



**Concerned**  
**Ohio River Residents**  
Advocating for a healthy and sustainable Ohio River Valley

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Governor Mike DeWine  
Riffe Center, 30<sup>th</sup> Floor  
77 South High Street  
Columbus, OH 43215-6177

1/28/2020

Dear Governor Mike DeWine,

Concerned Ohio River Residents (CORR) presents you with the following asks:

- 1.) Direct Laurie Stevenson, Director of OEPA, to pull the NPDES permit for the PTTG ethane cracker plant until adequate monitoring has been done for existing levels of contaminants in the Ohio River.
- 2.) Considering the scientific information and concerns provided to you in the meeting, we ask that you publicly take a position of neutrality on the PTTG ethane cracker plant. That is, neither supporting nor opposing the plant.
- 3.) Ask for an Attorney General investigation into the fracking industry's violations that harm people living near the current infrastructure (similar to that of the PA Attorney General).
- 4.) Engage with CORR in on-going collaboration and hold a follow-up meeting with our experts in the relevant fields. This meeting would be more technical in nature.
- 5.) Come to places like Belmont County and Cincinnati to meet with the community. We would like you to talk with mothers who are concerned about the water in which their babies' bathe and the air they breathe, as many people live near polluting facilities. Talk to us about alternative job opportunities. We would like help in collaborating with universities and hospitals to train communities to monitor their air and water, study the health impacts of pollution. We would like more research to be done to treat the cancer, respiratory disease, neurological, hormonal and autoimmune disorders caused specifically by pollution.

Other questions on which we will follow-up with Governor DeWine:

- 1.) You stated that you are concerned about plastic pollution in the environment (see Columbus Dispatch article on House Bill ban on plastic bag bans). So then, why are you supporting the cracker plant when it would create 3 billion pounds annually of plastic pellets to be used as feedstock for mostly single-use plastic items (650,000 tons would be #2 high-density polyethylene, and 900,000 tons would be #4 linear low-density polyethylene)?
- 2.) The fracking industry is in massive debt currently. They are having a hard time finding investors (see IEEFA fracking economics study). Also, more and more countries and cities are banning plastic. (China recently put in place a massive plastic bag and straw ban.) Why are you investing the region's economy in fossil fuels and plastics when both industries are going bust?
- 3.) In Cincinnati, there are companies like P&G and Kroger, which respectively have committed to transitioning to 100% recyclable or reusable packaging by 2030, and will stop distributing plastic bags in all stores by 2025. Why are you helping foreign companies make more toxic plastic when you should be supporting local companies who want to invest in green packaging, and transition away from plastic?

Questions posed to Director Stevenson for Governor DeWine's review:

- 1.) The standards used in the NPDES permit for PTTG are "technology-based standards" meaning they are not based on the water quality but on the available technology to control discharges from this industry. These standards were set 20-30 years ago, so do not include updates to technology that could be used instead. Center for Biological Diversity recently petitioned USEPA to get these technology-based standards updated. The technology-based standards being applied to PTTG are very outdated. Why didn't OEPA do a study of an exhaustive list of existing pollutants that PTTG would be discharging into the Ohio River before issuing the permit? Will Ohio EPA adopt all the requests outlined in the Center for Biological Diversity petition to USEPA regarding effluent limitations guidelines and standards for the petro-plastics industry? (See included petition.) Is the USEPA going to adopt these standards as well?
- 2.) How does the OEPA plan on enforcing and monitoring the PTT plant when they are failing to hold the fracking industry accountable? Some of these facilities have violations that have not been addressed for years. Are you planning to hire more staff, do you have a funding source, and could OEPA buy the necessary monitoring equipment? Frank Hoagland's office informed us that the Ohio EPA does not have appropriate equipment and that the OEPA relies on industry to do the reporting.
- 3.) Why doesn't the OEPA monitor all fracking wells for VOC's, particulate matter, and methane? Why isn't there a standardized way to monitor for these pollutants, not funded by taxpayers, but rather by the industry, and monitored directly by OEPA at ALL well sites, especially during blowdowns? Also, why doesn't the OEPA monitor the air

surrounding flaring operations, radioactive frack waste processing facilities, and compressor stations?

