Stantec

Memo

To:	Geoff Strack, P.E. Waste Connections	From:	Brad Sullivan, P.E., Stantec
File:	227704387	Date:	January 7, 2026

Reference: SKB Rosemount Industrial Waste Facility 2025 Annual CCR Inspection Report

Purpose

This memorandum fulfills the requirements of 40 CFR § 257.84 Inspection Requirements for coal combustion residue (CCR) Surface Landfills, Part b, regarding an annual inspection by a qualified professional engineer.

Background and Applicability

SKB Environmental, Inc. owns and operates the SKB Rosemount Industrial Waste Facility (the Landfill or Facility herein), an industrial waste disposal facility operating under MPCA Solid Waste Permit SW-383, originally issued in January of 1992.

The site is located on a 236-acre parcel in Sections 19, 20 and 25 of Township 115 North, Range 18 West, in the City of Rosemount, Minnesota, which is in Dakota County. The site is located between Minnesota State Highway 55 (aka Courthouse Boulevard) and Dakota County Road 38, and is accessed via 13425 Courthouse Boulevard, Rosemount, MN 55068.

All industrial waste cells are permitted to accept CCR and operating records indicate that CCR material is contained in Cells 1, 2, 3, and 6. See Figure 1 for a facility site plan.

CCR Landfill Inspection (40 CFR § 257.84)

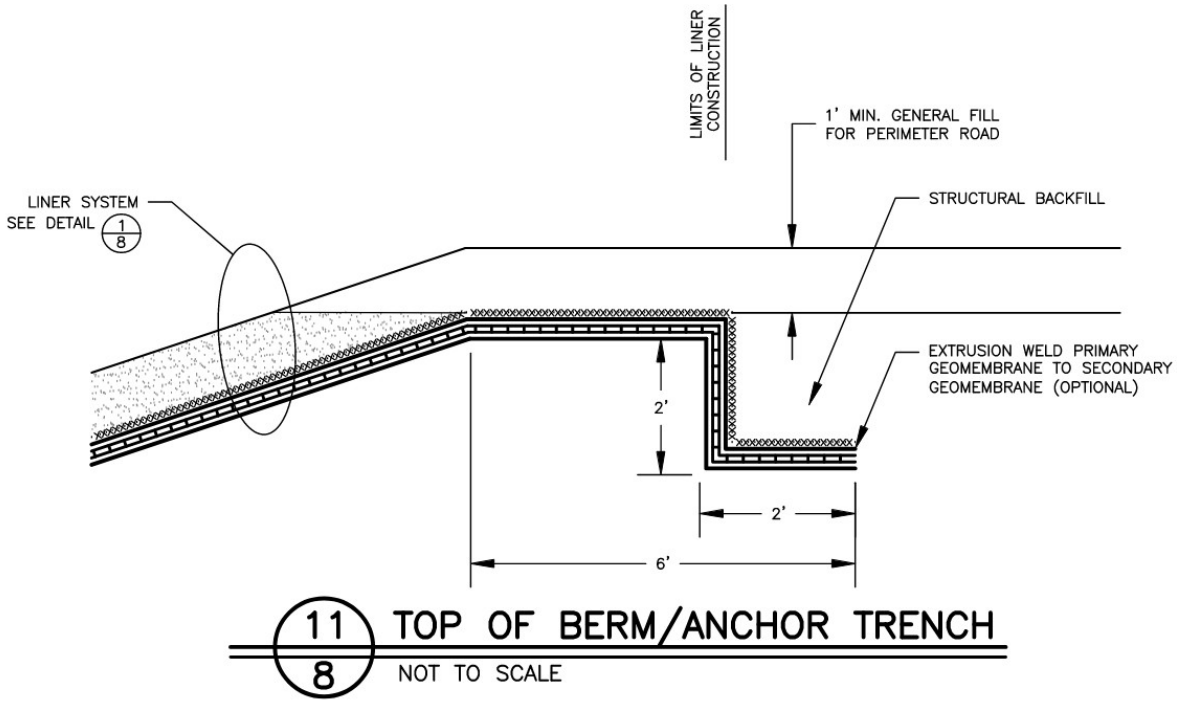
On October 23, 2025, Brad Sullivan, PE, of Stantec conducted the on-site inspection of the CCR Landfill. As part of the inspection, the following operating and inspection records were reviewed:

