

Remarks For EPA Public Hearing

Re: National Emission Standards for Hazardous Air Pollutants: Coke Ovens Batteries

August 31, 2023

Ref. Docket ID Nos. EPA–HQ–OAR– 2002–0085 and EPA– HQ–OAR–2003– 0051

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

The Breathe Project is a Southwestern Pennsylvania 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 strengthen the NESHAP Standards for Coke Oven Batteries to address ongoing, severe health impacts on residents of the Monongahela Valley in Southwestern Pennsylvania, the site of the U.S. Steel’s Clairton Coke Works.

The current situation in the Mon Valley and Allegheny County is untenable. U.S. Steel’s Clairton Coke Works emits large quantities of hazardous air pollutants such as benzene that harms health.

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

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, such as benzene, that are delivered directly into the bloodstream of residents.

The Clairton Coke Works is located in an environmental justice community. 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](#)).

Recently, NYU’s school of public health [documented the improvements in health](#) in communities near the Shenango Coke Works in Allegheny County after it closed in 2016: Average weekly visits to the local emergency departments for heart-related problems decreased by 42% immediately after the shutdown. The Clairton Coke Works is ten times larger than this Shenango facility and over 100 years old.

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. The Clairton Coke Works cannot continue to limp along at the expense of the health of people.

We experience a substantial number of days with temperature inversions, and these inversions trap pollution emitted overnight by the Clairton Coke Works. Short-term spikes in pollution impact the health of residents who are exposed to high levels of pollution for hours at a time. Evidence of the impact of these inversions can be seen on our Breathe [cameras that are pointed at the Clairton Coke Works](#).

To protect our community, we are requesting EPA to please:

1. Require fenceline monitoring of benzene at existing facilities immediately upon execution of the rule. Communities in the Mon Valley already have evidence of elevated benzene levels from monitoring using EPA Method 325A. They should not be forced to wait an additional year for fenceline monitoring near the Clairton facility.
2. Keep the proposed benzene action level of 3 micrograms per cubic meter. This level is protective of workers and communities.
3. Update standards on by-product recovery plants, which are not included in this rulemaking but are sources of hazardous emissions at coke facilities.
4. Include a short-term concentration action level with provisions to require immediate interventions. ATSDR has a minimum risk level for benzene at 29 $\mu\text{g}/\text{m}^3$ for acute exposures over 1–14 days and 19 $\mu\text{g}/\text{m}^3$ for intermediate term exposures over 15–364 days.
5. Require data for each fenceline monitor to be provided to the public monthly so that people can be aware of their exposure risks on a website that is easily accessible.
6. Require fenceline monitoring continuously and permanently for coking facilities for as long as the facility operates.

Our region's 2.6 million people are at risk. 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.

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

Thank you for your time and consideration.

Sincerely,

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