



December 26, 2016

*Via Electronic Mail*

Christopher Kriley, Regional Clean Water Program Manager  
Ryan C. Decker, P.E., Environmental Engineer, Clean Water Program  
Pennsylvania Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
[ckriley@pa.gov](mailto:ckriley@pa.gov)  
[rydecker@pa.gov](mailto:rydecker@pa.gov)

**Re: Additional Comments of the Environmental Integrity Project, et al,  
Regarding Draft NPDES Permit No. PA0002208, Amendment No. 1, for the  
Shell Chemical Appalachia LLC Shell Chemical Appalachia Petrochemicals  
Complex in Potter and Center Townships, Beaver County**

Dear Mr. Kriley and Mr. Decker:

The Environmental Integrity Project (“EIP”), Three Rivers Waterkeeper, Clean Water Action, Air Quality Collaborative, Beaver County Marcellus Awareness Committee (BC-MAC), PennEnvironment, Sierra Club, Clean Air Council, Women for a Healthy Environment, Cracker Plant Impact Initiative (CPI Initiative), Moms Clean Air Force, Allegheny County Clean Air Now (ACCAN), League of Women Voters Pennsylvania, Sustainable Pittsburgh, Clean Air Council, Pittsburgh Office, and Allegheny County Clean Air Now, and five individuals (together, “Commenters”<sup>1</sup>) hereby submit these additional comments regarding the Pennsylvania Department of Environmental Protection’s (“DEP” or “Department”) Draft Amendment 1 to National Pollutant Discharge Elimination System (“NPDES”) Permit Number PA0002208 (“Draft Permit”) for Shell Chemical Appalachia LLC’s (“Shell”) Shell Chemical Appalachia Petrochemicals Complex (“the Petrochemical Plant” or “Shell Cracker Plant”), to be located at the site of a former zinc smelter and coal-fired power plant (“the site”) in Potter and Center Townships, Beaver County.

Commenters incorporate by reference the comments previous submitted by EIP on October 18, 2016. We are thankful that DEP both held a public hearing and reopened the public comment period for this Draft NPDES Permit Amendment given the many concerns the public has regarding the potential water pollution impacts of this project. These comments are intended

---

<sup>1</sup> Commenters and their addresses are listed in full at the end of these comments. Due to the holidays, there were some additional Commenters from the October 18, 2016 comments that may not have been able to join in time.

to highlight and further support some of the issues raised in the many questions and concerned comments from the public regarding the failure of this Draft Permit to ensure strict compliance with applicable Clean Water Act and Clean Streams Law requirements.

## **I. Comments**

### **A. The TDS limit of 2,000 mg/L that applies to all new facilities applies to the Shell cracker plant, and DEP's failure to impose this TDS limit is inconsistent with Pennsylvania regulations.**

The 2010 TDS treatment requirements – and specifically a TDS monthly average limit of 2,000 mg/L – applies to Shell, a new facility with a different industrial classification and a different type of industrial wastestream with different outfall types and locations than the Horsehead Monaca Zinc Smelter. In addition to the arguments Commenters provided in our October 18, 2016 comments and oral testimony on December 15, 2016, Commenters are writing to further bolster this argument and refute DEP's argument that Shell met the regulatory definition of an "existing" TDS load by virtue of being transferred the permit from the now-defunct Horsehead Monaca Zinc Smelter.

#### **1. High TDS levels are dangerous for human health and wildlife.**

DEP's Draft Permit imposes no limit at all on TDS into the Ohio River, Poorhouse Run, or Rag Run from any outfall. DEP needs to impose the required TDS treatment limits on Shell because the discharge of high concentrations of TDS can have real-world consequences on health and the environment. DEP itself admitted the dangers of high TDS concentrations for PA waterways when it promulgated the 2010 TDS treatment requirements. As DEP stated: "Total Dissolved Solids (TDS) are dissolved materials (e.g. chloride, sulfate, sodium, manganese) in water. TDS is naturally present in rivers and streams, but it can be greatly increased as the result of runoff, mining or industrial or municipal treatment of water. The major concerns with high concentrations of TDS in water are the adverse effects it may have on aquatic life, human health, and drinking water supplies. High concentrations of TDS can make waters saltier, harder, and potentially toxic to fish and other wildlife." DEP, TDS Plain Language Summary, 2011, <http://files.dep.state.pa.us/water/Wastewater%20Management/WastewaterPortalFiles/TDS/TDSPainLanguageSummary11-3-11.pdf>.

