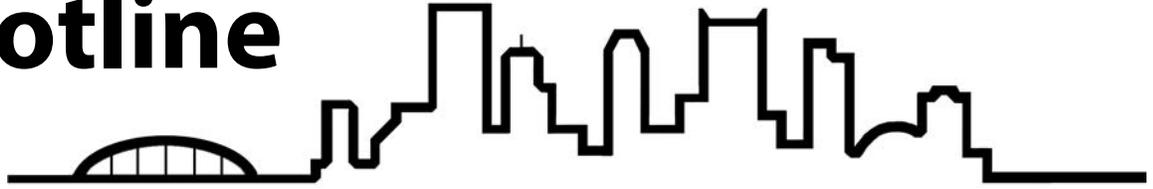




# Group Against Smog and Pollution, Inc. Hotline



Fall 2018

[www.gasp-pgh.org](http://www.gasp-pgh.org)

## In this issue

Health Department Tracks Down Source of "Rotten Egg" Hydrogen Sulfide Emissions	1
Funds for Air Quality Improvements Should Not Be Used to Renovate Office Space	1
ACHD Commits to Clear Permit Backlog After EPA Scrutiny	3
Pittsburgh Sinusitis Research Team Shows that Sinus Disease is Associated with Exposure to Fine Particulate Air Pollution	4
GASP in Action	5
Spotlight on a Board Member	7
GASP's 50th Anniversary	8

## Health Department Tracks Down Source of "Rotten Egg" Hydrogen Sulfide Emissions

by Rachel Filippini, GASP Executive Director

A year ago GASP began urging the Allegheny County Health Department (ACHD) to do more to eliminate violations of the County's hydrogen sulfide (H<sub>2</sub>S) standard and the offensive rotten egg odors that go along with those violations. GASP documented that the H<sub>2</sub>S standard has been violated on average more than fifty times a year, over the past six years, according to readings from the Liberty Borough monitor in the Mon Valley.

At the ACHD Air Quality Program Criteria Pollutant/Air Monitoring subcommittee meetings, we repeatedly insisted that ACHD staff look into the problem and do more to reduce these illegal emissions. We are pleased to report some progress is occurring. At a recent meeting of the sub-

committee, ACHD provided a preliminary study which compared the frequency and intensity of H<sub>2</sub>S concentrations with weather conditions and other pollutants at the Liberty Borough monitor from 2013-2017. The study concluded that there was no seasonal trend in the occurrence of high H<sub>2</sub>S concentrations but there was a daily trend: most of the highest H<sub>2</sub>S readings occurred between 8 p.m. and 10 a.m. It is likely our region's frequent atmospheric inversions, which occur at night, are trapping the H<sub>2</sub>S closer to the ground.

ACHD also concluded that sulfur dioxide (SO<sub>2</sub>), benzene, and fine particles (PM<sub>2.5</sub>) appeared to increase with an increase in H<sub>2</sub>S. These are all pollutants

continued on page 2

## Funds for Air Quality Improvements Should Not Be Used to Renovate Office Space

by Ned Mulcahy, GASP Staff Attorney

Threats to air quality exist in many forms. Dirty smoke coming from steel mills or old diesel buses are visible threats. One less obvious threat occurs when funds committed to implementing air quality regulations, enforcing air quality permits, researching air quality issues, and educating the public regarding air issues are misused or misappropriated. It is precisely this threat that pushed GASP and Clean Air Council to sue the County of Allegh-

eny this past summer. Specifically, on July 9, 2018, GASP and Clean Air Council filed a complaint in the Court of Common Pleas for Allegheny County seeking an order of court enjoining the County from spending more than \$9,000,000 from the Clean Air Fund and the Air Quality Fund on building renovations for new office space for Allegheny County Health Department's (ACHD) Air Quality Program.

