



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

RECEIVED  
OHIO EPA

2016 DEC 23 AM 10:19

LEGAL OFFICE

**Certified Mail**

**Re: PTTGCA US Petrochemical  
Complex  
Permit - Intermediate  
Approval  
401 Wetlands  
Belmont  
DSW401165026**

December 23, 2016

Mr. Roger Lewis  
Ohio West Virginia Excavating  
56461 Ferry Landing Road  
Shadyside, Ohio 43947

**Subject:** PTTGCA US Petrochemical Complex  
Belmont County / Mead Township / Village of Shadyside  
Grant of a Section 401 Water Quality Certification  
Minimal Degradation Alternative A  
Corps Public Notice No. 2014-1154  
Ohio EPA ID No. 165026

Dear Stakeholders:

I hereby authorize the above referenced project under the following authorities and it is subject to the following modifications and/or conditions:

Section 401 Water Quality Certification

Pursuant to Section 401 of the Federal Water Pollution Control Act, Public Law 95-217, I hereby certify that the above-referenced project will comply with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the Federal Water Pollution Control Act. This authorization is specifically limited to a Section 401 Water Quality Certification (here after referred to as "certification") with respect to water pollution and does not relieve the Certification Holder of further Certifications or Permits as may be necessary under the law. I have determined that a lowering of water quality in the Upper Ohio-Wheeling watershed (HUC 05030106) as authorized by this certification is necessary. I have made this determination based upon the consideration of all public comments, if submitted, and the technical, social, and economic considerations concerning this application and its impact on waters of the state.

## **PART I ON-SITE WATER RESOURCES AND IMPACTS**

### **A. Watershed Setting**

The watershed in which this project is located, Pipe Creek – Ohio River (HUC 05030106-12-07), has an area of 35.14 square miles of which 9.6 percent is developed, 74.0 percent is forest, 12.4 percent is grass/pasture and 3.9 percent is row crop agriculture.

Big Run is designated limited warmwater habitat (L-WWH) from the Nacco Mine # 3 portal to confluence with Ohio River, agricultural water supply and industrial water supply with an antidegradation category of limited quality water. Big Run was biologically sampled by Ohio EPA in 2009 and is recommended for WWH for the entire length.

The Ohio River is designated warmwater habitat, public water supply, agricultural water supply, industrial water supply and bathing waters.

### **B. Project Description**

The proposed project is a complete, fully-integrated petrochemical production plant consisting of an ethane cracker unit with 1,000 kiloton/year capacity, a high density polyethylene unit with two trains of 350 kiloton/year per train capacity, an ethylene oxide/ethylene glycol unit with capacity to produce 600 kiloton/year of monoethylene glycol and the flexibility to produce 100 kiloton/year of maximum high-purity ethylene oxide; and associated utilities infrastructure including an electrical substation, a natural gas-fired steam plant, flares, water supply and treatment, cooling towers, water intake structure, wastewater treatment, wastewater and stormwater outfall structures, stormwater management facilities, logistics infrastructure including a truck terminal, roadways, parking areas, barging areas including dolphins and dock facilities, rail expansion and a railyard, and administrative offices. In addition, as part of construction, a material offloading facility (MOF) will be constructed in the Ohio River.

### **C. Impacts**

Under the minimal degradation alternative A, impacts to waters of the state are as follows:

#### **1. Streams**

Impacts include 4758.17 linear feet (LF) of perennial streams and 1233.85 LF of ephemeral streams for a total of 5992.02 LF.

Stream ID	Type* E, I, or P	Impact Type	Total Length on Site (LF)	Total Length Impacted (LF)	Percent Avoided
1-Big Run	P	Culvert/Pipe	1707.66	325.00	81.0
2	P	Fill	321.57	321.57	0
3	E	Fill	1233.85	1233.85	0
4	P	Fill	3211.60	3211.60	0
5	I	N/A	135.00	0	100
Ohio River	P	Shoreline Alteration	12,000.00	900.00	92.5
<b>Totals</b>			<b>18,609.68</b>	<b>5992.02</b>	<b>67.8</b>

\* As provided by applicant

## 2. Wetlands

Impacts to wetlands includes 0.67 acres of non-forested Category 1 wetland, 2.46 acres of non-forested Category 2 wetland and 0.44 acres of forested Category 2 wetland for a total of 3.57 acres.

