

Neighborhood Advisory Committee
December 13, 2016

NAC members: NCA: Mary Peveto, Nick Caleb, NWDA: Bob Amundson, Bob Holmstrom

Not Present: Tom Giese (NCA), Aubrey Baldwin (NEDC), Sharon Genasci (NWDA)

ESCO Representatives: Austin Peterson, Travis Quarles

Other Attendees: ESCO: Shannon Huggins, Jeremy Pritchett

Nick Caleb called the meeting to order at 10:09 A.M.

Permit Status Update

Nick Caleb requested an update on the pending new air permit. Travis Quarles explained that ESCO has not received any response from DEQ since submitting the permit application last spring. Quarles added that permits for larger facilities are likely being delayed until the new rule making process is complete. Mary Peveto mentioned that NCA is aware of other permit holders experiencing similar delays. Bob Amundson asked if ESCO has any concerns regarding the delay in permit issuance. Quarles explained that ESCO would prefer to have the permit issued sooner but such delays are not uncommon and the delay doesn't affect overall operations. Amundson noted that the new Good Neighbor Agreement (GNA) will be delayed along with the new permit. Peveto expressed the value of the GNA becoming permit conditions. Quarles mentioned that the key GNA projects became permit conditions under the Title V operating permit in the form of the Best Work Practices Agreement. Caleb explained that we will continue to operate from the current GNA until the new permit and new GNA become effective.

Date of Closure

Travis Quarles provided an update on the timeline for Main Plant closure. Quarles noted that this week (Dec. 12 – 17) is the last full production week for melting, molding and pouring operations at Main Plant. Quarles added that the plant will most likely be melting, pouring, and molding the following Monday as well. Quarles noted that the commemorative last pour is scheduled for December 21st, in which ESCO employees will watch the final pour. Quarles further added that finishing operations (welding, grinding, and repair activities, etc.) will continue through January and that the Distribution Center will operate for a few additional months. Peterson added that the progress has been much faster than originally anticipated.

Amundson asked if ESCO will coordinate an effort to contain residual metal dust after the operations cease. Quarles explained that ESCO is just now beginning to develop decommissioning plans. The first goal was to reach closure and now ESCO is beginning to plan decommissioning. Quarles added that ESCO should have more information to report at the next NAC meeting regarding the decommissioning and demolition plans. Quarles mentioned that there will be plans to contain the dust and that ESCO will follow all applicable regulations. Nick Caleb asked which regulatory agency will oversee the demolition. ESCO representatives were not sure of the specific agencies that will oversee it. Amundson referred to memories of trace dust that was found along NW 25th Avenue. Amundson added that ESCO personnel were observed sweeping and hosing down the exit to Slinger Bay and it's possible that cars were

tracking the dust down 25th Avenue. Amundson further added that ESCO should make dust containment a primary focus. Caleb asked how the current schedule compares to the original July 1st closing date. Shannon Huggins mentioned that the July date was ESCO's early estimate.

Chapman Monitoring

Mary Peveto asked for feedback on the Chapman report and if there are any questions to relay back to Derek Espinoza. Peveto indicated that it's a valuable study demonstrating that Chapman School is being impacted. Amundson noted that the results for two metals were above the annual average, which is surprising considering the prevailing wind direction and wind speed. Quarles reminded the committee that the approved sampling plan included the opportunity for ESCO and DEQ to review the report to ensure accuracy and quality before it's distributed to the public. Quarles added that ESCO hired a consultant to review the report and the consultant identified significant gaps and missing information. Quarles promised that ESCO will submit a list of incomplete items and questions to the group. Peveto expressed interest in seeing the consultant's notes to compare with the study's QAQC plan. Quarles confirmed that the data gaps and questions will be shared with the group. Amundson expressed that the study provided a significant amount of valuable data, considering the cost. Peveto said that there are no legal issues with sharing the data with the public. Quarles mentioned that the data should be validated before being shared with the public, and ESCO is willing to have its consultant work with Linda George. Peveto explained that all possible resources were exhausted on this study, therefore, the study will have to stand on its own merit. Peveto added that she wishes to see a list of items detailing where the study was deficient. Peterson suggested that the group further discuss the study results then develop the next steps. Huggins offered to schedule a separate meeting to discuss the Chapman Report. Peveto wants to have the meeting and include Linda and Derek. Amundson expressed interest in the meeting but mentioned he will not be back in Portland until February. Quarles added that ESCO will send the information request prior to the meeting.

