Statement of Basis

Permittee: Twin City Tanning LLP

Facility: Twin City Tanning LLP, 501 Malden St, South Saint Paul, Minnesota 55075-5936, Dakota County

Permit Number: MN0068411

Date: April 30, 2026

Purpose

This document serves as a resource that describes and explains the rationale for the permit requirements.

Description of permitted facility

The principal activity at the facility is the processing of cattle hides into chrome tanned leather. The source of the facility's makeup water is from the South St. Paul municipal city water supply at a maximum rate of 500,000 gallons per day. The facility uses approximately 175 million gallons of water annually to facilitate the production process.

The industrial by-product (IBP) is generated from wastewater pretreatment. Waste from washing cattle hides are routed through a clarifier. Two main wastewaters are produced, which are either treated in the sulfide oxidation process, or are treated for chrome recovery. Wastewater entering the sulfide oxidation process contains dirt, blood, salt, proteins, sodium chloride, sulfides, sulfates, liming agents, calcium hydroxide and low pH sulfuric acid from the pickling process. The IBP for land application is the result of the pretreatment of wastewater from the sulfide oxidation process. None of the wastewaters containing residual chrome from the tanning process are discharged into the pretreatment system from where the IBP is generated.

Solids from the sulfide oxidation process are periodically removed, pH adjusted to lower pH prior to land application, and land applied at agronomic rates during the cropping season. The IBP is land applied continuously throughout the year typically at rates of twice per day, up to four times per day and land applied with a tanker truck by a licensed applicator within two hours of leaving the facility. If the facility is not able to apply their byproducts, it is discharged to the municipal wastewater treatment system, Metropolitan Council Environmental Services (MCES) - Metro Plant. Prior to 2008, all IBP was discharged to MCES without adverse impact.

There are two indoor 10,000-gallon tanks that store the solid material before it is transferred directly from the storage tanks to the tanker trucks for transport to the land application site.

Sanitary waste is sent directly to MCES and is not covered by this permit.

General information

The permit is based on an SDS permit application dated September 20, 2017, and additional documents found in the administrative record.

The primary reason for reissuing the permit is due to permit expiration. This SDS permit does not allow for the discharge of any wastewater to surface waters.

Significant changes from the previous permit

The draft permit contains the following changes from the last issued permit:

- Added PFAS sampling once per year.
- Other IBP parameters now required once per month.

Special conditions

- Submit site notification forms for land application sites.
- Submit a Sampling, Analysis and Field Equipment Calibration Plan by 60 days after permit issuance.
- Submit an IBP Annual Report by December 31 of each year.
- Submit a PFAS Source Identification and Reduction Report by 180 days prior to permit expiration.

Waste stream stations

Limits and monitoring requirements for waste streams are assigned to ascertain a waste stream's impact on wastewater treatment processes, another treatment facility, and/or land treatment/discharge sites. Requirements are based on MPCA sampling policies and/or state health requirements.

WS 301

This permit contains one waste stream, which has been assigned a waste stream station for monitoring and reporting purposes. The IBP (sulfide oxidation pretreatment solids) will be monitored as WS 301. The limits and monitoring section of the permit outlines the associated requirements for the waste stream.

Per- and Polyfluoroalkyl substances (PFAS)

Per- and polyfluoroalkyl substances (PFAS) are a group of more than 5,000 human-made chemicals that do not break down over time. They are a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom. Their extreme resistance to degradation in the environment and resistance to destruction in wastewater treatment plants, landfills, and incinerators has led to the nickname "forever chemicals."

Many PFAS are known to be health hazards to humans. Several specific PFAS have been linked to increased risks for cancer, liver disease, immune system disfunction, and other negative health impacts. PFAS can also negatively impact aquatic life and wildlife.

The draft permit includes effluent monitoring for PFAS parameters at a frequency of once per year.

Land application stations

LA 302- LA 487: IBP land application sites

The monitoring requirements have been updated to be consistent with changes made to the IBP general permit in January 2019.
Thirty-six land application sites were used during the previous permit term for which we have no Site Notification Forms. See Appendix B of the draft permit. The facility is required to submit these notification forms or these sites will be inactivated.

Industrial stormwater management

On June 1, 2025, the Industrial Stormwater (ISW) General Permit (MNR050000) was reissued. This general permit addresses stormwater discharges associated with industrial activity for facilities that discharge stormwater to waters of the state, including Municipal Separate Storm Sewer Systems. The general permit also addresses stormwater discharges associated with industrial activities at facilities that provide onsite infiltration of industrial stormwater discharges associated with the facility.

Industrial facilities with a Standard Industrial Classification (SIC) of 3111 are required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for industrial stormwater disposal.

This facility has applied for and obtained a Certification of No Exposure with the Industrial Stormwater Program in accordance with ISW General Permit.

The provisions for runoff control are based on Minn. Stat. ch. 115 and state WQS, according to Minn. R. 7001.1080, 7050.0210 and 7050.0220, and 40 C.F.R. § 122.26. The best management practices requirements are based on Minn. R. 7001.1080.

Land application of IBP

The IBP chapter in the permit has been updated to be consistent with changes made to the IBP general permit in January 2019.

IBP waste stream station and land application station sampling requirements, applicable limits, and application restrictions are listed in the appendix section of the permit. There are no electronic Discharge Monitoring Reports (eDMRs) for these stations; however, the IBP sampling results, IBP application rates, and soil sampling results are used to complete the IBP Annual Report that is due on December 31 of each year following permit issuance. The monitoring requirements have been updated to be consistent with changes made to the IBP general permit in January 2019.

Due to the variable nature of the IBP, the Sampling, Analysis, and Field Equipment Calibration Plan needs to be updated to describe how representative IBP samples will be collected.

Total facility requirements

Certified laboratory

Effective January 1, 2013, all Minnesota municipal, county, or industrial laboratories that analyze wastewater per Clean Water Act requirements must be certified by the MPCA or the Minnesota Department of Health. Information regarding MPCA laboratory certification is located on the MPCA website at https://www.pca.state.mn.us/business-with-us/mpca-laboratory-certification. If there are any questions concerning the MPCA laboratory certification, please contact the MPCA at 800-657-3864 or by email at qa.questions.mpca@state.mn.us. Commercial laboratories doing these analyses must maintain Minnesota Department of Health certification.

Construction projects

Separate written approval of plans and specifications, in addition to the final issued permit, must be obtained from the MPCA before construction can begin for any planned construction projects.

Additional requirements

Minnesota NPDES/SDS Permits contain certain conditions that remain the same regardless of the size, location, or type of discharge. These standard conditions satisfy the requirements outlined in 40 C.F.R. 122.41, Minn. R. 7001.0150, and Minn. R. 7001.1090. These requirements cover a wide range of areas, including operation and maintenance, outfall erosion control, best management practices, equipment calibration and maintenance, monitoring and analysis, recordkeeping, reporting, upsets,

bypass, solids handling, changes in operation, inspections, records retention, general prohibitions, duty to notify, compliance responsibilities, compliance/noncompliance notification, entry and inspection, and permit modification and reissuance.

Term of permit

The effective date of the permit and the permit expiration date will be determined at the time of issuance.

The MPCA has made a preliminary determination to reissue this SDS permit for a term of approximately five years.