite using your system. Otherwise, you can schedule a meeting with me through the above link and use our Google Meets.

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

Thanks,
Brian

Brian Rath, P.E.
Environmental Engineer Senior
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Ave, Suite 200
Des Moines, IA 50321
515-537-4051
brian.rath@dnr.iowa.gov
www.iowadnr.gov



On Tue, Oct 14, 2025 at 1:13 PM Mackenzie Holladay <Mackenzie.Holladay@grainprocessing.com> wrote:

Good Afternoon,

Following up to see if you had any questions or concerns regarding the continuation of the proposed sampling schedule? Also, we would like to set up a conference call sometime during the week of October 27th to discuss post-closure activities along with our consultant. Please let me know your availability.

Thank you,

Mackenzie Holladay, Environmental Specialist



Office: 563-264-4870 | Mobile: 563-260-9533

mackenzie.holladay@grainprocessing.com

www.kentww.com

www.grainprocessing.com

**THE INFORMATION IN THIS EMAIL MAY BE CONFIDENTIAL AND IS ONLY INTENDED FOR ITS STATED RECIPIENT.
PLEASE DO NOT FORWARD THIS MESSAGE OR ITS CONTENTS WITHOUT DISCUSSING WITH ITS SENDER.**

“Working towards a sustainable future, one grain at a time.”

From: Mackenzie Holladay
Sent: Monday, September 29, 2025 4:24 PM
To: Rath, Brian <brian.rath@dnr.iowa.gov>; Becky Jolly <becky.jolly@dnr.iowa.gov>
Cc: Chris Hage <Christopher.Hage@grainprocessing.com>; Brian Peters <brian_peters@grainprocessing.com>
Subject: Grain Processing Corporation - Annual Water Quality Report 2025
Importance: High

Good Afternoon,

Please find the attached 2025 Annual Water Quality Report for our Coal Combustion Residue Monofill (Permit No. #58-SDP-03-92C) completed by Stanley Consultants. Also, we plan to continue to sample at the same frequency since 2017 (see attached letter). Odd years will follow a Spring sampling schedule and even years will follow a Fall sampling schedule. Please let us know if you have any questions or concerns.

Thank you,

Mackenzie Holladay, Environmental Specialist



Office: 563-264-4870 | Mobile: 563-260-9533

mackenzie.holladay@grainprocessing.com

www.kentww.com

www.grainprocessing.com

**THE INFORMATION IN THIS EMAIL MAY BE CONFIDENTIAL AND IS ONLY INTENDED FOR ITS STATED RECIPIENT.
PLEASE DO NOT FORWARD THIS MESSAGE OR ITS CONTENTS WITHOUT DISCUSSING WITH ITS SENDER.**

“Working towards a sustainable future, one grain at a time.”

