Sunnyside Cogeneration Associates

P.O. Box 10, East Carbon, Utah 84520 • (435) 888-4476 • Fax (435) 888-2538

January 13, 2026

Brian Speer
Solid Waste Program Manager
195 North 1950 West
Salt Lake City, Utah 84116

RE: Sunnyside Cogeneration Associates (SCA)
SCA #2 Ash Landfill
CCR Annual Ground Water Report

Dear Mr. Speer,

Please find attached SCA's CCR Annual Ground Water Report. Monitoring wells MW-8, MW-9, MW-10 and MW-11 were evaluated and sampled on May 20, 2025, and October 23, 2025 (MW-8, MW-9 and MW-11) or December 5, 2025 (MW10), in accordance with federal regulations under 40CFR 257 and state regulations under R315-319.

After experiencing wetter than normal spring conditions, MW-10 experienced a change during 2025. While MW-10 has been dry consistently since it was drilled in 2015, groundwater was encountered in 2025. MW-10 had a about two inches of water in May 2025, but not enough to extract a sample. MW-10 then had adequate water for sampling in December 2025. Sample analysis results were in line with expectations for this area.

Water samples were collected at MW-8 in May and October. Sampling analysis results were similar to prior results and did not exceed permit protection limits.

MW-9 and MW-11 were dry wells.

SCA will post this annual report on its CCR web site.

If you have any questions regarding the sampling activities or this report, please contact me at 435-888-4476.

Sincerely,

Mike Mosley

Mike Mosley
Plant Manager / Agent for
Sunnyside Cogeneration Associates

Enclosures: Table 1 – CCR Ground Water Analysis for year 2025
Table 2 – CCR Monitoring Well Parameters for year 2025
Lab test results

cc: Eric Moller
Lauren Hambrook
Plant Files
Scott Carlson

TABLE 1

Sunnyside Cogeneration Associates Facility

SCA#2 CCR Ash Landfill Groundwater Compliance Sampling 2025

	Sampling Date	Field Parameters			Metals(mg/l)						
Sample Location		Temp (C)	pH (S.U.)	SC (umhos)	Boron	Calcium	Chloride	Fluoride	pH (S.U.)	Sulfate	TDS
MW-8 Permit Background Values		N.A.	N.A.	N.A.	0.35	422	251	0.6	7.2	6743	11013
MW-8 Permit Protection Levels		N.A.	N.A.	N.A.	0.46	510.7	394.2	1.42	7.98	7988	12659
MW-8	5/20/2025	15.3	7.56	8248	0.28	282	181	0.204	7.4	4500	7820
MW-8	10/23/2025	12.6	7.4	8450	0.36	375	217	0.302	7.1	5450	9900
MW-9	5/20/2025	NW	NW	NW	NW	NW	NW	NW	NW	NW	NW
MW-9	10/23/2025	NW	NW	NW	NW	NW	NW	NW	NW	NW	NW
MW-10	5/20/2025	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-10	12/5/2025	11.5	7.76	8122	0.51	496	256	0.261	7.6	4750	8200
MW-11	5/20/2025	NW	NW	NW	NW	NW	NW	NW	NW	NW	NW
MW-11	10/23/2025	NW	NW	NW	NW	NW	NW	NW	NW	NW	NW

* Note: no permit background values or protection levels have been established for MW-10

Sample taken at MW-10 on 12/5/2025 was also analyzed for additional parameters for informational purposes. See attached test results

NW = No water present in well

NS = No sample taken due to low water level in well

ND = Non-Detect

TABLE 2

Sunnyside Cogeneration Associates Facility

SCA#2 CCR Ash Landfill Groundwater Compliance Sampling 2025

Sample Location SCA #2 Ash Landfill Groundwater Wells	Sample Date	Personnel	Weather	PVC Casing Diameter	Static Water Level	Total Well Depth	Calculated Min Purge Volume (gal)	Purge Method	Purge Volume (gal)	Field Parameters		
										Temp (C)	pH (S.U.)	SC (umhos)
MW-8	5/20/2025	R. Netz	Cool	2"	17.8	50	15.4	Pump	15	15.3	7.56	8248
MW-8	10/23/2025	S. Carlson, R. Safely, M. Mosley	Cool	2"	17.7	50	15	Pump	16	12.6	7.4	8450
MW-9	5/20/2025	R. Netz	Cool	2"	NW	50	NW	NW	NW	NW	NW	NW
MW-9	10/23/2025	S. Carlson, R. Safely, M. Mosley	Cool	2"	NW	50	NW	NW	NW	NW	NW	NW
MW-10	5/20/2025	R. Netz	Cool	2"	58.1	58.3	NS	NS	NS	NS	NS	NS
MW-10	12/5/2025	R. Safely, Jeremy	Cool	2"	27.0	58.3	15	Pump	15	11.5	7.76	8122
MW-11	5/20/2025	R. Netz	Cool	2"	NW	65	NW	NW	NW	NW	NW	NW
MW-11	10/23/2025	S. Carlson, R. Safely, M. Mosley	Cool	2"	NW	65	NW	NW	NW	NW	NW	NW