Furthermore, the recently released Southwestern Pennsylvania Sustainability Goals & Indicators Report, among its 29 measures of regional prosperity, includes measures of TDS. Estimates of TDS are included due to TDS being critical to assessing water quality. The report finds that measurements show water quality is improving but is highly susceptible to adverse impacts from industrial activity. Sustainable Pittsburgh, Southwestern Pennsylvania Sustainability Goals & Indicators Report, at 57, <http://sustainablepittsburgh.org/2016Report/web/viewer.html#page=54>.

2. Shell does not meet the requirements to be exempt from DEP's TDS treatment requirements for new and expanding dischargers.

DEP did not approve an existing TDS load for the Shell plant because Shell's discharges will be from a brand new facility for which DEP never authorized a TDS load and neither of the two exemptions relied upon by Shell or DEP apply to the Shell Petrochemical Complex. Pennsylvania regulations require facilities with new and expanding mass loadings of TDS to meet a limit of 2,000 mg/L as a monthly average. 25 Pa. Code 95.10(c). Shell claims it is not a new or expanding mass loading because it is exempt according to subsections 95.10(a)(1) and 95.10(a)(7). DEP, Fact Sheet, at A-2. The first of these states:

Maximum daily discharge loads of TDS or specific conductivity levels that were authorized by the Department prior to August 21, 2010. These discharge loads will be considered existing mass loadings by the Department.

(i) Relocation or combination of existing discharge points of existing mass loadings of TDS do not constitute a new or expanding mass loading unless total mass loadings are increased.

(ii) Existing publicly owned treatment works (POTW) as defined in § 92.1 (relating to definitions) and industrial waste treatment facilities authorized prior to August 21, 2010, under permits authorizing the acceptance, treatment and discharge of TDS do not constitute a new or expanding mass loading unless total mass loadings accepted, treated and discharged are to be increased. Only the net increase in TDS mass loadings from these facilities will be considered a new and expanding mass loading of TDS.

25 Pa. Code § 95.10(a)(1). The second states there will be an exemption for "New and expanding discharge loadings of TDS equal to or less than 5,000 pounds per day, measured as an average daily discharge over the course of a calendar year, otherwise known as the annual average daily load." *Id.* § 95.10(a)(7).

As detailed in our October 18, 2016 and added to below, Shell does not qualify for either of these exemptions.

a. Neither the Shell facility nor Shell's discharges had an authorized TDS load as required under the (a)(1) exemption.

First, the exemption in (a)(1) clearly applies to *facilities*, but the Shell *facility* was never authorized in any manner or in any permit at all by the DEP prior to 2010. The first exemption clearly states that it is available for "industrial waste treatment *facilities* authorized prior to August 21, 2010 . . ." 25 Pa. Code § 95.10(a)(1) (emphasis added). Shell and DEP cannot claim that Shell's Petrochemical Plant *facility* was ever authorized to discharge TDS prior to 2010. In fact, DEP has already admitted this is a "*completely new facility*" than the zinc smelter. DEP, Fact Sheet, at 31 (emphasis added). Even if Horsehead's Monaca Zinc Smelter, could be said to have been "authorized" to discharge TDS according to its 2001 permit or 2006 permit

application (which is in question in the first place), Shell's facility – the Petrochemical Complex – is still not built, was not authorized to discharge anything prior to 2010, and no permits were even applied for by Shell for this facility at that time.

Similarly, Shell's discharge never had an authorized TDS load. DEP's guidance document states "Section 95.10 (a)(1) effectively exempts any existing mass loading of TDS up to and including the maximum daily discharge loading *for any existing discharge*, provided that the loading was authorized prior to August 21, 2010." DEP, Technical Guidance (Nov. 12, 2011), <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-85967/385-2100-002%20tech%20guidance.pdf>. DEP states multiple times that this is a new facility with completely different discharges, and there is no existing discharge. *See, e.g.*, DEP, Fact Sheet, at 22 ("construction has not yet begun on the facility from which the discharge of OCPSF ELG-regulated pollutants will occur," and "the facility will be constructed at a site where no other source is located," so "for these reasons, the petrochemical plant is considered to be a new source.").