Wetland ID	Forested or Non- Forested	Category	Total Acreage on Site	Total Acreage Impacted	Percent Avoided
DA	NF	2	0.02	0.02	0
DB	NF	2	0.56	0.56	0
DC	NF	1	0.30	0.30	0
DD	NF	1	0.03	0.03	0
DE	NF	1	0.07	0.07	0
DF	NF	2	0.69	0.69	0
DG	NF	2	0.30	0.30	0
	F		0.44	0.44	
DH	NF	2	0.89	0.89	0
DI	NF	1	0.04	0.04	0
PA	NF	1	0.01	0.01	0
PB	NF	1	0.07	0.07	0

PC	NF	1	0.03	0.03	0
PD	NF	1	0.01	0.01	0
PE	NF	1	0.07	0.07	0
PF	NF	1	0.04	0.04	0
<b>Totals</b>			<b>3.57</b>	<b>3.57</b>	<b>0</b>

### 3. Ponds

Impacts to man-made ponds total 27.831 acres.

<b>Pond ID</b>	<b>Impact Type</b>	<b>Pond Impact (Acres)</b>	<b>Cubic Yards Fill (Total)</b>
Pond 1	Fill	0.793	5000
Pond 2	Fill	0.038	5000
Pond 3	Fill	27.00	440,000
<b>Totals</b>		<b>27.831</b>	<b>450,000</b>

## **PART II TERMS & CONDITIONS**

- A. This certification shall remain valid and in effect as long as the 404 Permit issued by the U.S. Army Corps of Engineers for this project is in effect.
- B. Terms and conditions outlined in this section apply to project and mitigation construction as described in this certification.
- C. The Certification Holder shall notify Ohio EPA, in writing, and in accordance with *Part IV (NOTIFICATIONS TO OHIO EPA)* of this certification, upon the start and completion of site development.
- D. A copy of this certification shall remain on-site for the duration of the project.
- E. In the event of an inadvertent spill that exceeds reportable quantities (RQ) pursuant to ORC 3750.06, the Certification Holder shall comply with all applicable spill reporting obligations specified in ORC 3750.06
- F. Unpermitted impacts to surface water resources and/or their buffers occurring as a result of this project must be reported within 24 hours of occurrence to Ohio EPA,

Division of Surface Water, Section 401/Stormwater Manager (614-644-2001), for further evaluation.

- G. Pesticide application(s) for the control of plants and animals shall be applied in accordance with rule 3745-1-01 of the Ohio Administrative Code, and may require a pesticide applicator license from the Ohio Department of Agriculture.
- H. Any authorized representative of the director shall be allowed to inspect the authorized activity at reasonable times to ensure that it is being or has been accomplished in accordance with the terms and conditions of this certification.
- I. In the event that there is a conflict between the certification application, including the mitigation plan, and the conditions within this certification, the condition shall prevail unless Ohio EPA agrees, in writing, that the certification application or other provision prevails.
- J. The Certification Holder shall provide electronic maps of the development area and the mitigation area to Ohio EPA 401/Stormwater Section within 30 days of the date of this certification. JPEG, TIFF, PDF or BMP files are acceptable. When sending the electronic files, include the Ohio EPA ID Number and the Army Corps of Engineers Number (if applicable). If possible, these electronic maps shall be GIS shape files or Geodatabase files. If this is not possible, the electronic maps shall be in another electronic format readable in GIS (GIF, TIF, etc.). The electronic files shall be sent to the following e-mail address: [EPA.401Webmail@epa.ohio.gov](mailto:EPA.401Webmail@epa.ohio.gov)

If the files are too large to send by e-mail, a disk containing the electronic files shall be mailed to the following address:

Ohio Environmental Protection Agency  
Division of Surface Water  
Attn: 401/Stormwater Manager  
50 West Town Street, Suite 700  
PO Box 1049  
Columbus, OH 43216-1049

- K. This proposal may require other permits from Ohio EPA. For information concerning application procedures, contact the Ohio EPA District Office as follows:

Ohio Environmental Protection Agency  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138  
740-385-8501

**Additional information regarding environmental permitting assistance at Ohio EPA can be found at [http://www.epa.ohio.gov/dir/permit\\_assistance.aspx](http://www.epa.ohio.gov/dir/permit_assistance.aspx)**

**L. Best Management Practices (BMPs)**

1. All water resources and their buffers which are to be avoided, shall be clearly indicated on site drawings demarcated in the field and protected with suitable materials (e.g., silt fencing) prior to site disturbance. These materials shall remain in place and be maintained throughout the construction process and removed after completion of construction.
2. All BMPs for storm water management shall be designed and implemented in accordance with the most current edition of the Ohio Department of Natural Resources Rainwater and Land Development Manual, unless otherwise required by the National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities (construction general permit), if required.

