



CONSERVATION
MINNESOTA

Minnesota Pollution Control Agency
c/o Jacobe Timler
520 Lafayette Road
Saint Paul, MN 55155

Friday August 19, 2022

Re: Public Comment on Water Gremlin – Air Permit

Conservation Minnesota is a statewide conservation organization working to protect the Minnesota we love for future generations. Conservation MN aims to find common-ground solutions to address our most pressing conservation issues, including mitigating the impacts of a changing climate and protecting the quality of our air in all communities. Today, we're writing to comment on the draft updated air permit for Water Gremlin.

In 2019 and 2020, Conservation Minnesota worked diligently with the White Bear Lake area community and its legislators to pass the Trichloroethylene (TCE) ban through the MN State Legislature. While ultimately successful in 2020, the time spent with community members has shown the pervasiveness that this issue still presents in their lives, seen through an erosion in public trust and public health.

After the discovery of Water Gremlin's egregious over-emitting of permitted Volatile Organic Compounds (VOC's) into the surrounding air, it will take a long time to build back public trust in this company. We ask that Water Gremlin, with the help of the MPCA, become an industry leader and move away from the use of VOC's, including that of the chemical t-DCE, which is used as a TCE replacement. We also ask that Water Gremlin find an alternative to lead in its sinker weights and munitions. There is no safe level of exposure to lead, and the use of lead tackle and ammunition results in the poisoning of wildlife and the eventual exposure of Minnesotans to lead contamination. Such bold action is necessary to demonstrate a commitment to improved management.

We encourage the company to lead its industry and rebuild community trust, build a safer and healthier workplace, and resist an appeal of this draft permit. The MPCA, with community input, has crafted a draft permit that allows more frequent air monitoring and on-site visits and will persist in doing so until clear cultural and structural changes have been made within the company, including a reduction in emissions and full movement away from VOC's. We support the changes included in the proposed permit, particularly the expiration of the permit in five years. However, our organization also supports meaningful additions to the permit, such as extended sunset provisions, to ensure long-term accountability.

Ultimately, we want less toxic pollution to impact our communities and believe this is a necessary step toward investment in community accountability and industry change. We thank the MPCA and the White Bear Lake area community for the tireless and diligent work to protect Minnesota's air and water quality.

Sincerely,

Keely Cervantes, Program Manager
Conservation Minnesota