- b. Shell does not qualify for an exemption from the new discharge TDS treatment requirements under (a)(7) because even if DEP were to apply the old TDS limits, Shell's discharges are expanding, increasing the TDS load by more than 5,000 pounds.

Although it is clear the "existing" TDS loading from Horsehead's zinc smelter should not apply here, even if this were the same existing facility (which it plainly is not), DEP's calculations are unclear, at best, and actually appear to support that Shell will be discharging *more than* the exempted expanded loading of 5,000 pounds relative to the Horsehead facility, so the exemption should not apply anyway. DEP and Shell's calculations are confusing on several fronts and following their purported method for calculation actually show that Shell will be discharging a TDS load of 78,729.6 lb/day from Outfall 101 alone (through Outfall 001) – more than 5,000 lb/day than either the average daily load of 65,556 lb/day or maximum daily load of 73,184 lb/day DEP calculated for Horsehead based on its 2006 application.

The 2006 application materials, which DEP did not authorize until a permit was issued in 2015, are not a TDS load authorized by DEP prior to 2010. This is further bolstered by the fact that DEP apparently was first running these numbers to figure out what the TDS load was at that time (2006) in the 2016 Draft NPDES Permit because DEP admitted there was no existing discharge.

Nonetheless, even if we apply DEP's calculations on page A-2 of its fact sheet are correct for the 2006 numbers, the Horsehead zinc smelter's TDS load according to its 2006 application would have been an average daily load of 65,556 lb/day and a maximum daily load of 73,184 lb/day, using the TDS mass values from only Outfalls 004 and IMP 101. DEP walked through the calculations for these 2006 values in its Fact Sheet; however, when it was time to compare those to Shell's estimated TDS load, DEP did not show its calculations; it simply said that the discharge was 1.28 MGD at a TDS concentration of 4,690 mg/L, which is 50,078 lb/day and that

the dry weather loading would be less than that. Both of these conclusions are inaccurate, and DEP must show its numbers.

First, the TDS load using 4,690 would be 50,066.69 lb/day, not 50,078. Next, and more importantly, running the same equation for dry weather, would yield a loading of 78,729.6 lb/day:

$$8.34 \times [(1.28 \text{ MGD})(7,375 \text{ mg/L})] = \mathbf{78,729.6 \text{ lb/day}}$$

This value, 78,729.6 lb/day, represents the TDS load for the Shell cracker facility, and this value is more than 5,000 lb/day higher than either the average daily loading (65,556 lb/day) or the maximum daily loading (73,184 lb/day) from Horsehead's 2006 application. DEP did not provide any rationale for excluding the higher calculation, and DEP's guidance document, upon which DEP relied to exclude noncontact cooling waters from this analysis, does not mention anything about excluding dry weather TDS loadings from the analysis. *See generally*, DEP, Technical Guidance (Nov. 12, 2011), <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-85967/385-2100-002%20tech%20guidance.pdf>. In fact, DEP itself notes elsewhere in its Fact Sheet that "the dry weather data will be used because water quality analyses are supposed to be modeled at Q7-10 low stream flow conditions pursuant to 25 Pa. Code § 96.4(g)." DEP, Fact Sheet, at 33. Dry weather TDS values should be applied here, as well.

There are many other holes and plain language definitions that disqualify Shell from the exemption for existing TDS loads, but, additionally, Shell cannot be considered exempt under 25 Pa. Code § 95.10(a)(7) based on these calculations.

3. Shell has already stated its willingness and ability to comply with these TDS limits.

Shell's ability or willingness to pay to comply with regulatory requirements is not a factor in whether they have to comply, but, in any case, Shell has already indicated a willingness and ability to pay to comply with the more stringent TDS regulations that DEP must impose. For one, Shell is the fourth-largest company in the world by revenue, and it has received a historic \$1.65 billion in tax incentives – the largest in Pennsylvania history – to build this plant. Anya Litvak, "On the fenceline and on the fence about the Shell cracker plant," *Pittsburgh Post-Gazette* (Dec. 12, 2016), <http://powersource.post-gazette.com/powersource/consumers-powersource/2016/12/12/On-the-fenceline-and-on-the-fence-about-Shell-cracker-plant-pennsylvania-beaver-county/stories/201612120024>. Shell has far greater resources than many other new facilities that must comply with new discharger TDS limits.

