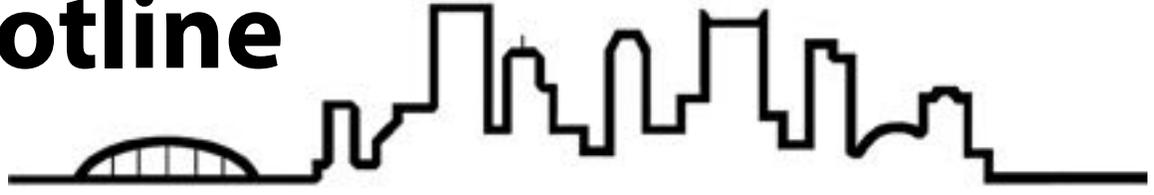




# Group Against Smog and Pollution, Inc. Hotline



Spring 2014

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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.

## Shenango and ACHD Enter into Consent Agreement after GASP Issues Notice of Intent to Sue

by John Baillie, GASP Staff Attorney

Shenango, Inc. operates a coke manufacturing plant with a 56-oven coke battery on Neville Island in Allegheny County. In July 2012, Shenango entered into a consent agreement with federal, state, and local environmental agencies to resolve those agencies' claims that the plant had violated federal, state, and county air and water pollution control laws. The consent agreement imposed a \$1,750,000 fine on Shenango and required it to make a number of changes to its facility and operations. Since the July 2012 consent agreement, Shenango has submitted quarterly, semi-annual, and annual compliance reports to regulators that reveal that Shenango continues to fail to comply with applicable emissions limitations, particularly limitations on visible emissions from the plant's charging operations, coke oven battery doors, pushing control device outlet, and combustion stacks, as well as limitations on the hydrogen sulfide content in the coke oven gas from the plant's coke oven battery.

The Clean Air Act and Allegheny County Health Department (ACHD) air pollution control regulations authorize citizens to bring court actions to require facilities that pollute illegally and on a continuing basis to comply with emissions limitations in their operating permits and the applicable law. However, before bringing such an action, a citizen must provide potential defendants, as well as the federal, state,

and local agencies responsible for enforcing those permits and the law, with at least 60 days' prior notice before filing suit.

Based on Shenango's repeated violations of emissions limits established by law and contained in its operating permits, GASP issued a notice of intent to sue Shenango on February 6, 2014. GASP's notice of intent identified more than 300 days between July 26, 2012 and September 30, 2013 on which Shenango violated at least one applicable emission limitation. As required, GASP served copies of its notice to ACHD, the Pennsylvania Department of Environmental Protection, and the United States Environmental Protection Agency, among other government agencies and officials.

Under Section 304 of the Clean Air Act and its analog in the Allegheny County air pollution regulations, a citizen's suit to enforce air pollution laws or regulations, or a permit issued pursuant to them, is ordinarily barred if a responsible government agency is "diligently prosecuting" an enforcement action of its own against the violator. On April 7, 2014, exactly sixty days after GASP issued its notice of intent to sue, Allegheny County filed a Complaint against Shenango in the Court of Common Pleas for Allegheny County, Pennsylvania. The county's complaint seeks a judgment that Shenango violated emissions limitations in its operating permit, as well as an order prohibiting Shenango from operating

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# Saying Goodbye to Wellington Development's Greene Energy Resource Recovery Project

by Joe Osborne, GASP Legal Director

Nearly a decade after it was first conceived, we can finally say goodbye to Wellington Development's Greene Energy Resource Recovery Project—a proposed 525 MW waste-coal-fired power plant that would have been located in Cumberland Township, Greene County.

In February 2014, PADEP terminated the air permit for the Greene Energy Resource Recovery Project at Wellington Development's request. The permit termination appears to mark the end of a coal power project that would have posed a serious and unjustifiable threat to human health and the environment in southwestern Pennsylvania.

For many years, the proposed plant clung to life in spite of:

- its significant environmental impacts (the facility's air permit would have allowed it to emit thousands of tons of sulfur dioxide, nitrogen oxides, and carbon monoxide; hundreds of tons



PADEP photo of the 525 MW waste-coal-fired Green Energy Resource Recovery Project from a December 2012 site inspection.

of particulate matter, over 100 tons of ammonia, and over 100 tons of volatile organic compounds in any 12-month period);

- lack of any compelling economic justification for building the plant in light of weak demand for generating capacity;
- several legal challenges in state and federal court brought by a coalition of local citizens and environmental organizations including GASP;<sup>1</sup> and
- a protracted, snail-like pace of plant construction that is difficult to reconcile with source operators' Clean Air Act obligation to complete facility construction "within a reasonable time."<sup>2</sup> PADEP authorized construction of the Greene Energy Resource Recovery Project in June 2005. A DEP site inspection in December 2012 noted, "the only sign of any construction are four (4) poured concrete slabs."<sup>3</sup> See photo.

