

Kelly Tapkan

Thank you to the MPCA and the MDH for their on-going work on this air permit and the opportunity to comment.

My home is located within 1/4 mile of Water Gremlin. I have ongoing concerns about the ability and intention of Water Gremlin to operate its facility safely and responsibly.

It is critically important that Water Gremlin continue to be monitored throughout the duration of the 5-year permit. Their history of egregious violations in air pollution, hazardous waste, facility safety and cleanliness lead me to believe that the likelihood of this company cutting corners and polluting again is high. It is very important that this permit be strong, that the consequences be clear and that the mechanisms to address any violations be defined and able to be implemented quickly.

Key draft permit response points:

- 1) The current limit in the Draft Permit of 32.6 tons per year of t-DCE emissions should be maintained with no change. This will allow the ambient concentration of t-DCE to remain below the MDH developed, 2020 Risk Assessment Advice (RAA) chronic inhalation health benchmark of 20 $\mu\text{g}/\text{m}^3$.
- 2) Continued VOC ambient air monitoring both at the stack and at the perimeter of the property for at least the duration of the 5-year permit should be included.
- 3) Ongoing monitoring of the pollution control equipment is also important. Water Gremlin has a clear history of operating with malfunctioning or non-functioning pollution control equipment. In addition, if equipment is not functioning properly and the company is emitting regulated substances exceeding permitted levels, there needs to be a clear path to shut down operations quickly. Operations should also be shut down if required testing is not completed on-time. Noted and appreciated in the draft permit are the significantly improved compliance and monitoring requirements and the improvements in the requirements for pollution control equipment.
- 4) Regular on-site inspections are important in addition to self-reported record keeping and air monitoring.
- 5) The community should be notified immediately if emissions levels exceed permitted levels.

Air emissions violations—particularly for VOCs such as TCE and t-DCE that breakdown quickly in the air and in the human body quickly, are interesting. It is difficult to prove a direct correlation between excessive emissions and health issues. Yet there are many people in this community who believe, as I do, that the excessive emissions of Water Gremlin over decades have impacted people's health and/or immune systems. It is imperative that this permit be as strong and enforceable as possible to protect community members moving forward—the community of people that have been impacted by past violations. This is particularly important because of the length of time during which the past violations occurred.

Sincerely,

Kelly Tapkan