

Revision to

Allegheny County Health Department Rules and Regulations  
**Article XXI, Air Pollution Control**

**§2106.06, “Mon Valley Air Pollution Episode” (new)  
and a related change to  
§2105.50, “Open Burning”**

and

**ALLEGHENY COUNTY’S portion of  
the PENNSYLVANIA STATE IMPLEMENTATION PLAN**

for the  
Attainment and Maintenance of the  
National Ambient Air Quality Standards

(Revision Tracking No. 97)

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# 1. Revision

Because §2106.06 is a **new section**, all type is shown in regular font.

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## §2106.06 MON VALLEY AIR POLLUTION EPISODE *{Effective September 25, 2021.}*

- a. **Applicability.** This section applies to the following sources located in one or more of the municipalities identified in Subsection d:
  1. All major and synthetic minor sources of PM<sub>2.5</sub>;
  2. All sources that have combined allowable emissions from all emission units of 6.5 tons or more per year of PM<sub>2.5</sub>; and
  3. All sources that have combined allowable emissions from all emission units of 10 tons or more per year of PM<sub>10</sub>.
- b. **Air Quality Forecast.** For purposes of this Section, the Department shall rely on the air quality forecast provided by the Pennsylvania Department of Environmental Protection for determining Mon Valley Air Pollution Episodes. The Director of the Allegheny County Health Department may approve a change in the air quality forecast provider or methodology. The Department shall post on its Air Quality Program website any changes to the air quality forecast provider or methodology.
- c. **Mon Valley Air Pollution Episodes.** For purposes of this Section, the “Mon Valley PM<sub>2.5</sub> threshold level” shall be the value of the primary 24-hour PM<sub>2.5</sub> NAAQS.
  1. **Mon Valley Air Pollution Watch.** The Department shall issue a Mon Valley Air Pollution Watch if the Department has determined from an air quality forecast that for at least the next 24-hour period atmospheric conditions will exist which indicate that the 24-hour average ambient concentration of PM<sub>2.5</sub> in one or more of the municipalities identified in Subsection d is forecasted to exceed the Mon Valley PM<sub>2.5</sub> threshold level.
  2. **Mon Valley Air Pollution Warning.** The Department shall issue a Mon Valley Air Pollution Warning if during a rolling 24-hour averaging period, the Mon Valley PM<sub>2.5</sub> threshold level is exceeded at an official monitoring station in the municipalities identified in Subsection d and the Department has determined atmospheric conditions will continue as described in Paragraph c.1.

- d. **Mon Valley Air Pollution Episode Area.** This Section shall apply to the following municipalities: City of Clairton, City of Duquesne, City of McKeesport, Borough of Braddock, Borough of Braddock Hills, Borough of Chalfant, Borough of Dravosburg, Borough of East McKeesport, Borough of East Pittsburgh, Borough of Elizabeth, Borough of Forest Hills, Borough of Glassport, Borough of Jefferson Hills, Borough of Liberty, Borough of Lincoln, Borough of Munhall, Borough of North Braddock, Borough of Port Vue, Borough of Rankin, Borough of Swissvale, Borough of Turtle Creek, Borough of Versailles, Borough of Wall, Borough of West Elizabeth, Borough of West Mifflin, Borough of White Oak, Borough of Wilmerding, Borough of Whitaker, Elizabeth Township, Forward Township, North Versailles Township, and Wilkins Township.
- e. **Mon Valley Air Pollution Mitigation Plan.** In addition to any applicable plan requirements under Sections 2106.02 and 2106.05, all sources subject to this Section shall submit to the Department according to the schedule provided in Subsection f, a Mon Valley Air Pollution Mitigation Plan (referred to in this Section as “Plan”) with the following two phases:
1. **Mon Valley Air Pollution Watch Phase:** A Mon Valley Air Pollution Watch Phase shall include procedures to ensure the source is operating in a manner consistent with good engineering practice and all air pollution control equipment is maintained in good working condition. The Mon Valley Air Pollution Watch Phase shall include procedures for record keeping and reporting to the Department the actions taken during the Mon Valley Air Pollution Watch period. The Mon Valley Air Pollution Watch Phase shall also include procedures to ensure that the source has sufficient staff and resources available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the Department’s notification to the source of a Mon Valley Air Pollution Watch.
  2. **Mon Valley Air Pollution Warning Phase:** A Mon Valley Air Pollution Warning Phase shall include measures to reduce PM<sub>2.5</sub> and PM<sub>10</sub> emissions to minimize the impact on public health, safety, or welfare, the timeframe for implementing each measure, and an estimate of the PM<sub>2.5</sub> and PM<sub>10</sub> emissions reductions during a 24-hour period for each measure. The Mon Valley Air Pollution Warning Phase shall include the procedures identified in the Mon Valley Air Pollution Watch Phase and procedures for record keeping and reporting to the Department the actions taken during the Mon Valley Air Pollution Warning period. The measures to reduce PM<sub>2.5</sub> and PM<sub>10</sub> emissions may include, but are not limited to, the following:

- A. Reduce transportation activity;
- B. Switch or decrease fuel use as allowed by the facility's permit issued under this Article;
- C. Delay nonessential activities that may cause emissions;
- D. Modify work or other practices; and
- E. Reduce, modify, cease, curtail, defer or postpone production and allied operations.

f. **Dates for Submission of Mon Valley Air Pollution Mitigation Plan.** Sources subject to this Section shall submit the Mon Valley Air Pollution Mitigation Plan according to the following schedule:

- 1. Existing sources shall submit to the Department the Plan within 90 days after the effective date of this Section.
- 2. Sources that startup after the effective date of this Section shall submit to the Department the Plan within 90 days after initial startup of the source.
- 3. Existing sources that become subject to this Section after the effective date of this Section shall submit to the Department the Plan within 90 days after the source becomes subject to this Section.
- 4. Any person responsible for operation of the source shall advise the Department in writing of any change affecting the technical content or the implementation of the Plan no more than 30 days following the change. Such submittals shall be reviewed and implemented according to the procedures described in Subsection g below.

**g. Procedure for Review and Effective Date of the Mon Valley Air Pollution Mitigation Plans.**

1. The Mon Valley Air Pollution Mitigation Plan shall be effective upon submission to the Department.
2. If the Mon Valley Air Pollution Mitigation Plan is not acceptable to the Department, the Department shall issue an order directing the responsible person to modify and resubmit the Plan within thirty (30) days after receiving notice. The order shall specify the reason or reasons for disapproval and shall specify the changes or additions necessary to make the Plan acceptable to the Department. The Plan submitted for review to the Department under Paragraph g.1 shall continue to be effective until a modified Plan has been submitted. The modified Plan shall be effective upon submission to the Department.
3. When determining whether the Mon Valley Air Pollution Mitigation Plan is acceptable, the Department may consider the following factors:
  - a. The feasibility of implementing the Mon Valley Air Pollution Warning Phase within 24 hours of the Department's notification to the source of a Mon Valley Air Pollution Watch;
  - b. Whether the measures to decrease PM<sub>2.5</sub> and PM<sub>10</sub> emissions can reasonably improve public health, safety, or welfare; and
  - c. Whether the estimated reduction in PM<sub>2.5</sub> and PM<sub>10</sub> emissions is proportionate to the source's contribution to emissions in any of the municipalities identified in Subsection d.
4. In the event that a source fails to submit the Mon Valley Air Pollution Mitigation Plan according to the schedule provided in Subsection f, fails to resubmit the Plan, or fails to resubmit the Plan in accordance with the changes or additions specified by the Department, the Department, in addition to any other remedies available to it under this Article, shall have the authority to issue an order to that person detailing the procedures for a Mon Valley Air Pollution Watch or Warning Phase.

- h. **Notification of Mon Valley Air Pollution Episodes.** When a Mon Valley Air Pollution Watch or Warning is issued, the Department shall make the following notifications:
  - 1. The Department shall notify all sources subject to this Section that they are required to implement the procedures and measures identified in either the Mon Valley Air Pollution Watch or Warning Phase.
  - 2. The Department shall notify all municipalities identified in Subsection d, and any other municipality that requests to be notified, that a Mon Valley Air Pollution Watch or Warning is in effect.
  - 3. The Department shall issue an advisory on its Air Quality Program website and notify various media that a Mon Valley Air Pollution Watch or Warning is in effect.
- i. **Termination of Mon Valley Air Pollution Episodes.**
  - 1. The Department shall terminate any Mon Valley Air Pollution Watch or Warning when the conditions in Paragraphs c.1 and c.2 no longer exist.
  - 2. The Department shall issue a notification to all person(s) identified under Subsection h when the ACHD has determined that a Mon Valley Air Pollution Watch or Warning is no longer in effect.
- j. **Other powers unaffected.** Nothing contained in this Section shall affect the power of the Department to issue an Emergency Order pursuant to §2109.05 of this Article, whether or not such emergency occurs during a Mon Valley Air Pollution episode.

