



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>

Wed, Apr 22, 2026 at 3:15 PM

To: Olana Costa <ocosta@all4inc.com>

Cc: Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>, Chris Hage <christopher.hage@grainprocessing.com>, Paul Hagerty <phagerty@all4inc.com>, Bob Kuklantz <rkuklantz@all4inc.com>, Becky Jolly <becky.jolly@dnr.iowa.gov>

We have received your questions; we will review it and get back to 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 Wed, Apr 22, 2026 at 7:54 AM Olana Costa <ocosta@all4inc.com> wrote:

Good morning, Brian,

We have reviewed the provided resources and have the following questions regarding the appropriate structure and submittal procedures for GPC's CCR Landfill Termination Plan.

- Please confirm that landfill gas emissions management does not need to be addressed in the Termination Plan, given that the landfill was not constructed with a gas collection system and only CCR, spent carbon, and construction debris were deposited.
- Please confirm that, since the landfill was not constructed with a leachate collection system, leachate management will be addressed in the Termination Plan via the groundwater monitoring program.
- Will an on-site inspection with IDNR be required prior to submitting the Termination Plan, as referenced in the Termination Plan Guidance?
- Please confirm that stormwater erosion modeling will not be required based on the existing stormwater letdown and management structures currently in place.
- Please confirm that groundwater modeling will not be required given that there were no downgradient receptors identified.

- Please confirm that the annual groundwater monitoring data collected to date will be sufficient for the Termination Plan, and that the supplemental data collection described in Section 2.2 of the Termination Plan Guidance will not be required.
- Please confirm that a settlement and slope stability evaluation will not be required based on the known characteristics of the materials placed in the landfill and the expectation that continued visual monitoring during the EC period will effectively identify any future settlement.
- Should the Termination Plan and the EC application be submitted concurrently?

We appreciate your guidance through this process.

Thank you!

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

From: Olana

Costa

Sent: Thursday, April 16, 2026 8:59 AM

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

Cc: Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Chris Hage <christopher.hage@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>; Becky Jolly <becky.jolly@dnr.iowa.gov>

Subject: RE: Grain Processing Corporation - Annual Water Quality Report 2025

Good morning, Brian,

Thank you for providing these comments and resources. We will review and reach out next week with any questions that come up.

Thank you,

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

From: Rath,
Brian

<brian.rath@dnr.iowa.gov>

Sent: Wednesday, April 15, 2026 4:29 PM

To: Olana Costa <ocosta@all4inc.com>

Cc: Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Chris Hage <christopher.hage@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>; Becky Jolly <becky.jolly@dnr.iowa.gov>

Subject: Re: Grain Processing Corporation - Annual Water Quality Report 2025

Good afternoon. As discussed at our virtual meeting on March 10, 2026, we completed our review of your January 19, 2026 submittal, which was in response to our comments on the 2025 Annual Water Quality Report. Although I said I would issue a comment letter, we recognize that time is now of the essence, so we are sending our comments in this email.

Comments

- MW-5. Based on the evidence provided in the submittal, the DNR concurs with not replacing MW-5 and continuing to attempt to sample the point when sufficient water for a suitable sample is available.
- Receptor Survey. The survey results indicate that there are no potential receptors for the contaminants of concern.
- MW-10. The submittal clarified that although MW-10 has multiple exceedances, the downgradient stepout well shows no similar impacts. Therefore, no changes are required to the monitoring program.
- Parameter Reduction. The DNR generally agrees with this approach, and you may proceed.

Reducing or Terminating Post-Closure Care

At the meeting, we also discussed the process for reducing or terminating post-closure care, which ultimately could include placing an environmental covenant on the property and rescinding the landfill permit. From a groundwater standpoint, a critical item is that contaminant levels must be stable or declining. Additionally, contaminants must not migrate offsite above the health-based levels, and onsite contaminants should typically remain below health-based standards as well.

For additional information on this process, we recommend you watch the [2025 webinar](#), which explains how to request the termination (or reduction) of a landfill permit. You can find the webinar, the slides, and the associated documents by scrolling down to the Reducing / Terminating Post-Closure Care and Environmental Covenants portion of the [Municipal and Industrial Landfills](#) of our website. There, you will also find the associated [RTPC Guidance](#) document and our [EC template](#) along with its [guidance](#).

