

July 15, 2026

Via Electronic Mail

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**Re: Continental Cement Company, LLC's Responses to the IDNR's Comment
Letter Dated May 14, 2026**

Dear Mr. Rath:

We write this letter in response to the IDNR's comment letter on Continental Cement Company, LLC's ("Continental") 2025 Annual Water Quality Report, Leachate Collection System Performance Evaluation Report, and Update to the Remedial Action Mitigation Plan (Doc. 117124), and the IDNR's comments on Continental's Fall 2025 Engineering Inspection Report (Docs. 114687, 115273) and 2026 Spring Semi-Annual Engineering Inspection Report (Doc. 117132).

As requested in your email dated May 28, 2026 (Doc. 117224), this letter is divided into sections addressing the landfill cap, leachate collection system, and groundwater quality.

I. LANDFILL CAP**A. Responses to IDNR's Comments on the Fall 2025 Engineering Inspection Report (Doc. 115273) Related to the Landfill Cap**

Bowman made five recommendations in the Fall 2025 Engineering Inspection Report (Doc. 114639), four of which are ongoing action items.¹ Two of those recommendations – #1 and #2 – relate to the landfill cap. The status of both action items is as follows:

¹ Continental repaired the communication cable to BMW-24-05 on December 8, 2025, which was Bowman's third recommendation in the Fall Report, i.e. item #3.

1. Regrade Cap Areas 1 and 2 to eliminate ponding and improve surface drainage.

Cap Area 1: On January 12, 2026, Continental placed 60 tons of topsoil to fill the low area shown as Cap Area 1 in the Fall 2025 Engineering Inspection Report. Cap Area 1 was mowed and reseeded on May 22, 2026. The photograph below shows Cap Area 1 as of July 8, 2026.



Cap Area 2: Ponding has not been observed at Cap Area 2. The photograph below shows Cap Area 2 as of July 8, 2026.



2. Continue vegetation maintenance on all capped areas until full cover is established.

Full cover is established. On May 22, 2026, Continental mowed and reseeded the capped landfill areas, referred to as the Phase I Closed Cell and Closed Cell on Figure 2 of the Fall 2025 Engineering Inspection Report, to prevent erosion and infiltration. The capped areas were mowed again on June 29, 2026. Mowing of the capped areas generally occurs quarterly. The photographs below show the capped landfill areas as of July 14, 2026.

Closed Cell



Phase I Closed Cell



B. Responses to IDNR's Comments on the Spring 2026 Semi-Annual Engineering Inspection Report (Doc. 117132) Related to the Landfill Cap

EnviroNET submitted the 2026 Spring Semi-Annual Engineering Inspection Report on behalf of Continental on April 15, 2026 (Doc. 116888). Three of IDNR's comments on that report relate to the landfill cap and are addressed as follows:

- 1. In general, the report was silent on the action items and schedule outlined following IDNR's review of the Fall 2025 Report. For ease of reference, a portion of the prior email thread is included below. Please provide an update on these action items by June 1, 2026, and include these updates in future inspection reports.**

As described in Section I.A. above, in January 2026, Continental placed topsoil on Cap Area 1 to fill in the area. Cap Area 1 was mowed and reseeded on May 22, 2026. Continental has not observed ponding at Cap Area 2. Continental will continue to reseed and mow all capped areas to ensure full vegetative cover.

Future landfill engineering inspection reports will address items 1 (regrade Cap Areas 1 and 2) and 2 (maintain full vegetative cover on the capped areas) from the Fall 2025 Engineering Inspection Report. As discussed in Section II.A.1 and 2 below, items 4 and 5 relate to the leachate collection system, and the proposed changes to the drainage pipes have been made. Continental will continue to update the IDNR on the jetting of the system.

- 2. Photos 10 and 14 show ponding in what appears to be the active fill area, which is not allowed. Please advise how this will be resolved and by when.**

The area depicted in photos 10 and 14 do not have ongoing ponding. Continental is working to identify when there is ponding and assessing options for eliminating the intermittent ponding at the base of the Active Phase II Cell. As that evaluation continues, Continental will provide an update to IDNR with the selected option by September 30, 2026.