1. For past reports on the excruciating saga of the Greene Energy Resource Recovery Project, see Hotline Fall 2005, Summer 2006, Winter 2006, Summer 2007, Winter 2007, Winter 2010.
2. 40 CFR §52.21.
3. PADEP Inspection Report – Greene Energy Resource Recovery Project (Dec. 19, 2012).

The **Hotline** is the semiannual newsletter of the Group Against Smog and Pollution.

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## GASP Mission Statement

The Group Against Smog and Pollution works to improve air quality to ensure human, environmental, and economic health.

## Methods of Achieving Mission

GASP is a citizens' group based in Southwestern PA which focuses on environmental issues in the surrounding region. 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.



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# You Can Read Books, But How About Reading Smoke?

by Sue Seppi, GASP Project Manager

**G**ASP's smoke reading team was out and about doing many observations in 2013. What does that mean, you ask? The smoke readers are a team of volunteers that checks on the opacity of smoke from flues--usually industry smoke stacks but also neighborhood chimneys. The team members go to Smoke School, just like our county inspectors, and learn how to judge the opacity of a smoke plume. Opacity is the obscuring power of the plume or how much of the background visibility is reduced, expressed as a percent.

Historically, controlling smoke emissions took on new urgency after a number of air pollution-related deaths in Donora, PA in 1948. The Surgeon General took action, pointing out that smoke was not only a nuisance, but a health hazard as well. Today many regulations are based on allowable smoke opacity.

This past year, the smoke readers focused on the Shenango Coke facility on Neville Island, as residents in the area were and are concerned about air pollution and tired of the ongoing regulatory violations. Smoke readers saw ample examples of fugitive emissions, those escaping emissions that could not reasonably pass through a stack or other flue. In a coke battery, smoke leaking through an oven door is a fugitive emission, for example.

The smoke readers take note of significant fugitive smoke, but do not record fugitive smoke as a definite violation because there are very specific rules about where an inspector should stand to observe smoke. For example, emissions from the charging ports (top of the battery holes where coal is unloaded into the ovens) are observed by an inspector walking the length of the top of the battery and noting any sealed ports with fugitive smoke escaping. The smoke readers can observe the large combustion stack, one area of the coke making process where the observation of smoke opacity is ideally done at a distance from the battery. Both noted fugitives and alleged stack violations are reported to the company and to the Allegheny County Air Program (ACAP).

There are many regulatory and observational specifics, but when observing smoke emissions, the basic regulatory requirement noted in Allegheny County Rules and Regulations Article XXI, 2104.01 Visible Emissions is as follows:



Shenango is one location targeted by the smoke reading team. This photo shows smoke from Shenango's coke operations rising in the background.

a. General.

No person shall operate, or allow to be operated, any source except those specifically excluded by Subsection b below in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

1. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
2. Equal or exceed an opacity of 60% at any time.

These requirements would apply to the tall combustion stack at the coke facility which is more of a typical smoke stack but other emission points unique to coke ovens have different visible smoke requirements.

Besides attending Smoke School twice per year, in 2013 the smoke readers and guests met with ACAP inspectors and engineers during an educational day outside the U.S.S. Clairton Coke facility to identify various batteries and quench towers, as well as to discuss operations.

If you would like to learn more or join the smoke reading team and make some observations on a facility or a chimney nearby, email GASP: [sue@gasp-pgh.org](mailto:sue@gasp-pgh.org). If you have seen a facility or situation (such as open wood burning) with excessive smoke, let us know and also report it to the Allegheny County Air Program Complaint Line, 412-687-ACHD. 

# Ten Regional School Flag Programs are Up, Up and Away!

by Karrie Kressler, GASP Education Coordinator

**H**ave you seen a green flag on a hike near the Rachel Carson Homestead? Perhaps you've noticed one or two in Washington County or as you stroll through Regent Square? Or maybe even somewhere else...?

The flags could also be yellow, orange, red or even purple at times, with each progressing color indicating worsening ambient air conditions. They have been placed in several locations with the help of students who check the air quality forecast daily and change the flag each morning.