Purge volume (gallons) = three times water volume in well

Purge volume (gallons) = ((well depth - static water level)/25) x (casing dia)^2 x3

NW = No water present to sample

NS = No sample taken due to low water level in well

Lab Results – Chemtech Ford
Sample May 20, 2025
MW 8

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9632 South 500 West
Sandy, UT 84070
O:(801) 262-7299 F: (866) 792-0093
www.ChemtechFord.com

Certificate of Analysis

Sunnyside Cogeneration
Rusty Netz
PO Box 10
East Carbon, UT 84520

PO#:
Receipt: **5/21/25 10:20 @ 7.9 °C**
Date Reported: **5/29/2025**
Project Name: **CCR Detection Monitoring**

Sample ID: **MW-8**
Matrix: **Water**
Date Sampled: **5/20/25 13:10**

Lab ID: **25E1647-01**
Sampled By: **Client**

	Result	Units	Minimum Reporting Limit	Method	Preparation Date/Time	Analysis Date/Time	Flag(s)
Inorganic							
Chloride	181	mg/L	1.00	EPA 300.0	5/21/25	5/21/25	
Fluoride	0.204	mg/L	0.100	EPA 300.0	5/21/25	5/21/25	
pH	7.4	pH Units	0.1	SM 4500 H-B	5/21/25 16:11	5/21/25 17:18	SPH
Sulfate	4500	mg/L	100	EPA 300.0	5/27/25	5/27/25	
Total Dissolved Solids (TDS)	7820	mg/L	20	SM 2540 C	5/21/25	5/21/25	
Metals							
Boron, Total	0.28	mg/L	0.05	EPA 200.7/200.2	5/21/25	5/22/25	
Calcium, Total	282	mg/L	0.2	EPA 200.7/200.2	5/21/25	5/22/25	

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www.ChemtechFord.com

Certificate of Analysis

Sunnyside Cogeneration
Rusty Netz
PO Box 10
East Carbon, UT 84520

PO#:
Receipt: **5/21/25 10:20 @ 7.9 °C**
Date Reported: **5/29/2025**
Project Name: **CCR Detection Monitoring**

Report Footnotes

Abbreviations

ND = Not detected at the corresponding Minimum Reporting Limit (MRL)
1 mg/L = one milligram per liter or 1 mg/kg = one milligram per kilogram = 1 part per million.
1 ug/L = one microgram per liter or 1 ug/kg = one microgram per kilogram = 1 part per billion.
1 ng/L = one nanogram per liter or 1 ng/kg = one nanogram per kilogram = 1 part per trillion.
On calculated parameters, there may be a slight difference between summing the rounded values shown on the report vs the unrounded values used in the calculation.

Flag Descriptions

SPH = Sample submitted past method specified holding time.

CHEMTECH - FORD ANALYTICAL LABORATORY

CHAIN OF CUSTODY

CHEMTECH-FORD LABORATORIES

COMPANY:	Sunnyside Cogeneration SCA
ADDRESS:	P.O. Box 10
CITY/ST/ZIP:	East Carbon, UT 84520
PHONE #:	435-888-4476, ext. 107
FAX	
CONTACT:	Rusty Netz
PROJECT:	CCR Detection Monitoring
EMAIL:	rusnetz@hotmail.com

BILLING ADDRESS:

BILLING CITY/STATE/ZIP:

PURCHASE ORDER #:

TURNAROUND REQUIRED:*

* Expedited turnaround subject to additional charge

Sample Receipt Conditions:

( ) Custody Seals Present
(N) Containers Intact
(N) COC and Labels Match
(N) Received on Ice
(N) Correct Containers
(N) COC Included
(N) COC Complete
(N) Sufficient Sample Volume
( ) Headspace Present (VOC)
( ) Temperature Blank
(N) Received within Hold
Checked by: A

ups: 12 E84214039476 3319

25E1647

Lab Use Only	#	LOCATION / IDENTIFICATION	DATE	TIME	MATRIX	Field Residual Chlorine	ICP by 200.7: B, Ca	Chloride, Fluoride, Sulfate	pH	TDS	Total Coliform + E coli (Present/Absent)	Total Coliform + E coli (Enumerated)	HPC (Plate Count)	E Coli Only
01	1	MW-8	5/20/25	1310	Water		x	x	x	x				
	2	[crossed out]												
	3													
	4													
	5													
	6													
	7													
	8				Ag	1400								
	9				M	1412								
	10													

Sampled by: [print]

Sampled by: [signature]

ON ICE (circled) NOT ON ICE Temp (C°): 7.9

Special Instructions:

Samples received outside the EPA recommended temperature range of 0-6 C° may be rejected.

Relinquished by: [signature]	Date/Time	Received by: [signature]	Date/Time
Rusty Netz [signature]	5/20/25 1425	AWorl-Teer [signature]	5/21/25 1020

CHEMTECH-FORD
9632 South 500 West
Sandy, UT 84070

801.262.7299 PHONE
866.792.0093 FAX
www.chemtechford.com

Payment Terms are net 30 days OAC. 1.5% interest charge per month (18% per annum). Client agrees to pay collection costs and attorney's fees.

Lab Results – Chemtech Ford
Sample October 23, 2025
MW 8

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Certificate of Analysis

Sunnyside Cogeneration
Rusty Netz
PO Box 159
Sunnyside, UT 84539

PO#:
Receipt: **10/24/25 13:38 @ 5.8 °C**
Date Reported: **10/31/2025**
Project Name: **Ash 2**

Sample ID: MW 8

Matrix: **Water**
Date Sampled: **10/23/25 13:30**

Lab ID: **25J2232-01**

Sampled By: **Client**

	Result	Units	Minimum Reporting Limit	Method	Preparation Date/Time	Analysis Date/Time	Flag(s)
Inorganic							
Chloride	217	mg/L	1.00	EPA 300.0	10/27/25	10/27/25	
Fluoride	0.302	mg/L	0.100	EPA 300.0	10/27/25	10/27/25	
pH	7.1	pH Units	0.1	SM 4500 H-B	10/24/25 14:47	10/24/25 14:53	SPH
Sulfate	5450	mg/L	50.0	EPA 300.0	10/30/25	10/30/25	
Total Dissolved Solids (TDS)	9900	mg/L	500	SM 2540 C	10/27/25	10/27/25	
Metals							
Boron, Total	0.36	mg/L	0.05	EPA 200.7/200.2	10/27/25	10/27/25	
Calcium, Total	375	mg/L	0.2	EPA 200.7/200.2	10/27/25	10/27/25	

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Certificate of Analysis

Sunnyside Cogeneration	PO#:
Rusty Netz	Receipt: **10/24/25 13:38 @ 5.8 °C**
PO Box 159	Date Reported: **10/31/2025**
Sunnyside, UT 84539	Project Name: **Ash 2**

Report Footnotes

Abbreviations

ND = Not detected at the corresponding Minimum Reporting Limit (MRL).
1 mg/L = one milligram per liter or 1 mg/kg = one milligram per kilogram = 1 part per million.
1 ug/L = one microgram per liter or 1 ug/kg = one microgram per kilogram = 1 part per billion.
1 ng/L = one nanogram per liter or 1 ng/kg = one nanogram per kilogram = 1 part per trillion.
On calculated parameters, there may be a slight difference between summing the rounded values shown on the report vs the unrounded values used in the calculation.

Flag Descriptions

SPH = Sample submitted past method specified holding time.

CHAIN OF CUSTODY - SAMPLE SUBMITTAL FORM

DRINKING WATER & MICRO

CHEMTECH-FORD LABORATORIES

COMPANY: SUNNYSIDE COGENERATION SCA
ADDRESS: PO Box 10
CITY/STATE/ZIP: EAST CARBON UT 84520
PHONE #: 435 888 4476
CONTACT: SCOTT CARLSON - 801 450 3511 cell
EMAIL: SCARLSON@TWINPEAKSENG.COM
PROJECT: ASH 2
PO Number:
INVOICE EMAIL ADDRESS:

State System #	*Rush Due Date
Send to State	
☐ Yes ☐ No	*Additional fees may apply

Chemtech-Ford Laboratories
- Drop-Off Location -
1384 W 130 S
Orem, UT 84058
Phone: 801-229-2782