- 3. Photo 16 shows a bare area. However, Section 2.1 states there were no areas of bare or exposed soil. Please address this discrepancy.**

Photo 16, taken on March 12, 2026, shows topsoil that was placed on Cap Area 1 on January 12, 2026 (Doc. 117197). Photo 16 also shows dormant vegetation in the foreground (i.e., the planted vegetation is alive but not growing due to winter conditions). Cap Area 1 was mowed and reseeded on May 22, 2026 (Doc. 117197) and is no longer bare.

The following photograph, taken at roughly the same location as Photo 16, shows this area of the Phase I Closed Cell as of July 14, 2026.



II. LEACHATE COLLECTION SYSTEM

This section addresses the IDNR's comments concerning the leachate collection system described in the December 22, 2025, comments on the Fall 2025 Engineering Inspection Report (Doc. 115273), the May 14, 2026, comments on the 2026 Spring Semi-Annual Engineering Inspection Report (Doc. 117132), and the May 14, 2026, comments on the 2025 Annual Reports (Doc. 117124). We also attach the Action Plan requested in Doc. 117124 to this letter.

A. Responses to the IDNR's Comments on the Fall 2025 Engineering Inspection Report (Doc. 115273)

Two of Bowman's recommendations in the Fall 2025 Engineering Inspection Report (Doc. 114639) – #4 and #5 – relate to the landfill's leachate collection system. The status of both action items is as follows:

- 1. Fit leachate drainage pipes with discharge fittings to allow hose connection during maintenance.**

Two lateral drains, one serving UL-2 and the other UL-3, discharge on the west side of the clay berm at the base of the Active Phase II Cell. Continental installed a PVC pipe on each lateral drain to extend the outlet. A wye-style fitting was then connected to the end of each drain, allowing jetting access through one branch of the wye while directing leachate flow through the other.

Seneca Companies Waste Solutions LLC visited the Continental plant on May 21, 2026, to review the engineered fixtures and assess the jetting approach. On June 26, 2026, Seneca returned to the facility and jetted the lines, resulting in the disposal of approximately 2,700 gallons of jetting and water and leachate. Additional information, including a picture of the fixtures, is included in Continental's July 2026 Quarterly Status Report (Doc. 117460). Seneca will be coming onsite to jet the lines again in the coming weeks.

2. Install engineered fixtures to contain leachate/jetting water mixture during jetting the drain lines.

See response to Section II.A.1. above.

B. Responses to IDNR's Comments on the Spring 2026 Semi-Annual Engineering Inspection Report (Doc. 117132)

Two of IDNR's comments on the Spring 2026 Semi-Annual Engineering Inspection Report relate to the leachate collection system. Responses to those comments are as follows:

1. Photos 5 and 6 show drainage pipes, and Photo 6 appears to have a missing cap. We assume these are cleanouts for the leachate collection system. Please confirm or correct the assumption and clarify whether the missing cap is a concern.

Yes, Photos 5 and 6 show one of the cleanouts for the leachate collection system (the pipe with the yellow cap). The pipe on the left in Figure 6 is not a drainage pipe and is not connected to the leachate collection system, so it does not require a cap. Since the inspection, Continental removed this component and it is no longer present.

The photograph below shows how the drainage pipe appears as of July 14, 2026. The blue nozzles are used to close and open the pipe.



- 2. Photo 13 refers to “pushing” leachate to the active area. It is assumed to be referring to “pumping” leachate for recirculation. However, as noted in recent correspondence, recirculation cannot commence until the persistent leachate head issues are resolved.**

Photo 13 in the 2026 Spring Semi-Annual Engineering Inspection Report shows the leachate sump and associated piping that “pumps” the leachate to the top of the Active Phase II Cell for spraying on the active area of CKD disposal to control dust and evaporation. Both activities are authorized by Special Provision 2.b. of Permit No. 82-SDP-16-97P (“Leachate collected from the leachate control system shall be used or treated in one of the following manners: 1) sprayed onto the active area of CKD disposal to control dust; . . . 3) evaporated . . .”), and have been authorized since the first landfill permit was issued on August 25, 1997.

Continental does not “recirculate” leachate as the word is traditionally used in the waste industry to mean the process of collecting leachate within the landfill and pumping it back into the waste mass to accelerate solid waste decomposition.