As of mid April, the School Flag Program had engaged over 250 students directly, impacting a total student population of approximately 3,700 in two counties (Washington and Allegheny) at three private schools and in four public school districts. The program is growing fast and the response is positive.

In a recent poll of the ten active schools, all educators reported that the program has helped empower their students to care more for the environment. "It makes [the students] more aware of things occurring in our environment that we cannot see. People do impact the environment," noted a participating educator.

Teachers have told GASP that "students are curious to see what kind of day it is and why." Over half of the educators said that the School Flag Program has also helped them push for other greening initiatives, like school recycling programs and anti-idling campaigns.

In some schools, students have been seen making small changes to reduce their own impact and even encouraging their families to do the same, expanding the program's reach beyond just the school grounds.

The program can bring many academic subjects together, such as math, science, and history. McCall Malecki, a 5th grade teacher at Colfax Elementary in Springdale, uses the program in her math class as a way for her students "to get real world data rather than just using numbers from a textbook."

Canon-McMillan School District in Washington County launched the School Flag Program at five of their school locations this year: Canon-McMillan High School, First Street Elementary, Cecil Elementary, Hills-Hendersonville Elementary, and Borland Manor Elementary.

The School Flag Program has opened the door for GASP to continue air quality conversations with educators, students, and other organizations. This includes presenting at the Pennsylvania Environmental Educators Conference in



Flag raising ceremonies at First Street Elementary School in Canon-McMillan School District (top) and at Sunnyside Elementary in the Pittsburgh Public School District (bottom).

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# From Grody to Green: GASP Competes in the Green Workplace Challenge

by Jamin Bogi, GASP Policy and Outreach Coordinator

The people at Sustainable Pittsburgh seem nice. They're friendly, smiley, and always have their arms outstretched to give you a handshake. But behind their gleaming facades hide a dangerous motive—they are secretly trying to make everyone sustainability experts.

I know this, because GASP joined their Green Workplace Challenge (GWC), a competition that pits like-sized organizations against each other in a battle-to-the-greenest. By performing sustainability actions, organizations receive points (and save a lot of energy and money in the process). Most points wins, Yogi Berra style. And the only way to achieve victory in the triple-bottom-lined arena is to know... everything. From water meter sub-metering, to carbon offsets, to software tools that help you track your office's energy usage, we studied the fine-grained details that fill in the shadows or make the highlights gleam on the canvas of sustainability. Oh sure, there are plenty of simple challenge tasks that are quick, simple, and will save your workplace money immediately. But we wanted to win, darn it.

Our office has a lot to love, like some rooms with great

natural lighting, indoor bike parking, and a fresh, airy, white-and-blue decor theme. The tin ceiling tops the front room and always drops jaws. However, the same room had a not-so-desirable feature as well that also dropped jaws. That feature was our hideous plastic-bubbly-window-things (see picture at left).

They were thin, dim, and grody. In fact, state government wouldn't allow us to use that room due to its scientific-ly-measured high grodiness levels. (Not really.) And since we had commissioned a new mosaic sign for the front of the building to go near the windows, we knew we had to replace them pronto. Otherwise our beautiful new sign would've just been shoe shine on grandpap's old house slippers.

This fruit wasn't low-hanging. It dropped from the tree last summer and had been rotting ever since. In our GWC-spurred study, we learned about double- and triple-paned argon-filled glass, glass block with glass pane inside, Energy Star ratings, R-factors and U-values, and on and on. Lots of learning, but in the end we chose glass block windows that let a lot of light in but obscure views for privacy and are a big upgrade on the older plastic-bubbly-window-things.

While we were getting estimates for the new windows and our mosaic was being completed, several polar vortices swirled around our city and settled in for a few months. It. Was. Cold. An energy auditor poked through our rented office, the long ground floor of an old three-story building on Penn Avenue. He gave us a list of tasks that would save us money on cooling and heating costs (and give us GWC points), and I excitedly began to cross off items from that list. The caulking in our largest room was cracked, on several windows about 12' high. Putting my palm near the cracks, I felt cold air flowing in.

Brrr. Old caulking out, and a lot of new caulking squished in. We then sealed the windows that opened with either window film or seam tape. I put several rolls of foam in door jambs to reduce drafts. I even put some in our mail slot. I sprayed expanding foam in a bunch of gaps around a door in the basement. This is easy! Victory is mine, I continued to dream.

And then winter got more wintery. Very, very cold, for many days on end. So cold that our office couldn't get above 60 degrees Fahrenheit, even with the heater running all day.