Closing

In closing, the ability to terminate or reduce post-closure care can result in substantial savings for a landfill. Therefore, we encourage landfills to look down the road with this goal in mind.

After reviewing our comments and this information, please reach out if you have further 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 Mon, Apr 13, 2026 at 4:17 PM Rath, Brian <brian.rath@dnr.iowa.gov> wrote:

I apologize for the delay on this. I plan to get you a response this week.

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 Mon, Apr 13, 2026 at 8:16 AM Olana Costa <ocosta@all4inc.com> wrote:

Hi Brian,

I hope you are doing well and enjoying the warmer weather.

I am following up on our recent meeting regarding your review of our report. Could you please provide an update on the anticipated timeline for your formal response?

As discussed, we would also appreciate it if your response could include an outline of your expectations for the content of our post-closure monitoring termination plan, given that the currently available guidance is focused on municipal landfills.

Thank you!

Olana

**Olana Costa** / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

From:Rath, Brian <brian.rath@dnr.iowa.gov>**Sent:** Friday, March 6, 2026 9:28 AM**To:** Olana Costa <ocosta@all4inc.com>**Cc:** Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Chris Hage <christopher.hage@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>**Subject:** Re: Grain Processing Corporation - Annual Water Quality Report 2025

Good morning, we have completed our review of your submittal. We are in general agreement with the findings and approach, but as previously discussed, we would like to meet with you prior to formalizing a response. Since you have more people to coordinate, I will let you set something up. To assist, please view my availability at the following link and then use your own meeting platform to schedule a meeting. Alternatively, you can use the link to schedule the meeting with me and/or hold the time on my calendar.

<https://calendar.app.google/rB1pPduGxZXma59A>

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 Fri, Feb 20, 2026 at 11:50 AM Olana Costa <ocosta@all4inc.com> wrote:

Thank you, Brian.

March 6th is good on our end. Thank you for keeping us posted.

Have a great weekend!

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

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

Sent: Friday, February 20, 2026 11:17 AM

To: Olana Costa <ocosta@all4inc.com>

Cc: Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Chris Hage <christopher.hage@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>

Subject: Re: Grain Processing Corporation - Annual Water Quality Report 2025

Thanks for the follow up. Believe it or not, I originally had it scheduled to review your responses by today. However, a number of other items have come up. Right now, I'm planning to complete the review by March 6th. If you need it sooner, please let me know, and I will see what I can move around.

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 Fri, Feb 20, 2026 at 9:55 AM Olana Costa <ocosta@all4inc.com> wrote:

Hi Brian,

I wanted to check in on this submittal and reach out in case you had any questions. Please let me know if you need any additional information or if there's anything else I can provide to help move this forward. I appreciate your time and look forward to hearing back.

Thank you!

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

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

Sent: Tuesday, January 20, 2026 9:04 AM

To: Chris Hage <Christopher.Hage@grainprocessing.com>; Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>; Olana Costa <ocosta@all4inc.com>; Becky Jolly <becky.jolly@dnr.iowa.gov>

Subject: Fwd: Grain Processing Corporation - Annual Water Quality Report 2025

Good morning, we have received your responses. Once we've had a chance to review, we will set up a meeting with you.

Meanwhile, I am forwarding this to Becky who manages our electronic filing system. Please include her when submitting documents/reports in the future.

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

----- Forwarded message -----

From: **Olana Costa** <ocosta@all4inc.com>

Date: Mon, Jan 19, 2026 at 5:34 PM

Subject: RE: Grain Processing Corporation - Annual Water Quality Report 2025

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

Cc: Chris Hage <Christopher.Hage@grainprocessing.com>, Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>, Paul Hagerty <phagerty@all4inc.com>, Bob Kuklantz <rkuklantz@all4inc.com>

Hi Brian,

On behalf of GPC, ALL4 is submitting the attached report, which includes the items requested per your review of the 2025 GPC AWQR.

After you have had time to review the report, we ask for the opportunity to meet as a group to address any questions or comments before issuing a formal response.