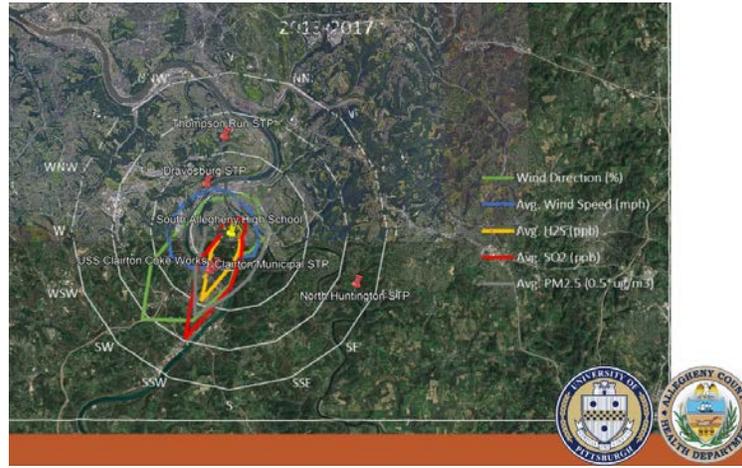
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Group Against Smog and Pollution, Inc. (GASP) is a nonprofit citizens group in southwestern Pennsylvania working for a healthy, sustainable environment. Founded in 1969, GASP has been a diligent watchdog, educator, litigator, and policy maker on many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

**Hydrogen Sulfide continued from page 1**

highly associated with coke-making. The study also revealed that most of the highest hourly H<sub>2</sub>S, SO<sub>2</sub>, benzene, and PM2.5 readings at the Liberty monitor typically came from the south, south-southwest, and southwest, which is in the general upwind direction of U.S. Steel's Clairton Coke Works. ACHD concludes that, "based on location and amount of reported emissions from USS Clairton, it is likely a substantial contributor to the H<sub>2</sub>S, SO<sub>2</sub>, benzene, and PM2.5 concentrations." Is anyone surprised by this? We weren't. U.S. Steel's Clairton Coke Works is by far the largest emitter of H<sub>2</sub>S in the county, emitting more than 109 tons in 2017, according to the PA Department of Environmental Protection's eFACTS online data portal. While we were glad to see ACHD put some effort into examining the problem, what we are most interested in is: what's next?

Now that ACHD has an answer as to the source of the smelly H<sub>2</sub>S, what will ACHD and U.S. Steel do to remedy the problem? In May, Jim Kelly, ACHD Deputy Director for Environmental Health, told the Allegheny County



**Evaluation of Hydrogen Sulfide Concentrations at Liberty Borough Monitoring Station-1**

Board of Health that the Air Quality Program planned to revise the county's coke oven regulations. Board of Health meeting minutes report, "[Jim Kelly] stated that fugitive emissions were responsible for the 'rotten egg' smell. He stated that the rationale for change is that the current H<sub>2</sub>S limit in the rule was not protective of the SO<sub>2</sub> NAAQS and that fugitive emissions should be reduced to improve compliance with the H<sub>2</sub>S State standard.

*Elements of the regulation to be changed include the door areas, which will impact allowable visible emissions; coke oven gas, which will impact the allowable H<sub>2</sub>S concentration; and updating of equipment lists."*

We know that the Air Quality Program's Regulation subcommittee is currently reviewing the coke oven regulations. Will revisions to the regulations help to reduce H<sub>2</sub>S emissions coming from Clairton Coke Works and the rotten egg odor that permeates so much of the Mon Valley and downwind areas? That is yet to be seen, but we will keep you posted. This is a welcome but overdue step in the right direction. Any changes to the County's air quality regulations must go out for public comment, and we will need your voice when that happens.