My dreams of victory became hours of insomnia as I lay in bed, grinding my teeth over all the gas burned to barely



These "hideous plastic-bubbly-window-things" in the GASP office were not energy efficient.

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# Greening Your Bookshelf

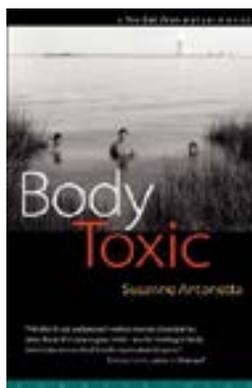
by Paola Corso, GASP Member

In our *Greening Your Bookshelf* column, we review books that discuss themes of interest to GASP members whose concerns range far beyond particulate matter and fly ash. This column will hopefully be a landing pad and a take-off point for those interests. No endorsement by GASP of these books or ideas is implied or intended.

**Paola Corso** is an award-winning author of fiction and poetry books, most recently *Once I Was Told the Air Was Not for Breathing* and *The Laundress Catches Her Breath*, winner of the *Tillie Olsen Award for Creative Writing*. In this issue, she interviews *Susanne Paola Antonetta*, author of *Body Toxic: An Environmental Memoir*.

**Susanne Paola Antonetta** is the author of the memoirs, *A Mind Apart* and *Body Toxic*, a *New York Times* Notable Book as well as the poetry collections, *Bardo*, *Petitioner*, *Glass*, and most recently, *The Lives of the Saints*. Her work has appeared in the *New York Times*, *New Republic*, *Best American Essays*, and other publications. Her latest book is a memoir, *Make Me a Mother*. She lives in Bellingham, Washington, with her husband and son.

**B**ody Toxic is a book where DDT meets DNA. There are the poisons Antonetta swallowed in her mother's breast milk; the polluted boglands of New Jersey where her immigrant family built a summer bungalow; the radiation from the nuclear power plant nearby; and the heavy metals, pesticides, and hazardous waste near the berries she picked, in the creek where she crabbed and fished, the river where she swam and rowed, and the drinking water. She deconstructs the pastoral's song of innocence and laces it with the horrific experience of a woman who is wise to the damage done to her body: her arrhythmic heart, brain seizures, severe allergies, growths on her liver, a double uterus, cysts on her ovaries and miscarriages as well as family members with organs malformed at birth, infertility, manic depression and a community wracked by childhood cancer.



**GASP:** Though family dynamics—one side from Italy, the other from Barbados—affected your childhood psychology, you refer to your parents as “a house full of cellular history.” One reviewer called your book a “postpsychological memoir.” Do genetic factors largely define your sense of self in *Body Toxic*?

**Susanne:** What fascinated me as I got drawn into researching the book were the inter-relationships. Certainly we knew we had a family history of manic-depression. But three out of eight cousins developing full-blown bipolar type I? This is a genetic predisposition with environmental insult, so to speak, squeezing the trigger. I say “so to speak” because I have come to terms with my manic-depression, though it's been difficult. It is who I am. But I say that with some sorrow because one cousin who had it is dead, another struggling terribly. What I think we live now as a culture is

a psychology that cannot free itself from the land. The rates of schizophrenia in the region after the Chernobyl disaster—you can't ascribe that just to psychic trauma or genetics. Freud's Oedipal families seem kind of innocent, by contrast.

**GASP:** You draw another strong biological connection between the environmental toxins that poisoned your body and the drugs you took as a teenager. I was moved by the passage where you wonder if the scars on your arm were from shooting drugs or the years of hospital blood work drawn to check for organ functions? On some level, was the drug use a response to the landscape that had already ravaged your body?

**Susanne:** Yes, I have scars from both, illicit drugs and the constant checking to make sure my psych meds aren't poisoning me. Isn't that astonishing, and rather sad. I was given really awful psychological treatment for such a long time, really more, I think, than I get into in the book. Rounds of shock treatment. First you take street drugs to control how much you're feeling, then you take them to feel something again. While I would never, never go back there, to the world of needing street drugs, I still acknowledge the value of trying to live, to feel, in all of that mess. And of course, if you look at the history of shock treatment, it was given the vast majority of the time to women, women and young girls. The ads for shock from the 60s and 70s say things like: “Mrs. Brown is back in the kitchen again.” It was all about making women compliant, traditionally feminine.

**GASP:** You say in the book that you don't expect anyone to explain what's wrong with you. Can you comment on the line, “Either it's Sodom and this is the wrath of God or it's the wrath of man, which is thoughtless, foolish and much more lasting.”

