



Matthew Mehalik, Ph.D.
Executive Director
Breathe Project
Energy Innovation Center
1435 Bedford Ave. Suite 140
Pittsburgh, PA 15219
412-514-5008
mmehalik@breatheproject.org
breatheproject.org

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Remarks for Public Comment

Policy Office
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Submitted via email to: ecomment@pa.gov and through <https://www.ahs.dep.pa.gov/eComment/>

Ref. 2020 Annual Monitoring Network Plan

Dear Secretary McDonnell and DEP Air Quality Staff:

I appreciate the opportunity to comment on the proposed updates to the 2020 Annual Monitoring Network Plan as posted on <https://www.ahs.dep.pa.gov/eComment/>.

The Breathe Project is a Southwestern Pennsylvania organization that constantly avails itself of top-level health, epidemiological, and air quality science and public health information. We are a collaboration of over 42 organizations working to improve air quality, eliminate climate pollution and make our region a healthy and prosperous place to live. We are public health professionals, academics, environmental advocates, and citizens. We use the best available science and technology to better understand the quality of the air we breathe and provide opportunities for citizens to engage and take action.

In reviewing the monitoring network that exists in Beaver County, there are concerns that there are inadequate monitors for ozone, nitrogen oxides, and hazardous air pollutants. The concerns are based on the anticipated air emissions from the Shell cracker plant that will possibly come online in 2021. The Shell plant is permitted to emit 522 tons of VOC's, 348 tons of NOx, and 31 tons of Hazardous Air Pollutants. The current monitors located in the prevailing wind direction and in closest proximity (Vanport, Beaver Valley) do not have any sensing equipment at all for NOx or hazardous air pollutants. The Beaver Valley site only samples ozone once every 6 days as a canister monitor. Continuous ozone monitors are located at Beaver Falls, Brighton, and Hookstown; however, none of these sites is located in the direction of the prevailing winds nor are located in the river valley communities adjacent to the communities where the Shell plant will be operating.

Therefore, it is my request that the DEP consider adding continuous ozone monitors, NOx monitors, and hazardous air pollutant monitors at the Beaver Valley and Vanport locations.

These updates to the monitoring network in Beaver County are essential for protecting our health.

Our region already suffers from some of the worst air pollution in the United States. The American Lung Association's (ALA) annual "State of the Air" (SOTA) report for 2020 again put Beaver County on notice. Beaver County once again received an F for ozone.

Ozone contributes significantly to poor air quality in all of Southwestern PA. An analysis of qualified EPA monitoring data showed that ozone is the driving factor of the air quality index for this region 347 out of 1096 days, about 1/3 of the time, over 2016 – 2018. Furthermore, of the ozone monitors in the SWPA, one of the sites was in the worst 10%, one was in the worst 20%, and four were in the 30% – 50% range over 2016 - 2018.¹

Beaver County's nearly 170,000 people are at risk. This includes vulnerable populations who bear disproportionate risks from current levels of air pollution: 3,113 children with pediatric asthma; 13,373 people with adult asthma; 10,199 people with COPD; 14,213 people with cardiovascular disease; 18,061 people living with low incomes; and 17,483 people who are non-white.² The environmental justice concerns are clear, substantial, and should not be ignored.

The Breathe Project urges you to add continuous ozone monitors, NOx monitors, and hazardous air pollutant monitors at the Beaver Valley and Vanport locations.

Thank you for your time and consideration.

Sincerely,

Matthew M. Mehalik, Ph.D.
Executive Director
Breathe Project

¹ Clean Air Task Force, Analysis of SWPA's Air Quality, 2019.

² ALA SOTA 2020, Available online: <http://www.stateoftheair.org/city-rankings/states/pennsylvania/beaver.html>, accessed 06/28/20.