

Dear Ohio EPA Officials,

I am standing here today on behalf of the Ohio Environmental Council to express strong concerns regarding the draft permit issued to SOBE Thermal. We have heard the voices of the residents in and around Youngstown who have asked policymakers to address the environmental impacts of this type of facility. And we join them in this fight. After careful consideration of the information provided, it is our assertion that granting this permit would not lead to a better environmental outcome for the City of Youngstown or the Mahoning Valley.

On a personal note, I grew up here in Youngstown and still call this Valley home. At times during my childhood, I lived blocks from the former Youngstown Thermal plant. I went to YSU and have had my fair share of visits to St. E's main campus, both blocks away. I spent many days at the nearby WRTA bus station as a kid and walked with my dad to football games at the former Buckeye Elks field. Today, I take every chance I can to walk all over downtown – taking meetings and enjoying events. My roots are here and firmly grounded in this Valley. Like many of you in this space, I want to see our community – and our environment – thrive.

Youngstown and Mahoning Valley have experienced a legacy of environmental injustice over the past century. From industrial pollution caused by the steel mills, a history of extractive out-of-town businesses, or the recent train derailment in East Palestine, the region has been hit hard. The communities throughout the region deserve a future built on renewable energy and sustainable economies, rather than fossil fuels and sacrifice zones.

It is alarming to note that the syngas produced by SOBE Thermal's proposed facility is projected to have a higher carbon dioxide output at 1604 lbs/hr compared to the existing carbon dioxide emissions of 1425 lbs/hr when burning methane gas. This potential increase in carbon dioxide emissions directly contradicts the goal of reducing greenhouse gas emissions and addressing climate change, a priority passed by Youngstown City Council this past year. If the applicant believes that burning syngas will, in fact, reduce greenhouse gas emissions, it must provide the data. Any calculations should also take into account fugitive emissions.

Secondly, in accordance with OAC 3745-31-05(H), the Director has the authority to consider the social, economic, and environmental impacts of granting a permit. Given the historical environmental injustices experienced by the people of Youngstown and the Valley, it is our firm belief that any negative consequences arising from this facility's unproven technology would unjustly burden an already vulnerable population. Within a mile of the facility there are two homeless shelters, two community kitchens, a county jail, a large hospital, several low income housing complexes, a university, a community college, several schools, a public transportation hub, a transforming downtown business and entertainment district, and four high rise apartment communities serving senior and disabled residents. Additionally, the facility is only steps from the Mahoning River, which is seeing great improvements as industrial-era dams are removed. Any mishap at the facility could cause catastrophic effects and devastate this community.

I implore the Ohio EPA to prioritize the well-being of the community and the environment by carefully reconsidering the issuance of the permit to SOBE Thermal. It is essential that decisions regarding permits for facilities with potential adverse impacts are made with the utmost consideration for the long-term health, equity, and sustainability of the affected area. The permit references the importance of considering environmental justice. Environmental justice requires including the impacted community in the decision-making process not just through comment periods, but by meaningfully listening to and empowering them.

Across Ohio, local communities have been given the opportunity to oppose and reject renewable energy projects at the Ohio Power Siting Board. While the OEC does not agree with those decisions, we do understand the importance of local communities voicing their perspectives. Here, in Youngstown, the community is standing up against a polluting industry, burning greenhouse gasses and affecting community health. Their perspectives should be accorded due weight.

The Ohio Environmental Council plans on developing additional technical comments prior to the comment deadline. Today, we urge you to take into serious consideration the voices of local residents, activists, and officials in opposition to the proposed future operations of SOBE Thermal.

Thank you for your time and attention to this critical matter.