



Addendum to the Preliminary Corrective Measures Assessment for the North- South Impoundment

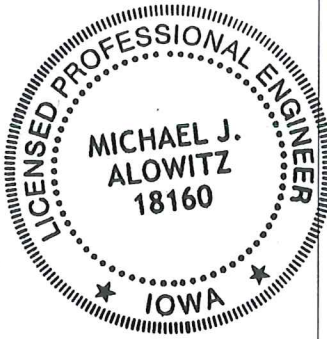


**Walter Scott Jr. Energy Center
Council Bluffs, Iowa**

MidAmerican Energy Company

January 14, 2025

Certification

This Addendum to the Preliminary Corrective Measures Assessment for the North-South Impoundment at the Walter Scott Jr. Energy Center was prepared to address progress toward completing requirements of 40 CFR §257.96(a).

	I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.	
	 Michael J. Alowitz, P.E.	 Date
	License Number:	18160
	My license renewal date is:	December 31, 2026
	Pages or sheets covered by this seal:	Entire Document

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1. Introduction

A preliminary corrective measures assessment (CMA) was completed to address molybdenum exceedances at monitoring well MW-29 (GHD, 2024a) at MidAmerican Energy Company's (MidAmerican's) North-South Impoundment at the Walter Scott Jr. Energy Center (WSEC) located near Council Bluffs, Iowa. The CMA was prepared in accordance with the requirements of 40 Code of Federal Regulations (CFR) §257.96.

This report serves as an addendum to the preliminary CMA for the WSEC North-South Impoundment to provide an update on the progress toward completing the CMA.

Characterization of the nature and extent of the release and the corrective measures assessment requires installation of monitoring wells in the Mosquito Creek levee and adjacent regulated areas. Work within the levee zone requires Section 408 approval from the U.S. Army Corps of Engineers (USACE). MidAmerican has been working with the local levee sponsor (the City of Council Bluffs) and the USACE to obtain the necessary permissions. A chronology of the coordination activities with the City of Council Bluffs and the USACE is provided in Table 1.1.

USACE review of the Section 408 authorization to complete work within the levee critical zone has been initiated. MidAmerican entered into a Section 1156 funding agreement to expedite the Section 408 review process; as of the date of this report, MidAmerican has signed the Section 1156 funding agreement and is awaiting USACE's execution of the agreement. USACE completed an initial review and requested additional reporting on the potential historical significance of the levee. Following approval of the USACE, MidAmerican will complete delineation and CMA activities in the Mosquito Creek levee right-of-way.

Interim updates will be filed semiannually during the CMA activities. The CMA will be updated following characterization of the nature and extent of molybdenum.

2. References

- GHD, 2024a. Preliminary Corrective Measures Assessment for the North-South Impoundment. Walter Scott Jr. Energy Center, Council Bluffs, Iowa. MidAmerican Energy Company. August 14, 2024.
- GHD, 2024b. Timeframe Extension for Corrective Measures Assessment North-South Impoundment Walter Scott Jr. Energy Center Council Bluffs, Iowa MidAmerican Energy Company June 17, 2024.
- GHD, 2024c. Notification of Initiation of Assessment of Corrective Measures. North-South Impoundment, Walter Scott Jr. Energy Center, Council Bluffs, Iowa. MidAmerican Energy Company. March 2024.
- GHD, 2024d. Notification of Detection Above Groundwater Protection Standard for the North-South Impoundment. Walter Scott Jr. Energy Center, Council Bluffs, Iowa. MidAmerican Energy Company. January 2024.

Table

Table 1.1

**Chronology of Activities Related to U.S. Army Corps of Engineers
North-South Impoundment Well Installation Along Levee and Mosquito Creek**

Date	Activity
February 7, 2024	Michael Alowitz (GHD) phone conversation with Adam Nebel – U.S. Army Corps of Engineers (USACE) Omaha District 408 Coordinator.
March 7, 2024	E-mail to USACE regarding the project. General overview and inquiry about availability for a meeting the week of March 18, 2024.
March 8, 2024	Per USACE suggestion, plan to submit a draft document for initial review and then have a meeting. Outlined in e-mail.
March 18, 2024	Draft 408 Submittal sent to USACE and request for a meeting the week of April 8, 2024.
March 25, 2024	Conversation between Michael Alowitz and Adam Nebel. Tentative meeting date of April 11, 2024.
April 4, 2024	USACE indicates still awaiting word from initial reviewer, tentatively scheduled meeting for April 12, 2024 at 10 am.
April 16, 2024	April 10 tentative call was cancelled. E-mail with USACE to request a meeting Thursday, April 25, 2024.
April 26, 2024	USACE confirms 408 Coordinator on temporary duty assignment from previous week and again week of May 5, 2024. May 9 or 10, 2024 suggested for a meeting.
May 9, 2024	On-line 408 submittal review meeting occurred with USACE. USACE noted potential funding issues may delay review of 408 submittal.
May 9, 2024	USACE sent information about Section 1156 funding for 408 review.
May 15, 2024	GHD sent request for a price quote to USACE for possibly funding the 408 review under Section 1156.
May 24, 2024	May 15, 2024 e-mail regarding funding sent to USACE as follow-up.
June 3, 2024	Submitted 408 to City of Council Bluffs to obtain local sponsor letter of no objection (LNO).
June 10, 2024	Received local sponsor LNO.
June 10, 2024	Submitted 408 application to USACE with local sponsor LNO.
June 11, 2024	Received email from USACE verifying internal funding shortfall and the 408 submittal cannot be reviewed without a funding agreement in place.
June 12, 2024	GHD emailed USACE to request a funding agreement be put in place to allow USACE review of the 408 submittal.
June 18, 2024	GHD left voicemail with USACE about the cost estimate for 1156 funding of the 408 Submittal to keep the project moving.
July 10, 2024	Follow-up e-mail to <Section408NWO@usace.army.mil> mailbox about cost estimate and 1156 funding. USACE responds requesting contact information for agreement.
July 11, 2024	Contact information for Section 1156 Funding Agreement provided to USACE.
July 12, 2024	USACE issues draft Section 1156 Funding Agreement to MidAmerican.

Table 1.1

**Chronology of Activities Related to U.S. Army Corps of Engineers
North-South Impoundment Well Installation Along Levee and Mosquito Creek**

Date	Activity
July 16, 2024	MidAmerican returned the signed Section 1156 Funding Agreement to USACE.
July 24, 2024	USACE sent email requesting additional information to support the Section 1156 Funding Agreement.
August 8, 2024	Information requested in July 24, 2024 overnighted to USACE. The August 8, 2024 submittal included a check for payment of the Section 1156 Funding Agreement.
September 17, 2024	The USACE emailed MidAmerican to clarify that Nationwide Permit (NWP) 5 does not automatically trigger a pre-construction notification (PCN), but any project authorized under NWP 5 must comply with all general conditions associated with the Nationwide Permits. General Condition 31, Activities Affecting Structures on Works Built by the United States, states that a PCN must be submitted if a project requiring Section 404 authorization also requires a Section 408 permission/review. If it is later determined that this project would either permanently or temporarily discharge dredged or fill material into any Water of the US, thus requiring Section 404 approval, a PCN would need to be submitted to the Rock Island Regulatory Office.
October 3, 2024	USACE requested a Desktop Assessment meeting the requirements of the Iowa State Historic Preservation Office (SHPO) and an architectural historian's report evaluating the Mosquito Creek Levee.
October 15, 2024	MidAmerican engaged a firm to complete the Desktop Assessment and architectural historian's report as requested by USACE.



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