A copy of the Rainwater and Land Development Manual is available at:  
<http://water.ohiodnr.gov/water-use-planning/stormwater-management#RAI>

A copy of the NPDES construction general permit is available at:  
[http://www.epa.ohio.gov/dsw/storm/construction\\_index.aspx#Construction%20General%20Permit](http://www.epa.ohio.gov/dsw/storm/construction_index.aspx#Construction%20General%20Permit)

3. Straw bales shall not be used as a form of erosion/sediment control.
4. Temporary fill shall consist of suitable non-erodible material and shall be stabilized to prevent erosion.
5. Materials used for fill or bank protection shall consist of suitable material free from toxic contaminants in other than trace quantities. Broken asphalt is specifically excluded from use as fill or bank protection.
6. Concrete rubble used for fill or bank stabilization shall be in accordance with ODOT specifications; free of exposed re-bar; and, free of all debris, soil and fines.
7. Chemically treated lumber which may include, but is not limited to, chromated copper arsenate and creosote treated lumber shall not be used in structures that come into contact with waters of the state.
8. All temporary fill material must be removed to an area that has no waters of the state at the completion of construction activities and the river bottom restored to pre-construction elevations to the maximum extent practicable.

9. Culverts

- a. Stream culverts shall be installed and designed at the streambed slope to allow for the natural movement of aquatic organisms and bedload to form a stable bed inside the culvert.
- b. The culvert base or invert with the substrate shall be installed below the sediment to allow natural channel bottom to develop and to be retained.
- c. The channel bottom substrate shall be similar to and contiguous with the immediate upstream and downstream reaches of the stream. The culvert shall be designed and sized to accommodate bankfull discharge and match the existing depth of flow to facilitate the passage of aquatic organisms.
- d. Where culverts are installed for temporary crossings, the bottom elevations of the stream shall be restored as nearly as possible to pre-project conditions.

M. Wildlife Protection

1. No in-water work shall take place during the environmental window of March 15<sup>th</sup> through June 30<sup>th</sup> in the Ohio River, unless specifically approved by the Ohio Department of Natural Resources, Division of Wildlife, in writing, with a copy provided to Ohio EPA prior to undertaking any in-water work during the environmental window. The In-Water Work Waiver was received by the Ohio EPA on October 13, 2016.

**PART III MITIGATION**

A. Description of Required Mitigation

The stream and wetland mitigation is to be provided through the purchase of in-lieu fee credits from the Stream + Wetland Foundation In-Lieu Fee program, as listed in the tables below.

1. Stream Mitigation:

Stream ID	Stream Type	Length Onsite (LF)	Impact Length (LF)	In-Lieu Credits Required
1 (Big Run)	Perennial	1707.66	325	325
2	Perennial	321.57	321.57	321.57
3	Ephemeral	1233.85	1233.85	1233.85
4	Perennial	3211.60	3211.60	3211.60
5	Intermittent	135	0	0
Ohio River	Perennial	12000	900	0
<b>Totals</b>		<b>18609.68</b>	<b>5992.02</b>	<b>5093</b>

2. Wetland Mitigation:

Wetland ID	Type	Area (Ac)	Category	1.5:1 Ratio	2.0:1 Ratio	3:0:1 Ratio*
DA	Emergent	0.018	2		0.036	
DB	Emergent/Scrub-Shrub	0.561	2		1.122	
DC	Emergent/Scrub-Shrub	0.3	1		0.6	
DD	Emergent	0.031	1	0.0465		
DE	Emergent	0.066	1	0.099		
DF	Emergent/Scrub-Shrub	0.694	2		1.388	
DG	Emergent/Scrub-Shrub	0.303	2		0.606	
DG	Forested	0.44	2			1.32
DH	Emergent/Scrub-Shrub	0.891	2		1.782	
DI	Emergent	0.036	1	0.054		
PA	Emergent/Scrub-Shrub	0.007	1		0.014	
PB	Emergent	0.065	1	0.0975		
PC	Emergent	0.027	1	0.0405		
PD	Emergent	0.014	1	0.021		
PE	Emergent	0.074	1	0.111		
PF	Emergent	0.037	1	0.0555		
<b>Totals</b>		<b>3.564</b>		<b>0.525</b>	<b>5.548</b>	<b>1.32</b>
<b>Total Wetland In-Lieu Fee Credits Required</b>				<b>7.4</b>		

\*Corps is requiring 3:1 ratio for forested wetland impacts

B. Mitigation and Monitoring Plan

As mitigation for impacts described in Part I.C of this certification, the Certification Holder shall implement the mitigation plan dated June 3, 2016, and in accordance with the conditions in this certification.



