



Concerned Ohio River Residents
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Laurie Stevenson
Director, Ohio EPA
Ohio EPA
50 West Town Street, Suite 700
Columbus, 43215

1/28/2020

Dear Director Stevenson,

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

- 1.) Pull the NPDES permit for the PTTG ethane cracker plant until adequate monitoring has been done for existing levels of contaminants, i.e. baselines, in the Ohio River.
- 2.) Adopt all the requests outlined in the Center for Biological Diversity's two petitions to USEPA regarding effluent limitations guidelines and standards for the petro-plastics industry regarding air and water emissions (see included petitions).
- 3.) Hold another meeting with Concerned Ohio River Residents that is more technical in nature with experts in the fields in which we have been working.
- 4.) Develop a plan to protect the community and especially workers from radioactive contamination from oil and gas operations, and share this plan with us and the public.

Questions posed in the meeting to Director Stevenson:

- 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 The technology-based standards being applied to PTTG are very outdated.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 second immediate 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 do not want to live in a fracking/petrochemical/plastics manufacturing sacrifice zone. We ask that you protect communities first and foremost, especially with all the current and proposed infrastructure.

Thank you for taking the time to meet with us today.

Sincerely,

Community Organizer/Liaison
Concerned Ohio River Residents