



January 21, 2021

Allegheny County Health Department
Air Quality Program
Re: Regulation Comment
301 39th Street, Bldg. 7
Pittsburgh, PA 15201-1811

Dear Allegheny County Board of Health,

On behalf of Women for a Healthy Environment (WHE), a non-profit that addresses environmental exposures that impact the health of Allegheny County residents, I am writing in support of both (1) proposed revisions to the Coke Oven Regulations (§2105.21 & §2101.20) and Inspection Regulations (§2109.01) and (2) continued work by the Allegheny County Health Department to reduce community and occupational exposure to point source air pollution.

Since 2009, WHE has been educating individuals about environmental threats to public health, providing action steps communities can take to reduce exposure, and advocating for solutions that create a better tomorrow for all. For example, we accomplish this by hosting community workshops that address indoor and ambient air pollution and working with schools and early learning centers on actions steps they should take when air quality is unhealthy.

Enforcing stricter production and inspection regulations is a critical act of primary prevention of well-known health outcomes caused by air pollution such as cancer, asthma and other respiratory problems, cardiac disease, stroke, kidney failure, pre-term birth, low birth rates and diabetes.ⁱⁱⁱ Particularly in the time of COVID-19, we need our public health officials to act to protect Allegheny County residents from increased risk of contracting and transmitting this disease which primarily infects the respiratory system. Preliminary studies have shown that areas with elevated air pollution leave residents at greater risk of contracting COVID-19, by weakening the respiratory and immune systems.ⁱⁱⁱ

The US Environmental Protection Agency recently released the 2019 Toxics Release Inventory report^{iv}, which tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. The Clairton Cokes Work facility emits 924.0 thousand pounds of point source air emissions, according to the report.

The American Lung Association's 2020 State of the Air Report^v indicates that the Pittsburgh metro region is one of the most polluted cities in the country. Specifically, Pittsburgh was ranked 30 for high ozone days out of 229 metropolitan areas, 16 for 24-hour particle pollution out of 216 metropolitan areas, and 8 for annual particle pollution out of 204 metropolitan areas.^v

We know that chronic exposure to air pollution has real impacts in the health of our community. Children in Clairton have rates of asthma that are almost double the state average. Children from lower-income families and minority children are disproportionately carrying this burden.^{vi} Allegheny County is in the top two percent of the country for cancer risk from air pollution and has elevated rates for both lung and bladder cancer.

In response to US Steel's Clairton Coke Works facility's frequent violation of the 24-hour National Ambient Air Quality Standard (NAAQS) for particulate matter and Pennsylvania standard for hydrogen sulfide, WHE initiated a text alert service to residents to alert them of poor air quality alerts according to the federal Air Quality Index. In 2020 alone, we issued 30 air quality alerts for days when the Air Quality Index was in the Orange or worse category. As a secondary prevention strategy, this action was effective at reducing individual level exposure on poor air quality days. But individual action alone will not protect community members from experiencing the negative health impacts of air pollution. The Allegheny County Health Department must commit to primary prevention strategies that control the major sources of air pollution in the county.

Women for a Healthy Environment calls on the Allegheny County Health Department to demonstrate a commitment to protecting the public health of Allegheny County residents by requiring the reduction in emission to the pollutants that threaten the well-being of communities. In a time where the COVID-19 pandemic has underscored the need for effective public health measures, I urge you to deploy the tools at your disposal to hold polluters accountable, including:

- Stricter, health-based emission regulations on coke ovens and other point sources of air pollution in Allegheny County.
- Fence line monitoring near polluting facilities to aid in the enforcement and evaluation of the proposed air pollution regulations.

We applaud the Board of Health for this step in the right direction, that we hope will result in some amount of reduction in emissions from coke ovens and Hydrogen Sulfide exceedances. We look forward to working together to identify additional primary prevention strategies that ACHD can take in order to significantly improve the air quality in the Mon Valley and surrounding communities. These proposed regulations will lead to cleaner air for our communities, a healthier and more prosperous region, and improved quality of life for the residents of southwestern PA.

Sincerely,



Michelle Naccarati-Chapkis

Executive Director

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ⁱ Wei Yaguang, Wang Yan, Di Qian, Choirat Christine, Wang Yun, Koutrakis Petros et al. Short term exposure to fine particulate matter and hospital admission risks and costs in the Medicare population: time stratified, case crossover study *BMJ* 2019; 367 :l6258

ⁱⁱ Brokamp C, Strawn JR, Beck AF, Ryan P. Pediatric Psychiatric Emergency Department Utilization and Fine Particulate Matter: A Case-Crossover Study. *Environ Health Perspect.* 2019 Sep;127(9):97006. doi: 10.1289/EHP4815. Epub 2019 Sep 25. PMID: 31553231; PMCID: PMC6792357.

ⁱⁱⁱ <https://www.hsph.harvard.edu/c-change/subtopics/coronavirus-and-pollution/>

^{iv} https://enviro.epa.gov/triexplorer/tri_factsheet.factsheet?pYear=2019&pzip=15205&pParent=NAT

^v <https://www.stateoftheair.org/city-rankings/msas/pittsburgh-new-castle-weirton-pa-oh-wv.html#pmann>

^{vi} <https://breatheproject.org/asthma-on-the-rise/>