Furthermore, Shell has already stated that there are "several" ways to "eliminate" TDS if required, and that they would comply if required by DEP: "There are several ways to eliminate TDS if required," he said. "If the agency determines protection of the environment necessitates such a development, we would work with (the Pennsylvania) DEP to develop the most efficient solution." Anya Litvak, "Transfer permit could allow Shell to avoid pollution limits," *Pittsburgh Post-Gazette* (Dec. 22, 2016), <http://powersource.post->

[gazette.com/powersource/companies/2016/12/22/Transfer-permit-could-allow-Shell-to-avoid-pollution-limits/stories/201612220067](http://gazette.com/powersource/companies/2016/12/22/Transfer-permit-could-allow-Shell-to-avoid-pollution-limits/stories/201612220067).

Shell's brand new facility cannot pass the "straight face" test as a facility with a discharge that had an "existing" TDS load authorized by DEP, and cannot be exempted from complying with TDS treatment requirements. Adding to that that Shell has the financial resources to comply and has already admitted there are many ways to actually "eliminate" TDS and that it would do so if required, Commenters see no remaining justification for DEP to fail to impose this important limit to ensure a reduction of the TDS load that will enter the Ohio River from the Shell Cracker Plant.

**B. DEP should reject this permit application and require Shell to submit a new application for an individual NPDES permit.**

As commenters discussed in detail in our October 18, 2016 comments, Shell's ethane cracker plant is, as DEP has stated, a "completely new facility conducting different industrial activities than the Horsehead Monaca Zinc Smelter, which has been "demolished." DEP, Fact Sheet, at 31–32. DEP also stated "[t]he former Horsehead Monaca Smelter Plant previously located at the site was almost completely demolished prior to submission of the NPDES permit amendment application for the petrochemical plant. For these reasons, the petrochemical plant is considered to be a new source." DEP, Fact Sheet, at 22. Furthermore, it is clear that Shell sought to have Horsehead's permit number transferred so that it could avoid attempt to avoid having to comply with legally required limits, including TDS treatment limits of 2,000 mg/L on a monthly average. DEP admits:

Shell requested to maintain the NPDES permit previously issued to Horsehead Corporation (NPDES PA0002208), in part, to maintain the existing TDS loading that was implicitly authorized under that NPDES permit for discharges from Horsehead Corporation's Monaca Zinc Smelter. Shell's request is not necessarily consistent with the intent of § 95.10 given that the change of wastestream and/or hydraulic expansion envisioned by the regulation is supposed to be an existing wastestream at an existing facility and not a new discharge from a completely new facility conducting different industrial activities.

DEP, Fact Sheet, at 32–32. DEP must not allow this brazen attempt to circumvent requirements aimed at protecting health and the environment, and must require Shell to reapply for a new permit with a new permit number for the discharges from this brand new facility.

In addition to the arguments previously made, Commenters are concerned about specific data that Shell's application was missing.

1. Shell’s 2015 Amendment Application failed to include information that would have been required in an individual NPDES application for a new discharger.

In addition to the general concern that an Amendment Application fails to require the same breadth of information about expected discharges than an application for an individual NPDES Permit for a new discharger, Commenters have specific concerns that Shell failed to submit important data. For example, Shell’s November 2015 Application has no estimated pollutant discharge information for IMP 201. While DEP’s Draft Permit imposes effluent limits for pH and free available chlorine and a flow reporting requirement, it is unclear where these requirements came from as the application and fact sheet do not include them.

**II. DEP must require that the monitoring requirements and limits in place during the Interim Period remain in place until there is no evidence of contamination of each pollutant.**

DEP admitted in the public hearing that the Draft Permit is not clear regarding when the Interim limits and monitoring requirements would be removed, and stated that their intent was that these limits would remain in place until sampling data show no evidence of contamination. Please ensure that the final Draft Permit and Final Permit reflect this and clarify how that would be measured.

DEP’s Draft Permit eliminates “Interim Limits” on legacy pollutants from this site once the Final Limits (for different pollutants related to Cracker Plant wastewater discharges) apply. Specifically, the following table (also in our October 18, 2016 comments) shows the pollutants that will be deleted once the interim period ends. How can DEP ensure the acknowledged lead, arsenic and other contamination on the former Horsehead Corporation Zinc Smelter site will not contaminate local drinking waterways if DEP does not require long-term monitoring of these pollutants?

