

August 19, 2024

**Remarks for Comment**

ACHD Public Hearing  
West Mifflin Borough Building  
1020 Lebanon Road  
West Mifflin, PA 15122

Re: Modifications to §2109.07, “Penalties, Fines, and Interest,” and Air Quality Program Fee Schedule

Dear ACHD Leadership:

I am Matthew Mehalik, Executive Director of the Breathe Project. Thank you for this opportunity to provide public comment.

The Allegheny County Health Department needs to have its air program fully funded. The costs of the program should be carried by the significant polluters seeking pollution permits. Additional costs should be covered by the county’s budget. Equipping ACHD with the tools it needs to protect our 1.3 million residents is a no-brainer.

Earlier this year a group of residents from the Mon Valley released updated [2020 – 2022 findings](#) from a report, ["Fine Particulate Matter and Mortality in Allegheny County, Pa.,"](#) that soot pollution kills between 640 -1,373 people each year in Allegheny County. Low-income communities had 33% higher proportions of these deaths than higher income communities. Communities of color had 18% higher rates of these deaths than other communities. This means that 3.5 to 7 times more people are dying each year from air pollution than Covid-19 in our county. We are having a 911-scale event in our county every 2 years.

The report’s release was covered widely by media.

The response from our public health allies at ACHD has been silence. This has been the case for other high quality science reports, such as [NYU’s study that showed significant decreases in emergency room visits](#) as well as pollution levels immediately following the closure of the Shenango Coke Works for economic reasons in 2016.

ACHD has been notably underfunded and understaffed. There is a backlog on Title V air pollution permits. Several drafts of these permits (USS Clairton Coke Works and Edgar Thomson Works) have been rejected by US EPA Region 3 because ACHD did not produce permits that fit the requirements of the Clean Air Act. ACHD needs the funding so that it can provide the staffing and expertise needed to update permits, enforce violations of the Clean Air Act, and protect the health of our county’s residents.

There is a lot of noise about a meagre \$1.9 million out of our county’s budget of about \$1 billion. Actuarial [valuation of human life in the U.S. ranges from \\$1 million - \\$10 million](#). The fee increases are less than the cost of saving 2-3 lives per year from air pollution. U.S. Steel’s [12-month trailing revenues are \\$19 billion](#). They can afford to pay for a \$55,000 permit especially given how many extra deaths from air pollution occur each year from toxic air pollution.

The fact that this is in any way controversial reflects larger, institutional governance issues that must also be addressed. I [raised many of these issues at the January 17, 2024, BOH meeting](#):

- Appoint new, responsive BOH members. Their terms have expired.
- Reconstitute the air advisory committee, which has not mustered a real quorum since the November election, and which does not provide any meaningful input on the most basic matters of ACHD operations including this permit fee regulation changes
- Remove US Steel as chair of the Pollution Prevention and Education Committee, which basically has done nothing for several years
- Meet with impacting community members instead of stonewalling them.

Reform is required at the root of the organization so that priorities to protect public health from toxic air pollution and listening to community voices becomes a core value. It is time to make major changes at ACHD. It needs the resources from these fee increases to make the needed changes.

Sincerely,

Matthew M. Mehalik, Ph.D.