- Weekly visual CCR inspections performed by landfill operators for this annual reporting period;
- Previous annual inspections performed by a licensed professional engineer;
- CCR unit design and construction information required by §257.73(c)(1) and §257.74(c)(1); and
- Previous periodic structural stability assessments required under § 257.73(d).

Landfill Cell Design

In general, most of the facility's landfill cell embankments were constructed using granular borrow material, which consisted of silty clay and clayey sand type soils. The fill was placed and compacted to 95% of Standard Proctor Dry Density in lift thicknesses ranging from 8 inches to 12 inches. The final subgrade surface was proof rolled prior to geosynthetics installation. The landfill lining systems varies from cell to cell, but all meet the requirements of CFR 257.70. A typical perimeter section from the 2021 Cell 6 Construction Drawings prepared by Tetra-Tech dated February 2021 is shown below.

Reference: SKB Rosemount Industrial Waste Facility 2025 Annual CCR Inspection Report



During the inspection, no signs of landfill cell embankment distress or waste slope instability were observed and no other structural or containment CCR landfill issues were noted. The landfill embankments and interim covered slopes were generally in good condition with a well-established vegetation cover and no signs of significant erosion.

Photos of the landfill embankments and waste slopes were taken during the inspection. Figure 2 presents the photo locations, and Attachment 1 contains a photo log from the inspections.

CCR Landfill Inspection Report

40 CFR § 257.84, Subpart b.2 requires the following topics in italics be addressed within this report. The requirements are shown in italics with the response immediately afterwards for each item.

(i) Any changes in geometry of the impounding structure since the previous annual inspection;

Approximately 9.4 acres of Cell 6 were constructed during the summer of 2025 which were nearly complete at the time of the inspection. Waste disposal operations had not yet commenced in this newly constructed portion of Cell 6. Once the 2025 portion of Cell 6 begins operations, all of the permitted Cell 6 area will be constructed.

The last phase of Cell 6 construction was completed in 2023. At the time of the inspection, all fully constructed areas of Cell 6 were actively receiving waste for disposal, including CCR.

There were no other apparent changes to the embankment geometry of any other landfill cell when compared to the permit drawings or the past inspection.

The annual aerial photogrammetry survey was performed on October 22, 2025, which the estimated in-place volume of total waste (including all accepted wastes) is based on. A comparison of the 2025

and 2024 aerial surveys confirm that the embankment and slope topography is substantially unchanged. The 2025 aerial survey is shown on Figure 1.

(ii) The approximate volume of CCR contained in the unit at the time of the inspection;

The approximate volume of CCR material contained in the landfill at the time of the inspection is 764,824 cubic yards.

(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures; and

None of the following were observed that could indicate structural weakness;

- Signs of slumping or rotational movement;
- Lateral or vertical distortion of the embankment crest;
- Seepage on the outboard slope; or
- Borrowing or damage due to vectors.

(iv) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

There were no changes noted that may could potentially affect the stability or operation of the impoundment. Observations were consistent with those noted in that report.

Notification Requirements

The SKB Rosemount Industrial Waste Landfill is in compliance with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g.

