

Some Questions to Ask the OHIO EPA About SOBE Youngstown Environmental Justice Concerns

from Permit Strategy write-Up, #6. EJ:

Ohio EPA has taken steps to address Environmental Justice (EJ) Concerns in the area where the proposed project is located. Ohio EPA performed an EJ analysis using the EJ screening tool to determine the main demographic and environmental indicators that classify this as an EJ area. Ohio EPA will be conducting a public hearing as part of the EJ plan, and Ohio EPA's Public Interest Center (PIC) has developed a plan of steps to address EJ concerns during the permitting process and after the permitting process.

What steps has the Ohio EPA taken to address EJ Concerns in the area?

Where is the OHEPA EJ analysis data for this area?

When and Where will the EJ public hearing be held?

Shouldn't the EJ plan be revealed and publicly discussed BEFORE the final permit is issued?

Youngstown, OH EJ data: People of color: 59% of total White population: 43%

Black population: 48% People who rent their homes: 71% of total

Designated an EPA "disadvantaged community": YES

Air non-attainment: YES The draft permit states that the County is in attainment

Health Indicators: Low life expectancy - 27% of total; or 96th percentile in the

US; Heart disease - 93rd percentile in the US; Asthma - 97th percentile in the

US- Youngstown was #7 in the top 100 cities for asthma in 2018, and Persons

with disabilities - 96th percentile in the US

In the Mahoning Valley, we have the highest rates of black infant mortality in

Ohio and one of the highest in the nation.

Where is the Ohio EPA's Public Interest Center (PIC) plan of steps to address EJ concerns during the permitting process and after the permitting process?

Pg 2. #7: "The permit terms include adequate monitoring, recordkeeping, reporting, and sampling and testing requirements to demonstrate this emerging technology's compliance with the Clean Air Act, and is protective of human health and the environment."

What are these specific requirements and how can Youngstown residents be kept up-to-date on SOBE's compliance with these requirements?

How does the OHEPA enforce compliance from the company?

Are there measures the OHEPA takes to check the data that is self-reported by the company?

Does the OHEPA schedule visits to the company to make sure they comply with the Clean Air Act?

SOBE site is less than 1/4 mile from a steel mill, Vallourec (a Title V polluter), a concrete plant, and metal recycling business. As per the EJ "goal of reducing combined risks to human health or the environment from multiple agents or stressors," **What regulatory enforcement(s) will OHEPA implement to address EJ concerns specific to multiple sources of air emissions?**

We are in a valley, prone to atmospheric inversion which concentrates toxic air emissions from the ground to the bottom of the inversion layer.

How will the OH EPA increase air monitoring for cancer-causing chemicals since inversion will subject our community to toxic exposure?