



**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor  
**Anne M. Vogel**, Director

May 12, 2023

Mr. Tom Hetrick  
President, Youngstown City Council  
26 S. Phelps St.  
Youngstown, Ohio 44503

Dear Councilman Hetrick,

Thank you for reaching out regarding SOBE Thermal Energy Systems' (SOBE) proposed operations.

In July 2022, Ohio EPA received notification forms for SOBE to operate two new boilers using only natural gas as fuel. These boilers were permitted at their Youngstown location by meeting requirements of a permit-by-rule (PBR), a permit provision in the Ohio Administrative Code that applies only to a certain type of air pollution source or facility. The PBR contains qualifying criteria, emission limitations, conditions for operation and requirements for record-keeping and reporting.

In September 2022, SOBE submitted an air permit-to-install and operate (PTIO) application to Ohio EPA for a scrap tire Thermolyzer (gasification) unit. The PTIO application also requests to use the synthetic gas produced by the gasification unit as fuel in the two new boilers, along with the natural gas that SOBE has already installed. The PTIO is currently the only permit application before Ohio EPA.

Ohio EPA's regulations and standards are designed to protect the public health of all Ohioans. Ohio EPA performs a thorough review of all permit applications prior to issuance, to ensure the proposed operation will comply with Ohio's environmental rules and laws. An important aspect of our air permit reviews includes consideration of whether the proposed location meets federal air quality standards. If the area's air quality does not meet standards, stricter permitting requirements may apply. Ohio EPA has an air monitoring site nearby on Youngstown State's campus that monitors for ozone, particulate matter, and sulfur dioxide. All are showing the outdoor air quality meeting federal standards.

Another important aspect of our permit reviews includes attention to public interest. If Ohio EPA is aware of significant public interest, as we are with SOBE, Ohio EPA will often issue the permit as a draft and ask for public input prior to making a final decision. If the permit application meets Ohio's environmental rules and laws, Ohio EPA plans to issue the permit as a draft and will include a 30-day public comment period.

If a draft permit is issued to SOBE, Ohio EPA will hold a public meeting in the community where our team will go over the content of the draft permit and answer questions from the community. This public meeting will also include a formal public hearing to accept the community's comments on the draft permit. While we can only consider comments within the scope of our environmental authority, the public comment process can result in changes to final permit terms and conditions to address specific concerns.

Ohio EPA reviews applications to ensure that the proposed operations will comply with requirements and are protective of human health and the environment. Ohio EPA does not dictate the technology used by a company as long as the permit application demonstrates that the air emission controls, and monitoring will

meet pollution control requirements. Authorization from Ohio EPA for this project would not supersede any safety requirements from other authorities, such as OSHA, the local fire department, local zoning authority, etc.

I hope we can continue this open dialogue throughout the public comment and permitting process.

If you have further questions, please feel free to contact Ohio EPA.

Sincerely,

A handwritten signature in black ink that reads "Anne M. Vogel". The signature is written in a cursive style with a large initial "A" and "V".

Anne M. Vogel  
Director, Ohio EPA