

Neighborhood Advisory Committee
April 11, 2017

NAC members: Mary Peveto (NCA); Sharon Genasci, NWDA; Bob Holmstrom, NWDA

Not Present: Tom Giese (NCA), Bob Amundson (NWDA)

ESCO Representatives: Austin Peterson, Travis Quarles

Other Attendees: ESCO: Shannon Huggins

Shannon Huggins called the meeting to order at 10:20 A.M.

Main Plant Decommissioning

Travis Quarles shared that ESCO has a great deal of experience decommissioning foundries, globally, and described the standard process that begins after operations shut down, indicating that this is the process ESCO is following for the Main Plant property. The decommissioning is performed within local (DEQ) regulations. ESCO is currently in the phase that identifies assets to be recovered, and once this phase is complete it will auction the remaining equipment, likely sometime in June. Bob Holmstrom asked if the facility is shut down. Quarles confirmed that operations ceased Dec 21st, and distribution/shipping ended at end of March. A small amount of painting that can't be completed at Plant 3 is still being conducted at the Main Plant. Sharon Genasci asked what ESCO is painting, to which Quarles cited castings but indicated that moving forward, ESCO will have a system for painting at Plant 3. Other activities taking place as part of the decommissioning include sampling for hazardous materials. Though there is currently no defined plan for the plant, ESCO is emptying the buildings now. Genasci asked if there are plans for cleanup. Quarles said teams are assessing what material is located where, and then they will determine how it's cleaned up - all within DEQ's regulations. How the plant is cleaned up will depend on what the end-state of the plant will be; whether it will serve another industrial purpose or whether the buildings will be coming down will make a big difference in the clean-up. Not much is known yet, other than the fact that big-box retail and residential are not allowed in this zone. Genasci asked about the process and expressed concerns about contamination; Quarles said there will be a website set up within the next few weeks and this is where ESCO will provide updates on the decommissioning progress. ESCO will send NAC and NWDA the link.

Current Plant 3 permit status and plant emissions: Quarles explained that ESCO is currently still operating under an administrative extension of the current Title V air permit and that DEQ has indicated they will delay permitting sources like ESCO until new legislative rules are in effect. Bob Holmstrom asked whether ESCO will remain a Title V business with just Plant 3 operating; Quarles confirmed that the primary reason is CO, above 100 tons/year threshold. Genasci asked how long the delay will be, and Quarles reiterated until DEQ is finished rewriting the rules – most likely not until summer, 2018. The process for rule-making will include modeling sources. Quarles distributed a handout that showed ESCO Portland emissions in 2016 compared to February 2017 emissions. Significant reductions are evident. Genasci asked what accounts for the reductions to which Quarles stated it was due to the closure of the Main Plant. Holmstrom asked if there is any place where Plant 3 has increased emissions over the year; are there any new products moved to Plant 3 for production. Austin Peterson pointed out that Plant 3 is not a primary source for any of ESCO's products – Plant 3 produces primarily construction products, not mining products. Genasci asked why cyanide compounds are not reduced. Quarles indicated that cyanide compounds are primarily from Plant 3 binders. Genasci

asked what is in the Plant 3 binders and Holmstrom pointed out that all the items mentioned in handout are in the binders. Quarles explained that the binders contain a phenol formaldehyde resin that reacts when mixed with a catalyst, and then it is heated; the cyanide compounds come from combustion of the binders during pouring, cooling and shakeout. Genasci asked why ESCO hasn't replaced this with a different binder; ESCO experimented with new binders at the Main Plant. Peterson reminded Genasci that ESCO did change binders to a lower phenol binder in 2013 (GNA project was to reduce phenol by 35%, but reduced phenol by almost 70%). The constraint at Plant 3 is that the machines revolve around the current binder system. There are some binders based in animal byproducts, but there is not a net benefit; emissions are still a tradeoff. The new binder at Plant 3 is one of the best choices for air quality, the neighbors and ESCO. There was more discussion about phenol and binders; the fact that residences are building up all around the industrial sanctuary. Quarles encouraged NAC members to educate new neighbors about NAC meetings, invite them to attend to ask questions and seek clarification.

