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

# RE: [EXTERNAL] Re: ADM Clinton Cogen quarterly report

1 message

**Baughman, Jesse** <Jesse.Baughman@adm.com> Fri, Feb 20, 2026 at 2:48 PM
To: "Stobbe, Chad" <chad.stobbe@dnr.iowa.gov>
Cc: "Peropat, Bobby" <Bobby.Peropat@adm.com>, Morgan Schuler <morgans@wendlingquarries.com>, "Jolly, Becky" <becky.jolly@dnr.iowa.gov>

Classification: Internal

Bed ash does not go to the quarry – only fly. A revised report is attached.

The thallium issue has been directed to the lab for correction.

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**From:** Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
**Sent:** Tuesday, February 17, 2026 4:46 PM
**To:** Baughman, Jesse <Jesse.Baughman@adm.com>
**Cc:** Peropat, Bobby <bobby.peropat@adm.com>; Morgan Schuler <morgans@wendlingquarries.com>; Jolly, Becky <becky.jolly@dnr.iowa.gov>
**Subject:** [EXTERNAL] Re: ADM Clinton Cogen quarterly report

Jesse -

Could you please provide an update on the status of the updated analytics? I have not received a response since my previous email sent on January 26, 2026.

Thanks

**Chad A. Stobbe**
**Environmental Specialist Senior**
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321
515-201-8272
chad.stobbe@dnr.iowa.gov

www.iowadnr.gov

On Mon, Jan 26, 2026 at 4:54 PM Stobbe, Chad <chad.stobbe@dnr.iowa.gov> wrote:

> Jesse -
>
> This quarter's submission included two analytic reports (Fly Ash Silo & Bed Ash Silo) and one Analytical Testing Report Form (Fly Ash). The BUD authorizes the following:
>
> > ***Archer Daniels Midland (ADM) Cogeneration Plant (Clinton).*** *Only coal combustion residual (CCR) (i.e.,* ***Bed Ash Silo or Fly Ash Silo*** *and combusted alternative fuel(s) in any combination consisting of agricultural feed and seed, on-site wastewater treatment byproducts, tire-derived fuel, algae fermentation by-products and wood) generated by the ADM Cogeneration Plant located in Clinton, IA is approved as fill material under this determination. All CCR shall be managed in accordance with the special conditions expressed within this determination.*
>
> Is ADM sending more than just Fly Ash Silo to the Goose Lake Quarry this quarter? If both by-products are being sent, please submit an Analytical Testing Report Form for each. Please clarify.
>
> As only one report form was submitted, I'm assuming it's just the Fly Ash Silo as in the past quarters. Given this assumption, I have the following comments:
>
> 1) The lab set the Method Reporting Limit (MRL) above the regulatory limit for Total Metals Thallium, therefore a <1.0 mg/kg result does not document compliance (regulatory limit = 0.78 mg/kg). Please have them rerun it for Thallium at a lower MRL to document compliance.
>
> 2) The Total Metal and SPLP results for Fluoride (<2.5 mg/kg and <0.25 mg/L, respectively) appear to have been taken from the analytics attributed to Bed Ash Silo, not Fly Ash Silo. The results for these attributed to the Fly Ash Silo sample are 18.0 mg/kg and 0.99 mg/L respectively. Please clarify
>
> 3) The TCLP results for Barium (2.5 mg/L) and Selenium (<0.0025 mg/L) appear to have been taken from the Bed Ash Silo analytics and not the Fly Ash Silo. The TCLP results from the Fly Ash Silo analytics are Barium = 0.77 mg/L and Selenium = 0.020 mg/L. Please clarify.
>
> Please let me know if you have any questions. Thanks
>
> **Chad A. Stobbe**
> **Environmental Specialist Senior**
> Solid Waste and Contaminated Sites Section
> Iowa Department of Natural Resources

6200 Park Avenue, Suite 200
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On Mon, Jan 26, 2026 at 1:44 PM Baughman, Jesse <Jesse.Baughman@adm.com> wrote:

> Classification: Internal
>
> Attached is the quarterly ash report for ADM Clinton Cogen. Please reply to this email so that we can document your receipt.
>
> **Jesse Baughman | Environmental Specialist | Archer Daniels Midland Company (ADM)**
>
> Clinton, IA 52732
>
> Confidentiality Notice:
> This message may contain confidential or privileged information, or information that is otherwise exempt from disclosure. If you are not the intended recipient, you should promptly delete it and should not disclose, copy or distribute it to others. For the avoidance of doubt, the official language for all communication(s) and agreement(s) is English. While we may provide translation(s) of the English language version into any other languages, in the event of any inconsistency(ies) or conflict(s) between a translation and the English language version, the English language version shall prevail.

