

Colleen Osborne

I have ongoing concerns with Water Gremlin's ability to operate responsibly and safely. Without consequences or monetary deterrents, Water Gremlin will return to polluting our air, water and soil in the White Bear Area. Unannounced on-site inspections are necessary to ensure compliance. Inspectors need to talk with workers handling lead and hazardous chemicals to determine adequate and continuous training of workers. The inspection report needs to note the hazardous signage on lead and chemical containers and the improvements needed. The inspection report needs to be specific about what is expected and how to correct the deficit. (A paper sign taped to the container or hand written with a sharpie on the container is not adequate.)

Multilingual Staff training & Multilingual Hazardous Signage

To prevent noncompliance, training needs to be conducted as part of the pre-employment process. Water Gremlin developed audio and written training materials approved by Minnesota Pollution Control Agency (MPCA) and Minnesota Department of Health (MDH) need to be available in the top 5 languages in Ramsey County. (English, Hmong Daw, Mong Leng Hmong, Spanish and Somali)* Trainers and interpreters should have a good understanding of Water Gremlin's equipment, lead and chemical solvents with knowledge of federal and state hazardous waste, lead and emission standard requirements. A computerized training system would ensure consistency across languages and training sessions.

To ensure understanding a post training assessment needs to be given. 85% of the questions answered correctly will be considered the minimal passing level for access to Water Gremlin's equipment, lead and other hazardous chemicals. A database needs to be developed by Water Gremlin to ensure up to date training for all employees on a yearly basis. The date of the training, the trainers' names and sign in sheets with attendees signatures need to be maintained which could be part of a computerized training modules system developed by Water Gremlin. These material will be available for review during on-site inspections. Ongoing access will given to MPCA and MDH permit enforcement staff to ensure compliance.

Training will be conducted yearly and when new equipment or chemicals are being introduced. New equipment, lead and chemical hazardous training materials will be reviewed for complete and accurate information by the MPCA and MDH before new equipment or chemical solvents are used at Water Gremlin.

Hazardous signage in English will be installed on new equipment and storage containers prior to use at Water Gremlin. When possible other languages will be included on the new equipment and containers. When only english is used, a permanent sign in the top 5 languages will be posted on the nearest wall or flat surface. Noncompliance will result in a monetary fine for each signage noncompliance noted in the inspection.

MPCA enforcement staff will review training materials and training records twice a year for compliance and accuracy. Discrepancies will be communicated in writing to Water Gremlin with the necessary corrective actions by a date determined by MPCA enforcement staff. A copy of this written notice will be filed at MPCA with a copy given to each of the joint powers (MDH and

Ramsey County).

I am confident that Water Gremlin will have no problem meeting the new training and signage requirements. I noticed the 999 page comment from Mr. Bradley Hartsell. I believe if Water Gremlin can delete and replace one word multiple times in the draft permit they have the resources to ensure adequate training for all staffs in multiple languages.

The Public Relations staff that wrote Mr. Hartsell's July 28th letter that I picked up at the MPCA meeting, could foster community trust by give more complete details of the improvements and a dateline for future UV equipment installations. Don't request a 'slightly' higher allowance. If Water Gremlin spent more effort on improving their image through meeting face to face with the community and answering questions rather than hiring lawyers and PR staff to spin the facts in a letter the community could take a deep breath of fresh unpolluted air.

MPCA and MDH don't back down, I support your draft permit and believe it needs to have severe monetary deterrents spelled out for Water Gremlin. These fines should be used to hire more inspectors to ensure compliance 365 days a year.

*2018 Ramsey County Community Health Assessment - Immigration & Growing Diversity, 2020 US Census