

**Allegheny County Clean Air Now
Statement to Allegheny County Health Dept. Board of Health**

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Breathe Project and ACCAN issued the following statement to ACHD in response to “Questions about ‘New Cracker Plant Impacts on Allegheny County’”, by Shaun Vozar, in ACHD’s Ecocurrents, Vol XVII, Issue 1, January – March, 2017, p.1.

Read the Report: http://www.achd.net/air/pubs/EcoCurrents/2017_Jan-March.pdf

ACHD recently completed a study entitled, “New Cracker Plant Impacts on Allegheny County,” in an attempt “to assess potential impact from the facility.” After stating that the facility will be under the jurisdiction of the PA DEP, the report ended with, “ACHD is confident that any health impacts from the proposed Shell plant will be negligible within Allegheny County.”

This report raises many questions about the analysis that the Air Quality staff did to establish this a vote of confidence.

The Allegheny County Health Department needs to address the following:

1. Why did ACHD only include 5 hazardous air pollutants in their analysis? A total of 187 hazardous air pollutants that may be emitted by this plant should have been analyzed.
2. Why did ACHD choose to not look at cancer endpoints, instead choosing to only do risk assessment for non-cancer endpoints?
3. Did the modeling include pre-existing levels, that is, levels already here, of hazardous air pollutants, with the levels being emitted by the plant, or just the plant’s projected emissions? This is not clear (and can be a major factor, because Benzene and Formaldehyde are already heavy cancer drivers here).
4. What are the reasons that ACHD did not look at all at criteria pollutants in the analysis?
5. What are the reasons that there is no public statement about ozone levels?

How can we have confidence in the analysis, when there appear to be such large gaps in what appears to be a very narrow analysis?