

November 6, 2019

Remarks for Public Comment

ACHD Board of Health Meeting
542 Fourth Ave., Pittsburgh, PA 15219

Thank you for allowing me to comment on today on ACHD's enforcement actions. My comments are intended to make sure that the Board is receiving useful, factual information to support its deliberations and decision making.

At the September 11, 2019 Board of Health meeting, the board and audience were subjected to a litany of low-value information graphs presented in a format that does not support adequate decision making. Comparing two-years does not provide useful trend information. No goals or targets were shared for each item. Colors, labels, and year information were switched from chart to chart. Information shared this way does not provide the Board with adequate information for enforcement oversight, and I suggest that the Board insist on higher standards in line with professional practices.

The Board also needs to know other important information pertaining to air quality enforcement. Our air has been particularly not good since the US Steel settlement agreement public hearing took place at the end of July. August, September, and October each had 16 days where the AQ index was moderate or worse, and there were very high numbers of bad smell reports. Our air stinks more than half of the time. This coincided with over 9 violations of the H2S standard during this same period. The smelly air followed weather patterns such that the bad air stuck around in clusters of 4 – 7 days in a row in August and October and 2 – 4 days in a row in September. The weather is not supposed to be a control strategy for air pollution and odor control, but it appears that this is what is happening. This needs to stop. Enforcement needs to step up.

Breathe Project had advised the Allegheny County Health Department to get U.S. Steel's investment commitment in writing as part of its testimony at the July 30 settlement agreement public hearing. It is clear that ACHD did not get this deal in writing, and so we are witnessing U.S. Steel's false commitment to improving air quality in the region, its false promise of investment in the Mon Valley, and the poor structure of the settlement agreement for not getting such commitments in writing. In September U.S. Steel spent more than \$700 million purchasing a specialty steel producer in Arkansas. Friday, they announced that they do not have enough capital to follow through with their voluntary investments in the Mon Valley. U.S. Steel has reneged on prior commitments to improve its plants in the past. Commitments to replace old batteries have been repeatedly postponed or abandoned. Instead, they are doing what they said they could not do to protect public health in January 2019 – hot idle a battery at the Clairton Coke Works. It appears that they can do this if market demand for their product slows. It is clear that U.S. Steel places profits over people as far as the Mon Valley is concerned. This latest announcement is just more of the same from U.S. Steel. ACHD needs to do a better job of enforcement.

Lastly, we are surprised by the re-appearance of the South Park lighting project on today's agenda. We are hoping that this is not a Halloween carryover – a zombie project whose inadequacies were clearly spelled out and raised by members of the Board. We are hoping that today will be the vote that puts the zombie to rest because of the lack of merit for the project.

Sincerely,

Matthew M. Mehalik, Ph.D.