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July 17, 2026

Mr. Brian Rath
Land Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave
Des Moines, IA 50321

**Subject: Marshalltown West Closed Landfill Permit #64-SDP-03-90C
Marshalltown East Closed Landfill Permit #64-SDP-05-91C
Response to IDNR Comments on 2025 Annual Water Quality Report**

Dear Mr. Rath:

On behalf of Interstate Power and Light Company (IPL), Alliant Energy is respectfully providing attached responses to comments provided by the Iowa Department of Natural Resources on the 2025 Annual Water Quality Report for the closed Marshalltown West and east fly ash disposal sites located in Marshalltown, Iowa.

Please call me at (515) 558-9704 or email me at jennycoughlin@alliantenergy.com with any questions regarding the enclosed responses.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jenny Coughlin", is written over a light gray rectangular background.

Jenny Coughlin
Sr. Environmental Specialist
Alliant Energy Corporate Services, Inc.

Enclosure

Cc: SCS Engineers

July 17, 2026
File No. 25226064.00

Mr. Brian Rath
Land Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave
Des Moines, IA 50321

Subject: Interstate Power and Light Company Marshalltown East and West Closed Landfills
Permits #64-SDP-05-91C and #64SDP-03-90C
2025 Annual Water Quality Report Comment Response

Dear Mr. Rath:

On behalf of Interstate Power and Light Company (IPL), SCS Engineers (SCS) has prepared this letter in response to the comments provided by the Iowa Department of Natural Resources (IDNR) on the 2025 Annual Water Quality Report (AWQR) for the above-referenced site. IDNR's comments were received by IPL in an email dated June 2, 2026

IDNR's comments are listed below in italic text, with IPL's response below each comment:

AWQR

The DNR could not find specific references to the upgradient wells for either site in the report text or on some tables. Please state these clearly in future reports.

Upgradient wells will be clearly stated and/or labeled in future report text and tables.

Sampling

A spot check of the groundwater sampling logs noted that turbidity did not appear to be stabilized prior to sampling at several locations (see page 65 of the PDF for an example). Please clarify how this may have impacted the validity of the samples.

Samples at monitoring wells MW-5 and MW-11AR were collected prior to stabilization of field turbidity, but after all other field parameters had reached stability criteria.

At MW-5, total suspended solids (TSS) in the September 2026 sample was 1.9 mg/L, consistent with prior results of 4.5 and 1.5 mg/L at this well. Other parameters were also within historical ranges at this well, with the exception of calcium and total dissolved solids (TDS). Calcium and TDS were the highest detected to date at this well; however, these parameters were added to the monitoring program in 2023, so only two prior results are available for comparison. Overall, groundwater quality in this sample is consistent with prior samples, and collection prior to meeting turbidity stability criteria does not appear to affect usability of the data.



At MW-11AR, TSS and field turbidity results have been variable during past sampling events. TSS at this well has varied between 100 mg/L in 2023 and 4.4 mg/L in 2024, and was 49 mg/L in 2025. Correlated changes in metals concentrations have not been observed over the same period. Overall, groundwater quality in this sample is consistent with prior samples, and collection prior to meeting turbidity stability criteria does not appear to affect the usability of the data.

Also, the sampler noted that wasp spray was used at several monitoring points, which is understandable; however, aromatic hydrocarbons including, benzene, ethylbenzene, toluene, and xylenes, serve as carriers, propellants, or petroleum distillate solvents in these sprays, which may cause cross-contamination. Please provide a discussion of any concerns regarding this potential issue.

If the use of wasp spray is needed for safe access to a well, the standard procedure is to leave the well cap (typically plastic or rubber) in place during application and for a period after application while the spray dries and insects disperse. This prevents spray from directly entering the well. Specifically at coal combustion residuals (CCR) sites such as Marshalltown, the aromatic hydrocarbons that may be present in wasp spray are not included in sample analysis.

Section 4.3 states that iron exceeded the control limits for the matrix spike/matrix spike duplicate, please clarify how this may have impacted the validity of the samples.