C. Timing of Mitigation Requirements

A copy of the fully executed in-lieu fee program agreement with Stream + Wetland Foundation has been provided to Ohio EPA.

**PART IV NOTIFICATIONS TO OHIO EPA**

All notifications, correspondence, and reports regarding this certification shall reference the following information:

Certification Holder Name: Ohio West Virginia Excavating  
Project Name: PTTGCA US Petrochemical Complex  
Ohio EPA ID No.: 165026

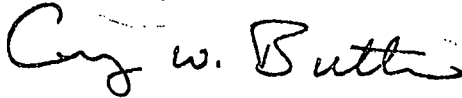
and shall be sent to:

Ohio Environmental Protection Agency  
Division of Surface Water, 401/IWP Unit  
Lazarus Government Center  
50 West Town Street  
P.O. Box 1049  
Columbus, Ohio 43216-1049

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, Ohio 43215

Sincerely,



Craig W. Butler  
Director

cc: Ty Bintrim, Department of the Army, Pittsburgh District, Corps of Engineers  
Donald Bole, Department of the Army, Pittsburgh District, Corps of Engineers  
Peter Swenson, U.S. EPA, Region 5  
Dan Everson, U.S. Fish & Wildlife Service  
John Kessler, ODNR, Office of Real Estate  
Dave Snyder, Ohio Historical Preservation Office  
Carol Siegley, Ohio EPA, DSW, SEDO, Section 401/IWP  
Jeff DeShon, Ohio EPA, DSW, EAS  
Andrea Kilbourne, Ohio EPA, DSW, Mitigation Coordinator  
Rachel Taulbee, Ohio EPA, SEDO, DSW, 401/Water Quality Unit  
Vince Messerly, Stream + Wetlands Foundation  
Hugh Crowell, Hull & Associates, Inc.

Attachments: Response to Comments

Ohio EPA has developed a customer service survey to get feedback from regulated entities that have contacted Ohio EPA for regulatory assistance, or worked with the Agency to obtain a permit, license or other authorization. Ohio EPA's goal is to provide our customers with the best possible customer service, and your feedback is important to us in meeting this goal. Please take a few minutes to complete this survey and share your experience with us at <http://www.surveymonkey.com/s/ohioepacustomersurvey>.



## **Division of Surface Water Response to Comments**

**Project: US Petrochemical Complex  
401 WQC Project ID #: 165026  
NDPES Permit No. 0IF00018/0IF00019**

### **Agency Contacts for this Project**

- 401 WQC Division of Surface Water Contact: Carol Siegley, (740)380-5225, [carol.siegley@epa.ohio.gov](mailto:carol.siegley@epa.ohio.gov)
- NPDES Division of Surface Water Contact: Eric Nygaard, (614)644-2024, [eric.nygaard@epa.ohio.gov](mailto:eric.nygaard@epa.ohio.gov)
- Public Involvement Coordinator: Kristopher Weiss, (614)644-2160, [kristopher.weiss@epa.ohio.gov](mailto:kristopher.weiss@epa.ohio.gov)

Ohio EPA held a public hearing on Sept. 15, 2016 regarding the proposed PTTGC petrochemical complex. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on Sept. 22, 2016.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

### **General Comments**

**Comment 1:** I think the proposed cracker plant at Dilles Bottom is a bad idea. While other states and countries around the world ban fracking and move toward cleaner, more sustainable energy production, building this plant will only increase the Ohio Valley's dependence on natural resource extraction. I don't think our economic success should be tied to a dirty industry run by corporations from afar that don't have Ohio

**Valley citizen's best interests in mind. We need jobs in the area, but we need jobs that won't further harm the environment, are sustainable, will allow our economy to keep up with the rest of the country and give young people a reason to stay in the area.**

**Response 1:** Noted. Any 401 water quality certification (WQC) and the individual National Pollutant Discharge Elimination System (NPDES) permit that would be issued for this project would contain conditions to ensure compliance with Ohio's water quality standards

**Comment 2:** I am very supportive of the cracker plant coming to the area because it will create jobs and impact the local economy through the employment opportunities, tax revenues, etc. I am also aware of the public's concern about the impact the cracker plant will have on the public's health, local wildlife and aquatic life in the nearby creeks and streams. As the state moves forward with the project, I am confident the EPA will work to ensure that all the necessary safeguards are in place so that the public doesn't have to worry about the negative impacts on the environment, local streams or wetlands.