<p>The <b>Hotline</b> is the semiannual newsletter of the Group Against Smog and Pollution.</p>		<p><b>GASP Staff</b></p>
<p>GASP (412) 924-0604 1133 S. Braddock Ave., Suite 1A www.gasp-pgh.org Pittsburgh, PA 15218 info@gasp-pgh.org</p>		<p>Rachel Filippini Executive Director Chelsea Arnold Education and Events Coordinator John Baillie Staff Attorney Jamin Bogi Policy and Outreach Coordinator Kathy Lawson Office Manager Ned Mulcahy Staff Attorney Suzanne Seppi Project Manager</p>
<p><b>GASP Mission Statement</b> The Group Against Smog and Pollution works to improve air quality to protect human, environmental, and economic health in southwestern Pennsylvania.</p>	<p><b>GASP Vision</b></p>	<p><b>GASP Board of Directors</b></p>
<p>GASP envisions a Southwestern Pennsylvania where the air we breathe supports human, environmental, and economic health and where:</p> <ul style="list-style-type: none"> <li>• Every citizen can breathe cleaner air, which at a minimum meets federal health-based standards and is no longer listed as one of the top 10 most polluted areas in the United States.</li> <li>• Regional data will show over time that citizens have less prevalence of diseases and conditions that are proven to be linked to air pollution.</li> <li>• Citizens understand the health implications of polluted air and appreciate that clean air is imperative not only to good health but also to both a healthy environment and a healthy economy and where they hold policymakers accountable for regional air quality.</li> <li>• Policymakers consider new development through an "air quality lens."</li> <li>• All regional businesses comply with their air quality permits. In the cases where they are not complying, regulatory agencies take swift action to stop violations of air quality permits and regulations.</li> </ul>	<p>Maren Cooke, PhD Zelda Curtiss Roger Day David Eibling, MD James Fabisiak, PhD Michelle Fanzo Marla Ferrency Karen Grzywinski Frances Harkins</p>	<p>Janis Johnson Charles D. "Dave" Litton Jonathan Nadle Abby Resnick Harold Rickenbacker Kate St. John Peri Unligil, MD Walter Goldberg, PhD (Board Member Emeritus)</p>

# ACHD Commits to Clear Permit Backlog After EPA Scrutiny

by John Baillie, GASP Staff Attorney

The Clean Air Act requires every major source of air pollution to have a Title V Operating Permit. A facility's Title V Operating Permit must include all federal, state, and local air pollution law requirements to which the facility is subject. Because Title V facilities must report on their compliance with those requirements at least once a year, the permits help to improve compliance with the air pollution laws. A Title V Operating Permit is good for five years, but a facility may continue to operate on an expired permit as long as it has submitted a complete and timely application to renew the permit.

The Allegheny County Health Department (ACHD) is the responsible Title V permitting authority for Title V sources located in Allegheny County. Currently, out of twenty-eight major sources of air pollution in Allegheny County, nine are operating with expired permits, including one facility that has operated under an expired Title V Operating Permit since 2008. Two major sources of air pollution in Allegheny County, Allegheny Ludlum's Brackenridge Works and Eastman Chemicals and Resins in West Elizabeth, have never been issued Title V Operating Permits. ACHD's own regulations purportedly required that all facilities in Allegheny County subject to Title V's operating permit requirement were to have been issued an initial permit by November 2004, at the latest.

ACHD's Title V permitting program is subject to oversight by the United States Environmental Protection Agency (EPA). In August 2017, EPA conducted an evaluation of ACHD's Title V permitting program. EPA detailed its findings in a report that was finalized in May 2018.

Although EPA's report did not include a determination that ACHD's Title V permitting program was deficient (a legal conclusion which, if required corrective action were not taken, could ultimately lead to federal takeover of the program and the loss of federal highway funds), its report identified several problems with the program that have contributed to the backlog of Title V Operating Permits. Primarily, EPA found that ACHD could not adequately implement its Title V permitting program given existing staffing levels. EPA also noted problems with the permit tracking software that ACHD uses, ACHD's failure to set formal due dates for permit applicants to respond to ACHD's requests for additional information, and ACHD's practice of prioritizing installation permits over operating permits. EPA's report directed ACHD to take a number of specific steps to address these problems and improve the Title V permitting program:

- ACHD must develop a corrective action plan for each backlogged Title V Operating Permit. The plan must

specify the date by which the backlogged permit will be issued and identify intermediate deadlines for issuing any installation permits for a given facility that may need to be issued before its Title V Operating Permit;

- ACHD must add additional permit engineers and other staff so that it can implement the corrective action plans it develops;
- ACHD must improve the data entry and data management systems used by its Title V permitting program;
- ACHD must determine whether its existing Title V fees are adequate to fund the operation of its Title V permitting program. If they are not, ACHD must work with the Pennsylvania Department of Environmental Protection to increase the fees so that they are adequate to fund the program's operations; and
- ACHD should continue the steps it has already taken to improve the permitting program's operations, by establishing deadlines for facilities to respond to its inquiries and tracking their compliance with such deadlines, developing permit templates, creating a database of specific sources within facilities, and working with EPA on permitting issues (especially those involving complex sources).

