



January 7, 2026

Minnesota Pollution Control Agency
Hazardous Waste Permitting
520 Lafayette Road North
St. Paul, MN 55155-4194

Re: Permit Modification Request
Hazardous Waste Disposal Facility No. MND985668342 (Lagoon No. 3)
12th Street North at 7th Avenue North
Sartell, Minnesota

To Mr. John Chikkala:

On behalf of the Co-Permittees, City of Sartell and Ballantyne Legacy Holdings, LLC, Braun Intertec Corporation (Braun Intertec) prepared this Permit Modification Request for the Hazardous Waste Disposal Facility No. MND985668342 (Lagoon No. 3) located at 12th Street North at 7th Avenue North, Sartell, Stearns County, Minnesota (the Site). Since November 2018, the Site has been conducting quarterly compliance monitoring. This Permit Modification Request has been prepared in accordance with the provisions described in Part 5.1.88 of the Hazardous Waste Land Disposal Permit Number MND985668342 (Permit) issued on April 8, 2022, and modified on July 13, 2023 to request the Site be returned to a semi-annual detection monitoring program.

Site Background

According to page 5 the Permit:

Item 8. Given exceedances at Lagoon No. 3, Minnesota Pollution Control Agency (MPCA) determined that the Co-Permittees would need to increase monitoring and as described in the MPCA's August 30, 2018 letter, required the Co-Permittees to initiate compliance monitoring as required under Minn. R. 7045.0484, subp. 12.G as described in the MPCA's August 30, 2018 letter to the Co-Permittees.

Item 9. Prior to November 2018, concentrations of dissolved cadmium remained below the MDH health risk limit and maximum contaminant level. From November 2018 to April 2019, there have been four reported consecutive samples collected at the downgradient compliance well P-9R by the Co-Permittees, on November 15, 2018, January 11, 2019, February 27, 2019 and April 19, 2019, all of which exceeded the MDH health risk limit for dissolved cadmium. Consequently, as required under Minn. R. 7045.0484, subp. 13.G and H, the Co-Permittees were moved to the corrective action program under Minn. R. 7045.0484, subp. 14. Since April 2019, cadmium has not been detected at well P-9R at concentrations at or above the MDH health risk limit.

Item 10. The Co-Permittees may not terminate corrective action measures unless they can demonstrate that the groundwater protection standard has not been exceeded for a period of five (5) consecutive years at any monitoring well from the date of the last exceedance.

Proposed Permit Modification

Dissolved cadmium has not exceeded the Groundwater Protection Standard (GPS) since April 2019 at the Site. Therefore, in accordance with the Permit, it is herein requested that the Site be transitioned back to a detection monitoring program reducing the frequency of groundwater monitoring from quarterly to semi-annual. If approved by MPCA, semi-annual groundwater monitoring events will occur in April and October 2026.

General Remarks

If you have questions regarding this letter, please call Brayden Kuester at 920.889.2229 and Steve Jansen at 612.599.2219.

Sincerely,

Ballantyne Legacy Holdings, LLC
Co-Permittee



Lindsey Nichols
Corporate Environmental Manager

City of Saretell
Co-Permittee



Anna Gruber
City Administrator