



GROUP AGAINST SMOG & POLLUTION
1133 S. Braddock Avenue, Suite 1A
Pittsburgh, PA 15218
412-924-0604
www.gasp-pgh.org

Comments to the Board of Health Encouraging Timely Progress Toward Final Development and Implementation of The Proposed New Article XXI Coke Oven Regulations

Good afternoon. My name is Rachel Filippini and I'm the Executive Director of Group Against Smog and Pollution (GASP). As the Board of Health knows, there are many reasons that our county must press forward to reduce our air pollution problems. At the May 2018 Board of Health meeting, Dr. Hacker noted that, "the area around the Liberty monitor is still having problems" and "temperature inversions and multiple sources, the largest of which is US Steel's site in Clairton, contribute to this problem"¹ The Liberty monitor is not demonstrating attainment for the federal standards for fine particulate matter, sulfur dioxide (SO₂) and the state/county standard for hydrogen sulfide (H₂S). It is the only monitor in Allegheny County to be presently out of compliance for a current air quality standard.

The concern for such noncompliance is not just a legal problem but of most importance, a health and quality of life problem. Allegheny County ranks in the top 2 percent of counties in the U.S. for cancer risk from air pollution.²

GASP thanks the Health Department for its recent stepped up enforcement efforts including the more than a million dollar fine on U.S. Steel for violations at the U.S. Steel Clairton Coke Works, the provision that two of the facility's worst performing batteries will need to be placed on hot idle if certain emission limits are not met, and increased night time inspections. All of these efforts will hopefully help reduce pollution in the County.

We note however that in just the first 8 days of 2019 the Liberty monitor has already had 3 days on which an exceedance of the one hour SO₂ standard occurred and just a few days before that, on December 28, 2018, there was a one hour SO₂ exceedance of 145 ppb, almost twice the 75 ppb standard. Right before this meeting I read in the Pittsburgh Post-Gazette that there was a fire on Dec. 24th at U.S. Steel's Clairton Coke Works, which damaged two gas dispatcher stations and led to several "exceedances" of federal standards for sulfur dioxide emissions. Why did it take more than two week for this information and a warning urging Mon Valley residents to limit their outdoor activities amid concerns about air pollution to happen?

The SO₂ State Implementation Plan to demonstrate attainment was due on October 4, 2018 meaning air pollution control at US Steel Clairton including redundant controls should have been operational. Even if, in 2019 the highest daily 1 hour SO₂ concentration measurement at the Liberty monitor was zero, the design value (98th percentile of the annual 1-hour daily maximum concentrations, averaged over 3 years-2017, 2018, 2019) would not achieve attainment of the 1 hour SO₂ standard.³

In addition, the hydrogen sulfide 24-hour standard was in violation 35 times in 2018.

We again urge you to continue strong enforcement and move forward on the new coke oven regulations proposed by Jim Kelly at the May 2018 Board of Health meeting. No company or facility should be allowed to continually violate air pollution laws. Nearby residents have filed lawsuits, described air pollution related illnesses and malodors and have asked repeatedly for you to live up to your responsibility as the Allegheny County Health Department. Thank you.

1. Allegheny County Board of Health Minutes, May 2,2018 Retrieved from http://www.county.allegheny.pa.us/uploadedFiles/Allegheny_Home/Health_Department/Resources/About_ACHD/Board_of_Health/18-0502-boh-minutes.pdf
2. Breathe Project, The Air We Share-Ten Health Facts You Need to Know, Retrieved from <http://breatheproject.org/resources/public-health/>
3. Allegheny County Air Program email query communication, Allegheny County Health Department Air Quality Daily Summary Reports