ACHD recently published the corrective action plan that it developed at EPA's direction. In a nutshell, to eliminate the backlog, ACHD has committed to adding necessary staff and publishing draft Title V Operating Permits for these sources before the end of 2018:

- Ashland, Inc.
- Buckeye Pipelines Coraopolis Terminal;
- Sun Oil;
- Pittsburgh Terminals/Gulf Oil;
- Alcosan; and
- USA Waste/Chambers Development Monroeville Landfill

ACHD has committed to issuing Title V Operating Permits for these sources in 2019:

- NRG Energy – Brunot Island;
- Harsco, Inc.;
- U.S. Steel Clairton Works;
- Bellefield Boiler; and
- University of Pittsburgh

In 2020, ACHD plans to finally issue Title V Operating Permits for Allegheny Ludlum's Brackenridge Works and Eastman Chemical & Resins, the two major sources that have never had Title V Operating Permits. If ACHD sticks to its plan, it will resolve its backlog of Title V backlog with the issuance of those two permits.



## Clean Air Fund continued from page 1

GASP and Clean Air Council have reiterated to County leaders and ACHD staff that the Air Quality Program should have all the tools it needs to protect our air. If the Program's County-owned facility needs significant repairs and upgrades, the County should repair it using the County's capital budget, just as the County would fund repairs to any other County-owned road, bridge, or building. For reasons we cannot explain, the County vehemently disagrees with us.

The complaint raises several legal issues with the County's proposed use of money from these Funds. A full and thorough discussion of those issues would require more space than the Hotline allows, but a common factor among them is that the County appears to be openly violating the spirit and text of its own regulations. Money held in the Clean Air Fund must be disbursed "solely to support activities related to the improvement of air quality within Allegheny County and to support activities which will increase or improve knowledge concerning air pollution, its causes, its effects, and the control thereof." The Air Quality Fund must be used "solely to cover all of the costs of the County's air pollution control program required by Title V of the Clean Air Act." Suffice it to say that GASP and Clean Air Council do not believe renovating the County-owned building that will house the Air Quality Program fits within these parameters.

Sadly, this is not the first time County leaders have attempted to misuse the Clean Air Fund. Luckily, GASP was

acting as a vigilant watchdog in two prior instances and in both cases, GASP prevailed.

The first was in 2006, when the Redevelopment Authority of Allegheny County requested and the Board of Health approved a \$1.3 million allocation to be put toward asbestos remediation and demolition of 15 inactive smokestacks at a former U.S. Steel plant in Duquesne. GASP sued the County, arguing that this was merely a million-dollar incentive for U.S. Steel to conduct work it was already obliged to do. GASP won a preliminary injunction and the request eventually was abandoned. Then in 2008, the County requested a Clean Air Fund disbursement of \$270,000 for a road-widening project in Kennedy and Robinson Townships along State Route 60. The County claimed that this project would reduce traffic congestion and subsequently reduce air pollution. After former GASP attorney Michael Parker (now assistant solicitor for Allegheny County) and current GASP employee Kathy Lawson (then working for Clean Water Action) spoke out in opposition at the January 9, 2008, Board of Health meeting, the County announced that they were withdrawing the proposal.

Fighting the County over budgetary matters is not new for GASP but a bit different from our usual legal work. Taking this fight into court is a significant undertaking for GASP but we believe it is necessary to protect air quality in Southwestern Pennsylvania. Those interested in following the case can view the complaint and all subsequent filings by going to <https://dcr.alleghenycounty.us/Civil/LoginSearch.aspx> and searching for the case number GD-18-008885. 🚲

## Pittsburgh Sinusitis Research Team Shows that Sinus Disease is Associated with Exposure to Fine Particulate Air Pollution

by Leila Mady MD, PhD, MPH

*Leila Mady is a fifth year Resident in the UPMC Otolaryngology Residency Training Program. She is a member of Dr. Lee's Research team and has authored or coauthored numerous scientific papers and presented her findings at several national meetings.*

Dr. Stella Lee is the Division Chief of Sinonasal Disorders and Allergy and an Assistant Professor of Otolaryngology - Head & Neck Surgery at the University of Pittsburgh Medical Center. She completed her residency at Yale University and a fellowship in Rhinology and Skull Base Surgery at Johns Hopkins University Medical Center. Upon joining the faculty at the University of Pittsburgh in 2011 she became interested in environmental risk factors that may affect