**Response 2:** Noted. See Response No. 1.

**Comment 3:** I write to support the permitting of PTT Global Chemical's proposed ethane cracker project in Dilles Bottom, Ohio. As it stands, the proposed investment in the project is projected to be \$5.6 billion. That sort of investment for Belmont County, as well as the whole region, would be life changing for the thousands who live and work in the region. Thousands of jobs stand to be created through the construction, operation and maintenance of such a facility, not to mention the auxiliary businesses that will open to use the ethane product and support the plant.

**The cracker plant could be the cornerstone in a rebirth of the Ohio Valley as a petrochemical manufacturing hub. Allowing PTT Global to secure the necessary permits while protecting the environment is the first step.**

**Response 3:** Noted. Please see Response No.1.

**Comment 4:** I've been a resident of Powhatan, which is about 11 miles south of the cracker plant, most of my life. I literally live right on the Ohio River bank. And I just am entrusting the EPA to do the right thing for us.

I grew up, and we would swim in the river because we didn't have a swimming pool in the '60s and the '70s. There was very little wildlife. We didn't have herons, we didn't have beavers, we didn't have osprey. And 20 years ago, we built a house down on the river and we have that now. And I am just entrusting that you will do the right thing, and the company from Thailand and Ohio Excavating will do the right thing and keep our wetlands safe.

**Response 4:** Noted. See Response No. 1.

**Comment 5:** I'm here tonight to express my support for the petrochemical complex in Dilles Bottom that is being considered by PTT Global Chemical of America.

What excites me about PTT's project isn't just the temporary construction jobs, and even the permanent jobs of the facility when it's built, all of which we need, it's the prospect of the existing businesses that will be strengthened and the new downstream businesses that will spring up because of the presence of the plant. If PTT makes the decision to go forward with this project early next year, it will create a sea of change in our economy that will change our community in Shadyside, in Belmont County, and in the entire region for the better.

I'm also confident that PTT will be good neighbors, providing employment, providing community service, being a responsible neighbor by being sensitive to community needs and environmental needs.

**Response 5:** Noted.

**Comment 6:** I'm able to recognize when we have a project that has a lasting effect for the working people of this state, and this project will have a lasting effect, not so much just with the construction, but the ongoing operation and the

**maintenance of the facilities for the years to come, and we are all about that.**

**I believe that this project, if PTTGC America makes the decision to build it, represents a once-in-a-lifetime project that will have the opportunity to redefine Ohio's energy resources in the industry for the generations to come.**

**Response 6:**           Noted.

**Comment 7:**           I see this \$6.5 billion project as transformational for this region. While other areas of the state have fully recovered from the great recession, this portion of the state still faces many challenges. In short, this project gives our members and their families hope for the future. We wholeheartedly and enthusiastically support Gov. Kasich's to make this project a reality and everybody here that is in support of the project.

**Of behalf of ACT Ohio, our local affiliates and our 93,000 plus members across the state, we urge your favorable consideration and certification of the permit application. Thank you.**

**Response 7:**           Noted.

**Comment 8:**           I am speaking tonight in favor of the EPA permits being approved for the PTT Global project proposed for this area. PTT Global has reached out to the area building and trades to supply the over 7,000 construction tradesman and women to build this project. They are committed to hiring a local workforce, providing us the opportunity to provide full employment to our construction workers for years in the future.

**This commitment will enable us to grow our local unions and increase our apprenticeship and training programs, hire local area graduates and start them into well-paying careers with health benefits for our local families. The payroll for this project will stay in our communities to support local businesses, to support local real estate and to support local medical providers and hospitals.**

**This project has been described as one of the largest single investments in our area since World War II. This**

project is described as an anchor project, using area raw materials processed and distributed to secondary industries, which will be attracted to our area again to employ local construction professionals, providing lifelong employment opportunity.

PTT Global will be a state- of-the-art facility with the latest technology for safety and environmental controls, and a good neighbor. They will be hiring local area graduates to operate this plant. These will be well-paying positions lasting for generations. This is the project we need to revitalize Belmont County, to revitalize our Valley, and to bring back manufacturing careers to the US of A.

We urge your approval of this project and their permits.

**Response 8:** Noted.

**Comment 9:** I can tell you as a Board of Commission, we support this project 100 percent. Since the 1980s, the Valley has been decreasing. We have lost many jobs, few of us had the fortune to be able to stay here and get by. This is a great opportunity for Belmont County that we have never seen in over 30 years, a chance for our families to stay here and raise their kids and provide a nice working wage for these families.

