



Group Against Smog and Pollution, Inc. Hotline



Summer 2012

www.gasp-pgh.org

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Group Against Smog and Pollution, Inc. (GASP) is a nonprofit citizens group in southwestern Pennsylvania working for a healthy, sustainable environment. Founded in 1969, GASP has been a diligent watchdog, educator, litigator, and policy maker on many environmental issues, with a focus on air quality in the Pittsburgh region.

PNC Announces New Policy for Reducing Diesel Emissions; Diesel Partnership Urges Other Institutions to Do the Same

by Rachel Filippini GASP Executive Director

The Allegheny County Partnership to Reduce Diesel Pollution, led by Group Against Smog and Pollution and Clean Water Action, applauded PNC's April announcement that building contractors of The Tower at PNC Plaza will be required to minimize diesel emissions during construction activity.

The Tower at PNC Plaza, expected to be complete in 2015, is already being touted as the greenest skyscraper in the world. The Tower's design currently calls for a double glass facade with operable windows to enhance energy efficiency and allow natural air flow into the building; a vegetated rooftop and greywater retention system; and geothermal-linked heating system.

PNC's most environmentally-friendly skyscraper in the world just got even greener by requiring contractors to use cleaner construction equipment. Cleaning up construction sites not only benefits the construction workers operating the equipment, but also the many people who live and work in downtown Pittsburgh.

Gary Jay Saulson, PNC's director of corporate real estate said, "Leveraging more than ten years of green building experience, PNC continues to look for innovative ways to improve its building practices. Adopting diesel emission standards for the construction of The Tower at PNC Plaza is a natural extension of our commitment to the environment and local community."

PNC's announcement to require EPA Tier 4 emission requirements follows in the footsteps of UPMC, which announced a similar policy last summer. It also follows Pittsburgh's Clean Air Act of 2010, which requires contractors working on publicly subsidized projects to use some percentage of cleaner equipment on the work site.

In addition to PNC and UPMC, the Diesel Partnership is in talks with a number of local universities and other institutions, educating them and encouraging them to pass similar policies. We have also begun to explore the possibility of introducing similar clean construction legislation at the Allegheny County level.

The evidence in support of cleaning up diesel emissions continues to mount. Two major studies of health risks from diesel pollution from the National Cancer Institute (NCI) and the National Institute for Occupational Safety and Health (NIOSH) underscore the need to reduce diesel emissions. These studies examined the public health risks of diesel pollution by looking at a group of 12,000 mining industry workers exposed to diesel carbon particles, and found an astonishing three-fold increased risk of both lung cancer and premature mortality among this study sample. Furthermore, the researchers found that lifetime exposure to diesel exhaust in some

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GASP Rallies Public to Comment on Frazer Twp. Compressor Station Permit

by GASP Staff

On May 18th, the Allegheny County Health Department (ACHD) Air Quality Program issued a permit to Superior Appalachian Pipeline (SAP) to construct a natural gas compressor station in Frazer Township. This station will gather, process, compress, and transfer natural gas from Marcellus wells in that area, and will be the first Marcellus compressor station in Allegheny County. The site will include five compressor engines, three dehydrators, and two wastewater storage tanks.

GASP has closely watched the development of this station. We submitted comments to ACHD and held a public meeting to provide more information about the facility and advice on how to craft and submit comments. We also asked ACHD to hold a public hearing and to extend the comment period. ACHD granted these requests and, on March 27th, heard testimony from over two dozen citizens.

The public outcry resulted in significant improvements to the final permit, which includes numerous changes to better protect human and environmental health. For instance, GASP was aware of similar facilities that better control their volatile organic compound (VOC) and formaldehyde emissions, and demanded that the same controls be applied here. As a result, VOC and formaldehyde emissions will be reduced by an additional 44% and 58% respectively. SAP conducted ambient air modeling to ensure that their emissions would not endanger human health and raised compressor engine stack heights to further reduce exposure.


Other positive results have to do with the way emissions from these sources are counted. Our comments led to the inclusion of additional VOC emissions that were previously overlooked. ACHD took a closer look at the facilities to be connected to the proposed compressor station, a necessary step to determine if the facilities should be permitted as a single source. ACHD is also requiring an analysis of

produced water every six months to verify the emissions estimates of VOCs from that source. Should the compressor station receive “wet gas,” VOC emissions would rise.

