



April 13, 2023

MidAmerican Energy Company
Attention: Jacob Arnold
4299 Northwest Urbandale Drive
Urbandale, Iowa, 50322

Dear Mr. Arnold,

The Izaak Walton League of America (League) appreciates this opportunity to comment on the Antidegradation Alternatives Analysis (AAA) on the proposed changes to MidAmerican Energy's operation of the George Neal Energy Center steam electric plant near Sergeant Bluff. The League has over 42,000 members in more than 200 chapters across the country. Many of our members live within the Missouri River basin and enjoy spending time on and along the river.

The League understands federal antidegradation regulations are designed to protect water quality. As a conservation organization, founded over a century ago, we continue to advocate for water quality and fish and wildlife habitat. Following this comment period, a revised version of the proposal will be submitted to the Iowa Department of Natural Resources. That will also be subject to public notice and a comment period.

MidAmerican Energy's evaluation of wastewater with leachate determined that a zero-discharge operation at this location over the long-term is not viable. Coal combustion residue is produced and stored on-site. Leachate occurs when precipitation passes through the stored material. Attempts to increase the evaporation rate from the holding pond have been unsuccessful. This proposal considers five alternatives to manage leachate water.

- Hauling it to the Publicly Owned Treatment Works (POTW).
- Piping it to the POTW.
- Zero discharge.
- Physical/chemical treatment.
- Discharge through Outfall 016

The leachate pond was designed to be a zero-discharge pond with mechanical evaporators installed. However, water droplets drifted outside of the lined area of the pond. It was determined that drift could not be managed so the use of the mechanical evaporators was discontinued.

Beginning in 2021, wastewater from the pond was hauled to the POTW, leachate has not been discharged through the Outfall 003 since 2018. Due to changes, and a potential safety factor, the company does not plan to discharge leachate into Outfall 003.

The proposal states MidAmerican's preferred alternative is Alternative 5. This would add leachate as permitted wastewater for Outfall 016. The previously used Outfall 003 would be removed from the permit. The request includes an increased flow for Outfall 016 by 100 gallons per minute into the Missouri River after the wastewater passes through the pond.

The League has concerns about this alternative. The Missouri is the nation's longest river and is a major recreational and drinking water resource. The Missouri River has a wide variety of native fish species, an associated native aquatic community, and is home to hundreds of wildlife species. The river provides drinking water to 12 million basin residents. The Missouri River has two federally listed species; the endangered pallid sturgeon and threatened piping plover. In addition, 51 native fish in the river are classified as rare or declining. The populations of all these species have been hindered by alterations to the river.

Increasing the flow from Outfall 016 would put additional discharge into a reach of the Missouri already listed as impaired with E. coli (Iowa's 2020 Integrated Report) and where a total maximum daily load (TMDL) value is still needed. The League is concerned that heavy metals and total nitrogen may be in the wastewater and won't be removed by any treatment practices.

With those reasons, the League supports zero discharge into the Missouri River from this facility. If wastewater is discharged, we strongly urge increased treatment to remove all the pollutants and contaminants deemed harmful to water quality and/or fish and wildlife.

The Izaak Walton League of America appreciates the opportunity to comment on the proposal and we thank you for your time and consideration. We ask to be kept apprised of all future developments related to this proposal.

Sincerely,



Paul Lepisto

Regional Conservation Coordinator

Izaak Walton League of America

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