**Susanne:** I love the E.O. Wilson essay, “Is Humanity Suicidal?” I don't think we're suicidal—I don't think Wilson does—but as he rightly points out, as top primates, we are

constitutionally short-term thinkers, running the show on a planet exquisitely sensitive and long-term in its impacts. Our “wrath” is meant to be slightly ironic--we’re less wrathful than we are beings who say, “We have surplus chemicals developed as chemical agents to kill other humans in a world war. Let’s unleash them on our insects! What’s the worst that could happen?”

**GASP:** You address the silence in your family and the “mantras of unspeech.” Were you reluctant to write this book? Was the diary you began as a teenager to express yourself and the entries that appear throughout this book the beginning of writing it?

**Susanne:** Yes, the diary was a key starting point. And writing the book was terribly hard. I still have one cousin who won’t speak to me. When you grow up with those rules of silence, you internalize them. I still struggle with the confidence to speak my truth, to feel I have the right to, though I exhaustively corroborate what I write.

**GASP:** Elizabeth, your other childhood home in New Jersey, was also thick with industrial pollution. I’m going to include an excerpt from your book about its air quality for your comment.

Elizabeth has an air like no other air--heavy, gray, like an odor becomes a scarf wrapped around your face: an olfactory purdah.

The city, and Newark, which squats next to it, survived on heavy industry. They’re amazing cities to see from far away: the rows of long smokestacks sticking up like goosenecks, breathing black clouds that roll together to become a lower layer of the atmosphere. Slices dripping muddy brown sludge matter-of-factly into the water. I remember how many days, especially in the summer, began with the radio declaring our air quality unacceptable. Like you had a choice about whether or not to breathe. (pp. 92-93.)

**Susanne:** Elizabeth has a lot of factories and a real chemical spew about it, especially in the old days. Most people, if they’ve driven by it, will know it by those rows of smokestacks. I will say that many places that look less polluted probably deal with as much, but it’s more hidden.

**GASP:** You’re a poet and a journalist. *Body Toxic* fuses the art of storytelling, lyrical language, and non-linear sequences with just enough scientific fact. Explain how you came to write the book this way.

**Susanne:** I had always had, even as a poet, a drive toward science and research. I wrote the family stories first, for the most part, but I became really obsessed with the research, all of the EPA reports on that area. And the interviews, espe-

cially with engineers who’d worked on the power plant, then grew disillusioned. Those were fascinating.

**GASP:** What are some earlier environmental memoirs combining science and autobiography that may have informed this book such as *Living Downstream* by Sandra Steingraber or others?

**Susanne:** Honestly, I had not read anything remotely similar to the book when I began *Body Toxic*--it was the latter 90s. I imagine there were books around, but I did not know them. I felt strongly that I was writing the book for me and it would live in a drawer forever. I used to jokingly call the manuscript “Susanne’s Folly.” I read Steingraber and Terry Tempest Williams and such authors only after my book was done.

**GASP:** How has this memoir been received in the environmental activist community? How has it been regarded as a tool for advocacy?

**Susanne:** I’ve had so many wonderful moments when I reached people. That’s been so touching to me. I know it was read aloud at rallies in that part of New Jersey.

**GASP:** *Body Toxic* was published 13 years ago. Can you offer an update since it came out?

**Susanne:** Well, I guess the most personally affecting update is that the houses where the book is centered--the bungalows built by my grandfather from Barbados, not well, but held together with spit and the islanders’ lust for the sea--were destroyed by Sandy. There is no possibility of rebuilding. The water level there has become crazy high, utterly different than when I was young. About a year ago my brother and I drove down to the place to say goodbye. We found one bungalow unmoored and hanging at a crazy angle and one utterly gone. There were mounds of mud filled with bits of the games that had defined our childhood. I took souvenirs, just whatever I could grab. Some really old Monopoly pieces we had grown up with, bits of jigsaw puzzles. I even grabbed a few butter knives. A TSA agent confiscated those at the airport, while I pleaded with him that they were practically all I had left from a house flattened by Sandy. Could a rusty butter knife really hurt anyone? Apparently he thought so.

**GASP:** Did your personal experience and writing this book politicize you? What activist projects are you currently engaged in?

**Susanne:** I am deeply involved in a fight in my current home town of Bellingham against a proposed coal terminal that would be the largest in the country, shipping U.S. coal

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except in compliance with that permit and the applicable regulations and requiring Shenango to pay a penalty to the Allegheny County Health Department Clean Air Fund. Also on April 7, the county and Shenango entered into a consent order and agreement that purports to settle the claims made in the county's complaint.

