



Response to Comments

**Project: The Mercer Energy Inc., Ethanol Production Facility
Ohio EPA ID #2IF00027*AD/OH0138886**

Agency Contacts for this Project

Michelle Sharp, Division of Surface Water, (419) 373-3019,
michelle.sharp@epa.state.oh.us

Darla Peelle, Public Interest Center, (614) 644-2160, darla.peelle@epa.state.oh.us

On June 26, 2007, Ohio EPA public noticed a draft National Pollutant Discharge Elimination System (NPDES) permit for the proposed Mercer Energy Inc., Ethanol Production Facility located at 7064 Four Turkey Road, Celina, Mercer County, Ohio.

Ohio EPA also scheduled a public hearing, held on August 23, 2007, at the Central Services Building Meeting Room, to obtain public testimony regarding the draft NPDES permit. The following comments were received during the public notice period, as well as during the public hearing held for the draft NPDES permit. An Ohio EPA, Division of Surface Water (Ohio EPA, DSW) response follows each comment listed.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Comment 1: **“Second of all, we are wanting to put more stuff into the lake and our lake is in such crises now that for anybody to approve a permit to allow any kind of discharge, whether it’s cleaner than what’s already in the water – which is not a far stretch, anyway, if anybody knows anything about our water – is preposterous. And you really should not allow this plant to go up.”**

Response 1: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down

and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 2: “My question is: How can we be assured that the data that Mercer Energy has submitted is accurate?”

Response 2: The facility is responsible for the accuracy of their submitted facility. Once the company is in operation they will have to provide data that supports the information submitted in the application.

Comment 3: “I am concerned about both the air emissions and the water discharge from Mercer Energy Ethanol Plant and the effects that the air emissions and water discharge will have on both the young and old alike.”

Response 3: The limits established in the NPDES and air pollution control permits are protective of aquatic life and human health.

Comment 4: “It bothers me that the water discharge might have a negative impact on Grand Lake St. Marys. The very existence and sustenance of the cities of St. Marys and Celina is dependent on Grand Lake St. Marys both historically and today. Therefore, it is of utmost importance to continue the work of improving the quality of water in Grand Lake St. Marys and minimize any potential for disaster. ”

Response 4: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be

protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals and trace minerals as required by Ohio EPA rules and regulations.

Comment 5: **“If there is a fire or explosion or spill, will dangerous air emissions or hazardous or toxic materials end up in Grand Lake St Marys? Since the Mercer Energy Ethanol Plant is in the watershed for Grand Lake St. Marys, it is not unreasonable to conclude that a fire, explosion, or spill in the Mercer Energy Ethanol Plant could be catastrophic for Grand Lake St. Marys and the surrounding communities. In fact, many people have come to live or play in the area that could end. Or a clean-up of astronomical proportions might be necessary. Who would have to pay for that if that were to happen?”**

Response 5: There is a possibility that materials on-site may reach Grand Lake St. Marys in the case of a fire, explosion, or spill. The NPDES permit requires the facility to develop a spill prevention plan, which outlines measures to prevent spills and actions that would be taken if a spill were to occur. Mercer Energy would be financially responsible for any spill that they may cause to waters of the state.

Comment 6: **“Was there any consideration given to our current state before this, before they even thought about building this plant? I mean, do you take into consideration the current condition of the area before you allow these permits, is basically what I want to know?”**

Response 6: The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. These rules and regulations consider the current state and use of the water that the proposed facility will be discharging into.

Comment 7: **“The self- monitoring model – and that’s how this will be done. This is self monitoring modeling, ladies and**

gentleman. We are relying on – the State EPA relies on the facilities to monitor themselves and send reports in. If they violate VOC emissions, which is air emissions, or water emissions, they report that to the State EPA. They have to monitor themselves. There’s not other way of doing it. They’re not required to be registered to a standard and report to the community. They can do it on their own. That’s how they do it. So if you’re worried about controls, they monitor themselves. The State doesn’t do that unless you, as the community, report that you have an issue with it.”