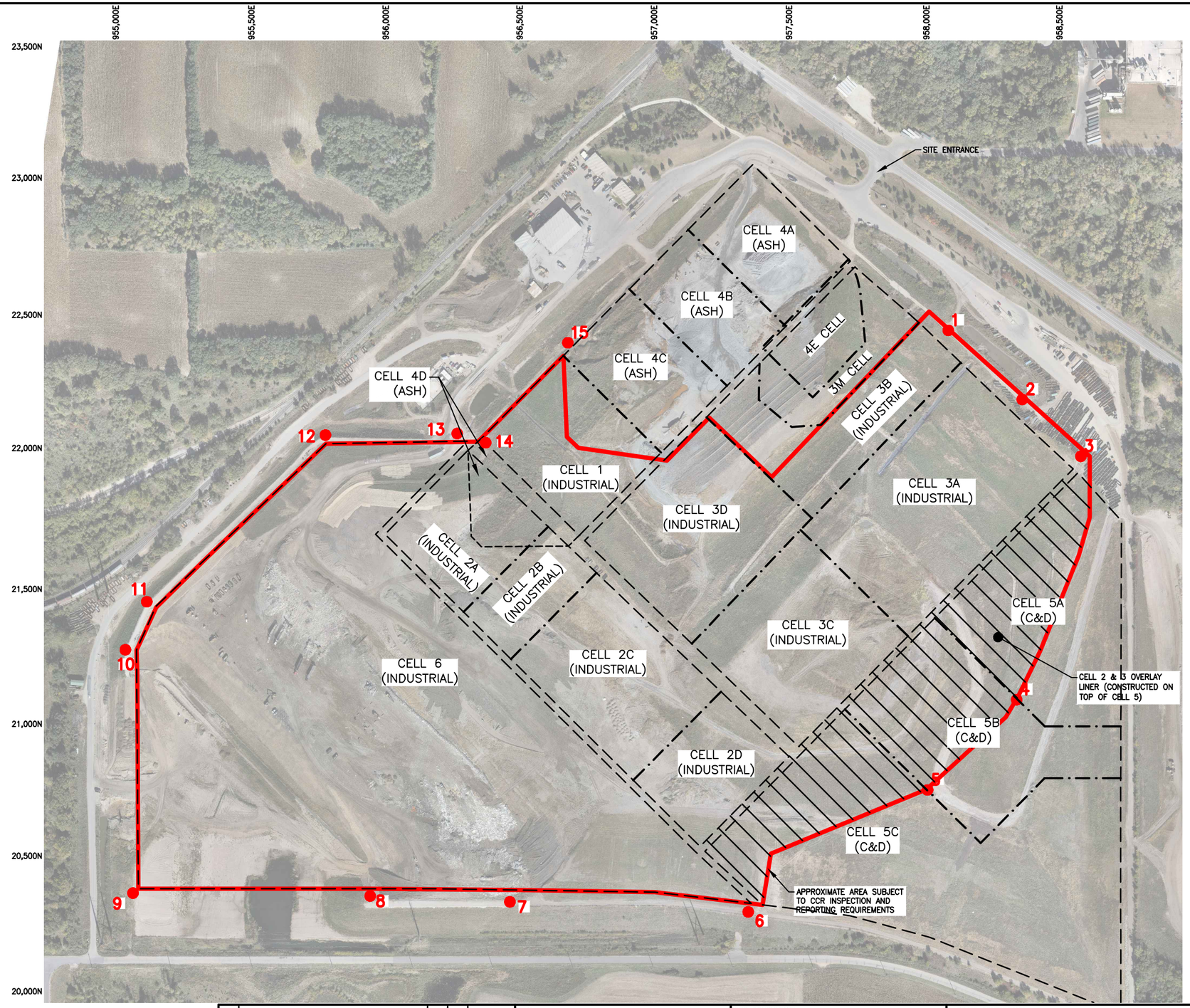
Conclusions and Recommendations

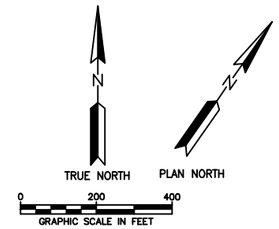
The SKB Rosemount Landfill facility has been constructed and operated in accordance with the facility permit and the CCR regulations. No embankment or waste slope stability issues were observed during the visual inspection.

40 CFR § 257.83, Subpart b.5 and 40 CFR § 257.84, Subpart b.5 each require that if a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken. There were no deficiencies or releases related to CCR operations identified during the inspection.