Belmont County Commissioners are so excited that we have worked with our Port Authority director and the property owners to of this to bring this opportunity to our county. This is not only great for Belmont County; this is great for the whole region.

**Response 9:** Noted.

**Comment 10:** I'm here tonight to express my support and my company's support and my family's support for PTT Global America's proposed facility in our neighborhood. I grew up in eastern Ohio. I'm the son of a steelworker and a brother of a factory workers.

For many years, eastern Ohio has been a hub for coal, glass and steel, and not only were these much-needed

products and resources produced locally, but it made this part of the country a blue-collar area and we were a leader in and some place many of us were proud to call home. These products were shipped not only around the United States, but around the world, and were created by some of the very talented workers that some of the people before me were testifying about, local working, local labor.

As a Dilles Bottom property owner, I understand that if the project does happen, the company will likely need our property. Since the early discussions about this property, PTT Global and its Ohio team have been very forthright with us and some of the other people that have property, and have been proactive about reaching out to us about what they're doing and making sure that we are updated on all aspects of the project.

Many of us have great hope again for this area and, like others, I see the potential of a natural gas industry here in the area to create jobs for this region, just as the coal and steel industry once did. If PTT Global America goes forward with this project, I believe it would positively impact the economic landscape of this community and the surrounding communities for the next generation of eastern Ohioans, maybe then our children will be able to stay home here in eastern Ohio and work and raise a family. It's something I wish I had the opportunity to do when I was much younger.

**Response 10:** Noted.

**Comment 11:** I am here tonight to speak in favor of the proposed petrochemical complex under consideration by PTTGC America for Belmont County.

The Dilles Bottom site in Mead Township in an industrial location most recently home to a coal-fired power plant. I worked at that facility for more than 32 years and have lived nearby for 25 of those years. During that time, I saw firsthand the benefit of its presence.

While we appreciated the jobs and economic activity from the plant, we were excited about the facility that PTT Global Chemical America would build. The ethane



cracker and derivative units will produce plastic pellets used in everyday items that we all consume on a daily basis. This facility would use the abundant shale gas being extracted and produced right here in the tristate region. I have every confidence PTT Global Chemical America would build and operate the facility in a manner that is consistent with their other facilities, which has a strong emphasis on safety and environmental issues like protecting our water for generations to come.

While PTT Global Chemical America will not know until March of next year whether we'll ultimately go forward with this project, the time and the resources the company has already invested in our community has made a positive impact.

Over the past several months, PTT Global Chemical America and its representatives have taken the time to meet with me and other elected officials, community leaders and project-area property owners to listen to us and answer our questions.

We thank the folks at PTT Global Chemical America for treating us with dignity and respect, and we hope they ultimately will make this decision to call Belmont County/Mead Township home.

**Response 11:** Noted.

**Comment 12:** Game changer doesn't start to touch what this could be for our area. The phrase just isn't big enough. This is not an Ohio project; this is a regional project within a huge radius. I want to thank JobsOhio for contacting us more than a year ago and bringing us into the loop on things. This will just be phenomenal.

As you know, Moundsville is the largest population center close to the plant and this will totally change our life over there with a potential of using our natural gas over there being produced now also and hopefully downstream plants being built in this area.

When I ran for office over three years ago, I kept hearing jobs, we need jobs. This is beyond anything I ever dreamed of; white collar, blue collar, you name it,

quality, high-paying jobs for generations to come. So anyway, I heartedly endorse this on behalf of the Marshall County Commission.

**Response 12:** Noted.

**Comment 13:** I write in support of PTT Global Chemical America's proposed ethane cracker plant. This project is a game changer for our region, the state of Ohio and America.

The instincts of PTT and their partners are right: Ohio is truly the heart of America's energy renaissance, and I'm pleased that Gov. Kasich and JobsOhio continue to work so hard to bring jobs and economic development to Appalachia Ohio. For far too long, we have been a forgotten region of the state, and this promising project is evidence that this changing. Those counties that have the shale play in them have seen unemployment drop by as much as 66 percent. The Ohio Valley, and the broader region, could see a manufacturing renaissance like we haven't seen in generations.

I look forward to continuing working with various state agencies, local officials, work force and labor groups and the hardworking people of eastern and southeastern Ohio to help bring this important project to life. Again, I write in full support of this game-changing project and encourage its favorable consideration.

**Response 13:** Noted.

**Comment 14:** The impact that this project is going to have for the future tradesmen and -women that will be entering the trades, as well as the employers who employ our craftsmen and women, the impact will be tremendous.

This isn't just the Shadyside or this area or the Powhatan thing, the impact that this is going to have on this entire community is unbelievable. We are supportive of this, and just wonderful to see to many different people coming together to support of a project for this area.