Updated 25 Year Projects List

Quarles explained that an air emission project summary already existed but it was recently updated to include the past five years of projects and improvements. The summary provides a history of improvement projects implemented within the past 25 years. Huggins asked the group for recommendations for where to make this information available. Peveto mentioned that it's beneficial to have this information publically available on the NAC website.

ESCO and DEQ communications

Quarles explained that the last NAC meeting was held in April, plus a GNA renegotiation meeting in June. Since then, there haven't been many communications with DEQ. The main communications entail an update to the Air Emission Control Device Operating Plan and one Deviation Report (submitted in May) for a dust collector that wasn't operating properly. A dust collector that captures dust from sand transport in Slinger Bay was not properly locked out during maintenance and repair, which caused the process to operate while the fan was not working. Quarles estimated that 7 lbs. of particulate was emitted during a 6 hour timeframe. Quarles added that much of the process is enclosed inside the building so ESCO estimated that 50 percent of the total particulate was emitted from the building. Quarles added that the employee was coached and disciplined to prevent such safety and

environmental issues from reoccurring. Amundson asked if the sand is spent or contaminated. Quarles explained that it is virgin sand.

Nick Caleb asked if ESCO received the Cleaner Air Oregon Data Request letter. Quarles explained that ESCO received the data request letter and plans to respond to DEQ, but there hasn't been much progress in terms of preparing the response. Quarles further added that DEQ has requested a very comprehensive data set and there are unknowns of how to estimate some emissions since many of these compounds are not currently being estimated. Quarles mentioned that Main Plant and Plant 3 were inspected by DEQ back April and that no compliance issues were found. Huggins brought a copy of the semiannual compliance report and offered to upload it to the NAC website. Quarles explained that it's a standard report required by DEQ that provides a summary of the emissions and compliance status. Peveto asked if these reports are included on the NAC website. Quarles responded that the annual reports are uploaded to the website, and the semiannual reports could be uploaded as well.

Scheduling

Quarles suggested that the next meeting be held in April. Peveto asked if it would be worthwhile to meet again in January. Peterson claimed that ESCO will not have much additional information to report in January. Holmstrom asked if ESCO will have anything new to report in January regarding deconstruction. Quarles replied that there will probably not be anything new to report by then. Caleb suggested having a separate meeting on the Chapman Study sometime in the first quarter plus the usual NAC meeting scheduled early in the second quarter. Huggins will send out proposed dates for the meetings. Huggins requested email addresses for Linda George and Derek Espinoza for the meeting to discuss the Chapman Study. Holmstrom asked if there are any proposed operational changes to Plant 3 and expressed interest in seeing Plant 3 air emissions data separated from Main Plant emissions. Quarles explained that such details are provided in the annual report, in which Plant 3 emissions are differentiated from Main Plant. Holmstrom noted that phenol, formaldehyde, and cresols are his main concerns. Holmstrom asked what percentage of these compounds are emitted from Plant 3. Quarles explained that most of them are from Plant 3 due to the specific binders and resins being used. Quarles offered to provide a Plant 3 emission summary at the next NAC meeting.

Trending Report

Quarles mentioned that ESCO received few complaints in the third quarter. The most recent odor complaint was received in September, which makes a total of 14 so far for the year.

Public Comment: None present

The NAC meeting adjourned at 10:50 A.M.

The group transitioned to discuss the GNA at 10:51 A.M.