Ohio Environmental Council

November 9, 2026

Ohio EPA, Central District Office
50 West Town St. Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

Submitted via: ohioepa.commentinput.com

RE: CWA Section 401 water quality certification for construction of PORTS Technology Campus – Ohio EPA ID No. 262779A2

Dear Ohio EPA, Division of Surface Water,

The following comment is submitted on behalf of the Ohio Environmental Council (OEC). The OEC is a non-profit environmental organization with thousands of members throughout Ohio and beyond. Our mission is to protect the environment and health of all Ohio communities through legal and policy advocacy, decision-maker accountability, and civic engagement.

The OEC requests that Ohio EPA deny the PORTS application for Clean Water Act, Section 401 water quality certification for the following reasons:

- The magnitude of the proposed lowering of water quality is significant. The proposed Project would require the destruction and permanent loss of approximately 8,999 linear feet of perennial stream, 17,780 linear feet of intermittent stream, 12,006 feet of ephemeral stream, 1.14 acres of Category 1 PEM wetland, 0.22 acres of Category 2 PEM wetland, 0.20 acres of Category 2 PFO wetland, 0.09 acre of Category 1 PSS wetland and 0.43 acres of open waters would be permanently impacted from excavation and grading activities, as required by the Project. Given these impacts, the Project will prevent or interfere with the attainment or maintenance of applicable water quality standards.

- The magnitude of the Project's impact on water quality has not been fully disclosed. The PORTS Project proposal includes the construction and operation of what would be the largest natural gas-fired power generator in the world, at approximately 9.2 gigawatts. The first PORTS Energy Center is currently moving through administrative processes at the Ohio Power Siting Board (Case No. 26-0746-EL-BGN), and its construction footprint is nearly contiguous with the project outlined in this application. The 401 application does not appear to include an evaluation of this uniquely massive component of the Project nor its potential environmental impacts. The impacts to water resources outlined in this application cannot be fully understood in isolation from the impacts of the PORTS Energy Center.

- Potential radiological and hazardous chemical contamination. Given the Project's direct adjacency to the former DOE Portsmouth Gaseous Diffusion Plant (a site with

documented radiological and hazardous chemical contamination), thorough radiological testing (e.g., uranium isotopes, technetium-99), volatile organic compound testing (e.g., trichloroethylene/TCE), and heavy metal testing must be conducted in connection with the Application's geotechnical investigation or environmental due diligence. Ohio EPA should require chemical analyses of water, sediment and fill material, and bioassays and biological monitoring.

Thank you for the opportunity to comment on the PORTS Project application for Clean Water Act, Section 401 certification. Please deny certification for the Project at this time.

Sincerely,

/s/ Nathan Johnson
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