**Response 14:** Noted.

**Comment 15:** I support this effort 100,000 percent. I come biased, because I work for an unemployment office in West Virginia, and so I desperately, desperately want employment to improve so our men and women can get back to work, so that our children and grandchildren can have a future here.

I come also as an unofficial chronically ill person because other companies, businesses, chemical plants in the Valley have perhaps caused a few problems. It might support or sustain the medical practices. So some of us, even though I do work and live here and have most of my life and love it here, and, again, want the facility to be a reality, I do just mention that in the vein that, please within all the powers of the Lord, that safety, protection of our citizens, and I don't even know all the adjectives I can use, but any measures to help protect the health and the welfare and the safety of the residents who either live here or plan to come as a wonderful opportunity for employment and/or to live in this community.

**Response 15:** Noted. Public health would be protected from facility emissions in a number of ways. First, workers at the plant are protected by federal Occupational Safety and Health Administration rules that address exposure to chemicals. Second, the NPDES permit limits are set to protect people who fish the Ohio River against chemicals that accumulate in fish.

**Comment 16:** I am a resident of Dilles, probably one of the oldest residents down there. My husband was born and raised in Dilles and we started our marriage in Dilles. We've been down there for almost 52 years. We as residents are not against PTTG, we appreciate them coming forward with the different meetings and answering our questions and hearing us, and we would like to thank all the respective people that have done that and hope the communications continue.

We all have our own struggles; my husband is currently in the Care Center now. So my struggle is me alone trying to pack up 52 years of stuff, our treasures as they're called, and him laying out there just saying, "I've

**lived in Dilles, I've lived in Dilles." We have nothing against the plant, but we want treated right.**

**Response 16:** Noted.

**Comment 17:** I'm here in support of the project. But one thing I haven't heard a lot of is how much it will affect the smaller businesses here in the Valley. I grew up in Powhatan not more than 100 yards from the river, and it was in the early '70s, late '60s and the river was, as I heard someone else say, it was bad. In the last 15 years or 20 years, the mines and the EPA have worked together, and we've mined more coal in this area than probably any place in the United States. The river and creeks are cleaner than they've ever been. I think that corporations and the EPA could work together to help the unions and small business people like myself.

**The other thing is I don't think the corporation that's considering moving here could find a better working force. Everybody's hardworking people in the Valley.**

**Response 17:** Noted. Ohio EPA takes pride in the water quality improvement in Ohio's rivers over the past 20 years. Taken collectively since the 1980s, the quality of aquatic life in all of Ohio's large rivers has shown a remarkable improvement. Then, only 21 percent of the large rivers met water quality standards, increasing to 62 percent in the 1990s, to 93 percent by late in the first decade of the 2000s. Biological improvement in wadeable streams and rivers has gradually been improving since the 1990s as detailed in the Ohio 2016 Integrated Water Quality Monitoring and Assessment Report (Ohio EPA, 2016), found at the following link: <http://www.wapp.epa.state.oh.us/dsw/2016IR.pdf>

Water Sampling and Point Source Discharge Concerns

**Comment 18:** I am concerned that from what I understood at the EPA hearing last night in Shadyside, Ohio, the water samples will be taken by the cracker plant officials. If the EPA can't take the samples, why can't the Belmont County Soil and Water Conservation personnel do this?

**Response 18:** While PTTGC could arrange for Belmont County to take samples under the conditions of a permit, Ohio EPA has no legal authority under the NPDES program to require this

sampling be done by a third party. The national NPDES compliance program is based on self-monitoring with annual, independent quality control checks and periodic compliance sampling by state or federal authorities.

**Comment 19:** **As far as the river goes, it is one of the most polluted rivers in the United States. The fish in the Ohio are so contaminated that they can't be eaten. The idea of polluting it more is outrageous. The Ohio River needs cleaned up, not more polluted. We need to protect our fresh water supplies not contaminate them.**

**Response 19:** Prior to the enactment of the Clean Water Act, the Ohio River, like many of the nation's large rivers, became a conduit for sewage and untreated industrial waste. The Clean Water Act has required sewage treatment plants and industrial sources are to be operated under permits that limit the pollutants that can be safely discharged. This has resulted in dramatic improvement in water quality. While there is more work to be done in improving water quality, any permits that would be issued for this facility would contain permit limits that would be protective of water quality. These limits would be set at levels that meet or exceed concentrations required to protect fish and fish tissue.

