

March 21, 2023

Remarks for Public Meeting on Air Quality

Allegheny County Courthouse, 4th Floor - Gold Room
436 Grant Street
Pittsburgh, PA 15219

Thank you for allowing me to speak today. I am Matthew Mehalik, Executive Director of the Breathe Project, an organization dedicated to improving our region's air quality working together with over 65 regional organizations and institutions with science and public health at our core.

How did you enjoy this beautiful spring morning? This was a beautiful spring morning in every respect except for when it comes to air quality, especially in the Mon Valley. As of 12:36 AM, there was a spike in air pollution, propelling the Liberty monitor to read an AQI of 124 (Orange) for fine particles, making it the #2 worst monitor in the U.S. By 2:31 AM the situation got worse: The monitor jumped to a reading of 162 (Red- unhealthy for everyone) and ranked #1 worst in the country. The AQI remained in the Red throughout the morning, reaching 170 at 9:31 AM. Why this spike? All evidence points to the Clairton coke works. We know this because of the rapid rise in pollution means it comes from a large source. Many residents in the Mon Valley, particularly around Clairton, submitted geocoded small reports through Smell Pgh throughout the night and early morning. We also know that the Hydrogen Sulfide values exceeded the PA 24-hour standard as of 8 a.m. at the Liberty monitor. H₂S has been documented to come from coke works, and it stinks like rotten eggs. This dirty, stinky air followed the slow wind pattern and flowed directly into the heart of the city. This is easy to see on the Smell Pgh site, where people in our city woke up this spring to a toxic, dangerous, stinky air mass. This is a terrible situation that is unfair and destructive to quality of life. This is not how we should be experiencing spring in our county and city.

I wish that this were an isolated incident. It is not. Our county has appeared as #1 on this worst list over 10% of all days in 2023 and 2022.¹ It appeared in the top 10 about 40% of all days in 2022.² 179 out of 365 days were considered not good air quality days in 2022.³

The most important thing this institutional body can do, and what each county council member can do, is send in comments to the US EPA by March 28 demanding that the agency **improve its annual average fine particle and soot standard so that it can be set to 8ug/m3 to protect health from fine particle air pollution.** The current standard is 12 ug/m³, which was set in 2012 and based on public health data that is older than a decade. Our region is barely meeting this old standard and is one of the very last places in the entire country to squeak by last year.

¹ EPA AirNow's Worst Ten Air Quality (AQI) Pittsburgh Reporting Areas, Available online: <https://airstats.createlab.org/highest-ten/>, accessed March 21, 2023.

² EPA AirNow's Worst Ten Air Quality (AQI) Pittsburgh Reporting Areas, Available online: <https://airstats.createlab.org/highest-ten/>, accessed December 5, 2022.

³ Breathe Project – Air Pollution Sources. Online: <https://breatheproject.org/air-pollution-sources/>, accessed December 5, 2022.

More importantly, you should include in your comments to the US EPA a demand to **improve the 24-hour standard so that it is set to 25ug/m3 for the 98th percentile and make the standard a 24-hour rolling average instead of a midnight-to-midnight standard.** Currently, this standard is set to 35 ug/m3, and our region, once again, barely squeaks by and is one of the last regions to do so. When inversions lift, highly concentrated pollution disperses. But people exposed to very high levels of pollution for 8 hours or so are highly negatively impacted. Just like this morning. Today.

This frequent dosing of pollution at high levels for hours at a time in the overnight and early morning hours is incredibly impactful. Recent data collection surrounding the Clairton Coke Works shows that spikes in benzene levels accompany these spikes in particles and hydrogen sulfide, the source of smell complaints. All of these emissions were clearly shown by ACHD to come from the Clairton Coke Works. EPA has [classified benzene](#) as a known human carcinogen for all routes of exposure.

It is reasonable to link our region's poor cancer statistics (Top 1% of counties for point source air pollution) as well as the many voices frequently heard in the Mon Valley about family and community disruptions to these ongoing acute pollution episodes. This situation needs to stop.

If we succeed in getting these changes to national policy, the problems that we experience with the current episodic rule will be made mostly moot. These standards would force the changes in operations at the most polluting facilities to protect the health of Mon Valley residents and all of Allegheny County.

In addition, County Council should provide oversight to ACHD:

- Call for an independent, transparent audit the health department because of recent budgeting issues coming to light that do not make sense.
- Why is the county manager running ACHD subcommittee meetings?
- Only appoint members to the Board of Health that commit to protecting county residents from polluted air and that have a public health, scientific, and air quality background.
- Only approve a new Health Department Director who will lead on air quality enforcement.
- Stop the hollowing out of ACHD's expertise and capabilities under its current mismanagement.
- Address ACHD budget issues so that ACHD can have experienced staff to address needed enforcement, monitoring, and inspection capabilities.
- Completely re-do ACHD's subcommittees to remove clear conflicts of interests that exist on those committees. The fact that US Steel chairs the "Pollution Prevention and Education" committee is emblematic of regulatory capture that exists in that agency. US Steel's chosen law firm frequently badgers community advocates on the Air Advisory Committee.
- Commit to NEVER agreeing to consent decrees and settlement agreements that create pay-to-pollute arrangements with major polluters. The 2019/2020 settlement agreement with the Clairton Coke Works is a case-in-point.
- Demand that ACHD do a better job of sitting down with residents to hear their complaints and respond to their concerns. Currently, ACHD has sealed itself off from any meaningful dialog with the community.
- Hold the current and any future County Executive accountable for protecting the health of county residents from air pollution. No more blaming the weather to taking unseemly victory laps by cherry picking unrepresentative statistics to mislead the community on air quality issues. Commit to protecting county residents.

Let's save thousands of lives, reduce burdens on vulnerable people, and take action that makes everyone proud of our country by embracing these improvements.

Sincerely,

Matthew M. Mehalik, Ph.D.