Response 7: To be in compliance with the Ohio wastewater (NPDES) permit, the facility is required to sample the wastewater and storm water as specified in the permit. This information is reported to Ohio EPA in the Monthly Operating Report that the facility is required to submit under their NPDES permit. Based on this information and compliance inspections that we conduct at the facility, Ohio EPA will work with the facility to come into compliance. However, if the facility is not adequately addressing compliance issues and has failed to achieve compliance with the permit, Ohio EPA will pursue enforcement. The pollutant limits established in the permit are protective of aquatic life and human health.

Comment 8: **“We asked the question before, having reviewed the permit application, it states that there is – Chris Korleski, Director of EPA, states that a lowering of water quality in Grand Lakes St. Marys is necessary in order for this permit to be approved. But back in March of this year, EPA issued a document stating that the water in this lake is very stressed. It is are very marginal, at best. And we are having – we are adding two wrong here to make a right. It just doesn’t sit well with me. I can’t – and you know, if you went to Ohio EPA and you stated that was boiler plate, I have gone around to my fellow professionals and asked them about this comment and they say you should be concerned. Especially if it is that close to your home. I’m speaking as a concerned citizen and I also work as an environmental professional and I have some concerns. And that comment said a lot to me. It stuck with me every day since I read it. And that’s been over a month. And I just – I wonder how they could say something like**

that and go ahead and approve a permit. I can't live with that. But I may have to live with it. You don't. I do."

Response 8: The Antidegradation Rule establishes that any additional pollutant load is seen as a lowering of water quality. Even though this statement is in the permit the limits are still protective of human health and aquatic life.

Comment 9: "I was wondering what kind of affect the anticipated discharge from Mercer Energy's proposed ethanol plant in Celina, Ohio might have on the lake?"

Response 9: The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by the Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 10: "Will the monthly summer (May 1 – Oct 31) discharge at an average of 82 degrees negatively affect the lake?"

Response 10: The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The 82-degree monthly summer temperature is protective of the aquatic life in Grand Lake St. Marys.

Comment 11: "Will the monthly winter (Nov 1 – April 30) discharge at an average of 65 degrees negatively affect the lake?"

Response 11: The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The 65-degree monthly winter temperature is protective of the aquatic life in Grand Lake St. Marys.

Comment 12: “Will the anticipated effluent concentrations negatively affect the lake?”

Estimated Effluent Concentration (mg/L)
TDS < 2200 (daily average)
pH 6.5 – 9.0
Calcium 147
Magnesium 280
Sodium 49
Potassium 3
Bicarbonate Alkalinity 732
Sulfate and Sulfite 891

Response 12: The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 13: “Who is the author of the law, and what is the name of the law, that was passed that mandated the sampling of the water in the inland lakes in the USA?”

Response 13: Inland lakes are considered waters of the state which are protected by state and federal regulations through the Clean Water Act.

Comment 14: “What treatment process is Mercer Energy going to use prior to sending the wastewater to Celina?”

Response 14: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the City of Celina from the Mercer Energy Ethanol plant. The discharge to the City will be addressed through a permit-to-install (PTI), for the line from the plant to the city and an indirect discharge permit (IDP).

Comment 15: “What is Mercer Energy treating their water for in order to send it to Celina?”

Response 15: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the City will be addressed through a permit-to-install (PTI), for the line from the plant to the city and an indirect discharge permit (IDP).

Comment 16: “What are the expected influent and effluent concentrations of the Mercer Energy contact water?”

Response 16: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the City will be addressed through a permit-to-install (PTI), for the line from the plant to the City and an indirect discharge permit (IDP).

Comment 17: “What materials will Mercer Energy need to dispose of in regards to the contact water that is being treated? How will those materials be disposed of?”

Response 17: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the City will be addressed through a permit-to-install (PTI), for the line from the plant to the city, and an indirect discharge permit (IDP).

Comment 18: “How much water will Mercer Energy be sending to Celina for treatment?”

Response 18: The flow diagram included in the NPDES permit application states that Mercer Energy will send 400 gallons per minute to the city of Celina, which is approximately 576,000 gallons per day.

