

**Comments of Michael Schmidt**  
**EPA Public Hearing - Steam Electric Effluent Limit Guidelines**

November 12, 2025

My name is Michael Schmidt and I am general counsel for the Iowa Environmental Council, or IEC. IEC is an alliance of more than 100 organizations, hundreds of individual members, and an at-large board of farmers, business owners, and conservationists. IEC works to build a safe, healthy environment and sustainable future for all Iowans. Thank you for the opportunity to provide comments today.

I am commenting because the 2024 Effluent Limit Guideline Rule's zero discharge requirement for coal ash leachate is critical for protecting public health and water quality, and any delay in its implementation would prolong and heighten the risk of contamination in communities in Iowa and across the nation.

Our experience in Iowa demonstrates that the 2024 ELG Rule sets feasible requirements for utilities and is necessary to ensure that coal plant owners stop discharging managed combustion residual leachate, or CRL, as soon as possible. Iowa has 69 known coal ash disposal sites, including both active and legacy landfills. Recent CRL monitoring in Iowa has also shown elevated concentrations of mercury, lead, cadmium, manganese, and zinc above the state's groundwater standards. We are concerned about potential health impacts associated with this heavy metal contamination. Iowa is second in the country for cancer incidence and has the fastest-growing cancer rate of any state. We need action now to reduce water contamination and the 2024 rule does that appropriately.

First, the rule is reasonable because the zero-discharge standard is feasible today from the standpoint of cost and technology. Coal plants in Iowa continue to produce coal ash, but some coal ash sites have successfully implemented the zero-discharge evaporative technology that provided a basis for the 2024 rule. Two years ago, MidAmerican Energy considered changes to its zero-discharge site near Sioux City, Iowa. IEC and hundreds of Iowans opposed a change that would allow a new discharge from the site. In response, MidAmerican has retained the zero-discharge process and is not discharging the leachate.

Second, the rule is necessary because our experience shows utilities will not otherwise stop their discharges. Alliant Energy's Iowa subsidiary operates a coal ash landfill near the town of Ottumwa. As I expect you will hear more about later, residents in Ottumwa are concerned about the discharges of heavy metals from the site. Alliant is currently trucking leachate to the municipal wastewater treatment facility. It essentially relies on dilution rather than a treatment system designed for the metals in combustion residual leachate. Unless EPA retains the deadlines in the 2024 rule, there is no indication the utility will switch to a zero-discharge option soon. The metals will continue to affect waters downstream or end up in biosolids that can be taken up by crops, accumulating in the environment and people.

Iowans and people across the country need the long-term solution provided in EPA's existing ELG rule to protect our health. We encourage EPA to retain the requirements and deadlines in the 2024 rule. Thank you for your consideration.