**Table. Pollutants (With Limits and/or Monitoring Requirements in the Interim Period) That Are Deleted from the Permit After the “Interim Period” Ends**

Outfall 004	Outfall 007	Outfall 008	Outfall 009	Outfall 010	Outfall 013
Nitrate-Nitrite, Aluminum, Arsenic, Cadmium, Chromium, Copper, Fluoride, Iron, Lead, Thallium, Zinc	Arsenic, Barium, Cadmium, Chromium, Copper, Fluoride, Manganese, Mercury	Arsenic, Barium, Cadmium, Chromium, Copper, Fluoride, Manganese, Mercury	Arsenic, Barium, Cadmium, Chromium, Copper, Fluoride, Manganese, Mercury	Arsenic, Cadmium, Chromium, Copper, Fluoride	Arsenic, Cadmium, Chromium, Copper, Fluoride, Nickel, Thallium (plus Lead and Zinc limits and 2x/month monitoring replaced with 2x/year report only)

DEP mentioned in the public hearing that their intent is that these pollutants will be monitored until the monitoring data show there is no longer contamination, but that is NOT what

the Draft Permit currently states. The Draft Permit states that the Interim Limits will apply until the end of the “Interim Period,” at which point the final limits would apply, meaning that when the final limits kick in the Interim limits would no longer apply. Commenters agree with DEP’s statement at the public hearing that the monitoring and limits for the pollutants included during the interim period should run *concurrently* with the final limits after the final limits apply until their concentrations are low enough that DEP determines contamination is no longer occurring. Will DEP’s final permit be changed to reflect that change?

**III. DEP should impose monitoring requirements and limits based on WQBEL calculations modeled using a design flow of 3.75 MGD, not 3.28 MGD.**

As an Addendum to our previous comments, Commenters additionally add that modeling based on 3.75 MGD must be applied to WQBEL calculations. DEP’s Draft Permit states that “effluent limitations for Outfalls 001 were determined using effluent discharge rate of 3.75 MGD,” Draft Permit, at 63, but the Fact Sheet reveals that this was false – a discharge flow of 3.28 MGD was applied. DEP, Fact Sheet, at 33. DEP should impose any additional resulting monitoring requirements or limitations that are required using a flow of 3.75 MGD.

**IV. Select Additional Outstanding Questions**

a. Regarding TDS Calculations

- i. Was DEP supposed to include TDS discharges from any other outfall in its TDS load calculations? For example, DEP’s technical guidance allows the exclusion of noncontact cooling water and storm water runoff, but what about discharges from Outfall 015, the unpermitted seep?
- ii. Shell’s application actually states that the mass from Outfall 001 will be 91,442 lb/day. Shell, 2015 NPDES Permit Application for PA0002008 Amendment 1, at 22. The load from IMP 101 is 50,078 lb/day. Does the cooling water from IMP 201 contribute the balance of the TDS total, or 41,364 lb/day? Was this information excluded from application materials?

b. What is DEP’s basis for determining storm water runoff at Outfall 004 and other stormwater Outfalls “no longer requires treatment” (Fact Sheet, at 9)?

c. Did DEP receive copies of the data from other plants that Shell’s engineering estimates relied upon to estimate discharge concentrations and mass values? If so, can DEP share that data? What about Shell’s other plants’ compliance histories?

d. Cooling tower discharges:

- i. Shell claims its cooling water intake structure is “existing,” with a design intake flow (“DIF”) of 21.4 MGD, an actual intake flow (“AIF”) of 18 MGD and 87% of AIF used for cooling. because Shell is artificially reducing the capacity of the system, and DEP has declined to apply hexavalent chromium or zinc limits to IMP 201 despite the

fact that the zinc smelter did have discharges of these pollutants. This is a brand new facility – DEP should not allow Shell to reuse old equipment from an otherwise demolished plant for the sole purpose of evading effluent limitations that should apply to this new facility and new discharger. “New source” is defined in federal regulations, and Shell’s Petrochemical Plant and meets the definitions of a “new source” under 40 C.F.R. 7 122.2 and a standalone facility, meaning it is a “new facility.” 40 C.F.R. § 125.83.