Comment 19: “What will be the effluent concentrations for the water going to Celina for treatment?”

Response 19: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit

applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the city will be addressed through a permit-to-install (PTI), for the line from the plant to the city and an indirect discharge permit (IDP).

Comment 20: **“What will the effluent concentrations be when Celina then discharges it?”**

Response 20: The city would have to continue to meet the limits that are established in their current National Pollutant Discharge Elimination System (NPDES) permit. If the plant would have to increase capacity to take the contact water from Mercer Energy or if new pollutants would be discharged to the city that they currently do not have limits for, the city would have to go through the antidegradation process. This process allows public comment on the increased load or additional pollutant loading.

Comment 21: **“Michelle Sharp’s two statements (paraphrase “The water will come from a well, not from a river”) in response to a question and the follow-up question regarding the effect of water consumption and/or pollution of the Teays River aquifer indicates her lack of even basic knowledge of the hydrological system in the area. Her lack of awareness of the existence of a major, multi-state aquifer in her area of “expertise” indicates her knowledge of the subject matter is insufficient to understand and assess information relating to water quality. Therefore, she is unqualified to understand or assess the water quality issues in question. All research, assessments, and conclusions as to the water quality issues in which Ms. Sharp participated, contributed to, or authored, must be reviewed by EPA personnel with the documented knowledge and training to understand the effects of this project on the hydrological system.”**

Response 21: The Ohio Department of Natural Resources (ODNR) administers the Ohio rules and regulations that apply to wells and ground water. The contact for this site is Jim Raab, ODNR, Division of Water. He can be reached at 2045 Morse Road, Columbus, Ohio 43229, at (614) 265-6747 or at jim.raab@dnr.state.oh.us.

Comment 22: “Concerning the discharge of water from the proposed ethanol plant, how can the EPA validate releasing any kind of additional wastewater discharge into the already polluted Grand Lake St. Marys (proposed 884,160 gallons per day in non-process wastewater)? It was stated earlier this year that Grand Lake St. Marys could not withstand any further pollutants and now you are proposing to discharge 884,160 gallons per day?”

Response 22: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 23: “Where will the exact location be to discharge this water?”

Response 23: The discharge from this facility will be to a man made channel located on the south side of State Route 703 just to the east of Four Turkey Road.

Comment 24: “And, how will this affect the immediate property owners not to mention our most valuable resource of the Lake? What will the results be on our fish, turtles, birds, water fowl, wildlife, etc.? We feel our Lake is well over its limitations on current pollutants and absolutely no more should be allowed.”

Response 24: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the

Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 25: **“Will this wastewater be legally discharged into the Wabash watershed or will it go to the Lake Erie watershed (ref. the Continental Divide)? We understand that if water is obtained from one side of the watershed it cannot cross over to be discharged into the other.”**

Response 25: The location of the proposed Mercer Energy ethanol plant is located within the Beaver Creek and Grand Lake St. Marys (Wabash) Watershed. The wells that the proposed ethanol plant will be using as their water source are also in the same watershed. This watershed drains to the Ohio River Basin; therefore, there is no continental divide concern.

Comment 26: **“Also, concerning the proposed discharge of water from the plant through the county sewer system, can the city of Celina handle the estimated 576,000 gallons per day of total discharge into their system? If so, maybe they can also handle the additional 884,160 gallons in non-process wastewater.”**

Response 26: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the city will be addressed through a permit-to-install (PTI), for the line from the plant to the city, and an indirect discharge permit (IDP). The water being discharged to Grand Lake St. Marys is non-contact cooling water and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. There is a limit for both of these parameters, which is protective of human health and aquatic life. Since this is essentially "clean water" discharging it to a city sewer system would take up treatment capacity unnecessarily. Ethanol facilities recycle their water as much as possible.