For the following section:  
Additions are shown in **larger font, bolded, and underlined.**

**§2105.50 OPEN BURNING** *{Subsection f amended May 8, 2007, effective August 17, 2007, and amended July 16, 2009, effective July 26, 2009. Subsections a, b, and d amended, and e & f renumbered November 13, 2014, effective January 1, 2015. Paragraph a.3 amended September 15, 2021, effective September 25, 2021.}*

a. **General.**

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3. Wood burning activities shall not be conducted on Air Quality Action Days **or in the municipalities identified in Subsection 2106.06.d when a Mon Valley Air Pollution Watch or Warning under Section 2106.06 has been issued,** with the exception of conducting such burning for the commercial preparation of food.

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*End of Regulation Changes*

## 2. Technical Support Document

### 2.1 General Summary

The Allegheny County Health Department (ACHD) is making changes to Article XXI in this SIP revision to address air pollution episodes in the Mon Valley Area involving fine particulate matter (PM<sub>2.5</sub>).

In the past, particularly in 2019, Allegheny County has experienced strong and lengthy temperature inversions as a result of extended periods of weather conditions including light wind speeds, heavy fog, and a significant warm front. Temperature inversions alter the profile of the local atmosphere and tend to trap pollutants closer to the surface.

During these episodes, ACHD recorded exceedances of the 24-hour PM<sub>2.5</sub> federal National Ambient Air Quality Standard (NAAQS) at the Liberty monitor, although elevated pollution readings were also recorded at other monitored sites across the county. During these incidences, Air Quality Action Alerts were issued for citizens in the Clairton and Liberty communities. ACHD recognizes that industry is not the only contributor to poor air quality as wide-spread mobile and area source emissions from motor vehicles, lawnmowers, solvents and open burning can have a significant impact on pollution levels. While continuing to advocate for residents to do what they can to reduce emissions, the new regulation will impose corrective action requirements on industry during short-term pollution events.

This new air quality regulation is aimed at emission mitigation requirements for industry operating in the portion of the county known as the “Mon Valley” during weather-related pollution episodes. The goal is to have emission reduction plans in place that could be implemented within 24 hours of notice from ACHD. Such “Mon Valley Air Pollution Warning Plans” will include measures to reduce emissions to minimize the impact on public health.

Concurrent with this newly added emission mitigation regulation, ACHD plans to build an infrastructure to model and forecast inversion events as a necessary component for effective regulation implementation. The enhanced meteorological forecasting is expected to be accompanied by additional public notifications.

Finally, the newly added Article XXI §2106.06 will be submitted as a revision to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) as additional weight of evidence of the attainment of the NAAQS for Fine Particulate Matter, PM<sub>2.5</sub>. The Open Burning regulations at §2105.50 are already part of the Allegheny County portion of the PA SIP and therefore the revision to §2105.50.a.3 will be submitted as a change to the existing Allegheny County portion of the PA SIP.

## 2.2 Extent of Area

To determine the extent of the area in which the regulation would be applicable, ACHD examined monitored concentrations, modeled results, and point source emissions in recent years.

Since 2016, the Liberty monitor site has recorded the highest 24-hour concentrations in Allegheny County and the most exceedances of the 2012 24-hour PM<sub>2.5</sub> NAAQS level of 35µg/m<sup>3</sup>, including consecutive exceedance days. The North Braddock and Parkway East monitors also exceeded on one day (Dec. 3, 2017) during a consecutive-day Liberty exceedance period.<sup>1</sup> Table 1 below shows the average 24-hour concentrations for Liberty, North Braddock, and Parkway East during periods with Liberty exceedances. Averages for the Lawrenceville and South Fayette sites are also shown, for a look at general urban and background concentrations, respectively.