Thank you,

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

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

Sent: Wednesday, November 12, 2025 9:38 AM

To: Olana Costa <ocosta@all4inc.com>

Cc: Chris Hage <Christopher.Hage@grainprocessing.com>; brian_peters <brian_peters@grainprocessing.com>; Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>

Subject: Re: Grain Processing Corporation - Annual Water Quality Report 2025

Sorry, forgot to answer that. No onsite/field component is required.

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 Mon, Nov 10, 2025 at 6:36 PM Olana Costa <ocosta@all4inc.com> wrote:

Brian,

Thank you for providing these resources. Will an on-site component to the survey be required?

Thank you,

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

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

Sent: Monday, November 10, 2025 6:00 PM

To: Olana Costa <ocosta@all4inc.com>

Cc: Chris Hage <Christopher.Hage@grainprocessing.com>; brian_peters <brian_peters@grainprocessing.com>; Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>

Subject: Re: Grain Processing Corporation - Annual Water Quality Report 2025

Thanks for requesting clarification. I'd rather we all be on the same page upfront.

- Wells. Iowa has two different well databases and unfortunately some wells only show up in one or the other. Information on the databases is provided on our [Well Logs and Reports webpage](#).
- Surface Water Intakes. We are switching some of our online GIS systems, so I just looked at our different resources. Our [Solid Waste Map](#) seems to be the best place for surface water intakes at this point - note that you can ignore the login request (we are working on fixing that). You can also use our [Facility Explorer](#) but sometimes it is non-responsive (another thing we are working on).
- Search Distances. Several recent receptor surveys have searched out to a mile from the facility for wells, which with topography, well logs, etc. provides a good picture of potential subsurface receptors. For surface water bodies and surface water intakes, that is more of a judgement call that depends on how offsite surface water flow travels. For this site, the creek to the east should be looked at closely as I believe there is a surface water intake downstream.

I hope that helps.

Thanks,

Brian

Brian Rath, P.E.

Environmental Engineer Senior

Solid Waste and Contaminated Sites Section

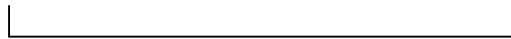
Iowa Department of Natural Resources

6200 Park Ave, Suite 200

Des Moines, IA 50321

515-537-4051

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



On Mon, Nov 10, 2025 at 2:57 PM Olana Costa <ocosta@all4inc.com> wrote:

Hi Brian,

I wanted to clarify what you'd like to see included in the receptor survey. We were anticipating including the identification of all wells listed on the Iowa Well Information System (IWIS) database within 1,000 feet of the property boundary, all surface water bodies listed on the IDNR GIS Services within 200 feet of the property boundary, and any registered water intake structures located on the surrounding water bodies.

Does this align with your expectations? Can you confirm if any on-site inspection is needed for this effort?

Thank you,

Olana



Olana Costa / Consulting Scientist

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From: Olana Costa
Sent: Friday, November 7, 2025 10:40 AM
To: 'Rath, Brian' <brian.rath@dnr.iowa.gov>
Cc: Becky Jolly <becky.jolly@dnr.iowa.gov>; Chris Hage <Christopher.Hage@grainprocessing.com>; brian_peters <brian_peters@grainprocessing.com>; Mackenzie Holladay <mackenzie.holladay@grainprocessing.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>
Subject: RE: Grain Processing Corporation - Annual Water Quality Report 2025

Brian,

Thank you for your review. We'll dig into your observations and requested additional information and likely circle back with a follow-up meeting in the next few weeks to make sure we're aligned on expectations and methods. In the interim, if we have any questions, I'll be sure to reach out.

Thank you and have a great weekend,

Olana



Olana Costa / Consulting Scientist

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ALL4 // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

From: Rath, Brian <brian.rath@dnr.iowa.gov>
Sent: Thursday, November 6, 2025 12:56 PM
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>; Olana Costa <ocosta@all4inc.com>; Paul Hagerty <phagerty@all4inc.com>; Bob Kuklantz <rkuklantz@all4inc.com>
Subject: Re: Grain Processing Corporation - Annual Water Quality Report 2025

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.gov
www.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

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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

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