Comment 27: **“Who, if anyone, will be held responsible if there is an accidental spill at the plant facility and this somehow gets into Grand Lake St. Marys? Only one such accident would spell immediate disaster for the entire city of Celina and surrounding communities. We feel this concern should be definitely a concern of the EPA.”**

Response 27: There is a possibility that materials on-site may reach Grand Lake St. Marys in the case of a fire, explosion, or spill. The NPDES permit requires the facility to develop a spill prevention plan, which outlines measures to prevent spills and actions that would be taken if a spill were to occur. Mercer Energy would be financially responsible for any spill that they may cause to waters of the state.

Comment 28: **“In notes presented at the meeting, it was stated that water will be drawn from wells at a rate of 2,190,240 gallons per day. Do you realize this water will be coming from the underground water supply of the Taeyes River – the same that supplies every other homeowner in the area? At the meeting, the question was asked if anyone could guarantee that the Taeyes River would not be drawn dry by the use of the ethanol plant. Michelle Sharp of the Division of Surface Water, Northwest District Office, stated no it would not because the water for the ethanol plant would be coming from wells! I believe she learned very quickly that the water from these wells will come from the Taeyes River. When we wake up one morning and find that our water wells have run dry, who do we contact and who will be held responsible for getting our water supply back? Are there currently provisions in your rules and regulations relating to water-conservation restrictions of this ethanol plant should water levels drop to a predetermined level? For example, would Mercer Energy be forced to reduce their production, look for another source of water, or shut down?”**

Response 28: The Ohio Department of Natural Resources (ODNR) administers the Ohio rules and regulations that apply to wells and ground water. The contact for this site is Jim Raab, ODNR, Division of Water. He can be reached at 2045 Morse Road, Columbus, Ohio 43229, at (614) 265-6747 or at jim.raab@dnr.state.oh.us.

Comment 29: “Like most other new adventures, there are so many unknowns in exactly what will be the final outcome of such a facility. But, because of these unknowns, is it fair to our environment and daily well beings to be put at such a risk?”

Response 29: The limits established in the NPDES and air pollution control permits are protective of aquatic life and human health. In this situation, Ohio EPA has no objection to Mercer Energy Inc indicating that the terms and conditions of the NPDES permit can be met without providing treatment. Ohio EPA does not have the authority to regulate commerce and/or where a proposed facility should be located.

Comment 30: “On the first page of the draft copy of the Ohio Environmental Protection Agency Authorization to Discharge Under the National Pollutant Discharge Elimination System director, Chris Korleski, says, “I have determined that a lowering of water quality in Grand Lake St. Marys is necessary.” ----- Why is it necessary to allow a discharge into Grand Lake St. Marys that will lower the quality of the lake?”

Response 30: The Antidegradation Rule establishes that any additional pollutant load is seen as a lowering of water quality. Even though this statement is in the permit the limits are still protective of human health and aquatic life.

Comment 31: “What incentive is it to local stakeholders to partner with the Ohio EPA if the Ohio EPA allows Mercer Energy Ethanol to discharge water into Grand Lake St. Marys that would lower the quality of the water in Grand Lake St. Marys, as stated by Chris Korleski?”

Response 31: To ensure that the lake is being protected as well as improved. The permit limits established are protective of human health and aquatic life.

Comment 32: “Will the non-processed water that is discharged into Grand Lake St. Marys contain chemicals or minerals that will have an odor or contribute to the corrosion of the motors of propellers of the boats docked in the area?”

Will it have a negative affect on human health or aquatic life?”

Response 32: We are not aware of any chemicals or minerals in the discharge that are corrosive in nature. In fact, additives to the water are anti-corrosive. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health.

Comment 33: “The city of Celina has given Aaron D. Miesse, Chief Financial Officer of Mercer Energy, Inc. a letter stating that the city is capable of receiving 500,000 gallons of wastewater a day from Mercer Energy Ethanol. However, according to the figures given to the public by the Ohio EPA at the hearing on August 23, 2007, Mercer Energy Ethanol will be discharging 564,480 gallons of wastewater a day to the city of Celina. How can Mercer Energy discharge more to the city of Celina that what the city of Celina has agreed upon as their capacity for Wastewater from Mercer Energy?”

Response 33: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the city will be addressed through a permit-to-install (PTI), for the line from the plant to the city and an indirect discharge permit (IDP).

