

May 1, 2019

Remarks for Public Comment

ACHD Board of Health Meeting
Allegheny County Health Department Administrative Offices
542 Fourth Ave.
Pittsburgh, PA 15219

Thank you for the opportunity to comment on the PM 2.5 SIP Demonstration.

On the positive side, we are pleased that the Department has gotten around to addressing this issue. Allegheny County was required to submit a Moderate area attainment plan to EPA no later than October 15, 2016 and was notified in the Federal Register on April 6, 2018 for failing to submit a State Implementation Plan for the 2012 NAAQS.¹

The fact that this plan has been drafted and will be available for public comment is a notable milestone—another example of ACHD’s ongoing efforts to get out from under a significant backlog of air quality responsibilities, such as expired Title V permits, tepid past enforcement actions, and weak regulatory actions. Thank you for your ongoing process of improvement. You are beginning to align with expectations.

From another perspective, this current SIP modeling provides the impression that the goal is to do just the minimum to meet a design value for 12.0 ug/m³ from the Liberty monitor, a value that really means straddling the line between whether the County’s air is lawful or unlawful with respect to the Clean Air Act.

ACHD is primarily a Health department, not just an ordinary air district regulatory agency. What we know from the health literature is that it makes sense to pursue a goal that is well below the line between lawful/unlawful. We know that health effects start showing up at levels above 8 ug/m³ and that the World Health Organization sets 10 ug/m³ as its recommendation for average annual PM. At this level 50% of Pittsburgh’s population is currently being exposed to annual PM levels above the 10 ug/m³ guideline.

What this means is that the attainment demonstration should aim for the more protective standard. The SIP draft currently does not require any additional Reasonably Available Control Technologies for the Clairton Coke Works, which just demonstrated over the past 4 months that “Control” needs to be interpreted rather loosely to justify the designation of “Meets RACT requirements” in this SIP.

Aiming higher to protect health also means not taking premature victory laps, as is the impression you gave the media from your press release about the Liberty monitor earlier this week indicating an annual mean value of 11.5

¹ “Findings of Failure To Submit State Implementation Plan Submissions for the 2012 Fine Particulate Matter National Ambient Air Quality Standards (NAAQS),” 83 FR 14759, pp. 14759-14762, CFR:40 CFR 52, Agency/Docket Numbers: EPA-HQ-OAR-2018-0135, FRL-9976-35-OAR, Published April 6, 2018.

micrograms per cubic meter, which would be lower than the EPA standard of 12.0 micrograms per cubic meter. Again this suggests straddling the line between lawful/unlawful is somehow a laudable target.

This annual average can be explained partially by the air outside of the county getting cleaner because of coal fired power plant closures and by an unusual lower number of weather inversion events in 2018. Sound science means using caution about attributing this monitor's performance to Department actions.

More recent data suggests a Liberty monitor mean value of 12.67 micrograms per cubic meter for the first quarter of 2019, according to Clean Air Council's calculations² based on data reports from the Department. This suggests continuing nonattainment. It's too early for victory posturing.

Bottom line: Aim for health protective outcomes; require better control technology at Clairton and with US Steel; do more with Coke Oven regulations. Keep up the enforcement. Save the victory lap for the future.

Thank you for your commitment to improving our region's health and air.

Sincerely,

Matthew M. Mehalik, Ph.D.

² See <http://pacokeovens.org/news/> (Section 41.D).