I hereby certify that this engineering document was prepared by me or under my direct supervision and that I am a duly registered Professional Engineer under the laws of the State of Minnesota.

Brad Sullivan, P.E. # 56502
January 7, 2026





LEGEND

- PHOTO LOCATIONS
- CELL 2 & 3 OVERLAY LINER
- CCR DISPOSAL LIMITS

NOTE:
BASE MAPPING HAS BEEN UPDATED BY AERIAL SURVEY PROVIDED BY FIRMATEK MAPPING COMPLETED ON OCTOBER 22, 2025.

REV	REVISION DESCRIPTION	DWN	APP	REV DATE

SEAL

SUB CONSULTANT

PRIME CONSULTANT

Stantec

PROJECT TITLE
2025 CCR INSPECTION REPORT

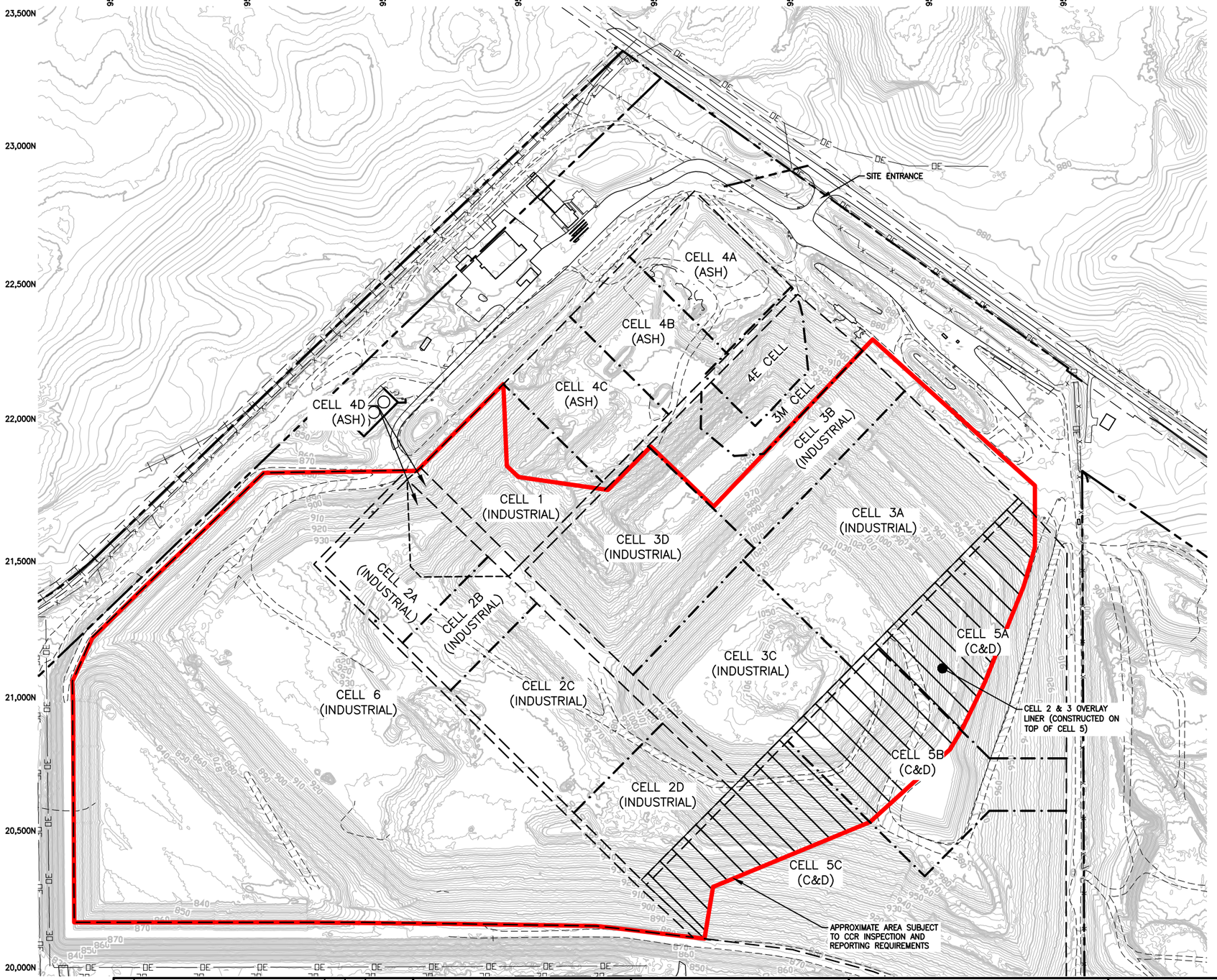
SKB ROSEMOUNT LANDFILL
ROSEMOUNT, MINNESOTA

SHEET TITLE
PHOTO LOCATIONS

DWN BY	CHK'D	APP'D	DWG DATE	SCALE
JJT	TJS	BWS	JAN. 2026	AS NOTED

PROJECT NO.	SHEET NO.	REV NO.
227704387	FIGURE 1	0

Plot Date & Time: 16 December 2025 2:57 PM



N
TRUE NORTH
PLAN NORTH

0 200 400
GRAPHIC SCALE IN FEET

LEGEND

CELL 2 & 3 OVERLAY LINER

CCR DISPOSAL LIMITS

NOTE:
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PROJECT TITLE
2025 CCR INSPECTION REPORT

SKB ROSEMOUNT LANDFILL
ROSEMOUNT, MINNESOTA

SHEET TITLE
SITE MAP

DWN BY	CHK'D	APP'D	DWG DATE
JJT	TJS	BWS	JAN. 2026

SCALE AS NOTED

PROJECT NO.	SHEET NO.	REV NO.
227704387	FIGURE 2	0

L:\227704387\drafting\Rosemount\2021 CCR Report\civil.cod 2025\figure 2 Site Map.dwg

Location 1 – Looking Southeast, Cell 3A & 3B Waste Slope & Anchor Trench

Location 1 – Looking Northwest, Cell 3 Berm

Location 2 – Looking Northwest, Cell 3 Anchor Trench and Waste Slope

Location 2 – Looking Southeast, Cell 3A Anchor Trench and Northeastern Waste Slope

Location 3 – Looking Northwest, Cell 3A Anchor Trench and Northeastern Waste Slope

Location 3 – Looking Southwest, Cell 3 East Corner at toe of Interior Access Road