**Table 1. Average 24-Hour PM<sub>2.5</sub> Concentrations (µg/m<sup>3</sup>) on Liberty Exceedance Days, by Site, 2016-2020**

Exceedance Scenario	Liberty	North Braddock	Parkway East	Lawrenceville	South Fayette
Any Liberty Exceedance Day	44.7	23.1	21.8	18.4	12.8
Consecutive Liberty Exceedance Days	48.7	25.4	24.5	22.1	12.7

The Liberty monitor shows the highest concentrations on exceedance days, with North Braddock showing the 2<sup>nd</sup>-highest concentrations. Parkway East is a near-road site that can be affected by highway emissions as well as general urban emissions. The differences in concentration from Liberty compared to Lawrenceville (general urban) and South Fayette (background) can be considerable during exceedance days, indicating that the Mon Valley is unique in comparison to the rest of Allegheny County.

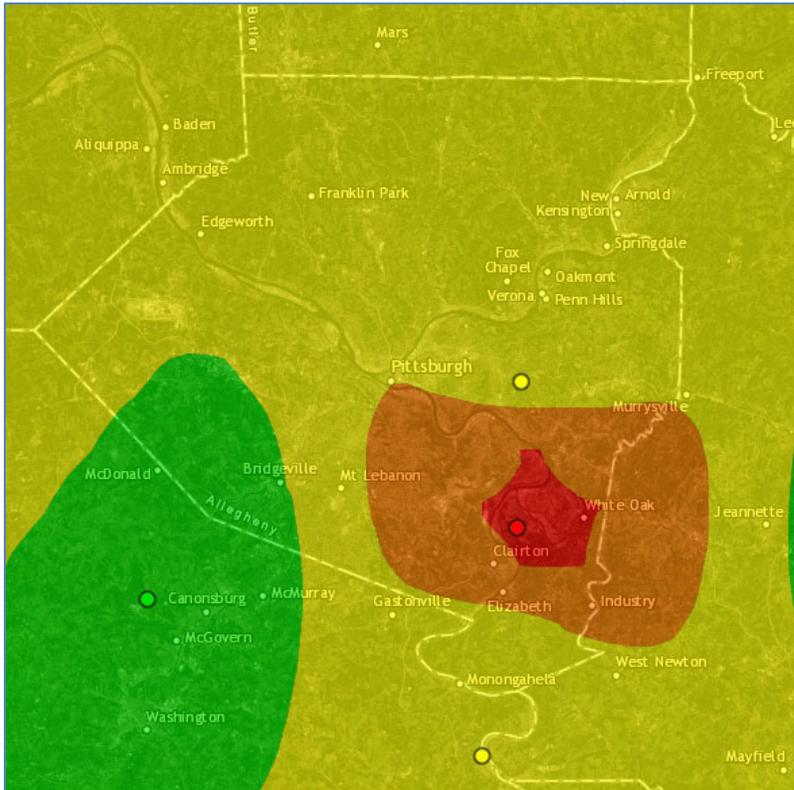
PM<sub>2.5</sub> monitors are located at several locations in Allegheny County as well as surrounding counties. EPA's AirNow interactive map<sup>2</sup> can provide visual interpolations of maximum daily Air Quality Index (AQI) values from all available monitor sites. Figure 1 below shows an example AQI map for a day during a period of consecutive exceedances at Liberty in December of 2019. (Shown in the figure: Dec. 23, 2019, during the period of Dec. 21-26, 2019.)

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<sup>1</sup> Additionally, the Avalon site, located in the Ohio Valley, exceeded on one day (Nov. 8, 2020) when no other site exceeded in the county, based on final FRM/FEM combined results. There may be occasional isolated exceedances at any location in the county – the intent of this regulation is to mitigate exceedances in the area that is most prone to exceed on consecutive days, which is the Mon Valley.