### **What does the April 7 consent agreement require and what does it mean?**

The April 7 consent agreement generally requires Shenango to pay a fine, undertake an investigation, and make a number of changes to its plant and operating methods. Five of the consent agreement's requirements particularly merit attention.

First, the April 7 consent agreement requires Shenango to pay a civil penalty of \$300,000 to the Allegheny County Health Department Clean Air Fund.

Second, Shenango must complete repairs to its pushing emission control shed and install a shed extension to minimize the size of an existing opening between the plant's quench tower and main shed.

Third, the consent agreement requires Shenango to undertake a "Supplemental Environmental Project," pursuant to which it must spend at least \$285,000 and up to \$300,000 to study other physical changes that could be made to the plant's quench tower to enhance the tower's ability to control emissions of particulate matter. If that study costs less than \$285,000, Shenango is obligated to either spend the difference between \$300,000 and the cost of the study on implementing physical improvements to the quench tower or pay it to ACHD as an additional penalty.

Fourth, the consent agreement requires Shenango to submit a "Baghouse Maintenance Plan" and "Charging Procedures Work Plan" to ACHD for their approval. Following ACHD's approval of those plans, Shenango must implement them.

Fifth, the consent agreement will also force Shenango to maintain a minimum coking time, and increase that time following any three-day periods when, on the average, its rate of compliance with applicable limitations on visible emissions falls below 90%. The consent agreement also authorizes Shenango to reduce coking time following three-day periods when, on the average, its rate of compliance with applicable limitations on visible emissions exceeds 95%. In no event, however, may the coking time be reduced below 17 hours and 30 minutes.

### **What does the April 7 consent agreement fail to do?**

First, the April 7 consent agreement fails to impose a fine on Shenango that approaches the maximum fine authorized by law. Although \$300,000 is a substantial amount, it pales in comparison to the amount of penalty that ACHD's regulations and the Pennsylvania Air Pollution Control Act authorized it to impose on Shenango: up to \$25,000 per day of violations. Based on the approximately-300 days between July 26, 2012 and September 30, 2013 on which documented violations occurred, ACHD could have imposed on Shenango a penalty in excess of \$7,500,000.

Second, there is no requirement in the April 7 consent agreement that the required physical alterations and repairs to the plant yield emissions reductions or compliance with applicable emissions standards. Indeed, ACHD may be allowing Shenango to escape full liability for its violations of applicable emissions limitations in exchange for plant upkeep that Shenango would (or should) have performed absent the agreement.

Third, the consent order does not require Shenango to alter its facility or undertake any operational changes that may be identified by the "Supplemental Environmental Project," even if those alterations or changes might yield greatly increased compliance or other substantial environmental benefits.

Fourth, the consent agreement does not specify what provisions the "Baghouse Maintenance Plan" and "Charging Procedures Work Plan" that Shenango is required to submit to ACHD must include in order to be approved by ACHD. Nor does the consent agreement explicitly require that the plans ultimately yield any actual emissions reductions after they are implemented.

Fifth, the April 7 consent agreement does not require Shenango to comply with applicable emissions limitations in the applicable law and its operating permit 100% of the time. Rather, Shenango is authorized to reduce coking times (to its benefit) even when compliance drops below 100%.

Finally, the April 7 consent agreement imposes no requirements on Shenango with respect to excessive hydrogen sulfide content in the plant's flared, mixed, or combusted coke oven gas, despite numerous violations by Shenango since July 2012 of regulatory and permit standards limiting the hydrogen sulfide content of the plant's coke oven gas. Rather than impose new requirements on Shenango designed to achieve compliance of those standards, the April 7 consent agreement relies on existing requirements which have proven to be inadequate.



## Green Workplace Challenge continued from page 5

warm our building. Starting during the cold spell and on and off throughout the winter, I plunged into our basement with only a roll of foil tape and ten pounds of pure pluck. Going from the furnace and following the supply and return lines out, I found many, many spots where our heated air was blasting pathetically straight into the basement, or places where the return ducts were damaged, meaning cold, smelly basement air was being sucked through those leaks back into the furnace--and thus costing us more money to heat that untreated air.

The worst thing I found (other than a collection of someone's 1000+ VHS tapes of movies copied off the TV) was a hole bigger than my fist, allowing hot air to rush into the basement. Next to the hole, resting on the ductwork, sat a cap. The exact shape and size of the hole. The cap was simply never placed in the hole.

