

## Remarks For EPA Public Hearing

Re: National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities

August 15, 2023

Ref. Docket ID No. EPA-HQ-OAR-2002-0083

Thank you for the opportunity to provide remarks for this hearing.

The Breathe Project is a Southwestern Pennsylvania organization that avails itself of top-level health, epidemiological, and air quality science and public health information. We are a collaboration of over 65 organizations working to improve air quality, eliminate climate pollution and make our region a healthy and prosperous place to live.

**The Breathe Project emphasizes the need to go further to strengthen the National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities to address ongoing, severe health impacts on residents of the Monongahela Valley in Southwestern Pennsylvania, the site of the U.S. Steel's integrated Mon Valley Works.**

SWPA clearly needs a more health protective standard for hazardous air pollutants from steelmaking facilities.

The current situation in Allegheny County is untenable. The interconnected 3 U.S. Steel facilities in the Monongahela Valley, the Edgar Thomson Steel Plant, the Clairton Coke Works, and Irvin Works emit hazardous air pollutants, metals, benzene, and lead in addition to SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>2.5</sub> and H<sub>2</sub>S pollution that harm health.

Allegheny County is in the top 1% of all counties for cancer risk from point source air toxics emissions ([Cancer Risk in Allegheny County, Pa., May 2021](#)). 90 percent of this risk attributable to these integrated steelmaking facilities.

People in the Mon Valley already have air that is worse than 93 percent of the entire country for fine particulate matter, and it is well known that particles are carriers for hazardous air pollutants that are delivered directly into the bloodstream of residents. In 2022, 179 out of 365 days were considered not good air quality days. In 2021, 200 out of 365 days were considered not good air quality days.

Communities where the Mon Valley Works facilities are located are environmental justice communities. Approximately 21,000 people live in Braddock and North Braddock within a 2-mile radius of the Edgar Thomson blast furnaces and rolling mills. Approximately 130,000 people live within a 5-mile radius of the Clairton Coke Works property. 1/3 of the people have low income. 36 percent are minority population, primarily African American, and 1/5 are older than 64 ([EPA EJ Mapper Tool](#)).

In 2022 these residents have experienced air quality being ranked in the [top-10 worst airsheds](#) in the US 40% of all days for at least a portion of the day based on EPA's Air Quality Index hourly values. These areas ranked as

the #1 worst airshed about 10% of all days (with exceedances of the PM 2.5 daily particle standards multiple times). The Mon Valley plants cannot continue to limp along at the expense of the health of people. Many residents know too well the toll that high levels of toxics emissions take on their lungs, heart, and family members.

Allegheny County, particularly in the Mon Valley, experiences a substantial number of days with temperature inversions, and these inversions have large impacts on regional air quality. We know that these events frequently occur in the overnight or early morning hours when atmospheric conditions and low wind velocity conditions trap pollution emitted overnight by industrial operators in river valley communities. Short-term spikes in pollution impact the health of residents who are exposed to high levels of pollution for hours at a time.

The Create Lab at Carnegie Mellon University has created a crowdsourced app that documented over 70,000 air quality complaints over 4 years. These complaints are based on people smelling bad air, which has been shown to have a [strong correlation](#) with sulfur and VOC emissions. The visualization of these reports, in another app, “Plume Pgh,” shows how weather inversions trap these pollutants in the Mon Valley, resulting in these smell reports that occur in the waking hours, when people get up and enter the dome of pollution in the mornings.

Additionally, other evidence of the impact of these inversions can be seen on [cameras that are pointed at polluting facilities in the Mon Valley](#), such as at the [Clairton Coke Works](#) and the Edgar Thomson Works.

Here is what we are asking for:

1. Make the fence line monitoring provisions in the proposed rule more robust. Increase the monitoring frequency so that sampling occurs more than once every 6 days to sampling every day. Increase the number of fence line monitors required so that such monitoring resembles the refinery rules for fence line monitoring. Make the results available on a public website in a data-friendly format in near real time, at least every other week, rather than quarterly.
2. Require that fugitive emissions be reduced 65%, the amount that the EPA showed was possible in a 2019 study. The industry can afford to achieve these levels of reductions given their profitability and preference for stock buybacks instead of protecting the health of communities where they operate.
3. Require substantial reductions in harmful stack emissions – up to 90% reduction seems possible. Currently the proposal does not address this issue adequately.
4. Change the sunset provision for stopping monitoring so that monitoring is gradually reduced rather than abruptly stopping.

Our region’s 2.6 million people are at risk unless the air toxics NESHAP standards are revised to protect health. This includes [vulnerable populations who bear disproportionate risks](#) from current levels of air pollution: 55,269 children with pediatric asthma; 213,963 people with adult asthma; 160,478 people with COPD; 228,249 people with cardiovascular disease; 267,874 people living with low incomes; and 372,912 people of color. The environmental justice concerns are clear, substantial, and must play a prominent role in setting updated standards.

The Breathe Project encourages the EPA and Administrator Regan to set standards that reduce the risks of exposure to hazardous air pollutants from steelmaking facilities. 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.

Thank you for your time and consideration.

Sincerely,

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