Sample Condition		Delivery Method	
☐ Custody Seals	☑ COC Complete	UPS	USPS
☑ Container Intact	☑ Sufficient Sample Volume	FedEx	Chemtech-Ford Courier
☑ COC/Labels Agree	☐ Headspace Present (VOC)	☑ Walk-in	Client Courier
☑ Received on Ice	☐ Temperature Blank	Tracking #:	
☑ Correct Containers	☑ Received within Holding Time		

R = Routine
I = Investigative
TR = Trigger Source
RP = Repeat

Lab Use Only	CLIENT SAMPLE INFORMATION: LOCATION / IDENTIFICATION	DATE	TIME	FACILITY ID (Source Code)	POINT CODE (DBP)	TESTS REQUESTED: Field: Residual Chlorine	ICP by 200.7 B, Ca	Chlorine, Free and Total	pH	TDS						BACTERIA: Total Coliform + E coli (Present/Absent)	Total Coliform + E coli (Enumerated)	HPC (Misc Bacteria Plate Count)	Repeat	Failed Sample Lab ID #
-01	1 MW 8	10-23-25	13:30				✓	✓	✓	✓										
	2										AQ 1520									
	3										M 1570									
	4																			
	5																			
	6																			
	7																			
	8																			
	9																			
	10																			
	11																			

Sampled by (print):
Special Instructions:

ON ICE NOT ON ICE Temp (C°): 5.8
Samples received outside the EPA recommended temperature range of 0-6 C° may be rejected.

Relinquished by (signature)	Date/Time	Received by (signature)	Date/Time
Scott Carlson	10-24-25 13:38		10.24.25 1338
	10.24.25 1400	Anne Tea	10/24/25 1430
Relinquished by (signature)	Date/Time	Received by (signature)	Date/Time

Payment Terms are net 30 days OAC. 1.5% interest charge per month (18% per annum). Client agrees to pay collection costs and attorney's fees.

Lab Results – Chemtech Ford
Sample December 5, 2025
MW 10

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www.ChemtechFord.com

Certificate of Analysis

Sunnyside Cogeneration
Rusty Netz
PO Box 159
Sunnyside, UT 84539

PO#: **SCA 1078**
Receipt: **12/9/25 11:40 @ 4.8 °C**
Date Reported: 12/24/2025
Project Name: **[none]**

Sample ID: **#2 MW10**

Matrix: **Water**
Date Sampled: **12/5/25 12:00**

Lab ID: **25L0774-01**
Sampled By: **Raymond Safley**

	Result	Units	Minimum Reporting Limit	Method	Preparation Date/Time	Analysis Date/Time	Flag(s)
Calculations							
Hardness, Total as CaCO3	3230	mg/L	6.6	SM 2340 B/[CALC]	12/9/25	12/10/25	
Inorganic							
Alkalinity - Bicarbonate (as CaCO3)	360	mg/L	1.0	SM 2320 B	12/11/25	12/11/25	
Alkalinity - Carbonate (as CaCO3)	ND	mg/L	1.0	SM 2320 B	12/11/25	12/11/25	
Alkalinity - Hydroxide (as CaCO3)	ND	mg/L	1.0	SM 2320 B	12/11/25	12/11/25	
Alkalinity - Total (as CaCO3)	360	mg/L	1.0	SM 2320 B	12/11/25	12/11/25	
Chloride	256	mg/L	1.00	EPA 300.0	12/9/25	12/9/25	
Fluoride	0.261	mg/L	0.100	EPA 300.0	12/9/25	12/9/25	
pH	7.6	pH Units	0.1	SM 4500 H-B	12/9/25 12:39	12/9/25 15:35	SPH
Sulfate	4750	mg/L	100	EPA 300.0	12/9/25	12/9/25	
Total Dissolved Solids (TDS)	8200	mg/L	100	SM 2540 C	12/9/25	12/9/25	
Metals							
Arsenic, Total	0.0035	mg/L	0.0005	EPA 200.8/200.2-MS	12/9/25	12/10/25	
Barium, Total	0.080	mg/L	0.005	EPA 200.7/200.2	12/9/25	12/10/25	
Boron, Total	0.51	mg/L	0.05	EPA 200.7/200.2	12/9/25	12/10/25	
Cadmium, Total	0.0002	mg/L	0.0002	EPA 200.8/200.2-MS	12/9/25	12/10/25	
Calcium, Total	496	mg/L	1.0	EPA 200.7/200.2	12/9/25	12/10/25	
Copper, Total	0.019	mg/L	0.005	EPA 200.7/200.2	12/9/25	12/10/25	
Lead, Total	0.0070	mg/L	0.0005	EPA 200.8/200.2-MS	12/9/25	12/10/25	
Magnesium, Total	483	mg/L	1.0	EPA 200.7/200.2	12/9/25	12/10/25	
Potassium, Total	14.5	mg/L	0.5	EPA 200.7/200.2	12/9/25	12/10/25	
Selenium, Total	0.0200	mg/L	0.00060	EPA 200.8/200.2-MS	12/9/25	12/10/25	
Silver, Total	ND	mg/L	0.0005	EPA 200.8/200.2-MS	12/9/25	12/10/25	
Sodium, Total	1360	mg/L	5.0	EPA 200.7/200.2	12/9/25	12/10/25	
Zinc, Total	0.05	mg/L	0.01	EPA 200.7/200.2	12/9/25	12/10/25	