Oh, and next to the rushing hot air was this old box of rat poison. Sigh. OK, it was a hardened lump, probably 60 years old. But still.

In many places, our return "ducts" were made of a sheet of metal covering the space between two joists. The joists often had holes drilled through them to make room for wiring. Or the joists leaked air where, due to being rough, natural wood, they didn't line up as perfectly as they should. Or the duct work just... didn't fit. Note the cobwebs: spiders often make these near drafts of air. Look for cobwebs and you'll find air leaks.

The upshot of all this? I have been certified as an HVAC Fixer-Guy. I certified myself. I taped, nailed, capped, and sealed up every leak I could find. Also, we will not come close to winning the GWC. All the time I had to go through the list of actions rushed away, like... hot air through a huge seam gap. More important than winning a contest, however, is understanding our heating and cooling systems, significantly reducing our heating and cooling costs, and giving our office cleaner air. That's what I'll repeat to myself at the GWC awards ceremony, where I will sulk from the back of the room. 

## School Flag Program continued from page 4

March with the Environmental Charter School and with Creek Connections and the US Green Building Alliance in April.

Five more schools plan to launch the program by the end of spring 2014. Want to get your school involved? Contact Karrie at GASP: [karrie@gasp-pgh.org](mailto:karrie@gasp-pgh.org). 



Flag raising ceremony at Cecil Elementary School in Canon-McMillan School District.

## Air Quality Index Outdoor Activity Guidance for Schools

*Numbers in parentheses are the AQI Values.*

### **(0-50) GREEN - "GOOD"**

Air quality is considered satisfactory, and air pollution poses little or no risk. It's a great day to be active outside!

### **(51-100) YELLOW - "MODERATE"**

Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a small number of people who are sensitive to air pollution. In general, it's still a good day to be active outside.

### **(101-150) ORANGE - "UNHEALTHY FOR SENSITIVE GROUPS"**

It's okay for students to be active outside, especially for short activities such as recess and physical education (PE) class. For longer activities such as athletic practice, students should take more breaks and do less intense activities. Watch for symptoms such as coughing or shortness of breath.

### **(151-200) RED - "UNHEALTHY"**

Everyone may begin to experience health effects, and members of sensitive groups may experience more serious health effects. For all outdoor activities, students should take more breaks and do less intense activities. Watch for symptoms such as coughing or shortness of breath.

### **(201-300) PURPLE - "VERY UNHEALTHY"**

Health alert: everyone may experience more serious health effects. Move all activities indoors or reschedule to another day.

*The AQI Guidance chart was developed by the EPA and CDC.*

## Greening Your Bookshelf continued from page 7

to China. It has been a years' long battle but I am finally cautiously optimistic about it.

**GASP:** You have a son, Jin, adopted from Korea. If not genetics, what has he inherited from you and your experience in Body Toxic?

**Susanne:** That's a tough question! Right now, like any self-respecting 16-year-old, he finds things that concern his parents utterly uninteresting. I do think he has learned so much from us about environmental impacts that this will stay with him in the future. He has been to rallies with us.

**GASP:** I'd like to end the interview with an excerpt from your book, the chapter where you talk about where you lived, a "sacrifice community" chosen to house toxic waste

and nuclear power because these communities are often poor and rural.

Our area had pineys and immigrants, and to the latter the place just looked like America: uncrowded, unclaimed, able to glow in the right light. Until recently, you could buy a decent piece of land for a few thousand dollars in Berkeley Township. The median household income in 1990 was \$23,000. We were chosen, in a way that sounds almost like a religious calling.

My brother and my cousin Mark and I formed a terrorist group: the Environmental Liberation Army, or the ELA. We were sincere terrorists and very much in the sixties mode of talking about our terrorism and creating manifestos, though we were something like ten, twelve and fourteen at the time. When For Sale signs went up in the pinewoods we spraypainted them with "We Will Stop You" and "ELA Will Avenge." We thought if we could convince people there were hundreds of us, armed and dangerous, they might stop. (p. 26)



## The Bounty Is Back

### Get Gift Cards or Cash for Your Old Wood-Burning Stoves and Boilers

To help reduce fine particulate pollution from wood smoke and in response to an increase in citizen complaints regarding wood burning, ACHD is distributing \$200 gift card "bounties" in exchange for uncertified woodstoves and \$500 bounties for non-Phase-II outdoor wood-fired boilers (OWB). To participate in this program, you must be an Allegheny County resident with valid ID. Pre-registration is also required.

