KANAWHA COUNTY COMMISSION

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July 27, 2026

Sent via Email to: Edward.S.Andrews@wv.gov
and dep.comments@wv.gov
Edward Andrews, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, West Virginia 25304

Re: Comments Regarding the Clean-Seas West Virginia Air Quality Permit Application

Dear Mr. Andrews:

On behalf of the Kanawha County Commission and the residents we represent, we respectfully submit these comments regarding the air quality permit application for the proposed Clean-Seas West Virginia plastic conversion and pyrolysis facility near Belle, West Virginia.

The decision before the West Virginia Department of Environmental Protection is more than a technical permitting determination. For the families who live, work, attend school, own businesses, and have invested their lives in the Upper Kanawha Valley, it is a decision that could affect the health, economic future, and identity of their communities for many years.

The Commission recognizes that the Division of Air Quality is responsible for evaluating this application under applicable state and federal laws and regulations. We respect the Division's technical expertise and understand that its decision must be based upon sound science and engineering. We also believe the review must fully account for the setting in which this facility would operate: an established community containing homes, schools, businesses, recreational resources, and existing industrial operations.

Over the past several weeks, the Commission has heard from a significant number of residents who are deeply concerned about the proposed facility. Residents attended the Division's public meeting, submitted written comments, and appeared before the Kanawha County Commission on July 23, 2026. At that meeting, the Commission was presented with a petition containing 951 signatures, including at least 338 signatures from residents who live in communities in close

proximity to the proposed facility. A copy of the petition is enclosed with these comments for the Division's review and consideration.

These residents spoke as parents, educators, homeowners, taxpayers, business owners, and lifelong residents of the Upper Kanawha Valley. They asked whether the air would remain safe for their children to breathe. They expressed concern that their communities could be required to accept another environmental burden without sufficient information, meaningful safeguards, or a direct role in the ultimate decision.

One resident described the sense of helplessness felt by people who believe decisions affecting their homes and families are being made beyond their reach. Another spoke of the pride she takes in her home along the Kanawha River and her fear that the proposed facility could diminish both her quality of life and the future of the community. Educators and parents expressed particular concern about the facility's proximity to Riverside High School, Midland Trail Elementary School, and nearby residential neighborhoods. Those concerns deserve careful consideration, transparency, and the highest level of scientific scrutiny.

The Upper Kanawha Valley already contains numerous industrial operations and transportation corridors that affect local environmental conditions. Residents have therefore questioned whether emissions from the proposed facility have been evaluated not only in isolation, but also in combination with emissions from existing industrial sources throughout the valley. Residents have raised concerns regarding volatile organic compounds, fine particulate matter, hazardous air pollutants, odors, and other emissions that could occur during normal operations, startup, shutdown, maintenance, equipment malfunctions, or other abnormal operating conditions.

Accordingly, the Kanawha County Commission respectfully requests that the Division fully evaluate:

1. Whether the air dispersion modeling reflects maximum potential operating conditions, reasonably foreseeable upset conditions, local terrain and weather patterns, and the cumulative effects of existing industrial sources in the Upper Kanawha Valley;

2. Whether the applicant's emissions estimates are supported by reliable data from comparable facilities operating on a commercial scale;

3. Whether the proposed pollution-control technologies, operational restrictions, monitoring requirements, recordkeeping provisions, and reporting obligations are sufficient to protect nearby schools, residential neighborhoods, and other sensitive populations;

4. Whether emissions during startup, shutdown, maintenance, equipment malfunctions, and emergency conditions have been adequately identified, evaluated, and controlled; and

5. Whether the permit contains meaningful and enforceable mechanisms for verifying the facility's actual emissions after operations begin.

The Commission is also particularly concerned about the absence of localized ambient air quality monitoring in the Upper Kanawha Valley. We understand that the Division currently relies, at least in part, upon information collected from the Dixie Street monitoring station in Charleston. While that station may provide useful regional information, it is not located in Belle/Quincy area and may not accurately reflect localized conditions near the proposed facility, surrounding communities, or nearby schools.

The Commission therefore requests that the Division require appropriately located baseline and continuing ambient air quality monitoring in the Belle/Qunicy area. Monitoring should begin before the facility commences operations so that reliable baseline data can be established and should continue throughout the facility's operation.

The pollutants to be monitored, location of the monitoring equipment, reporting intervals, quality-assurance standards, and public-access requirements should be established through enforceable permit conditions or an enforceable monitoring plan. Monitoring results should be reported to the Division and made readily available to the public in an understandable format.

Without baseline and continuing monitoring, residents may never have an objective means of determining whether changes in local air quality are attributable to the proposed facility. Localized monitoring would provide real-world data, increase transparency, strengthen public confidence, and allow the Division to promptly identify and respond to unexpected emissions or deteriorating air quality.

The Commission must also emphasize the potential economic consequences of the proposed facility. For decades, the Upper Kanawha Valley's coal-mining and industrial activity helped build Kanawha County and the State of West Virginia. As those traditional industries have changed, the State, the County Commission, local organizations, and community leaders have worked to create a broader economic future for the region—one built around outdoor recreation, tourism, small businesses, family-owned restaurants, lodging, and the natural beauty of the Kanawha River and surrounding mountains.

The State of West Virginia and the Kanawha County Commission have committed substantial public resources to these efforts. The Appalachian Outlaw Trails and related recreational initiatives are intended to serve as anchors for the revitalization of the Upper Kanawha Valley. These investments are designed to attract visitors, encourage private development, create new businesses, and establish the area as a recreational gateway to southern West Virginia and the New River Gorge region.

Residents have worked hard to build upon the Upper Kanawha Valley's industrial and coal-mining heritage while broadening the region's economic identity. They are seeking to create a community where families want to live, tourists want to visit, and businesses want to invest.

If the proposed facility produces persistent odors, visible emissions, increased pollution, or a public perception of environmental danger, it could undermine years of work and substantial public and private investment. Visitors arriving to ride the Appalachian Outlaw Trails or enjoy the

Kanawha River should encounter a community defined by its mountains, trails, history, and hospitality—not one defined by concerns about what may be in the air.

Economic development cannot be measured solely by the number of jobs promised by a single project. It must also account for the homes, schools, businesses, recreational opportunities, public investments, and long-term development prospects that already exist. A project should not be viewed in isolation from its potential effects on the broader economic future of the region.

The Commission therefore respectfully requests that the Division refrain from issuing a final permit unless the record satisfactorily addresses the concerns identified above, the permit contains enforceable operational, monitoring, reporting, and compliance-verification requirements, appropriately located baseline and continuing ambient air quality monitoring is required in the Belle/Quincy area, and the Division has reasonable assurance that nearby residents, schools, and community investments will be adequately protected.

If the applicant submits material supplemental emissions data, revised modeling, or significant changes to the proposed operation, the Commission further requests that the public be provided a meaningful opportunity to review and comment upon that information before a final decision is made. The people of the Upper Kanawha Valley deserve to know that their government has listened to them, that their concerns have been taken seriously, and that every reasonable safeguard has been employed before an operation of this nature is permitted near their homes and schools.

We respectfully ask the Division to hear their voices and place the protection of public health, the environment, and the long-term future of the Upper Kanawha Valley at the center of its decision. Thank you for your careful consideration of these comments and for your continued commitment to protecting the health and welfare of the citizens of Kanawha County and the State of West Virginia.

Respectfully submitted,

Ben Salango
Commission President

Natalie Tennant
Commissioner

Enclosure: Petition