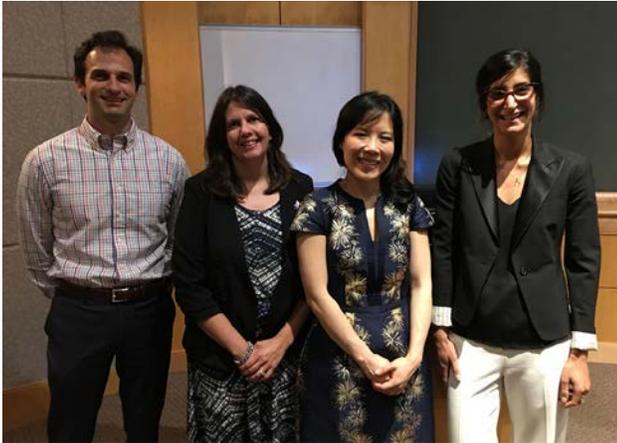
patients who have chronic sinusitis and allergy. Though anecdotally her patients living near coke factories and diesel powerplants seemed to have more severe disease, refractory symptoms and require more surgery, there was little data at the time to support these observations. This led to further research and on-going collaboration in examining the role of air pollutants in these diseases.

continued on page 5

# GASP in Action



This summer, GASP members and friends gathered for a potluck picnic, enjoying good food and company for an afternoon. Photos by Chelsea Arnold and Jonathan Nadle.



GASP's *Making the Connection* event series is intended for medical professionals and community members interested in learning more about the links between air pollution and health problems. Last June, we learned about allergies and air pollution from Doctors Stella Lee and Leila Mady, both of UPMC's Department of Otolaryngology–Head and Neck Surgery, and Dr. Albert Presto of CMU's Center for Atmospheric Particle Studies, pictured with Rachel Filippini, GASP Director. Photos by Maren Cooke.

## Sinusitis continued from page 4

Little is known about the role of environmental exposures and air quality in the pathophysiology of upper airway disease. In two recently published investigations titled, “The Association of Air Pollutants and Allergic and Nonallergic Rhinitis in Chronic Rhinosinusitis,” and “Air Pollutants May be Environmental Risk Factors In Chronic Rhinosinusitis Disease Progression,” Dr. Lee’s team has found that small inhalant pollutants may contribute to symptom severity and disease progression among patients with chronic inflammation of the nose and sinuses. In patients with chronic rhinosinusitis (CRS) without nasal polyps, the team found that particulate matter 2.5 (PM2.5) was significantly associated with undergoing more sinus surgeries. In addition, increases in black carbon (BC) were associated with increases in symptom severity scores as measured by the 22-item

Sino-Nasal Outcome Test (SNOT-22). In looking at CRS patients who described rhinitis symptoms (i.e. runny nose, sneezing, congestion, red, watery, and itchy eyes) but tested negative with allergy testing, Dr. Lee’s research has found higher PM2.5 and BC levels among CRS patients with nasal polyps compared with their allergic counterparts. These findings may partly explain persistent rhinitis symptoms in allergy test-negative patients, which are often labeled with a diagnosis of chronic rhinitis. These pilot studies highlight potential clues that air quality may play a role in differential disease expression and provide insight into potentially underlying etiologies of chronic sinonasal disease. Further investigations are being conducted by Dr. Lee and her team in collaboration with Carnegie Mellon University to address these critical knowledge gaps.



# GASP in Action



As part of our *Athletes United for Healthy Air* initiative we teamed up with Bike Pittsburgh to bring air quality education to Open Streets Pittsburgh, an event series in which major roadways throughout Pittsburgh are closed off to traffic and opened up for walking, biking, activities, classes, and fun.



We created large games and activities that utilized the road, including an Air Quality Meditation Maze. Drawn with chalk, this giant lung shaped maze contained air quality facts relevant to our region. We also created a cloud "hopscotch" game. The clouds were drawn in a large rectangle which represented the enormous surface area of human lungs. Each cloud had air quality info, and children were tasked with making it from one side of the rectangle to the other by jumping from cloud to cloud.



At our table we interviewed community members for our "On the Air with GASP" podcast as others played air quality Jenga, and picked our giant nose. Throughout the summer we were able to reach hundreds of community members with information on our regional air quality and how they can better protect themselves from pollutants while being active outdoors. Look for us at Open Streets next year!



