

Ann Coffey

Water Gremlin Permit Response 8/20/22

I have lived in White Bear Township near Water Gremlin for 30 years. My health has personally been affected by their long term illegal emissions of toxic chemicals. I know family members, and friends in the immediate area and heard their stories. They are living and dying with the effects of this company. And now MPCA, Water Gremlin is asking you for another permit-which in their hands is a loaded gun- to kill more- men, women, and CHILDREN in our residential area. To destroy the environment, to harm and kill animals. Water Gremlin was trusted before to be responsible, moral, and legal. They FAILED.

The mission of MPCA is to PROTECT and IMPROVE the environment and human health.

Therefore, I submit to you my responses:

1) The ambient air concentration of T-DCE must follow the MDH developed 2020 RAA health benchmark to stay below 20 ug/m<sup>3</sup>. Please do not INTENTIONALLY expose us to more-no matter how Water Gremlin wants to spin it. T-DCE is similar in structure to the TCE our neighborhood was poisoned with for decades. T-DCE is not well studied. But it IS on the list of products the EPA considers MOST CONCERNING.

2) Water Gremlin must never again be allowed to have more than a 5 year permit. This neighborhood has already been exposed to too much by this company. Look at the history. The largest civil penalty ever given by MPCA. One of the WORST POLLUTERS IN STATE HISTORY. Do not let history repeat itself. Strict follow up is required by MPCA.

3) Community notification needs to happen immediately when MPCA is aware of any emissions levels above the allowable permit levels.

4) Water Gremlin needs to notify MPCA of emission level above permitted levels, malfunctioning equipment, chemical leaks, -anything out of normal range- versus documenting it themselves and being done with it or someone "fixing" it and being done with it. Look at the history.

5) I disagree with the reduction of the air monitoring. This permit discontinues the monitoring except the North and West side of the building. It also reduces the

monitoring to only once every 6 days (vs once every 3). Not acceptable to protect human life and environment from this serial offender.

6) I disagree with the "facility" (Water Gremlin) being responsible for managing each (air) monitor's operation, maintenance, record keeping, and reporting of results.

7) I strongly disagree with ever discontinuing the PM monitors.

8) Disagree with Water Gremlin even suggesting that the past agreements/orders be terminated. Apparently they have not learned from the past.

9) Do not remove the air monitor from the battery terminal coater stack.

10) This facility needs very frequent (remember one of THE WORST POLLUTERS IN MINNESOTA HISTORY!!) inspections by very qualified inspectors who will catch their "mistakes". I request 4 times per year scheduled plus unscheduled also. Water Gremlin should pay for the cost of this.

11) Absolutely no modifications should be allowed on emission control equipment by in house personnel. Any modifications whatsoever (by outside technicians, etc., need to be prior approved by MPCA.

12) Please increase annual testing on coating rooms to ensure all VOC solvent vapors are being vented to the stack. Once a year is not enough! Look at the history. Sub slab contamination has also occurred at this facility among all the other violations. How much time does it take to do this enclosure test? How much money does it cost? How much money is our environment worth? What about one life?

13) The vapor remediation system requirements must remain in place.

14) Please check employee and their children's lead levels on a regular basis. Look at past history of lead tracking outside of facility and lead poisoning of employee's children.

15) I disagree with the 365 day rolling sum model for allowable emissions levels. We inhale these chemicals daily. The 24 hour limit should be used in addition to the yearly level. This is a very compromised population and permit regulations should be site specific.

16) Please allow the public a short (? 10 day) comment period after the many revisions are semi worked out with Water Gremlin.

Thank you,  
Ann Coffey