<sup>2</sup> Available at: <https://gispub.epa.gov/airnow/>

*Figure 1. PM<sub>2.5</sub> AQI Map for Allegheny County Region, Dec. 23, 2019*



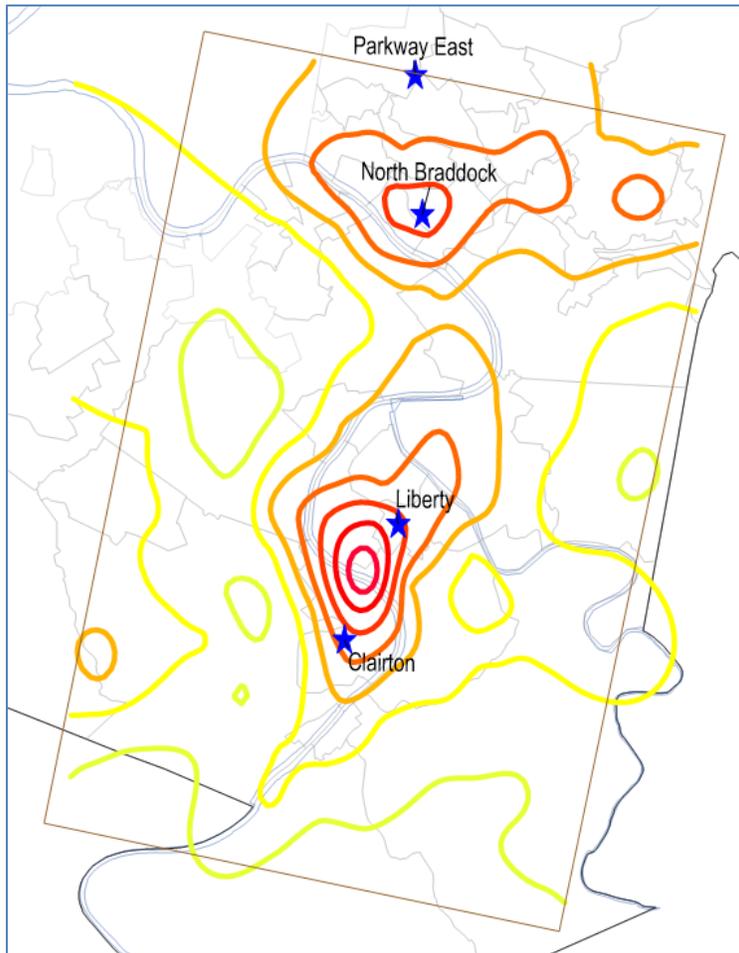
Based on interpolated monitored data alone, the Mon Valley region showed PM<sub>2.5</sub> concentrations in the unhealthy ranges (orange/red) when other sections of the county and surrounding counties were actually in the good range (green). Widespread concentrations in the moderate range (yellow) were also evident throughout the Pittsburgh region.

For a more specific analysis of highest concentration locations, modeled results can be examined. Modeling for the PM<sub>2.5</sub> SIP for the 2012 PM<sub>2.5</sub> NAAQS included CAMx chemical transport model<sup>3</sup> predictions for year 2021. The model was configured at 1.33 km grid resolution (i.e., site-specific meteorology and modeled concentrations at 1.33 km horizontal spacing). Emissions included both primary PM<sub>2.5</sub> and secondary transformation from precursors (see more below in Section 2.3) from all source sectors (point, area, mobile).

Figure 2 shows the maximum modeled 24-hour contours for the Mon Valley, along with monitor locations, based on a domain from the Parkway East site to the north and extending to the edges of the Allegheny County border to the east and the south. (Note: The modeled contours are color-coded to be analogous to the AQI ranges. Additionally, the domain is skewed diagonally due to the Lambert Conic Conformal (LCC) projection used by the model.)