2018 marked our second annual summer camp. This year we had 11 campers from 7 different schools throughout the city. During the week campers learned about a variety of air quality related topics including effects of pollution on human health and the environment, climate change, and environmental justice.



Campers discussed the different types of transportation and their effects on air quality. We decided to lower our impact by taking a PAT bus on our field trip to the Carnegie Museum of Natural History. While we were there we visited the We Are Nature exhibit and learned what it means to be living in the Anthropocene.



Throughout the week we had several guest speakers join us, including Carnegie Mellon University and Zero Fossil. Campers had a great time learning about different sources of energy as they blended their own bicycle smoothies.



During a private tour of Tree Pittsburgh's Simonton Nursery, campers learned how plants can improve air quality by removing pollutants from the air. Afterwards we did a stewardship project by planting our own native flowers in Frick Park.

Photos by Chelsea Arnold

# Spotlight on a GASP Board Member

Dave Litton is one of GASP's newest board members, coming to us courtesy of Roger Day, also on the board.

Several years back Roger represented GASP at the Squirrel Hill street festival. Dave came across him and struck up a conversation about air quality, telling him of his interest in particulate matter and his research in that area. Roger suggested he would be a good candidate for the board. Dave was interested, being familiar with GASP's pioneering work from the early '70s, and met Executive Director Rachel to discuss things over coffee, joining the board shortly thereafter.

Dave's professional background makes him well suited for his role, as he has multiple degrees in physics (and a mathematics minor) from Berea College in Kentucky and the University of Tennessee Space Institute. His masters work was in molecular spectroscopy as it applies to the measurement of nitric oxide in the exhausts of jet engines.

In September 2016, Dave retired from the National Institute of Occupational Safety and Health (NIOSH) as a Senior Research Physicist. While there, he received awards for his technical papers and innovative research. He holds 4 patents, two related to measuring particulate matter; one for a novel detection system for methane/air explosions; and one for measuring temperatures of dust explosions.

Shortly after leaving NIOSH, Dave began working with Airviz, Inc., a small start-up company based in the CREATE Lab at CMU responsible for developing the widely used Speck air quality monitor [www.specksensor.com](http://www.specksensor.com). His current work there centers on developing improved particulate matter sensors, with an emphasis on measuring ultrafine particles. He is interested in Mon Valley monitoring and sits on a CMU project steering committee for an ACHD funded project to model contaminant flow there. Dave also is working with the Breathe Project to put together a resource page for their new website relevant to the impact of air pollution on health. He believes that students at all levels as well as the general public should be made aware of these issues.

Outside of his work and research, Dave likes to read and travel and is a member of the Pittsburgh Branch of the Charles Dickens Fellowship, managing their website. He has "a wonderful wife, Karen, two daughters, and five grandsons, all of whom keep me quite busy if I ever run out of things to do."

Dave says he does "find it an honor to be a part of GASP and remember vividly how much I admired the work done in its earliest days." He is helping us continue important work today.



## 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!

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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.



# 2019 is a special year for GASP

GASP turns 50 in 2019! We can't wait to invite you to our celebration. In the meantime, please consider:

- sending us a personal story about how GASP has affected your life
- joining our 50th Anniversary Planning Committee
- sponsoring our event or suggesting a local business that we should invite to be a sponsor (contact [chelsea@gasp-pgh.org](mailto:chelsea@gasp-pgh.org))

## Tell Us Your Story!

Do you have a personal story to tell about GASP and our region's air quality? We are collecting testimonies from current and former residents of southwestern PA as we prepare for GASP's 50th anniversary, coming up in 2019. Whether it's one sentence or one page, we want to hear from you! Send your comments to Chelsea Arnold at [chelsea@gasp-pgh.org](mailto:chelsea@gasp-pgh.org).

## Join Our 50th Anniversary Planning Committee

Join our committee to help plan all things related to this milestone, including special campaigns and a large anniversary celebration next year. We'd love your input on how to make this our best birthday ever. For more information or to join the committee, contact Chelsea Arnold at [chelsea@gasp-pgh.org](mailto:chelsea@gasp-pgh.org).

**NEW:** Check out GASP's new events calendar at <https://gasp-pgh.org/events> . Visit our calendar to find out about the latest GASP programs and other air quality events in the area.

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