

Re: Application No.: OH0144967
Ohio EPA Permit No.: 0IF00018*CD
Public Notice No.: OEPA 21-12-039 DFT

I am opposed to the renewal of the PTTGCA NDPES permit for the proposed ethane cracker/plastics facility in Belmont County.

The Ohio River serves as a drinking water source for 5 million people with 23 water supply intakes located downstream from the proposed facility, including the drinking water intake for the city of Cincinnati. The closest water supply intake to the site of the proposed PTTGCA facility is in Sistersville, WV only approximately 30 river miles downstream. Recent research has found that existing petrochemical facilities are already permitted to pollute 500,000 pounds of toxic discharge into the Ohio River. The PTTGCA would further exacerbate this problem.

Additionally, the permit did not include a full antidegradation review, meaning the state did not look at how the Ohio River water quality would become degraded. As the 2018 modification to the permit led to a net increase of regulated pollutants that modification required an antidegradation review. This process, including full public input, should have been completed before approving the current modified permit and since it was not, the permit should not be renewed until this full review is done.

When the Ohio EPA approved the modification to the permit in 2018 there was “no representative data available” regarding Background Water Quality in the Ohio River on the following pollutants which PTTGCA would discharge into the Ohio River:

Acenaphthylene, Pyrene, Acenaphthene, Acrylonitrile, Anthracene, 3,4-BenzoFluoranthene, Benzo(k)Fluoranthene, Benzo-A-Pyrene, Chloroform, Carbon Tetrachloride, Toluene, Benzene, Chloroethane, Chrysene, Diethyl phthalate, Dimethyl phthalate, Ethylbenzene, Fluoranthene, Fluorene, Hexachloroethane, Methyl Chloride, Methylene Chloride, Nitrobenzene, Phenanthren, Tetrachloroethylene, 1,1-Dichloroethane, 1,1-Dichloroethylene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Benzo(A)Anthracene, 1,2-Dichloroethane, 1,2-Dichlorobenzene, 1,2-Dichloropropane, 1,2-trans-Dichloroethylene, 1,2,4-Trichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 2-Chlorophenol, 2-Nitrophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 2,4-Dinitrotoluene, 2,4-Dinitrophenol, 2,6-Dinitrotoluene, 4-Nitrophenol, 4,6-Dinitro-o-cresol, Phenol, Naphthalene, Bis(2-ethylhexyl) Phthalate, Di-N-Butylphthalate, Vinyl Chloride, Trichloroethylene, Hexachlorobenzene, Hexachlorobutadiene, Chlorobenzene, 1,3-Dichloropropylene.

If there is still no background water data on these pollutants the Ohio EPA can not know if the Ohio River has any remaining assimilative capacity for the pollutants listed above and if these pollutants would violate water quality standards. Rather than renew this permit the Ohio EPA must collect this background water data and do a full antidegradation review.

Despite proposing this project in 2015 PTTGCA has still not made a Final Investment Decision (FID). Over the past 7 years, the project has lost a major partner, and the FID has been delayed indefinitely. There is no urgency to renew the permit for a project that has shown no progress. I urge you to deny the renewal.

Finally, the public notice of this renewal was published on December 20th, at a time when many residents are out of town or busy preparing for the holidays. Given this timing and the ongoing stressor of the worsening COVID-19 pandemic, I also request the comment deadline be extended to ensure full public participation. I also request a public hearing so that the public has an opportunity to have its questions answered and to provide information on existing uses of the Ohio River near the proposed location.

Sincerely,

Jill Hunkler
Belmont County, Ohio

Written comments, requests for public meetings and adjudication hearing requests must be sent to (sending via email is fine):

Hearing Clerk
Ohio Environmental Protection Agency
50 W. Town St., Suite 700
Columbus, OH 43215
HClerk@epa.ohio.gov
Nicholas.McGovern@epa.ohio.gov
Ariel.Ruth@epa.ohio.gov
(614) 644-3037