

September 12, 2011

NWDA Health & Environment Committee GNA Minority Report

Overall, the GNA is a good step in a series of steps taken by Esco over the last fifteen years toward cleanup of air emissions coming from the Esco facility. Many of the recommendations from ERM, the engineering firm hired by Esco to audit the plant and Jim Karas, an independent auditor recruited by our committee and hired by DEQ to independently audit Esco, have been agreed to by the company in the current draft of the GNA.

However, Jim Karas' recommendation to, "Add local capture at all pour points at the Main Floor and Slinger Bay" is not an agreed item in the current GNA draft. Slinger Bay is the large rectangular building across from the Distillery on 24th and Vaughn Streets. A variety of pours occurs on the floor in different parts of that building, and the emissions are completely uncontrolled. They exit the building through four large vents in the roof with large fans beneath. Jim Karas spoke to me recently and suggested a portable hood could be designed to move about the room and cover the work. Emissions would go into a baghouse, perhaps an existing baghouse.

The NWDA Health and Environment Committee feels that leaving this building uncontrolled is not acceptable in the agreement. Nearby neighbors have suffered for years from fugitive emissions, many of which come from Slinger Bay. We feel that since negotiations are proceeding to put controls on emissions from the plant, Slinger Bay should be included. The current proposal to study it for a further five years to find a solution is an unacceptable delay to solving a longstanding problem for the neighbors.

The other problem with the current GNA draft is there is no provision for fence line monitoring, which will be the means by which neighbors can monitor the air to see what emissions are coming from the plant during the next five years of the permit. Jim Karas told us that it was very important to be able to monitor the plant to check results of the new control equipment.

Esco has stated that they do not want fence line monitoring. We feel that a current idea for continuous dust collection from neighbors' porches under the direction of a reputable scientist chosen by the neighbors and paid for by Esco would also meet our need to know about emissions continuing to come from the plant.

The GNA is a legally binding agreement with Esco, which in current form binds NWDA from public dissent should future problems arise. Esco is about to go public, and much is not known about future management. Therefore, it is important during this negotiating period to agree on a GNA that meets neighbors' needs, as well as those of Esco. For this reason we submit to NWDA this minority report, which we hope the Board will support.

Sharon Genasci, Chair, NWDA Health & Environment Committee