- 4.) Why didn't the EPA take into consideration air inversions when granting the air pollution permit to PTTG?
- 5.) Are you aware of the radioactive risk from cracker plants, and related industries/processes, e.g., landfills, liquid processing, brine for roads and dust control? (See Rolling Stone article included in materials.) What is your plan to protect the public/workers from these potential harms and when will you share it with us and the public?
- 6.) It's well reported that fracking, and infrastructure, for example, injection well, transfers stations, and cracker plants cause cancer and other serious health impacts. It has been reported that every new cracker will require a thousand new frack wells (every 3-5 years or so). Do you think that our children's health is worth sacrificing for this industry? (See Human Toll article.)
- 7.) The largest-ever EPA fine was assessed on DuPont and their Teflon plastic manufacturing on the Ohio River. The current administration recently turned down congressional legislation that would have banned these so-called "forever chemicals." How do we build trust that the plastics industry will be adequately regulated when National EPA has decided not to regulate it?
- 8.) The EPA does not currently regulate PET (polyethylene) plastic, even as it collects in gyres in our oceans and chokes wildlife. How is the EPA committed to regulating plastic, including microplastics, on our land and in our waterways especially during the peaking global plastic crisis?
- 9.) Lea- How would the Ohio EPA like to participate in the community baseline air and water testing project? We have gotten funding and are working with the American Geophysical Union's Thriving Earth Exchange project and we have connected with various scientists who are going to help the community with baseline air and water testing. We are in the planning phase.

To add more context to the first ask, the company Formosa Plastics was fined \$50 million for the contamination of plastic nurdles (the same thing that would come from the PTTG plant) into the Lavaca Bay and other waterways in Texas. We ask that you strictly prohibit discharge of this material into waterways.

Belmont County is now known by some as the county with the largest methane leak from an oil and gas drilling pad ever recorded in the nation. Attached is a study revealing these new findings from the Powhattan Point, OH well pad explosion in Feb. 2018. We have more permitted fracking pads than any other county in the state of Ohio- 669 as of December 2019. Many people who live in Belmont County, as well as the state of Ohio are concerned about

living in a fracking/petrochemical zone. To compound these concerns, we know that tons of carcinogens permitted will concentrate and become increasingly toxic since the nearby community is a valley that is subject to air inversions. Air inversions happen throughout the year- it is when colder air traps warmer air beneath it and whatever pollution there is gets trapped near the ground and in the communities. The externalized public health costs, estimated to be in the billions of dollars over the life of the proposed cracker plant, would be paid for by those who live in the valley, especially our children and the elderly.

Since last March, we have requested a meeting with you and/or your designate to express our concerns and ask for a better vision for the valley, free from extractive, exploitative industries, especially those that would send profits overseas. We would like to deliver our petition with almost 2,500 signatures, copy enclosed. The effort to collect signatures and educate the community is ongoing and this is just what we have collected thus far. We have also enclosed peer-reviewed scientific articles that should be reviewed before a decision is made to sacrifice our communities once again to fossil fuel interests, especially in the days of climate change and with the plastic pollution crisis our world now faces. We need to find alternatives to petrochemical-based plastic products. The survival of our ecosystems depends on that. Also, as you can see in the enclosed article, one study done by economists found cracker plants to only provide short-term economic growth. They do not provide sustainable support for communities. This valley needs a long-term plan. We who live in Ohio want no part of the proposed petrochemical buildout, plastics production, toxic pollution and massive greenhouse gas emissions.

We appreciate the ability to meet with your staff regarding these issues. We look forward to ongoing collaboration and follow-up meetings.

Sincerely,

Community Organizer/Liaison  
Concerned Ohio River Residents