<sup>3</sup> Available at: <http://www.camx.com/>

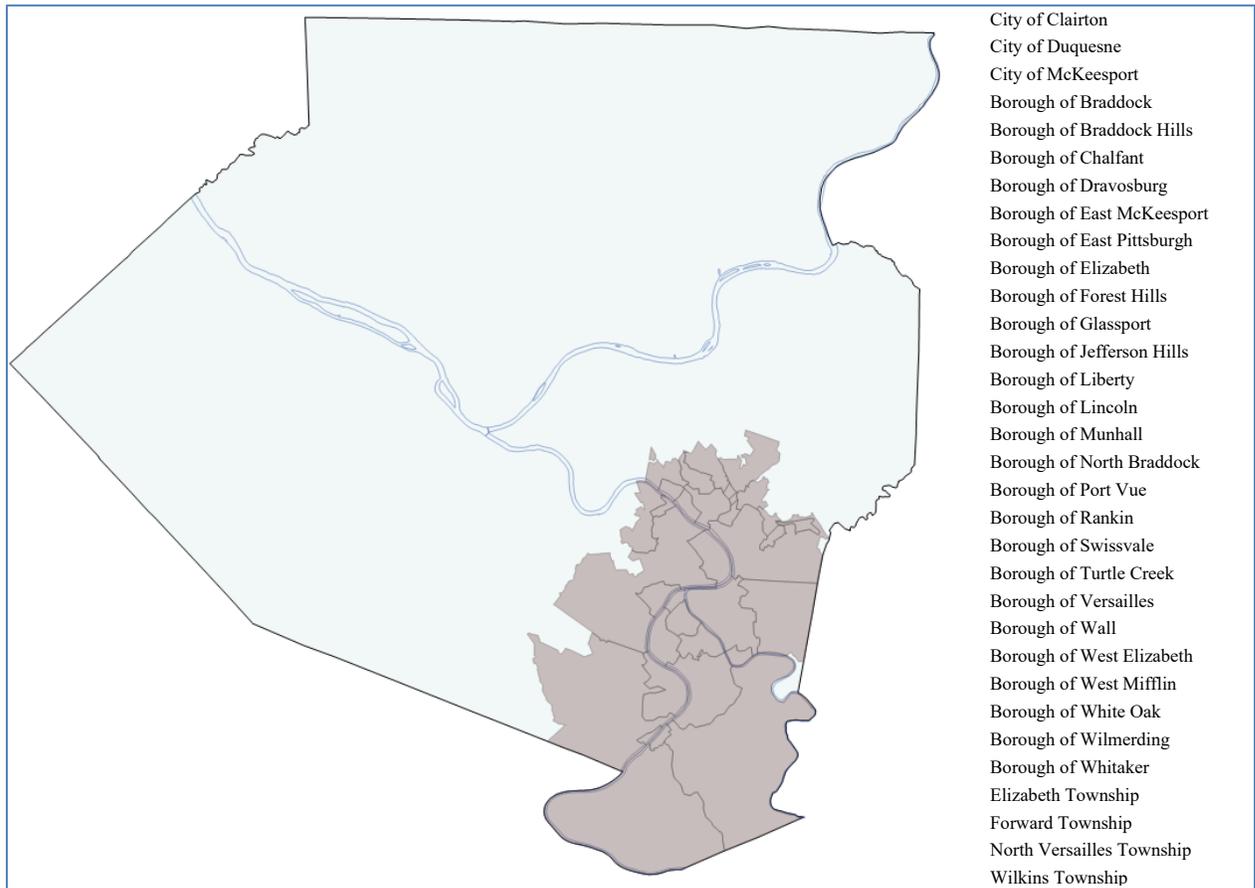
*Figure 2. Contour Map of Maximum Modeled 24-Hour Impacts, Mon Valley, 2021*



The modeled results show that the expected peak locations are near the Liberty and North Braddock monitor sites, roughly within a 5-km radius surrounding the Liberty site and a 3-km radius surrounding the North Braddock site. Recent emissions inventories (based on actual emissions) show that about 70% of the annual PM<sub>2.5</sub> point source emissions in Allegheny County are from point sources within these zones (see more below in Section 2.4).

Based on the available monitored, modeled, and emissions data, the extent of the area that is most affected by and most contributing to PM<sub>2.5</sub> exceedances is likely best assigned as a contiguous region of the Monongahela River Valley from the southern border of Allegheny County to the border of the City of Pittsburgh. The area is shaded in grey in Figure 3 below. The municipalities included in the shaded area are within the vicinity of the Liberty and/or North Braddock monitor sites. The shaded area is also similar to the Allegheny, PA SO<sub>2</sub> nonattainment area for the 2010 NAAQS. Figure 3 shows the shaded area within the boarder of Allegheny County, along with list of the names of the included municipalities.