Get more information and register at:  
<http://www.achd.net/air/bounty>

Saturday, May 17  
1 - 4 PM  
South Ridge Drive  
Swimming Pool Parking Lot  
North Park  
McCandless Township, PA 15101

## 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](mailto: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.

# Spotlight on a GASP Staff Member

**G**ASP welcomes our new Staff Attorney, John Baillie, who began working full time with us in late January 2014. John takes over for Lauren Burge, who recently left GASP to work for the PA Office of the Consumer Advocate in Harrisburg. Before coming on board as a staff attorney, John worked with GASP's legal team on a volunteer basis, doing facility permit file reviews and drafting permit comments.

John grew up near Reading, Pennsylvania and first became interested in air pollution while watching smog fill the valley below his high school on chilly fall mornings. He received his undergraduate degree from Georgetown University and his law degree from the University of Pennsylvania Law School. After passing the bar, John worked in private practice for about ten years, mostly doing commercial litigation, and later worked as an in-house lawyer for a railroad holding company. More recently, John served as an in-house attorney for PennFuture, where he worked on cases involving air pollution, gas drilling, mining, and the regulation of electric distribution companies and other public utilities in Pennsylvania.

At GASP, John works with Joe Osborne on legal issues involving air pollution in western Pennsylvania. The bulk of John's work thus far has been focused on reducing diesel vehicle emissions, reviewing and drafting comments on facility air pollution permits, and devising and implementing strategies to reduce illegal emissions of air pollutants from Shenango, Inc.'s coke ovens on Neville Island. John expects to devote a lot of attention to the upcoming Allegheny County rules governing sulfur dioxide emissions as those rules are revised in the near future in response to a new, reduced National Ambient Air Quality Standard for SO<sub>2</sub>.

When asked what he likes best about his work at GASP, John responded that it provides him an opportunity to work in-depth on legal issues that are often novel and cutting edge. "It's always fascinating to me to learn that the reason we go about our lives in a certain way is because of a particular regulation or interpretation of a rule under the Clean Air Act or some other environmental law."

John lives in Pittsburgh's Park Place neighborhood with his wife Karen and their two children. In the spring and summer, John volunteers as an assistant coach for his son's Colt League (for fifteen and sixteen-year-olds) baseball team. In his free time, John likes to ride (and repair, and rebuild) bicycles, hike, garden, and cook. He would have a lot more free time to spend on the activities he really enjoys, but for the constant stream of small projects required to keep his aging house from falling into disrepair.



## Join GASP Today!

- \$40 Grassroots Supporters (\$15 low income/student rate)
- \$60 Grassroots Contributors
- \$100 Grassroots Patrons
- \$250 Clean Air Defenders
- \$500 Clean Air Protectors
- \$\_\_\_\_\_ Other

*Call GASP at (412) 924-0604 to learn about automatic monthly giving, deducted directly from your checking account or charged to your credit card. An easy, hassle-free way to support GASP all year round!*

Name \_\_\_\_\_

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Phone \_\_\_\_\_

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Check    Visa    Mastercard    American Express

Card # \_\_\_\_\_

Exp. Date \_\_\_\_\_ Amount \$ \_\_\_\_\_

Signature \_\_\_\_\_

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.

# Athletes: Save the Date!

Runners, what are you doing on October 5th, 2014? How about competing in the second annual **GASP Clean Air Dash**? We're excited to announce the 5K race for a second straight year after last year's smashing success. Mark your calendars for **October 5 in the South Side Riverfront Park!**



The 2013 Clean Air Dash attracted over 400 runners. Photo by Joshua Franzos Photography.

In 2013, over 400 athletes registered to run. Attendees enjoyed a crisp morning run, yoga in the park, great company, and terrific music. This fall, we're going to build on the Clean Air Dash's reputation as Pittsburgh's best new 5K. There will also be a slower paced fun walk, perfect for taking in a fall day with family and friends.

Primary funding for the event comes from the Heinz Endowments' Breathe Project. We are also excited to announce that GASP and the University of Pittsburgh are partnering for the race this year, which means that the Clean Air Dash will be attended by loads of Pitt's best and brightest athletes. All proceeds will go to GASP. We hope to see you there!

**Save the Date:  
GASP Clean Air Dash  
October 5th, 2014**

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Pittsburgh, PA 15224

Group Against Smog and Pollution, Inc.



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