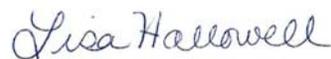
1. How is Shell not a new facility? The only way Shell can claim it is existing is by artificially reducing its capacity. DEP claims it will reduce the cooling system design capacity from 80 MGD to 21.4 MGD. Can DEP provide more information on the existing structure? Does DEP believe that federal regulators intended for a large, brand new facility to circumvent new facility regulations by “retaining” the “existing” intake structure from an otherwise demolished facility and “decreasing” the new plant’s design flow?
  2. Will DEP apply hexavalent chromium and zinc limits to IMP 201, or any additional requirements for these discharges?
  3. DEP, while requiring “at least daily” monitoring of actual intake flows, fails to require Shell to *report* actual intake flow data until the next permit application, which is not required to be submitted for 4.5 years from when this permit issues. Will DEP require evidence of the reduced design capacity prior to that time? Can that prior time be written down in the permit as a requirement?
  4. Shell’s application failed to disclose any estimated discharge concentrations of chromium, zinc or any other pollutants from IMP 201. This makes the permit application incomplete. Will DEP require Shell to submit a new and complete application that contains all estimated discharge information?
- e. Can DEP provide trend or other data showing what the stream flows of Poorhouse Run and Rag Run are and whether they have decreased? Will plant operations further reduce stream flows for these smaller waterways?
- f. In past meetings, Shell has noted the ethane cracker plant will have a 24/7 rail yard with a power-washing operation to clean an immense quantity of train cars.
- i. Shell’s NPDES application did not provide the details on how much water would be discharged from these operations, what the pollutants discharged or their concentrations would be, or other important information such as what treatment would be applied. Can Shell provide this information in detail?
- g. Why didn’t DEP require Shell to provide missing data from its application, specifically including detection limits for pollutants that Shell listed as “Not Detectable” or “<MDL”?

- h. DEP admitted in its Fact Sheet and again in the hearing that the groundwater seep that is proposed to be permitted as Outfall 015 has not been permitted and is therefore currently an unpermitted discharge, but that DEP has not and will not be issuing an NOV or a penalty to Horsehead or Shell for this unpermitted discharge. Why not?

## V. Conclusion

For the foregoing reasons, DEP must reject Shell's Amendment Application and require Shell to submit an application for a new individual NPDES Permit. In addition, the requirements in the resulting permit must be substantially reassessed and revised before a final permit can be issued in order to impose all limits applicable to new facilities to discharges from this facility. Thank you for your consideration of our comments.

Respectfully submitted,



---

Lisa Widawsky Hallowell  
Senior Attorney  
Environmental Integrity Project  
509 Vine Street, Apt. 2A  
Philadelphia, PA 19106  
(202) 294-3282 (direct)  
(202) 296-8822 (fax)  
[lhallowell@environmentalintegrity.org](mailto:lhallowell@environmentalintegrity.org)

*On behalf of Commenters (listed below)*

### COMMENTERS

1. Lisa Widawsky Hallowell, Attorney  
**Environmental Integrity Project**  
509 Vine Street, Apt. 2A  
Philadelphia, PA 19106
2. Rob Walters  
Executive Director / Waterkeeper  
**Three Rivers Waterkeeper**  
425 N Craig St, Suite 202  
Pittsburgh, PA 15213  
[rob@threeriverswaterkeeper.org](mailto:rob@threeriverswaterkeeper.org)
3. Myron Arnowitt, Pennsylvania Director  
**Clean Water Action**  
100 Fifth Ave., #1108  
Pittsburgh, PA 15222  
412-765-3053, x203  
[marnowitt@cleanwater.org](mailto:marnowitt@cleanwater.org)
4. Matthew Mehalik, Executive Director  
**Air Quality Collaborative**  
Energy Innovation Center, Suite 140  
1435 Bedford Avenue  
Pittsburgh, PA 15219  
412-514-5008  
[mmehalik.aqc@gmail.com](mailto:mmehalik.aqc@gmail.com)

