

**From:** [Puco ContactOPSB](#)  
**To:** [Puco Docketing](#)  
**Subject:** public comment 21-0902-GE-BRO  
**Date:** Wednesday, August 31, 2022 8:02:00 AM

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**Issue:** Public Utilities

**First Name:** Scott

**Last Name:** Newbury

**Street:** 966 Murnan Rd

**City:** Galloway

**State:** Ohio

**Zip Code:** 43119

**County:** Franklin

**Subject:** Emergency moratorium on Solar pending Rules Review and EPA study

**Message:** I live adjacent to the proposed Pleasant Prairie Solar facility, a 2,500 acre facility which will be discharging runoff directly into the Big Darby Watershed, a Federally Protected National and Scenic River. Your EPA Director and the OPSB have summarily rejected any concerns over PFAS contamination from PV panels, despite the Federal EPA's acknowledgment that these chemicals are 'included in solar panel production and thus have the capacity to be sources of PFAS'. Even a cursory search reveals the use of 'included' in that quote is misleading at best: The anti-reflective coatings applied to all PV panels are 100% PFAS chemicals (Sol-Gel Coating process) and are required for correct panel function. Unlike the dangerous heavy metals used in PV panels which are encapsulated and protected by glass, these coatings are on the surface and subject to wear. So much wear in fact that the coatings needs re-applied in as little as 5-7 years. Imagine a white picket fence or any other painted exterior structure: as the paint weathers and fails it chips and falls to the the ground below. Are anti-reflective coatings somehow exempt from the laws of physics and simply disappear? Furthermore, unlike every other industrial coating, the Federal/State EPA has yet to establish regulations or even acknowledge the danger of open-air spraying of PFAS coatings during reapplication. Coating failure causes premature panel failure so unless operators are forced to follow normal EPA Industrial Spray Booth regulations or replace the panels, directly releasing large volumes of these harmful chemicals into the environment via direct overspray and wind blown aerosol is inevitable. Nearly all research on PV technology is funded by the PV manufacturers, so it is no surprise that robust studies on long term soil or water conditions around industrial solar sites simply do not exist. The one study I was able to find discovered some alarming levels in the soil around the site - a number of expected heavy metals were highly elevated though curiously a number of highly reactive elements were found to be substantially lower, indicating the presence of unknown chemical reactions. The researchers

recommended further investigation, however their executive summary concluded the contamination was certainly less concerning than emissions from a coal burning power plant and thus worth the risk. Note this study did not even consider PFAS. I submitted this study to the OPSB and number of Ohio EPA officials directly. If I were in your position I would pause all solar projects pending full independent EPA study and completion of the OPSB rule review - siting an abundance of caution an concern for the environment in alignment with your H2Ohio initiative. Barring this pie in sky wish, would you please consider requiring this project include stricter storm water controls (ie the same standard as parking lots) so testing and monitoring are at least possible in the future?

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**8/31/2022 8:53:34 AM**

**in**

**Case No(s). 21-0902-GE-BRO**

Summary: Public Comment of Scott Newbury, via website, electronically filed by  
Docketing Staff on behalf of Docketing