March 3, 2020

Via email to:

Ronald.Sugar@AlleghenyCounty.US
Jim.Kelly@AlleghenyCounty.us
Jayme.Graham@AlleghenyCounty.us
Dean.Deluca@AlleghenyCounty.us

Re: Request for 90 Day Comment Period for US Steel Upcoming Permits

Mr. Ron Sugar, Esq., Acting Director
Mr. Jim Kelly, Deputy Director, Environmental Health
Ms. Jayme Graham, Air Quality Program Manager
Mr. Dean Deluca, Enforcement Chief
Allegheny County Health Department
301 39th Street, Bldg. No. 7
Pittsburgh, PA 15201-1891

Dear Mr. Sugar, Mr. Kelly, Ms. Graham, and Mr. Deluca:

In follow-up to correspondence originally sent on October 2, 2019 and in anticipation of the pending release of draft installation permits for the cogeneration plant at US Steel Clairton Coke Works and the new caster at US Steel Edgar Thomson facility, the undersigned organizations request the Allegheny County Health Department (ACHD) provide a 90 day public comment period for these permits, with any public hearing scheduled near the end of this 90 day period.

As stated in prior communications, both Clairton and Braddock are considered environmental justice communities. Both communities have historically and currently bear a disproportionate share of adverse environmental impacts from United States Steel operations. We submit that a 90-day comment period with public hearing at the end of the period in one of the impacted EJ communities will provide for a better assurance that EJ communities have the opportunity to participate and comment on these draft permits.

Thank you for your consideration of this request.

Sincerely,

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October 2, 2019

Via email to:

Jim.Kelly@AlleghenyCounty.us
Jayme.Graham@AlleghenyCounty.us
Dean.Deluca@AlleghenyCounty.us

Re: Requests Relating to US Steel Upcoming Permits

Mr. Jim Kelly, Deputy Director, Environmental Health
Ms. Jayme Graham, Air Quality Program Manager
Mr. Dean Deluca, Enforcement Chief
Allegheny County Health Department
301 39th Street, Bldg. No. 7
Pittsburgh, PA 15201-1891

Dear Mr. Kelly, Ms. Graham, and Mr. Deluca:

In anticipation of the installation permits for the cogeneration plant at US Steel Clairton Coke Works and the new caster at US Steel Edgar Thomson facility going out to public comment, the undersigned organizations write to urge the Allegheny County Health Department (ACHD) to do several things to enhance public participation, especially in those communities most impacted by the pollution from these facilities.

As you know both Clairton and Braddock are considered environmental justice communities. Both communities have historically and currently bear a disproportionate share of adverse environmental impacts from United States Steel operations. To ensure that EJ communities have the opportunity to participate and be involved in a meaningful manner throughout the permitting process the ACHD should do the following:

1. Given the technical complexities of these permits, we call upon the ACHD to produce and distribute project summary documents regarding the proposed activities. Additionally, we urge ACHD to host a community informational meeting to answer questions about the permit conditions, expected emission reductions, and other pertinent details to make the project clearer. We would request that this informational meeting be held well before any public hearing so that community members can ask questions to understand what is being proposed. As you know, public hearings do not provide community members with an opportunity to ask important questions about the permits, nor does it provide an opportunity for dialogue. Additionally, the information community meeting can help residents formulate meaningful commentary on the proposed changes at a subsequent public hearing.
2. Thirty days is an insufficient amount of time to review the installation permits. We request a ninety day public comment period, with any public hearing scheduled near the end of this 90 day period.

3. To maximize community member participation, we request that both the informational meeting and public hearing be held in those communities most impacted by the facilities requesting the permit. ACHD should utilize electronic, conventional and non-conventional methods of spreading information to community members.

Thank you for your consideration of this request.

Sincerely,

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