In all, ACHD conducted a more thorough review of potential emissions, has a more accurate grasp of the facility’s potential effect on human and environmental health, and required more emissions reductions in some areas than had been previously accepted. Perhaps most importantly, we have set a strong precedent that will ensure that any future compressor stations proposed in Allegheny County are subject to rigorous review.

While the final permit is much improved, the facility is just one part of a much bigger problem. Though this station is legally defined as a “minor source” of air pollution, it still has the potential to emit about 35 tons of nitrogen oxides and 13.5 tons of VOCs each year. Both of these pollutants are ozone precursors, and our region already struggles to meet federal health-based standards for ozone. While this facility maybe deemed “minor” when considered in isolation, this is just one of hundreds of other compressor stations and thousands of well sites constructed in the Marcellus in the past several years. The combined air quality impact of these sources is anything but minor. The pollutants added to our air from this and other Marcellus sources will make reducing our ozone level that much harder. That is why GASP will continue its efforts to get regulators to see the big picture and realize that these minor sources add up to a major problem.

Thanks to all who commented on this permit and helped improve it. We have a long way to go before the environmental challenges posed by natural gas development are adequately addressed, but your comments helped make this permit a step in the right direction.

To view the full permit and other information about this facility, visit GASP’s website at www.gasp-pgh.org. 

The **Hotline** is the quarterly newsletter of the Group Against Smog and Pollution, Inc.

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GASP Mission Statement

GASP will act to obtain for the residents of southwestern Pennsylvania clean air, water, and land in order to create the healthy, sustainable environment and quality of life to which we are entitled.

Methods of Achieving Mission

GASP is a citizens’ group based in Southwestern PA which focuses on Allegheny County environmental issues. When pertinent to these concerns, we participate in state and national environmental decisions.

We believe in the public’s right to receive accurate and thorough information on these issues and to actively participate in the decision making process.

To achieve our environmental goals on behalf of our membership, GASP will advocate, educate, serve as an environmental watchdog, mobilize action, and litigate when necessary.

We will work both independently and in cooperation with like-minded individuals and groups as determined by the Board of Directors.

We will uphold GASP’s reputation for scientific integrity, honesty, and responsible involvement.

Stealth Jargon: The confusion of technical terms with their common sense lookalikes

by Joe Osborne, GASP Legal Director

You keep using that word. I do not think it means what you think it means.

– Inigo Montoya

*where Cathy adores a minuet,
the Ballets Russes, and crepe suzette,
our Patty loves to rock and roll,
a hot dog makes her lose control,
what a wild duet!*

– theme from the Patty Duke Show

Most any field of knowledge includes specialized terminology to describe concepts that are frequently encountered in that field. For instance, medical literature contains a staggering number of terms describing symptoms, anatomical features, medical procedures, and biological processes. Those outside the medical field may pick up a few of these terms from, say, medical dramas or hypochondria-induced internet research, but most of these terms remain unfamiliar. Obscure, specialized terminology certainly isn't unique to medicine; other notable examples include corporate business-speak, the acronym-heavy vocabulary of information technology, even environmental policy.

Specialized terminology improves the accuracy and efficiency of communication between members of a field; however, this comes at a cost: the more a statement relies on specialized terminology, the less comprehensible that information becomes to laypeople. This wouldn't be a problem if technical terms were rarely used outside of their specialized fields, but the general public is routinely confronted with unfamiliar technical jargon and, worse yet, often forced to make important decisions on the basis of that information.

In most of these cases, we can at least recognize that a technical term has been used—"CPU L3 cache," "valve-train," "mortgage origination fee"—but sometimes technical fields take an everyday word and give it a very different meaning. A layperson reading that word would assume the ordinary meaning applies, and if the word is used in an ambiguous context—such as when a member of a specialized field is quoted in a newspaper article—even those who know the word has a separate technical definition may not know which meaning is intended.

In the world of air pollution regulation there are many technical terms that look identical to commonplace words but have very different meanings. I notice three of these "stealth jargon" terms frequently make their way into com-

munications directed at a general audience. See if you can spot them in these newspaper article excerpts:

"[T]he new generator will be efficient enough to qualify as a minor pollution source."¹

"[T]he crematory will have 'no significant impact on air quality.'"²

"[T]he company is planning a modular design for possible expansion and would use the best available technology to minimize the environmental impact."³

The stealth jargon terms are "minor source," "significant," and "best available control technology." In the context of air pollution regulation, none of these words mean what you probably think they mean.

