

Sheri Smith

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Comments on Major air permit
Submitted by Sheri Smith, Resident of White Bear Lake area

First, I want to thank MPCA for the opportunity to submit comments on this very important Major air permit for Water Gremlin. I also want to recognize the support, involvement and time commitment from MPCA on this matter – and say it has been extremely meaningful to the White Bear Lake area community.

Over the last 3.5 years, I've worked hard to understand the issues and stay informed with respect to Water Gremlin. I congratulate you for having successfully drafted a strongly regulated permit. And though I could submit pages and pages of comments relating to the need for a strongly regulated permit, and an even stronger need for a strictly enforced permit, I'm choosing to limit my comments to a single point. A simple and single point that matters most to me.

I am asking that MPCA stand firm on the t-DCE limits noted in the draft permit.

This Company, Water Gremlin, cannot be trusted.

I understand Water Gremlin is lobbying to increase the t-DCE limits. Citing, among other things, the need to use a higher amount, during the 'transition' period as they pull down t-DCE use and move to another process (UV coating). I also understand they are requesting a permanently higher amount of t-DCE – indicating their research into safe limits differs from the Minnesota Department of Health recommendations published in April of 2020. While t-DCE hasn't been well-studied, we do know it is very similar to the now-banned chemical TCE.

On behalf of myself and the communities surrounding this plant, I ask that you NOT cut Water Gremlin any breaks with regard to limits on t-DCE. Citizens of the White Bear Lake area are still trying to understand the cumulative impact of 24 years of toxic pollution this Company illegally introduced into our air, water and soil. Water Gremlin has a history of saying one thing – and doing another. Such as when they informed the MPCA in 2018 they would be scaling back their operation due to malfunctioning pollution control equipment. In fact, they actually increased their production. In that one year alone (2018) they emitted 120 tons of TCE on a 9.5 ton permit. Shameful. There are many other examples that demonstrate their lack of ethics and outright dishonesty. In a letter that WG surreptitiously left on tables at the July 28th MPCA community meeting – it appears Water Gremlin is attempting to re-write history. They're characterizing many of their actions over the last 3.5 years as voluntary when in fact their actions were mandated by MPCA through a Stipulation Agreement and Administrative Order. Again, the bottom line here, Water Gremlin cannot be trusted.

As one of those closest to this issue, I believe the Company continues to look for ways to return to their habits of dishonesty -- with profound disregard for the health of community members, health of workers at the plant and for the health of the environment where they operate. We continue to

hear they are waiting for both MPCA and NCCG to get tired of watching and monitoring and just 'go away'. This belief is solidly rooted in reports we hear from within the plant. And from what we see happening in the community.

In conclusion, I am personally very impressed with the level of detail in the draft permit, and in particular, I'm impressed with the level of specificity around regulation of Water Gremlin.

This community and me as an individual citizen are counting upon MPCA to strictly and aggressively enforce the permit as written.

Thank you.

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