This sentence in the text was an erroneous carry-over from a prior report. The 2025 laboratory analytical report did not include matrix spike/matrix spike duplicate flags on any reported results.

TSS and Dedicated Pumps

The discussions of potential TSS impact on sample results in the Executive Summary and Section 6.3 appear to be inconsistent. Please clarify

Elevated TSS does not appear to be correlated with higher metals concentrations when comparing results between wells at the site, as the three wells with the highest TSS results had relatively few or no UPL or GWPS exceedances in 2025. As discussed in the 2025 AWQR, fewer UPL and GWPS exceedances were recorded at MW-5 and MW-18 in 2023 through 2025 as compared to previous years. TSS data are not available prior to 2023, but field turbidity at MW-5 and MW-18 was previously variable and results from these wells do appear to indicate that installation of dedicated pumps improved sample quality.

Similar changes have not been observed at other wells with dedicated pumps. For example, the TSS result at MW-20 in 2025, following dedicated pump installation, was equal to the 2023 result (2 mg/L). The TSS result at MW-21 in 2025 was the lowest detected to date, but a correlated decrease in metals concentrations was not observed at this well.

Taken together, these results indicate that installation of dedicated pumps has lowered sample turbidity and TSS and has generally improved sample quality at some monitoring wells, but this effect has not been consistent across all wells with dedicated pumps.

Also, it is unclear where dedicated pumps have been installed. For example, Section 3.1 does not include the recently installed pumps, and some groundwater sampling logs contain Additional Notes regarding whether or not the pump is dedicated. Please clearly indicate whether or not a pump is dedicated on future groundwater sampling logs. Meanwhile, please clarify which wells have dedicated pumps.

Monitoring wells MW-4, MW-5, MW-18, MW-20, and MW-21 have dedicated pumps. These will be clearly labeled on future groundwater sampling logs and in future AWQR text.

Statistical Analysis

The DNR understands that the forthcoming 2026 report will include an updated statistical report as noted in Section 5.1 of this report.

The comment is acknowledged, and an updated statistical report will be included in future reporting.

Exceedances

Exceedances of the GWPS for lithium and molybdenum have continued, including in the recent groundwater underdrain sample. As noted above, IPL anticipates calculating UPLs for lithium and molybdenum for the first time in 2026, when four rounds of data will be available. Please also include a discussion of these parameters in the forthcoming 2026 report.

The comment is acknowledged, and a discussion of lithium and molybdenum will be included in future reporting.

Receptor Survey

Based on the discussion in Section 9.0 of the report, it is unclear if Well #30897 is a potential receptor or not. Please clarify.

Based on available information about the well's location, depth, geology, and construction, it does not appear that Well #30897 is a potential receptor.

Inspection Reports

The Spring 2025 inspection forms noted several items that should be addressed but weren't stated in the text. This includes woody vegetation on the north side of west landfill, lock at MW-22, and an unclear concern with MW-7. Please provide a schedule for addressing these items.

Clearing of woody vegetation at the site is being coordinated for summer 2026. A new lock has been installed at MW-22. A portion of the protective metal cover at MW-7 has rusted through. This cover has been evaluated for repair, and the recommended course of action is the replacement of the protective cover. This work is being coordinated with a certified driller in summer or early fall 2026, pending driller availability.

Shutoff Request

The DNR has reviewed this request. Although we generally agreed with this approach during previous discussions, the recent liquid levels at LW-4, the flow at the groundwater underdrain, and the nearby groundwater elevations appear to be outside of historical trends. Therefore, additional supporting data and justification are needed to support the request before the DNR can consider approving the request. Please provide a schedule on or before July 17, 2026, for addressing the above.

IPL intends to provide the additional supporting data and justification on or before September 30, 2026.

Sincerely,



Meghan Blodgett
Senior Hydrogeologist/Project Manager
SCS Engineers



Thomas J. Karwoski
Project Director
SCS Engineers

MDB/JC_AJR/TK

cc: Jenny Coughlin, Alliant Energy