5. Marcia Lehman  
**Beaver County Marcellus Awareness Committee (BC-MAC)**  
998 Mayfield Ave  
Ambridge, PA 15003  
[marcia.lehman@comcast.net](mailto:marcia.lehman@comcast.net)
6. Adam Garber, Field Director  
**PennEnvironment**  
1429 Walnut St, Suite 1100  
Philadelphia, PA 19102  
(215) 732-5897 x120
7. Tom Schuster, Sr. Campaign Representative, **Sierra Club**  
PO Box 51  
Windber, PA 15963  
(814) 467-2614 (office)  
[tom.schuster@sierraclub.org](mailto:tom.schuster@sierraclub.org)
8. Joseph Otis Minott, Esq.  
Executive Director and Chief Counsel  
**Clean Air Council**  
135 S. 19th St, Ste. 300  
Philadelphia, PA 19103  
215-567-4004 ext. 116
9. Michelle Naccarati-Chapkis  
Executive Director  
**Women for a Healthy Environment**  
5877 Commerce Street  
Pittsburgh, PA 15206  
[Michelle@womenforahealthyenvironment.org](mailto:Michelle@womenforahealthyenvironment.org)
10. Thaddeus Popovich, Co-founder  
**Allegheny County Clean Air Now**  
Diamond Bldg, 100 Fifth Ave  
Pittsburgh, PA 15222
11. Mark Peluso  
**Cracker Plant Impact Initiative (CPI Initiative)**  
1490 River Road  
Beaver, PA 15009  
[mpeluso@towncenter.info](mailto:mpeluso@towncenter.info)
12. Patrice Tomcik, Field Organizer  
**Moms Clean Air Force**  
211 Chesapeake Drive  
Gibsonia, PA 15044  
[ptomcik@momscleanairforce.org](mailto:ptomcik@momscleanairforce.org)
13. Michael Bett  
**Allegheny County Clean Air Now (ACCAN) Co-Founder**  
221 Ridge Avenue  
Ben Avon, PA 15202  
[michaelbett63@gmail.com](mailto:michaelbett63@gmail.com)
14. Susan Carty, President  
**League of Women Voters Pennsylvania**  
226 Forster Street  
Harrisburg, PA 17102  
Ph: (717) 234-1576
15. Court Gould, Executive Director  
**Sustainable Pittsburgh**  
307 Fourth Avenue, Suite 1500  
Pittsburgh, PA 15222  
phone (412) 258-6643  
[cgould@sustainablepittsburgh.org](mailto:cgould@sustainablepittsburgh.org)
16. B. David Smith  
**Clean Air Council, Pittsburgh Office**  
Suite 200, 200 First Ave.  
Pittsburgh, PA 15222  
[dsmith@cleanair.org](mailto:dsmith@cleanair.org)
17. Anita Teresa (“Terrie”) Baumgardner  
620 Grand Ave.  
Aliquippa, PA 15001  
[tbm2@psu.edu](mailto:tbm2@psu.edu)
18. Leah Andrascik  
205 South Birmingham Ave  
Pittsburgh, PA 15202
19. Alan Horowitz  
211 Monroe Drive  
Pittsburgh, PA 15229

20. Lucille Sturdevant  
211 Monroe Drive  
Pittsburgh, PA 15229

21. Joanne Martin  
243 Cordak Drive  
Darlington, PA 16115  
[joanne@eastvisionpartners.com](mailto:joanne@eastvisionpartners.com)

cc:

*Via Email*

Brian Trulear, NPDES Program manager, PA Oversight, EPA [trulear.brian@epa.gov](mailto:trulear.brian@epa.gov)

John Herman, Regional Counsel, DEP, [joherman@pa.gov](mailto:joherman@pa.gov)

Mary Martha Truschel, Assistant Counsel, DEP, [mtruschel@pa.gov](mailto:mtruschel@pa.gov)

Potter Township, Secretary, Linda McCoy: [linda@PotterTwp.comcastbiz.net](mailto:linda@PotterTwp.comcastbiz.net)

Vanport Township, Solicitor Nathan L. Bible, Esq.: [nlbible@gmail.com](mailto:nlbible@gmail.com)

Borough of Beaver, Council Member, Michael L. Deelo: [MLDward3@comcast.net](mailto:MLDward3@comcast.net)

Center Township, Secretary Rachel DelTondo: [rdeltondo@ctbos.com](mailto:rdeltondo@ctbos.com)