C. Responses to IDNR's Comments on the 2025 Annual Reports, including the Leachate Collection System Performance Evaluation Report (Doc. 117124)

This section responds to IDNR's comments in its May 14, 2026, letter relating to the leachate collection system (Doc. 117124).

1. Provide summary of procedures and/or systems in place to prevent overtopping of the lift station due to power failure.

The lift station pump is powered by an array of six 245-watt solar panels. To confirm the pump remains operational at all times, Continental maintains remote monitoring capability that allows personnel to verify pump status and system performance without requiring an onsite visit, supplementing this with daily physical inspections of the lift station to visually confirm proper operation, check for leaks or blockages, and verify that the sump level remains below the high-level set point.

During winter months, freezing temperatures can affect the exposed piping and stagnant water within the lines connecting the solar-powered pump to the sump. As a precautionary measure, Continental utilizes a portable trash pump during the winter months to manually evacuate the sump, when needed, ensuring that leachate is removed on a controlled basis.

Taken together, the solar power supply, remote monitoring, daily physical inspections, and the seasonal manual pump-out procedure form a system that is designed to ensure continuous leachate removal from the lift station to prevent overtopping.

III. GROUNDWATER QUALITY

A. Groundwater Flow Direction

In addition to the responses provided above, Continental would like to provide additional information on some of the other items IDNR discussed in the May 14, 2026 letter to ensure there is comprehensive understanding of the current dataset, ongoing monitoring, and conclusions derived therefrom.

In its May 14, 2026 letter, IDNR states that the groundwater flow directions are highly variable. This has been our experience, as well. However, to better understand groundwater flow directions, Continental has been collecting additional and more specific groundwater flow information for years. This shows, at a high level, that groundwater flows east to west within the Middle Groundwater Bearing Zone ("Middle GBZ").

In addition, as IDNR is aware, Continental has committed to collecting more frequent groundwater level measurements using In-Situ transducers and will generate more frequent groundwater flow maps moving forward to ensure we have adequately captured seasonal or other variability. Continental is planning to generate maps that represent average monthly

groundwater levels. In addition, Continental recently converted MW-2CR to a groundwater well and the early data shows east-to-west flow within the Middle GBZ. This data and related hydrographs will be provided in Continental's 2026 Annual Water Quality Report.

B. Modeling

Continental disagrees with IDNR's statement that the 2025 Annual Water Quality Report "implies that the horizontal elevation(s) of the stope and associated geologic layers . . . may not have been adequately documented." The spatial extent of the stope is defined off the basis of a map of the stope that was extracted from the Site Assessment Plan for the Mine Stope submitted by Linwood Mining and Minerals Corp. ("Linwood") on October 23, 2023 (Doc. 41309 at Figure 1). The elevations of the top and bottom of the stope are based on direct measurements taken from wells MW-2CR and BMW-24-03. The geologic layering stems from detailed boring logs collected in support of the mining operations at Continental and from published borehole logs from the Linwood property.

With regard to modeling, in the 2025 Update to the Remedial Action Mitigation Plan (Doc. 116024 at pg. 30), Continental proposed development of a 3D geological conceptual model that depicts the spatial relationships between the geologic layers; the extent, top, and bottom of the stope; and the extent, top, and bottom of the CKD bodies. This is underway and we anticipate completing it sometime in Spring 2027.

C. Chemical Composition of CKD versus LKD

Continental is concerned with your statement about the similarity or dissimilarity between CKD and LKD and may address this point in future IDNR submittals.

D. Liner

With respect to the liner, the existence of a significant vertical hydraulic gradient between the upper and lower leachate collection zones strongly indicates that the liner is effectively preventing water from moving between the two zones. However, at present, we do not understand the mechanism for water to get into the lower leachate collection zone. In the Action Plan, Continental proposes draining the lower leachate collection zone and monitoring to see how quickly it comes back and from what direction.

Brian L. Rath, P.E.

July 15, 2026

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Sincerely,

Stinson LLP



Brittany A. Barrientos

BAB:sls

Enclosures: Leachate Collection System Action Plan

cc: Bill Hilger, Environmental – Public Affairs Manager, Continental Cement
Claire Wilson, Plant Manager, Continental Cement
Todd Kincaid, Geohydros LLC