



## **U.S. Steel Clairton Coke Works Messaging for January 10, 2024, Title V Hearing** **UPDATED 1/09/24**

### **Overall Messaging**

- Residents of the Mon Valley and Allegheny County deserve to live and work in communities without unfair risks to their health from toxic air pollution.
- They deserve to be free from cancer risks from large pollution sources with inadequate permit requirements.
- The current permit for the U.S. Steel Clairton Coke Works is out of date, and the current proposed draft is inadequate because it does not go far enough to protect the community or to comply with EPA's recent order to ensure that the facility would not violate its emissions limits.
- Allegheny County Health Department needs to heed the call from community members who have been impacted by pollution from the Clairton Coke Works for decades because of the losses in family members from health problems from this facility.
- U.S. Steel needs to be held accountable for improving operation of the Coke Works so that people are not unfairly burdened by toxic air pollution.

### **Background/General Messaging about the Clairton Coke Works**

- The U. S. Steel Clairton Coke has been at the heart of ongoing poor air quality and public health impacts in the Mon Valley and in Allegheny County, a situation that needs to change.
- The Clairton Coke Works is a dinosaur, built in 1901 and acquired by U.S. Steel in 1904. It is the largest coke plant in the United States and the largest by-products coke plant in North America. The Clairton Plant is a major source of CO<sub>2</sub>, NO<sub>x</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, VOCs, and Hazardous Air Pollutants (HAPs). Click [here](#) for definitions on these emissions.
- Allegheny County is in the top 1% of all counties for cancer risk from point source air toxics emissions. 90 percent of this risk is attributable to coke oven facilities, with 90 percent attributable to the Clairton Coke Works ([Cancer Risk in Allegheny County, Pa., May 2021](#)).
- The cancer risk for residents is more than six times higher than the national average for residents of other urban counties ([Cancer Risk in Allegheny County, Pa., May 2021](#)).
- U.S. Steel's poorly maintained plant, the largest source of pollution in Allegheny County, had its Title V operating permit draft rejected by EPA Region 3 in the late summer of 2023 because of deficiencies with the draft that Allegheny County Health Department (ACHD) prepared. Special attention on this permit is warranted because the permit sets the standard to which the facility is held accountable for limiting its emissions and harms inflicted on the community where it operates.

- The current Title V operating permit is out of date – the last time it was updated was 2012 – so the permit needs to be aligned with updated public health and pollution protection information.
- As of Jan. 5, 2024, CCW has been fined over \$12 million for not even meeting old, outdated, permit requirements. The updated draft must be examined carefully given these past deficiencies.
- 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.
- [Medical professionals in Clairton](#) report evidence of children with higher rates of respiratory distress and asthma as a result of this pollution.
- 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 a 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 U.S. 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 for about 10% of these periods. 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](#).
- Children in Allegheny County are exposed to higher levels of cancer-causing chemicals – diesel particulate matter, formaldehyde, benzene, arsenic and coke ovens emissions – than most children in the U.S. as a direct result of industrial polluters in the region, according to an analysis by [Environmental Health News](#).
- Pollution has caused more deaths per year in Allegheny County than homicides and traffic crashes combined. In terms of numbers, it's about equivalent to the opioid epidemic [Neil Donahue, CMU atmospheric scientist, told a Pittsburgh City Council](#) panel.
- The Clairton Coke Works is in [Penn Environment's "Toxic Ten"](#) report, based on the EPA's Toxic Release Inventory Data.
- U.S. Steel has abandoned the Mon Valley and invested elsewhere, leaving the proud union steelworkers and residents in the Pittsburgh area adrift, continuing to breathe some of the most polluted air in the country. In December 2023, the company sold to Nippon Steel, beginning the process of turning over operations to a foreign company. Our region deserves assurances that clean air quality will be a concern now and in the future ([KDKA, October 2020](#))

- Hundreds of residents of Clairton and the Mon Valley have expressed their outrage at press conferences, Clairton community meetings and rallies, Allegheny County Health Department meetings and on social media.
- The residents of Clairton, the Mon Valley and Allegheny County deserve to breathe clean air. #EnoughisEnough.

### **Specific, Technical Points about the Current Draft of the Title V Operating Permit (Hearing Topic)**

- The EPA ordered ACHD to make changes to the earlier draft of the permit in 2023. ACHD did not make all of the needed updates as required.
- The permit draft's monitoring, recordkeeping and reporting requirements are still inadequate to ensure compliance with emissions limits.
- The current draft does not call for continuous emissions monitoring systems for particulate matter (PM) for all boilers other than boiler 1 and boiler 2. This means that there is no way to so ensure the Coke Works can be in compliance with the hourly particle (PM) emissions limits.
- The permit should require continuous emissions monitoring systems (CEMS) on the coke batteries to monitor for Volatile Organic Compounds (VOCs), such as benzene, because emissions can vary for different types of coal and coking procedures in the coking batteries. Without such monitors, there is no way to ensure the Coke Works is in compliance with VOC emissions standards and limits.
- The permit should require the reporting of daily emissions data when the monthly emissions reports are submitted, along with monthly emissions data and rolling annual emissions data. The reporting requirements should match data record keeping, which includes this daily information.
- There are typos in the review memo that need to be fixed, because the typos point to the wrong provisions in the permit and risk confusion that could interfere with accountability.
- The permit has proposed reductions in monitoring and Inspection frequencies of the cooling tower without sufficient justification.
- ACHD has proposed making additional changes to the permit not based on the directives in EPA's order. Many of those changes lack sufficient explanation and reasoning. They also lack the sufficient transparency needed to allow for meaningful public comment. These changes include removing some limits and reducing some monitoring frequencies, among other revisions.

### **Sign Up To Speak**

Persons wishing to provide public testimony may attend in person to speak by filling out [the public participation form](#).

Special requests such as virtual attendance can be [requested here](#).

**Wednesday, January 10, 2024 at 6:00 pm**

Clairton Municipal Building

**[551 Ravensburg Blvd.](#)**

Clairton, PA 15025

## Permit Under Review

United States Steel Corporation – Clairton

- [Title V Operating Permit Amendment #0052-OP22a\(PDF, 4MB\)](#)
- [TVOP Review Memo](#)