

June 11, 2019

Remarks for Public Comment:

**Proposed Revision to the Allegheny County Portion of the Pennsylvania State Implementation Plan:
Attainment Demonstration for the Allegheny County, PA PM_{2.5} Nonattainment Area for 2012 NAAQS**

ACHD Public Hearing
Allegheny County Health Department
Clack Health Center - Bldg. 7
301 39th St.
Pittsburgh, PA 15201

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

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 This means that this current SIP demonstration is running behind its deadline of approximately two and a half years. This delay has consequences. Today's Pittsburgh City Paper discusses a new report from the American Thoracic Society and New York University's Marron Institute for Urban Management. The report and article highlight that "the Pittsburgh region had the fourth most air-pollution related deaths of any metro area in the country. In 2017, the Pittsburgh region, which includes Allegheny County, all of its bordering counties, and Fayette County, suffered 232 deaths related to air pollution, according to the study's estimates. This was the most of any region outside of California."²

When matters of public health from air pollution are at stake, timeliness is a necessity as well as the production of a quality analysis and plan for attainment demonstration. It is a good thing that this demonstration is moving forward. There are, however, ongoing concerns with the current draft that should be addressed expeditiously.

The demonstration modeling conveys 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.

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.

² Ryan Deto, "Study estimates Pittsburgh ranks 4th in air pollution-related deaths nationally," Pittsburgh City Paper, Pittsburgh, PA. June 11, 2019. Online: <<https://www.pghcitypaper.com/pittsburgh/study-estimates-pittsburgh-ranks-4th-in-air-pollution-related-deaths-nationally/Content?oid=15182486>>

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. ACHD has the authority to pursue more health protective standards under the federal Clean Air Act, and so the Department should pursue a more protective standard. An analysis of 2015 – 2017 data from the national monitoring network performed by Clean Air Task Force on which our organization's "Breathe Meter,"³ is based, shows Pittsburgh air ranks at the 7.2 percentile of all major cities in the United States with air monitors. That analysis is based on an annual average of 13.0 for the Liberty Monitor averaged in with nine other PM monitors (from 2015 – 2017 data) from our region to produce a county-wide average of 9.8 ug/m³.

The current SIP demonstration is claiming a value of 12.0 for the Liberty monitor. If a proportionate decrease is applied across the same 10 monitors, our region's air would still rank at about the 16th percentile nationally, assuming that none of the other city regions improve their air at all. The reality will be somewhere in between 8th and 16th percentile. What this means is that the goals set forth in this current SIP demonstration, a "target" of 12.0 ug/m³, is not serving the region's population adequately from a public health perspective. Remember that this current level of performance resulted in 232 deaths from air pollution according to the American Thoracic Society's recent study -- 4th worst in the U.S. Clearly, we can do better.

In order for our airshed to achieve 50th percentile nationally, the average of all of our region's ten monitor's annual daily max values would need to be at the 7.9 ug/m³ level (based on 2015 – 2017 data). That is just under an improvement of 2.0 ug/m³ average across all 10 monitors. This is an achievable level. If ACHD requires greater performance controls on our region's major industrial pollution sources as well as on other sources (diesel emissions and woodsmoke) so as to reduce overall emission levels, we would be able to have air as good as half of the United States. This is a better goal for framing this SIP demonstration than choosing the 12.0 ug/m³ design value for Liberty/Clairton.

Unfortunately, the SIP draft currently does not require any additional Reasonably Available Control Technologies for the Clairton Coke Works or any of the Mon Valley Works or the Cheswick Power plant, the region's largest sources of particulate pollution.

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 in May indicating an annual mean value of 11.5 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.

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.

³ See <https://breatheproject.org/breathe-meter/>