Additionally, fish caught in the Ohio River can be consumed in moderation. A list of the fish species to be consumed on a limited basis can be found at the following link:  
<http://www.orsanco.org/images/stories/files/publications/brochures/state%20of%20the%20ohio%20river.pdf>

**Comment 20:** **Because Ohio EPA has not conducted a watershed study recently in the area, someone requested that U.S. EPA have oversight on this permit application.**

**Response 20:** The United States Environmental Protection Agency (U.S. EPA) does have federal oversight over the 402 and 404 permit applications.

Ohio EPA has been delegated the authority to issue NPDES (402) permits in the state. The draft permit is Ohio EPA's responsibility, although U.S. EPA may review the permit if they choose. Any permit drafted by Ohio EPA is required to meet state water quality standards and federal treatment

standards. A watershed study is not needed to issue a permit to PTTGC; the company is not proposing to discharge any of the pollutants responsible for impairments in the Ohio River.

The U.S. Army Corps of Engineers (U.S. ACE) Department of the Army 404 permit is a federal permit that is certified by the issued 401 WQC. The issued 401 WQC will ensure the project will not prevent or interfere with applicable state water quality standards, while the issuance of the 404 permit ensures the project meets the 404(b)(1) guidelines found in federal law. U.S. EPA reviews and comments on individual 404 permit applications to the U.S. ACE and U.S. EPA also has veto authority over 404 permit decisions issued by the Corps.

Lastly, Ohio EPA conducted an in-depth watershed survey of this watershed in 2009. This survey included the biological, habitat, surface water and recreation (bacterial) conditions of the watershed. Big Run (the main stream onsite) was found to have poor water quality due to large gob piles located adjacent to the stream (Biological and Water Quality Study of the McMahon Creek Watershed and Selected Ohio River Tributaries, 2009, Ohio EPA Report DSW/EAS 2010-4-2 available online at <http://www.epa.state.oh.us/portals/35/documents/McMahonCreekTSD2009.pdf>)

#### Wetland Impact and Mitigation Concerns

**Comment 21:** I'm a little concerned about if they mess up one area then they would have to make things up in another site. Well, there are islands in that river that I personally love so much, and I don't want anything to happen to those islands. We're passionate about the river, and we're trusting that you will keep it safe and just keep it getting it better and better for us.

**Response 21:** The current project design does not propose to fill or alter the islands in the Ohio River in any way.

The proposed wetland mitigation is in "watershed" which is defined in Ohio Administrative Code (OAC) 3745-1-54 as a common surface drainage area corresponding to one from the list of 37 adapted from the 44 cataloging units as

A map of Nigeria divided into administrative regions, each labeled with a code. The codes are as follows:

- 04100002
- 04100006
- 04100009
- 04100010
- 04100005
- 04100007
- 04100008
- 04100011
- 04100012
- 04110001
- 04110003
- 04110004
- 04110002
- 05030103
- 05040002
- 05040003
- 05040005
- 05040006
- 05040004
- 05030204
- 05030201
- 05030202
- 05030101
- 05030102
- 05060001
- 05060003
- 05060002
- 05080001
- 05080002
- 05090202
- 05090201
- 05120101
- 05120103
- 05080003

**Comment 22:** I have been following all the writings on this cracker plant, and I think it is going to be bad for the Ohio Valley. The tons of toxins it will produce will stagnate over the valley, because it is a valley, creating severe

health problems. What is even worse than this, is the probability of these toxins mixing with the fog from the river and creating smog.

I am also concerned about the people who live around Dilles Bottom. Recently, people around Hannibal had to be evacuated because of a chlorine gas leak. People lost plants, animals and had to postpone some events because of it. There are children who live in Dilles Bottom. Also, what about the city of Moundsville right across the river from the proposed site? These people's lives matter more than making a buck.

I, like most people in the valley, enjoy getting outside in the fresh air. If the day comes, when I must wear a mask because of the pollution around my house, I will litigate those responsible. I have a right guaranteed by the Constitution to life and I plan on defending that right.

**Response 22:** This Response to Comments specifically addresses concerns relating to water quality. Comments regarding air quality will be solicited during the public comment period initiated after Ohio EPA's Division of Air Pollution Control public notices a draft air permit-to-install.).

**Comment 23:** I am very concerned about the possible construction of the PTT America plan to be possibly being built in Belmont County. I live in Moundsville, West Virginia, and my home is directly across the Ohio River from where the plant is to be built. I am very concerned about the emissions coming from the plant. I would appreciate any type of contact or information you could send me about this plant. I eagerly await your reply.

**Response 23:** See Response No. 22.

**End of Response to Comments**