Location 4 – Looking Northeast, Cell 3 Liner Limit

Location 5 – Looking Southwest, Phase 3 Liner Limit

Location 5 – Looking Northeast, Phase 3 Liner Limit

Location 6 – Cell 6 southeast corner, toe of southern waste slope, looking west

Location 6 – Cell 6, southeast corner, outer berm, looking west

Location 6 – Cell 6, southeast corner, looking north at edge of overlay liner

Location 7 – Cell 6, toe of southern waste slope, looking east

Location 7 – Cell 6, southern outer berm, looking east

Location 7 – Cell 6, interior of southern landfill berm, looking west

Location 7 – Cell 6, exterior of southern landfill berm, looking west

Location 8 – Cell 6, interior of southern landfill berm, looking west

Location 8 – Cell 6, exterior of southern landfill berm, looking west

Location 8 – Cell 6, looking north along temporary phase construction berm

Location 9 – Cell 6, looking east along anchor trench

Location 9 – Cell 6, looking east along landfill berm southern slope

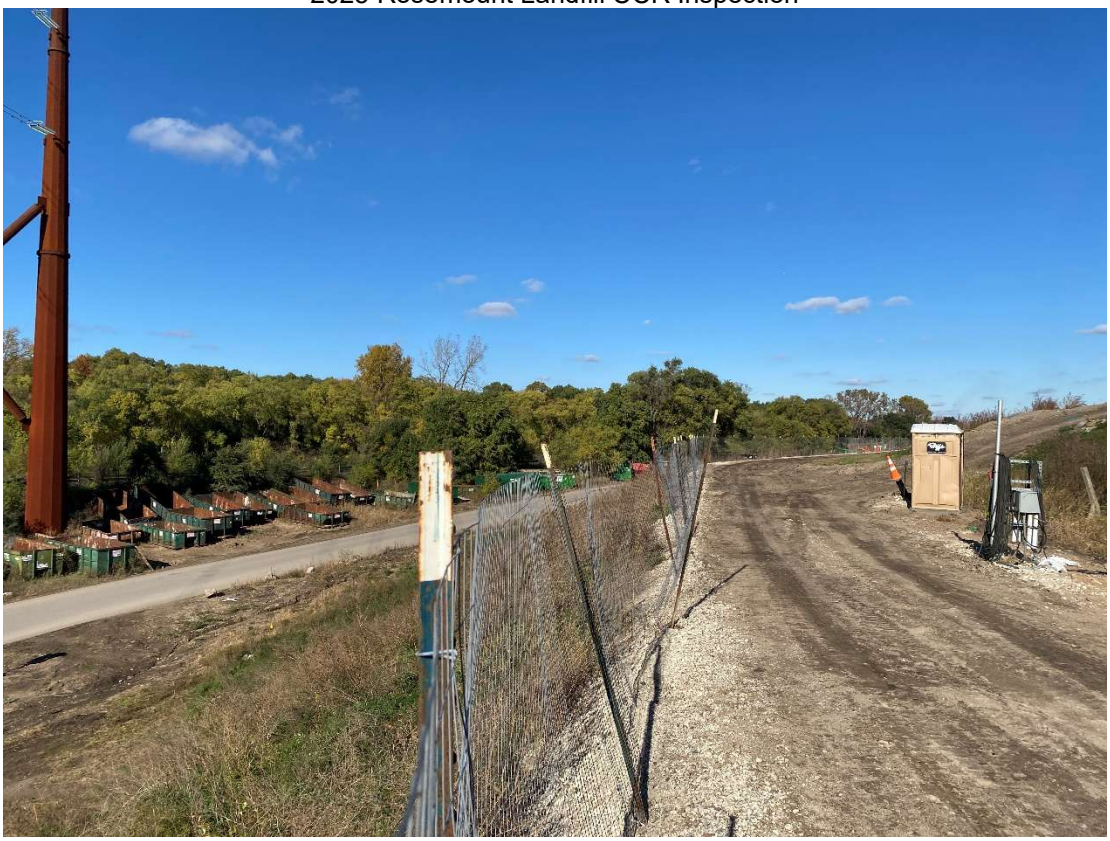
Location 9 – Cell 6, looking north along anchor trench

Location 9 – Cell 6, looking north along landfill berm western slope

Location 10 – Cell 6, looking east along temporary phase construction berm

Location 10 – Cell 6, exterior top of berm, looking south

Location 10 – Cell 6, interior top of berm, looking south



Location 10– Cell 6, exterior top of berm, looking northeast

Location 11– Cell 6, interior top of berm, looking northeast

Location 11– Cell 6, exterior top of berm, looking northeast

Location 11– Cell 6, interior top of berm, looking southwest

Location 11– Cell 6, exterior top of berm, looking southwest

Location 11 – Cell 6, interior top of berm, looking north

Location 12 – Cell 6 northwestern interior top of berm, looking southwest

Location 12 – Cell 6 northwestern exterior top of berm, looking southwest

Location 12 – Cell 6 northern top of berm, looking northeast

Location 12 – Cell 6 northern outer berm, looking northeast

Location 13 – Cell 6 northern top of berm, looking southwest

Location 13 – Cell 6 northern outer berm, looking southwest

Location 14 – Cell 6, looking southwest

Location 14 – Cell 1, looking northeast

Location 15 – Cell 1 Toe of Waste Slope, looking southwest

Location 15 – Cell 1 edge of cap, looking south