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Certificate of Analysis

Sunnyside Cogeneration
Rusty Netz
PO Box 159
Sunnyside, UT 84539

PO#: **SCA 1078**
Receipt: **12/9/25 11:40 @ 4.8 °C**
Date Reported: **12/24/2025**
Project Name: **[none]**

Report Footnotes

Abbreviations

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1 ug/L = one microgram per liter or 1 ug/kg = one microgram per kilogram = 1 part per billion.
1 ng/L = one nanogram per liter or 1 ng/kg = one nanogram per kilogram = 1 part per trillion.
On calculated parameters, there may be a slight difference between summing the rounded values shown on the report vs the unrounded values used in the calculation.

Flag Descriptions

SPH = Sample submitted past method specified holding time.

CHAIN OF CUSTODY - SAMPLE SUBMITTAL FORM

COMPANY: Sunnyside Cogeneration
ADDRESS: PO Box 159
CITY/STATE/ZIP: Sunnyside UT 84539
PHONE #: 435 - 888 - 4476
CONTACT: Michael Mosley
EMAIL: mmosley@sscogeneration.com
PROJECT:
PO Number: SCA 1079
INVOICE EMAIL ADDRESS:

RUSH Due Date*:	QC Level

* Expedited turnaround subject to additional charge

QC levels definition
QC1: none (default if blank)
QC2: Batch QC, random sample
QC3: 25% surcharge. Narrative plus Batch QC, your sample selected
QC4: 40% surcharge. Add raw data

CHEMTECH-FORD LABORATORIES

Chemtech-Ford, Inc
9632 South 500 West
Sandy, UT 84070
Phone: 801-262-7299
www.chemtechford.com

Sample condition					
✓ Custody Seal	✓ Correct Containers	Delivery Method			
✓ Container Intact	✓ Sufficient Sample Volume				
✓ COC/Labels Agree	Headspace Present (VOC)	Y	UPS	USPS	
✓ Received on Ice	Temperature Blank		FedEx	Chemtech-Ford Courier	
	✓ Received within Holding Time		Walk-in	Customer Courier	

1ZE84214039406 8466
FCM1Z03 UNLOAD033 DEC 9 06:1
US R419 HIP 35.9.1 274118

25L0774

TESTS REQUESTED

Added B and Fl per Client Request. -AR

Lab Use Only	CLIENT SAMPLE INFORMATION				Hardness	Alkalinity	pH	Chloride, Sulfate	TDS	200.8: As, Cd, Pb, Se, Ag	200.7: Ba, Ca, Cu, Mg, K, Na, Zn
	LOCATION / IDENTIFICATION	DATE	TIME	MATRIX							
01	1 #2 MW 10	12/5/25	1200		X	X	X	X	X	X	X
	2										
	3										
	4										
	5										
	6										
	7										
	8										
	9										
	10										
				Bottle type	AG	M					
				Lot #	1506	1503					

Sampled by: [print] Raymond Safley
Sampled by: [signature]

ON ICE NOT ON ICE Temp (C°): 4.8

Samples received outside the EPA recommended temperature range of 0-6 C° may be rejected.

Special Instructions:

Relinquished by: [signature]	Date/Time	Received by: [signature]	Date/Time
			12.9.25 1140
Relinquished by: [signature]	Date/Time	Received by: [signature]	Date/Time
Relinquished by: [signature]	Date/Time	Received by: [signature]	Date/Time

Payment Terms are net 30 days OAC. 1.5% interest charge per month (18% per annum). Client agrees to pay collection costs and attorney's fees.