Confidentiality Notice:
This message may contain confidential or privileged information, or information that is otherwise exempt from disclosure. If you are not the intended recipient, you should promptly delete it and should not disclose, copy or distribute it to others. For the avoidance of doubt, the official language for all communication(s) and agreement(s) is English. While we may provide translation(s) of the English language version into any other languages, in the event of any inconsistency(ies) or conflict(s) between a translation and the English language version, the English language version shall prevail.

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Iowa Department of Natural Resources

# Beneficial Use Determination: Solid By-Product Management Plan

## Analytical Testing Report

Beneficial Use ID#: 23 -BUD- 15 - 03

DNR Certified Lab: Pace Laboratories

Lab Report Date: 01/21/2026

By-Product Generator: ADM Cogeneration

City: Clinton State: IA Zip: 52732

By-Product Name: Fly Ash

**Send completed report form(s), laboratory analytics, and supplemental Solid By-Product Management Plan (SBMP) documentation to:**

**Iowa Department of Natural Resources**
**Land Quality Bureau**
**Solid Waste & Contaminated Sites Section**
**6200 Park Ave Ste 200**
**Des Moines, IA 50321**

**For questions concerning this report form please contact the DNR at (515) 201-8272.**

## ANALYTICAL TESTING RESULTS

**Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (SW-846).**

| Required | | Synthetic Precipitation Leaching Procedure (EPA Test Method 1312) | | | Total Metals | | |
|---|---|---|---|---|---|---|---|
| * | Contaminant | MCL | 10 X MCL | Test Result | Regulatory Limit | Test Result | |
| ☒ | Antimony | 0.006 mg/L | 0.06 mg/L | <0.0030 mg/L | 31 mg/kg | <3.0 | mg/kg |
| ☒ | Arsenic | 0.010 mg/L | 0.10 mg/L | <0.0050 mg/L | 17 mg/kg | 6.0 | mg/kg |
| ☒ | Barium | 2.0 mg/L | 20.0 mg/L | <0.50 mg/L | 15,000 mg/kg | 3000 | mg/kg |
| ☒ | Beryllium | 0.004 mg/L | 0.04 mg/L | <0.0010 mg/L | 110 mg/kg | <5.0 | mg/kg |
| ☒ | Boron | | | | 16,000 mg/kg | 260 | mg/kg |
| ☒ | Cadmium | 0.005 mg/L | 0.05 mg/L | <0.0010 mg/L | 70 mg/kg | 1.2 | mg/kg |
| ☒ | Chromium | 0.1 mg/L | 1.0 mg/L | 0.031 mg/L | **(Total) | 25 | mg/kg |
| | | | | | (Hexavalent - VI) 210 mg/kg | | mg/kg |
| | | | | | (Trivalent - III) 97,000 mg/kg | | mg/kg |
| ☒ | Cobalt | | | | 23 mg/kg | 17 | mg/kg |
| ☒ | Copper | 1.3 mg/L | 13.0 mg/L | <0.10 mg/L | 15,000 mg/kg | 92 | mg/kg |
| ☒ | Fluoride | 4.0 mg/L | 40.0 mg/L | 0.99 mg/L | 4,700 mg/kg | 18 | mg/kg |
| ☒ | Lead | 0.015 mg/L | 0.15 mg/L | <0.005 mg/L | 400 mg/kg | 23 | mg/kg |
| ☒ | Lithium | | | | 160 mg/kg | <50 | mg/kg |
| ☒ | Manganese | | | | 10,000 mg/kg | 170 | mg/kg |
| ☒ | Mercury | 0.002 mg/L | 0.02 mg/L | <0.0010 mg/L | 23 mg/kg | <0.20 | mg/kg |
| ☒ | Molybdenum | | | | 390 mg/kg | 5.2 | mg/kg |
| ☒ | Nickel | | | | 1,500 mg/kg | 33 | mg/kg |
| ☒ | Selenium | 0.05 mg/L | 0.5 mg/L | 0.020 mg/L | 390 mg/kg | 6.1 | mg/kg |
| ☒ | Silver | | | | 370 mg/kg | <5.0 | mg/kg |
| ☒ | Thallium | 0.002 mg/L | 0.02 mg/L | <0.0010 mg/L | 0.78 mg/kg | <1.0 | mg/kg |
| ☒ | Vanadium | | | | 350 mg/kg | 92 | mg/kg |
| ☒ | Zinc | | | | 23,000 mg/kg | 130 | mg/kg |

