

Roger Bjork

My general comment is to reinforce the need for stringent monitoring for compliance of all provisions of this permit. That is especially true for all time deadlines in the permit. Water Gremlin has previously failed in regard to many deadlines and often asked for time extensions that resulted in significant delays.

My interest in this permit is as a resident of White Bear Township living within a few yards of the area of concern. I remain concerned about the health of township residents and the environment we want to preserve.

1. Continuous emission monitoring system should remain in battery terminal post coating stack.
2. Addition of ambient monitoring for VOC, especially t-DCE, should remain for life of this permit, not just 2 years. This will better protect human health and better inform the next permit issuance.
3. Keep requirement for daily record keeping for voc coating, waterbased coating and uv coating usage. Maybe relax this requirement for next permit cycle, but for now daily record keeping seems crucial for this company given their long record of non compliance.
4. section 5.1.6 Please explain "may use other credible evidence to establish compliance...". This seems too vague. What other evidence is deemed credible?
5. section 5.1.16 Maintain strict adherence to performance test schedules. The company has failed in this regard in the past.
6. section 5.1.26 Notification of deviations endangering human health should be within 24 hours or as soon as detected, not 2 days. This implies an urgent condition requiring quick response.
7. Adhere to emissions limits for t-DCE. It's critical that t-DCE emissions be less than human health values established by the Department of Health.
8. 5.1.53 Change "my" to "by"
9. section 5.1.57 Require VOC ambient air monitoring for life of permit, not just two years. This will better inform the next permit and provide critical information for the whole 5 year permit cycle.
10. section 5.9.11 Adhere to monthly inspections for life of permit.
11. section 5.16.13 What is margin of error for calculation that established emission of 8.46 pounds of lead per year?

Finally, thank you for the chance to comment. I appreciate the time and effort that was required for this long and detailed permit. Please commit to the level of t-DCE emissions as specified by the Department of Health. I recommend seeking input to support this level from the Environmental Protection Agency. Please be prepared for rigorous enforcement of this permit. The citizens of White Bear Lake deserve and expect this continuous scrutiny of this polluter.