Comment 34: “Will Mercer Energy be using an equalization tank for their wastewater in order to regulate the amount of wastewater going to the city of Celina?”

Response 34: The NPDES permit only regulates the discharge to Grand Lake St. Marys. Ohio EPA has not received any permit applications regarding the discharge of process water to the city of Celina from the Mercer Energy Ethanol plant. The discharge to the city will be addressed through a permit-to-install (PTI), for the line from the plant to the city and an indirect discharge permit (IDP).

Comment 35: “What kind of safeguards and guarantees are in place that will protect an individual’s well from contamination

due to regular, accidental, or nature-related activities at the proposed Mercer Energy Ethanol plant?”

Response 35: The Ohio Department of Natural Resources (ODNR) administers the Ohio rules and regulations that apply to wells and ground water. The contact for this site is Jim Raab, ODNR, Division of Water. He can be reached at 2045 Morse Road, Columbus, Ohio 43229, at (614) 265-6747 or at jim.raab@dnr.state.oh.us.

Comment 36: “Therefore, if there were an unfortunate accident such as an explosion, is it possible that Grand Lake St. Marys could become contaminated and that contamination could continue down the Ohio River Basin. Even if containment systems are in place, an explosion could compromise their integrity and allow a discharge into Grand Lake St. Marys. Also since a discharge into the lake of 884,000 gallons of non-process water a day is planned as a normal discharge, could that system to discharge into the lake also become a route for contaminants to enter Grand Lake St. Marys if it were damaged during an explosion?”

Response 36: There is a possibility that materials on-site may reach Grand Lake St. Marys in the case of a fire, explosion, or spill. The NPDES permit requires the facility to develop a spill prevention plan, which outlines measures to prevent spills and actions that would be taken if a spill were to occur. Mercer Energy would be financially responsible for any spill that they may cause to waters of the state.

Comment 37: “Effect on local water table including potential depletion of the aquifer and water supply to private wells.”

Response 37: The Ohio Department of Natural Resources (ODNR) administers the Ohio rules and regulations that apply to wells and ground water. The contact for this site is Jim Raab, ODNR, Division of Water. He can be reached at 2045 Morse Road, Columbus, Ohio 43229, at (614) 265-6747 or at jim.raab@dnr.state.oh.us.

Comment 38: “Environmental effects upon Grand Lake which is already polluted and distressed according to Government EPA and Dept. of Natural Resources agencies. In addition, there are potential effects upon

other water sources, including, streams, creeks, ditches, and the aquifer from waste water drainage, run off, or potential spills.”

Response 38: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 39: “On the issue of water discharged into Grand Lake, I could not for the life of me understand Mrs. Howick’s concern of putting cleaner water into the lake being a problem. If you take a glass and fill it $\frac{3}{4}$ full with muddy water (or lake water) and add $\frac{1}{4}$ glass of clear (clean) water to it, percentage wise it has to improve the whole glass of water. It may not solve all the lake’s water issues, but I cannot believe it will hurt the quality of the lake water!”

Response 39: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 40: “The concern I still have deals with the standards for effluent discharge of the plant being lower than the standards the City of Celina Wastewater Treatment Plant (WWTP) must meet. The WWTP discharges to Beaver Creek, which is not a source of drinking water, unlike the Grand Lake St. Marys. The ethanol plant will be discharging into the lake, the drinking water source for the City of Celina. Is it possible to require the ethanol plant to meet the same or more stringent standards than the WWTP?”

Response 40: When limits are established in a new permit, a waste load allocation (WLA) is completed by Ohio EPA staff. This spreadsheet takes into consideration the size of the water body the discharge will be going into, the type of mixing zone that is created in the water body, the water quality upstream and downstream of the new discharge, the amount of water that will be discharged, and the possible contaminants and their concentration within the discharge. Using these parameters, a reasonable potential to violate Ohio water quality standards calculation is completed. Limits are established to ensure that Ohio’s water quality standards are not violated.

Comment 41: “Celina intends to spend 6 million dollars to clean up the water, can any filtering system filter out carcinogens?”