"minor source"

In common usage, "minor," usually means something like "unimportant" or "insignificant." However, a "minor source" of air pollution is any source that is not regulated under more stringent "major source" provisions of the Clean Air Act. Depending on the pollutant and the type of facility, a source must be capable of emitting between 10 and 250 tons per year of a pollutant to be considered "major." In some cases a "minor source" may truly be relatively unimportant or insignificant, but a "minor source" might also emit nine tons per year of benzene or 99 tons per year of fine particulate matter, levels which may pose a substantial threat to human health or the environment.

"significant"

Typically, if something is "not significant" we assume it's not meaningful or, perhaps that it's statistically insignificant. The terms "significant" and "insignificant" are used in multiple contexts in air pollution control law, but in most cases they do not resemble the commonsense meaning.

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Stealth Jargon
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For instance, if a source has “no significant impact” that means air dispersion modeling indicates the source will not cause the ambient air concentrations of certain pollutants to increase above one of several “significance levels” listed in the Clean Air Act regulations. This isn’t consistent with the term “statistically insignificant” because these concentrations are both measurable and attributable to the source. In many cases, concentrations below these significance levels are also sufficiently large to have a tangible effect on human health, particularly for sensitive populations, so “no significant impact” does not necessarily mean “no meaningful effect on human health,” either. Finally, these significance levels apply to only five specific pollutants,⁴ so a source may technically have “no significant impact on air quality,” but that doesn’t tell us much about the many other pollutants regulated under the Clean Air Act, including lead, ozone, reduced sulfur, six varieties of greenhouse gas, and 187 listed hazardous air pollutants.

Similarly, if a modification or expansion of an existing source will not result in a “significant emissions increase,” one might think that means there will be no measurable increase in emissions, but as defined in the Clean Air Act, the term simply means the change will not increase emissions by more than a “significance threshold” which would trigger tougher regulatory requirements. Depending on the pollutant this “significance threshold” can range from 0.6 to 100 tons per year.⁵ Thus it may be entirely accurate to say an emissions increase is “not significant” for purposes of the Clean Air Act, but that same emissions increase may be quite significant in terms of its impact on public health.

“best available control technology”

If you thought “best available control technology” was synonymous with “state of the art” or “top of the line,” and that the company had spared no expense to minimize its air emissions you’re wrong, but you’ve made a perfectly reasonable mistake. In everyday life if someone tells you they have the “best available _____,” “top of the line” is probably exactly what they mean, and there’s a very good chance the “best available” thing they’re boasting about was also ridiculously expensive.

However, EPA’s defines “best available control technology” as “the maximum degree of [pollutant] reduction” the air permitting authority determines is achievable for a source “taking into account energy, environmental, and economic impacts and other costs.”⁶ This is not to say that the level emissions control achieved using the “best available control technology” is bad—often it’s quite good—but because cost is taken into account, it’s often not the most effective level of pollution control that exists. Further, in most

cases, “best available control technology” is only required for “major sources” and only for those pollutants the source is capable of emitting in quantities exceeding the major source or significance thresholds I mentioned above. Thus a source might employ “best available control technology” for one or two pollutants, while its emissions of other pollutants are controlled to a lower standard or go uncontrolled entirely.

I hope this information will prove useful the next time you hear about a “minor source” of air pollution, a source that will have “no significant impact on air quality,” or a source that will employ “the best available control technology.” But stealth jargon is by no means limited to these three terms or unique to the field of environmental policy. Ideally, I hope this information allows you to better recognize stealth jargon in whatever context you encounter it.

Finally, one point of clarification: while the effect of stealth jargon is often misleading, it can, and often does, happen entirely innocently. For example a specialist might honestly forget that a technical term they encounter on a daily basis is unfamiliar to a general audience, or a journalist might quote a portion of a communication originally intended for an audience of specialists, unwittingly turning the original communicator’s entirely appropriate use of a technical term into stealth jargon. So when you next encounter stealth jargon, don’t be too quick to assume the source of the communication was intentionally deceitful; on the other hand, if the source stands to benefit from reasonably foreseeable confusion of a technical term with it’s common sense definition, don’t be too quick to rule it out.

