

















December 21, 2023

Via email to:

<u>Patrick.Dowd@alleghenycounty.us</u> JoAnn.Truchan@alleghenycounty.us

Re: Request for additional 30 Days for Hearings and Comments for Air Permits Due 1/18/2024:

- US Steel Clairton Coke Works Title V Operating Permit Amendment #0052-OP22a
- ATI Flat Rolled Products Installation Permit Amendment #0059-I006c

Mr. Patrick Dowd, Acting Director Ms. JoAnn Truchan, Section Chief, Engineering Allegheny County Health Department 542 Fourth Ave, Pittsburgh, PA 15219

Dear Mr. Dowd and Ms. Truchan,

The undersigned organizations and individuals request the Allegheny County Health Department (ACHD) reschedule the <u>current hearings</u> for the US Steel Clairton Coke Works Title V Operating Permit and the ATI Flat Rolled Products Installation Permit to provide an additional 30 days of time in order that community members can plan, review and respond to these major permits that have major environmental justice impacts and implications. We are also requesting that all hearings provide a virtual attendance option for community members who have time and transportation barriers for participating in the rescheduled hearings.

We acknowledge that ACHD has provided some extra time because of the holiday period; however, the current hearing dates of January 10 and January 17 are still burdensome for community members to properly assess and respond to these complex and lengthy drafts.

The permits warrant heightened levels of scrutiny and more time for proper review for the following additional reasons:

- The Clairton Coke Works permit was rejected by EPA Region 3 in the late summer of 2023 because of deficiencies noted by several legal and technical experts and affirmed by EPA Region 3. The updated draft must be examined carefully given these past deficiencies.
- The Clairton Coke Works is the largest source of pollution in Allegheny County and has been fined over \$10 million for not even meeting its old, outdated, permit's requirements.
- Allegheny County's website has undergone transition, and all prior links to the AQ Permits for Public Comment Page do not work (https://www.alleghenycounty.us/Health-Department/Programs/Air-Quality/Public-Comment-Notices.aspx). This is the site where any participants in any public comment process could get information about the permits and the hearings. The listing of the permit materials is several layers deep on the new page, and the current link to the January 18 items is broken on this new site (https://www.alleghenycounty.us/uploadedFiles/Allegheny-Home/Health-Department/Programs/

- <u>Air_Quality/0% 20-% 20notice% 20241% 20-% 20through% 201.19.pdf</u>) Because of these information access barriers, community participants need more time to access and review these materials properly.
- Each of these permits is highly technical and complex and requires a great deal of expertise to analyze. Placing them for public review at once during this time of year and transition warrant a longer timeline for proper review.
- The facilities under question reside in environmental justice communities. People in these communities have born the burden of pollution for generations and have been excluded from proper community engagement in the past.

We acknowledge the need to move these permits along, given the desires of several environmental groups; however, these groups have heard the need for the community to have more time, and they have indicated that the requested extension is reasonable given the need for proper community review.

Thank you for your consideration of this request.

Sincerely,

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