

February 22, 2022

Remarks for Public Comment

ACHD Public Hearing on US Steel Corporation Clairton Plant, Title V Operating Permit
Clairton Municipal Building
551 Ravensburg Blvd.
Clairton, PA 15025

Dear Ms. Truchan and ACHD Staff:

I am Matthew Mehalik, Executive Director of the Breathe Project. Thank you for this opportunity to comment on the proposed revisions to the US Steel Clairton Coke Works' Title V Operating Permit.

ACHD must revise the permit so that ongoing air pollution episodes at the Clairton Coke Works stop occurring.

The Allegheny County Health Department has issued at least 13 enforcement orders and notices of violation to the US Steel Clairton Coke Works since April 2019, the time that the Coke Works fire episode was supposedly “fixed.” ACHD has fined US Steel over \$1.73 million for penalties associated with emissions violations over this period. US Steel is paying approximately \$217,000 per quarter in penalties since April 2019¹. This is in addition to the \$2.7 million US Steel paid as part of the June 2019 settlement agreement for violations stemming from 2017 and 2018². The permit structure and fine structure are clearly not working. This history of paying fines instead of reducing emission violations indicates a willingness of US Steel to operate the Clairton Coke Works in a “pay to pollute” relationship with ACHD. This needs to end, as these emissions are harming our region’s residents.

Pollution from the Clairton Coke Works must be reduced.

The Clairton Coke Works is the largest coke plant in the U.S. and has been a major source of air pollution in our region for decades. Nearly 90% of the point source cancer risk estimated in Allegheny County is attributable to coke oven emissions, with 90% of those emissions coming from the Clairton facility ([Cancer Risk in Allegheny County, Pa., May 2021](#)).

According to the PA State Implementation Plan’s emissions inventory, the Clairton Coke Works emits over 554 tons of PM 2.5 per year which is around 25 percent of all particle emissions from point sources in the county (not including unplanned leaks and breakdowns, which are in addition) ([ACHD PM2.5 SIP, Appendix D, Emissions Inventories, pp.14-15](#)).

¹ See “ACHD Air Quality Enforcement Actions 2020 – 2022,” online: <https://www.alleghenycounty.us/Health-Department/Programs/Air-Quality/Enforcement-Actions.aspx>, accessed February 22, 2022.

² See “ACHD Settlement Agreement and Order #19060,” online: https://www.alleghenycounty.us/uploadedFiles/Allegheny_Home/Health_Department/Resources/Legal/Docket/USS-ACHD-Settlement-Agreement-and-Order-190604.pdf, accessed February 22, 2022.

The Liberty PM 2.5 monitor, the monitor most impacted by emissions from the Clairton Coke Works ranked in the worst 10 percent nationally of all monitored locations using the latest qualified EPA data.

During the first 51 days of 2022, 23 days (45%) had air rated as “not-good” in Allegheny County ([EPA Airnow Data for 2022](#)). In 2021 there were 189 days (52%) with air rated as “not good” in Allegheny County ([EPA Airnow Data for 2021](#)).

[Group Against Smog and Pollution](#) reported that our region's air has violated the state's Hydrogen Sulfide (H2S) standard more than 54 times in 2021, giving the air a rotten egg-like stench from coke oven emissions.

Based on EPA’s Highest-10 NowCast AQI Locations data, which tracks which regions of the country rank in the top-10 worst airsheds, based on Air Quality Index information on an hourly basis, our county has appeared on this top-10 worst list over 95 times in 2021 (26% of all days). ([EPA Highest NowCast AQI Locations](#))

Out of the first 53 days of 2022 (including today), our region's air ranked among the top 10 worst places in the country for at least a portion of the day on 19 days (36% of all days) and was ranked as #1 worst air 7 of these times (13% of all days), including today. ([EPA Highest NowCast AQI Locations](#)).

Clearly what we have now is not working. This permit has been expired since 2017 and was created over a decade ago. It is time to update this permit so that our region’s air is improved, our region’s health is improved, and impacts from this egregious source, the US Steel Clairton Coke Works, end.

Sincerely,

Matthew M. Mehalik, Ph.D.