1. “DeKalb approves crematory,” Atlanta Journal Constitution (Sep. 28, 2010) <http://www.ajc.com/news/dekalb/dekalb-approves-crematory-642358.html>
2. “South Heart ponders first refinery in 60 years”, Bismark Tribune (May 30, 2012) http://bismarcktribune.com/bakken/south-heart-ponders-first-refinery-in-years/article_9a4069ae-aad9-11e1-91a5-0019bb2963f4.html
3. coarse particulate matter, fine particulate matter, sulfur dioxide, nitrogen dioxide, and carbon monoxide, see 40 C.F.R. Part 51 Appendix S.
4. 40 C.F.R. § 52.21(b)(23).
5. 40 C.F.R. § 52.21(b)(12) [emphasis added].



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DTE Shenango Update

by Karen Grzywinski, GASP Board Member

GASP volunteer smokereaders continue to monitor the combustion stack and coke battery emissions at DTE Shenango on Neville Island. In August of 2011, the plant was cited by the Allegheny County Health Department (ACHD) for 114 air pollution violations and fined \$114,000. The violations were recorded over a period of several months. While the company has completed several maintenance projects at the facility, including oven and shed repairs, fugitive emissions from the coke battery continue to be problematic. Shenango and ACHD are currently negotiating a consent agreement which is expected to address operating procedures, revised monitoring and reporting practices for fugitive emissions, and fines.

ACHD's Air Quality Division presented an emissions inventory for the Shenango facility at the June meeting of the Shenango Working Group of the Neville Island Good Neighbor Committee. The most recent inventory available was prepared for 2010; it was based on the emissions

that Shenango was required to report to the Environmental Protection Agency, using the EPA's base methods for facilities with significant emissions. ACHD is responsible for auditing these inventory reports and, additionally, conducts stack tests in order to improve emission reporting accuracy. Sources of emissions at the plant are the 56-oven coke battery, the quench tower, the boiler, venting, and flaring. As reported to the EPA, emissions from Shenango for 2010 totaled 1257 tons, averaging approximately 3.5 tons per day. Included in the inventory: sulfur dioxide at 419 tons, nitrogen oxides at 379 tons, carbon monoxide at 249 tons, volatile organic compounds (VOCs) at 114 tons, particulate matter 2.5 microns at 83 tons and benzene at 14 tons. Battery emissions were most significant, accounting for 786 tons or 63% of the total emissions for the facility.

We invite interested individuals to learn more about smokereading by contacting Sue Seppi at sue@gasp-pgh.org or 412-924-0604.



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Spotlight on a GASP Board Member

At our June 2012 board meeting, GASP officially welcomed our newest board member, Laurie Anderson. Although she's new to the board, GASP isn't new to Laurie, who recounts first learning about GASP almost 20 years ago when Sue Seppi (our Project Director) came to the Foundation Center at the Carnegie Library looking for grant opportunities. At the time, Laurie was the librarian managing the center. From her conversation with Sue, it was clear to her that GASP had a small budget but still managed to accomplish a great deal; very few organizations were so involved in advocacy work and having real success in changing legislation. Commenting on a long running GASP program, Laurie said "I learned about the Smoke Readers program and thought it was a great way to involve everyday citizens."

Over the years, Laurie would run into Sue, get a copy of the Hotline, or read about GASP in the newspaper. Then a couple years ago, she met Ed Gerjouy, GASP board member, through her job. She relates, "Being a good board member, it wasn't long before Ed began to talk to me about GASP. I met with (Exec Director) Rachel and attended a Meet & Greet and continued to be impressed with the organization's accomplishments. I joined the event fundraising committee and enjoyed working with staff and board members on the fall 2011 Have a Ball event and was pleased to be asked to join the board."

Laurie received her BA in English Literature from Eastern Baptist College (now Eastern University), an MA in English Literature from Temple University, and a Master of Library Science from Pitt. Although Laurie doesn't "think like a scientist," a lot of her work requires that she understand and be conversant in scientific and technical information in order to write about it.


Laurie is active in the community, serving as a Tree Tender through Tree Pittsburgh, through which she's helped plant trees in Lawrenceville, and as an Urban EcoSteward, responsible for caring for a site at Riverview Park. Professionally, Laurie is Director of Grants Administration for the Pittsburgh Parks Conservancy (PPC). She's responsible for researching grant opportunities, preparing grant applications, monitoring grant activities, and preparing reports. She also was Executive Director of two small nonprofits, the Executive Service Corps of Western PA and the Radio Information Service. She became interested in joining a larger nonprofit where she'd have more colleagues and resources to work with. Being an avid, lifelong fan of the outdoors, the PPC was a good fit for her.