Chapman Monitoring data results: Quarles distributed documents from both ESCO and DEQ containing concerns each had about the report and data. ESCO asked DEQ if they would be willing to work on a revised report, addressing their concerns, to get it ready for public distribution. DEQ responded that they didn't have the resources to dedicate to this effort, but expressed (in a letter) concerns about the condition of the current report. Quarles reminded the NAC that DEQ approved the Chapman monitoring plan that John Krallman (NCA's original attorney) helped develop, but with caveats: 1) sampler should be higher flow, 2) data analysis that was discussed in plan was vague and needed clarification, 3) procedures for acquiring samples should follow DEQ's plan, but the report was missing some information. These were similar to issues identified by ESCO's consultant. The final report doesn't discuss the whole plan, what the results are, it is difficult to determine if the data is valid, and there is no conclusion. DEQ recommended restructuring the report. They noted that the way the average was calculated for the year didn't follow DEQ's method. Holmstrom asked if that would that move numbers up or down; Quarles said he did not know. Holmstrom said there weren't really any high numbers found for the whole time. Some were so low, so it was difficult to come to conclusion. Genasci said this is why they didn't want monitors at the school; not a good site for monitoring ESCO emissions. Quarles noted that the table in the report is missing data which is important (August 4th and Nov 8th). No one is sure why – whether this was PSU's decision or an oversight, or otherwise. Mary Peveto said there was a battery issue for a small time in August, but didn't think it extended to November. Quarles said there were some notes about temporary data omissions, but in this case it's almost an entire quarter missing from table and therefore presumably missing from analysis. Holmstrom said it is unfortunate, because also during that interval, there would likely be the highest reading. Genasci stated that the report seems inconclusive. Holmstrom asked what typical PM2.5 numbers are; Quarles said anything above 50 is considered "yellow," doesn't trigger DEQ notification. If it's over 100, that is when DEQ would issue bans, advisories. Typical is between 20 and 30. Holmstrom pointed out that only one data point in the report is over 20. Quarles said he hasn't done any correlation with this data and DEQ's air quality data. Holmstrom pointed out that this is only measured in one place for the whole city. Peveto indicated that more monitoring is happening now (throughout the region) but it is spotty. Genasci said it was a shame they can't use the report; it was a waste of time and money. Next time, it should be on the fence line.

ESCO/DEQ Communications: There were four communications, no deviations. (Documents presented to attendees.) Quarles stated that there are a small amount of parts that traditionally have been painted sometimes at Plant 3 (manually sprayed) or at Main Plant (dipped). Now that Main Plant is closed, ESCO is putting in a paint system in at Plant 3. Proposed potential emissions of 4.6 tons of VOCs. Holmstrom asked if the small painting really put 5 tons of VOC in the air; Quarles said there should be a reduction in emissions because paint that will be used has a lower VOC content than what is currently used. Genasci asked what the ingredients are, Quarles said it is a propylene glycol ether, water reducible paint, no HAPs. Holmstrom stated that they use much worse ingredients in other places. Genasci said it would be good to let the NAC know what is in the paint. Quarles said he will share the ingredient list with the NAC. Holmstrom asked if there have been any complaints about the paint and Peterson said not that ESCO is aware of. He pointed out that there are auto paint places in the neighborhood. Quarles reviewed other communication items, including the pollution prevention report. Annual Report: Peterson reviewed market conditions (flat), closures of several plants, reduced production – particularly due to closure of Main Plant. Genasci asked what emission reductions are based on, Quarles said they calculate emissions monthly based on production. GNA projects are a significant factor in emission reductions. Peterson reminded everyone that regarding Project 17: there was no need for the project since the Main Plant is shut down. Genasci reiterated her relief that slinger bay was shut down. Peterson reviewed the summary of complaints: most were relative to Plant 3 production. High-level trends dropped over time, while not sure exactly why complaints reduced (could be reduced activity, could be due to fatigue). Holmstrom said it was too bad building owners aren't required to let residents know how they can complain. Genasci said that DEQ has relied on citizen complaints to drive their activity. Peveto asked if ESCO was tracking where complaints are coming from, and Quarles stated that typically they are from two main clusters: A couple who lives in the Pearl, they usually are source for a few of the complaints, and a NW resident provides a handful of the complaints. Marshall, Johnson and 25th. General discussion about the many odors as you hike/run in forest park, but not all attributed to ESCO. Holmstrom said he ordered a device that tracks particulate data; he said that PM levels in China are typically in the 100s, but get up to 300-500.

Research and Development changes: Quarles reported that ESCO will expand the use of R&D at Plant 3; they have always done some there but now that Main Plant is closed, ESCO needs to invest in R&D here in PDX. No-bake mold is still in a controlled area. All will remain controlled similar to what they are now. No impact on tonnage. Peveto asked if the city has resolved zoning use issue, and Quarles confirmed that it appears so, particularly regarding the administrative offices south of Wilson.

GNA Negotiation: All agreed to hold until DEQ writes new rules. Genasci stated for Mary's benefit, having missed this portion of discussion that the permit probably won't happen for a year. Peterson said he didn't expect any tonnage changes. Holmstrom asked where ESCO still has large plants; Quarles answered Newton, Port Hope outside Toronto, Xuzhou, and Chile. Genasci asked if the new permits with new rules for glass manufacturing will apply to ESCO, and Quarles said they would not.

There was no new discussion, and the meeting was adjourned at 12:00PM.