*Required contaminant

**If Total Chromium ≥210 mg/kg, further analysis shall be conducted to determine hexavalent and trivalent results.

Toxicity Characteristic Leaching Procedure (EPA Test Method 1311) - Regulatory Limits

| Metals | | | | | Volatile Organic Compounds | | | | |
|---|---|---|---|---|---|---|---|---|---|
| * | Contaminant | Regulatory Limit | Test Result | | * | Contaminant | Regulatory Limit | Test Result | |
| ☒ | Arsenic | 5.0 mg/L | <0.0050 | mg/L | ☐ | Benzene | 0.5 mg/L | | mg/L |
| ☒ | Barium | 100.0 mg/L | 0.77 | mg/L | ☐ | Carbon tetrachloride | 0.5 mg/L | | mg/L |
| ☒ | Cadmium | 1.0 mg/L | <0.0010 | mg/L | ☐ | Chlorobenzene | 100.0 mg/L | | mg/L |
| ☒ | Chromium | 5.0 mg/L | 0.025 | mg/L | ☐ | Chloroform | 6.0 mg/L | | mg/L |
| ☒ | Lead | 5.0 mg/L | <0.0050 | mg/L | ☐ | 1,2-Dichloroethane | 0.5 mg/L | | mg/L |
| ☒ | Mercury | 0.2 mg/L | <0.0010 | mg/L | ☐ | 1,1-Dichloroethylene | 0.7 mg/L | | mg/L |
| ☒ | Selenium | 1.0 mg/L | 0.020 | mg/L | ☐ | Methyl ethyl ketone | 200.0 mg/L | | mg/L |
| ☒ | Silver | 5.0 mg/L | <0.0050 | mg/L | ☐ | Tetrachloroethylene | 0.7 mg/L | | mg/L |
| | | | | | ☐ | Trichloroethylene | 0.5 mg/L | | mg/L |
| | | | | | ☐ | Vinyl chloride | 0.2 mg/L | | mg/L |

| Pesticides | | | | | Semi-Volatile Organic Compounds | | | | |
|---|---|---|---|---|---|---|---|---|---|
| * | Contaminant | Regulatory Limit | Test Result | | * | Contaminant | Regulatory Limit | Test Result | |
| ☐ | Chlordane | 0.03 mg/L | | mg/L | ☐ | o-Cresol | 200.0 mg/L | | mg/L |
| ☐ | Endrin | 0.02 mg/L | | mg/L | ☐ | m-Cresol | 200.0 mg/L | | mg/L |
| ☐ | Heptachlor (and its epoxide) | 0.008 mg/L | | mg/L | ☐ | p-Cresol | 200.0 mg/L | | mg/L |
| ☐ | Lindane | 0.4 mg/L | | mg/L | ☐ | Cresol | 200.0 mg/L | | mg/L |
| ☐ | Methoxychlor | 10.0 mg/L | | mg/L | ☐ | 1,4-Dichlorobenzene | 7.5 mg/L | | mg/L |
| ☐ | Toxaphene | 0.5 mg/L | | mg/L | ☐ | 2,4-Dinitrotoluene | 0.13 mg/L | | mg/L |
| | | | | | ☐ | Hexachlorobenzene | 0.13 mg/L | | mg/L |
| | | | | | ☐ | Hexachlorobutadiene | 0.5 mg/L | | mg/L |
| | | | | | ☐ | Hexachloroethane | 3.0 mg/L | | mg/L |
| Herbicides | | | | | ☐ | Nitrobenzene | 2.0 mg/L | | mg/L |
| * | Contaminant | Regulatory Limit | Test Result | | ☐ | Pentachlorophenol | 100.0 mg/L | | mg/L |
| ☐ | 2,4-D | 10.0 mg/L | | mg/L | ☐ | Pyridine | 5.0 mg/L | | mg/L |
| ☐ | 2,4,5-TP (Silvex) | 1.0 mg/L | | mg/L | ☐ | 2,4,5-Trichlorophenol | 400.0 mg/L | | mg/L |
| | | | | | ☐ | 2,4,6-Trichlorophenol | 2.0 mg/L | | mg/L |

*Required contaminant

## BY-PRODUCT GENERATOR CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

**Signature:** Jason Dolash **Date:** 02/19/26

**Printed Name:** Jason Dolash **Title:** Cogen Site Manager