Groundwater & Environmental Services, Inc.

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Eagan, MN 55121

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April 14, 2026

Megan Lindstrom
Central Region Environmental Manager
SKB Environmental, Inc.
251 Starkey Street
St. Paul Minnesota 55107

RE: 2025 Coal Combustion Residuals (CCR) Annual Report Addendum
Elevated Chromium in D-3D; D-3S
SKB Rosemount Industrial Waste Facility
13425 Courthouse Boulevard
Rosemount, Minnesota, 55068

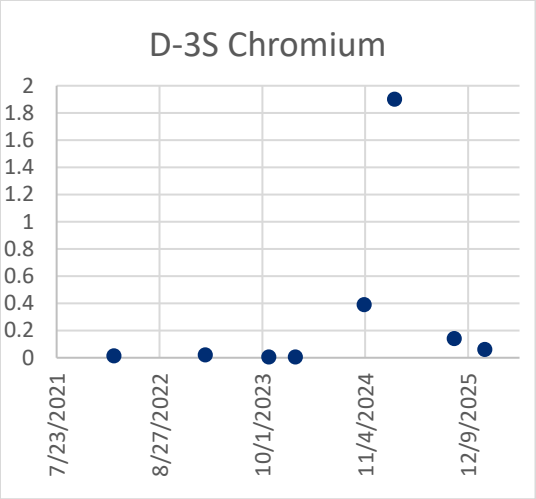
Dear Megan,

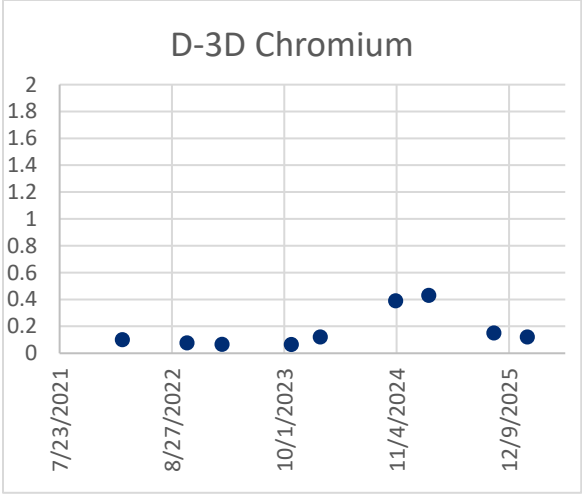
Groundwater & Environmental Services, Inc. (GES) reviewed the analytical concentration data associated with Rosemount CCR 2025 locations D-3D and D-3S that reported confirmed elevated detections above the Groundwater Protection Standard (GPS) for chromium in 2025.

Chromium is a common low-level contaminant at all monitoring locations at Rosemount, with reported concentrations ranging between 0.004 milligrams per Liter (mg/L) and 0.27 mg/L with the average concentration 0.031 mg/L over the last five years. At D-3S and D-3D the average is 0.028 mg/L over the last five years.

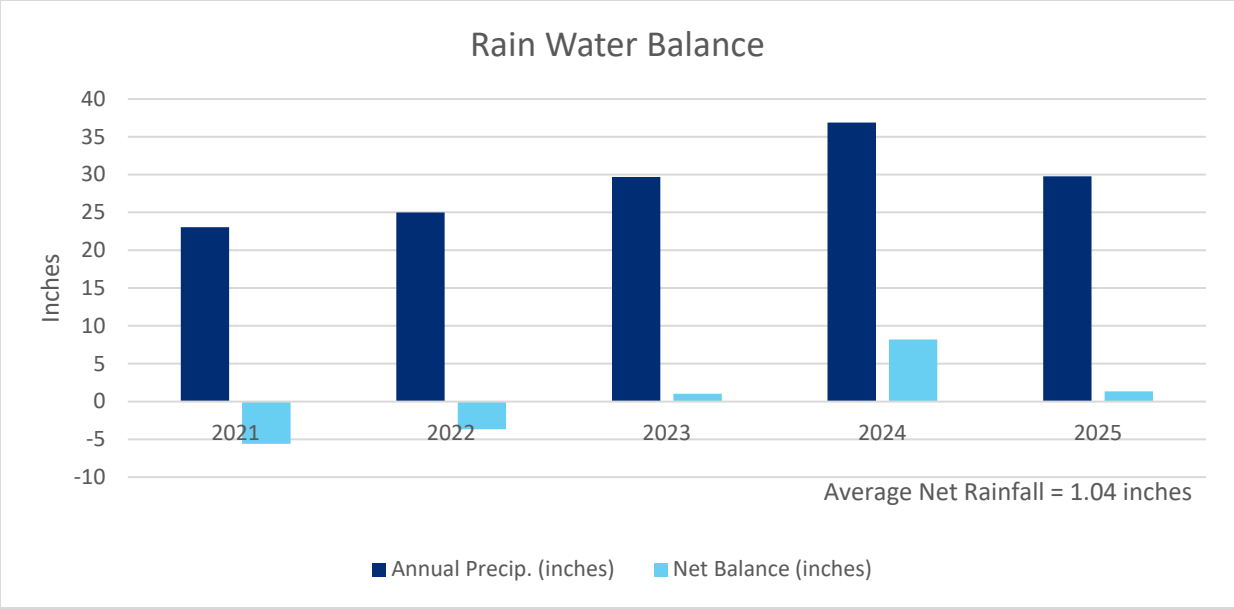
Elevated concentrations above 0.12 mg/L were reported beginning in the spring of 2024 in the deep aquifer. Concentrations of chromium at D-3D were reported as 0.39 mg/L in the fall of 2024 and 0.43 mg/L in the spring of 2025 and0.39 mg/L in the shallow aquifer in the fall of 2024 with an increase to 1.9 mg/L chromium in D-3S in the spring of 2025.

In both locations, chromium concentrations decreased in fall of 2025 to 0.14 mg/L and 0.15 mg/L in with continued decrease in the spring of 2026. The quick decrease indicates the temporary nature of the elevated concentrations and is not likely due to a release from the landfill.





A pattern of sudden increases in concentration of a metal that both solubilizes when pH changes and is temporary in nature is characteristic of mobilization due to excessive groundwater recharge. Weather data from the local weather stations are corroborative of this phenomenon. Data from the Rosemount weather station and the Minneapolis-St. Paul (MSP) weather station indicates that the years 2021 through 2023 had below average rainfall (dark blue bars), with low to no rainfall recharging the local aquifers (net rainfall available for aquifer recharge). These three dry years were followed in 2024 with a significantly above average rainfall starting in the spring, resulting in a record eight inches of groundwater recharge available for the local aquifers (light blue bars). This type of recharge is expected to mobilize metals into the aquifer, and shallow aquifers are expected to be impacted by any rain dissolved compounds from the groundwater recharge to a greater extent than deeper aquifers, then return back to historical concentrations quickly which exactly matches the pattern in D-3S and D-3D. Concentrations of chromium are expected to continue to fall to typical levels at both monitoring points.



Elevation of chromium in the D-3S and D-3D location in 2024-2025 is due to an unprecedented groundwater recharge and not to facility activities.

The next CCR sampling event is scheduled for October 2026. An annual report will be submitted for 2026 in January 2027.

Sincerely,
Groundwater & Environmental Services, Inc.

Bonnie Janowiak, Ph.D.
Principal Chemist

Erin Letrick
Senior Project Manager