She hopes to use her 20+ years experience in fundraising and nonprofit management to help GASP become stronger so it can accomplish even more. She also hopes to facilitate a working relationship between GASP and PPC, which has already happened on a small scale via GASP sponsored educational walks in our regional parks, in collaboration with PPC.

Living in Pittsburgh, Laurie is well aware of our air quality problems. Her husband has asthma and her elderly mother has lung disease, and they "can't always take breathing for granted." Her main priority in her life right now is helping her mom, who lives near her.

Although she and her husband, Don, live in a Lawrenceville row house with a small yard, they manage to do some gardening. They have a lot of shrubs and flowers and were happy to get their tomatoes and lettuce planted just before Memorial Day. Laurie is also an avid reader and began reading Scandinavian mysteries long before they were popular. For those familiar with George R.R. Martin's Song of Fire and Ice series, she's on Book 3.

While Laurie enjoys the exercise of hiking, what she enjoys most is taking a rambling walk in the woods. She finds it's the best way unwind, looking at huge trees and tiny plants and trying to find birds in the treetops. We are pleased to have Laurie join the GASP family. 

Athletes United

GASP's Athletes United for Healthy Air Campaign recently got a boost with a \$5000 grant from Highmark Blue Cross Blue Shield. Funding from Highmark will allow us to update educational materials and produce promotional items like 100% organic cotton t-shirts with the new Athletes United logo.



An Independent Licensee of the Blue Cross and Blue Shield Association



Diesel Partnership continued from page 1

U.S. urban areas with high levels of diesel carbon pollution could carry similar risks. According to the study, particularly at risk are other workers besides miners who are continuously exposed to diesel exhaust, such as the 1.8 million heavy truck drivers and 460,000 heavy construction equipment operators in this country as estimated by the Bureau of Labor Statistics in 2008.

The International Agency For Research On Cancer (IARC), which is part of the World Health Organization, has, for more than two decades, classified diesel engine exhaust as a “probable” carcinogen—a cancer-causing agent—but until recently there was no clear evidence linking it to higher cancer rates. The two studies mentioned above helped to change that. In June of this year, IARC classified diesel engine exhaust as carcinogenic to humans based on sufficient evidence that exposure is associated with an increased risk for lung cancer. This announcement could put pressure on governments to introduce stricter limits on emissions, especially to protect workers who are exposed to diesel exhaust while on the job.



Hot Diggity Downward-Facing Dog

A great BIG thanks to pair Networks and South Hills Power Yoga for giving GASP all donations from two yoga classes in April. We received more than \$800!

If you would like to support GASP with a special event or donation, please contact Rachel at gasp@gasp-pgh.org or 412-924-0604.



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All contributions are tax-deductible to the extent allowed by law. Group Against Smog and Pollution, Inc. is a 501 (c)(3) nonprofit organization. The official registration and financial information of GASP may be obtained from the Department of State by calling 1-800-732-0999. Registration does not imply endorsement.

Join us for GASP's Open House

Thursday, July 19th 5:30-7:30pm at our new office:
5135 Penn Ave., Pittsburgh 15224

- Learn about GASP's recent victories and current projects.
- Meet the GASP staff, board, members, and others who care about cleaning up our region's air.
- View a recently discovered 1970's short film and cartoon which depict the fight for clean air in Pittsburgh.
- Enjoy refreshing cocktails and yummy hors d'oeuvres.



Having a Bad Air Day?

If you are smelling foul odors or seeing heavy smoke, you may be witnessing a violation of county or state regulations. If you live in Allegheny County, call the Allegheny County Health Department at (412) 687-ACHD to report an odor or opacity problem. If you are outside of Allegheny County, call PA DEP at (412) 442-4184 to file a complaint, or (412) 442-4000 for emergencies. Please let GASP know if you contact ACHD or DEP and how your complaint was handled by emailing jamin@gasp-pgh.org.

GASP consistently receives complaints from community members about foul odors and thick smoke. We urge you to call ACHD or DEP every time you notice these problems. Let your officials know that you want polluters to be held accountable and that you want the laws and regulations enforced.

FREE and open to the public, but please RSVP to jamin@gasp-pgh.org.

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