Response 41: The pollutant limits established in the permit are protective of aquatic life and human health.

Comment 42: “The Mercer County Commissioners have been very involved with the Mercer Energy Project. The Board has made a commitment to provide the necessary water, sewer, and utilities for this venture. Approximately, \$100,000 has already been spent on wells and water research. In addition, we have just exercised an option to purchase 13 plus acres for a well field. We will continue to work with Ohio E.P.A. on a future sewer treatment plant to be located on the northeast side of Celina.”

Response 42: Ohio EPA acknowledges your comment.

Comment 43: **“Secondly, I really became upset after reading the Friday, front page, Standard article about the Ethanol hearing. It stated that the discharge water from the proposed project will be cleaner than the existing lake water. Now that really is reassuring! Do two wrongs make a right? It will not improve the existing conditions, mind you!”**

Response 43: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 44: **“The EPA was formed to guard against any damage to our environment, and to improve conditions where possible. Issuing permits, to allow the Ethanol plant to use and discharge 880,000 gallons of wastewater daily, that has been used ostensibly for cooling purposes only, into Grand Lake is in direct opposition to their purpose. There is no way to determine the damage to the water table level, ground water contamination and drainage, and the actual pollution to our lake.”**

Response 44: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in

the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 45: **“Too much speculation on draw down of water from the Teays Aquifer. At very minimum, should require a registered hydrologist to submit a certified report of consumptive use timeline.”**

Response 45: The Ohio Department of Natural Resources (ODNR) administers the Ohio rules and regulations that apply to wells and ground water. The contact for this site is Jim Raab, ODNR, Division of Water. He can be reached at 2045 Morse Road, Columbus, Ohio 43229, at (614) 265-6747 or at jim.raab@dnr.state.oh.us.

Comment 46: **“Why can’t the plant be moved 300 yards to the north thereby eliminating surface water run-off into the lake?”**

Response 46: Ohio EPA does not have the authority to regulate commerce and/or where a proposed facility should be located.

Comment 47: **“Lake St. Marys is a very shallow lake and cannot survive having millions of gallons of water taken out. Over the last few years...there has been a major effort to clean up the lake...and with pollutants being discharged into the lake...it will not be a good thing.”**

Response 47: Water being used by this proposed facility will come from wells and not be drawn from the lake. The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested

for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 48: **“There is not a better location in our county for this ethanol plant. We have a 4-lane highway on one side and a railroad on the other side. We also have available, the Teays underground river near the site for plenty of quality water. The Board of County Commissioners is also working with the EPA on a long term wastewater project which would be expedited by this new plant.”**

Response 48: Ohio EPA acknowledges your comment.

Comment 49: **“Lake water quality is already poor and threatened... I do not want anything else to damage it further.”**

Response 49: The major sources of impairment for Grand Lake St. Marys are bacteria and nutrients. The discharge from this proposed facility is composed primarily of cooling blow down and reverse osmosis reject water. The concern with it will be the level of dissolved solids and the temperature. The NPDES permit incorporates permit limitations based on the Ohio rules and regulations, which were promulgated to be protective of the aquatic habitat and human health. The NPDES permit requires toxicity testing twice a year for pollutant intolerant species. These testing results will be closely monitored by Ohio EPA to ensure the aquatic life in the streams is protected. The NPDES permit also requires that the wastewater discharged to Grand Lake St. Marys be tested for pollutants, metals, and trace minerals as required by Ohio EPA rules and regulations.

Comment 50: **“Mercer county commissioner Bob Nuding stated to me that the Mercer Energy Ethanol proposed site is not located in the Grand Lake St. Mary’s watershed. Is that true? If it is not true what watershed is it located in? How does that relate to the continental divide?”**

Response 50: The location of the proposed Mercer Energy ethanol plant is located within the Beaver Creek and Grand Lake St. Marys (Wabash) Watershed. The wells that the proposed ethanol plant will be using as their water source are also in the same watershed. This watershed drains to the Ohio River Basin; therefore, there is no continental divide concern.

End of Response to Comments