**Figure 3. Map of Mon Valley Air Pollution Episode Area**



### 2.3 PM<sub>2.5</sub> Composition in the Mon Valley

To help determine the source applicability of this regulation (discussed in Section 2.4 below), especially in regard to minor sources as well as sources from outside the Mon Valley, it is important to consider the composition of PM<sub>2.5</sub> in the Mon Valley.

PM<sub>2.5</sub> can be both primary and secondary in nature. Primary PM<sub>2.5</sub> can be emitted from a source as a particle or can quickly condense from a gas to particle or aqueous phase. Secondary PM<sub>2.5</sub> is formed from precursors, which can include the following pollutants:

- Sulfur dioxide (SO<sub>2</sub>) can transform to sulfuric acid and then to sulfate, generally over long distances and during hot/humid conditions. Localized transformation can possibly also occur during extreme stagnation conditions. Sulfate can also be emitted in primary/aqueous form.
- Nitrogen oxides (NO<sub>x</sub>) can transform to nitric acid and then to nitrate, generally in cold conditions.
- Volatile organic compounds (VOC) can transform to secondary organic aerosols (SOA).

- Ammonia (NH<sub>3</sub>) can react with other compounds, generally sulfuric and nitric acid.

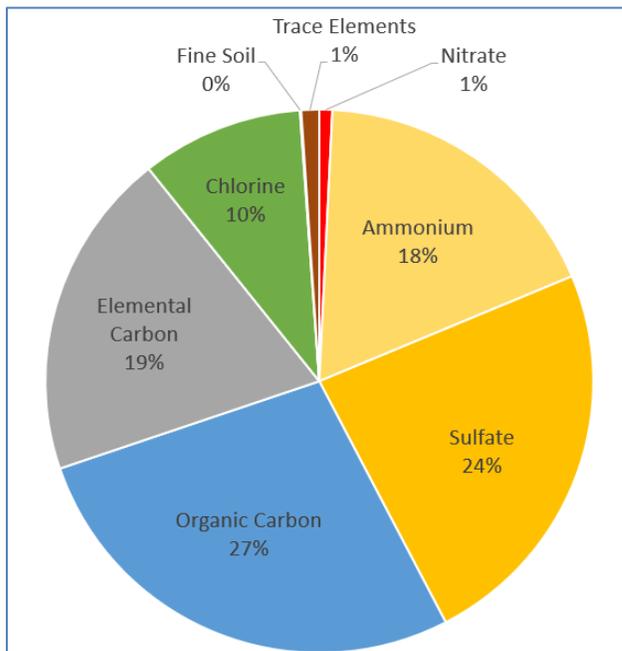
When examining the excess PM<sub>2.5</sub> in the Mon Valley – that is, the amount of PM<sub>2.5</sub> above what is found to exist throughout the rest of the Allegheny County or the Pittsburgh region – differences in the types of individual species can be used to determine the potential source contributions of PM<sub>2.5</sub>. Speciation monitors are available at both Liberty and Lawrenceville, as well as some tri-state locations.

The excess analysis undertaken for this regulation examined monitored samples at Liberty and Lawrenceville on days in 2015-2019 when Liberty was greater than 25 µg/m<sup>3</sup> (or about 72% of the 2012 24-hour PM<sub>2.5</sub> NAAQS of 35µg/m<sup>3</sup>). Table 2 below shows the average species concentrations in µg/m<sup>3</sup> for both sites on these days, with the difference representing Liberty minus Lawrenceville. (A total of 23 dates were available with speciation data at both Liberty and Lawrenceville, and five of those dates were during episodes with consecutive exceedances.) Figure 4 shows the difference in pie chart format, with percentages of the total excess shown for each species.

**Table 2. Average PM<sub>2.5</sub> Species Concentrations (µg/m<sup>3</sup>) on Liberty High Days, 2015-2019**

Site	Ammonium	Sulfate	Nitrate	Organic Carbon	Elemental Carbon	Fine Soil	Chlorine	Trace Elements
Liberty	4.30	6.40	1.93	9.46	5.13	0.94	1.90	0.57
Lawrenceville	0.86	1.84	1.78	4.18	1.38	0.95	0.06	0.37
Difference	3.45	4.55	0.15	5.27	3.75	-0.01	1.84	0.20

**Figure 4. Liberty Excess PM<sub>2.5</sub> Species, High Days, 2015-2019**

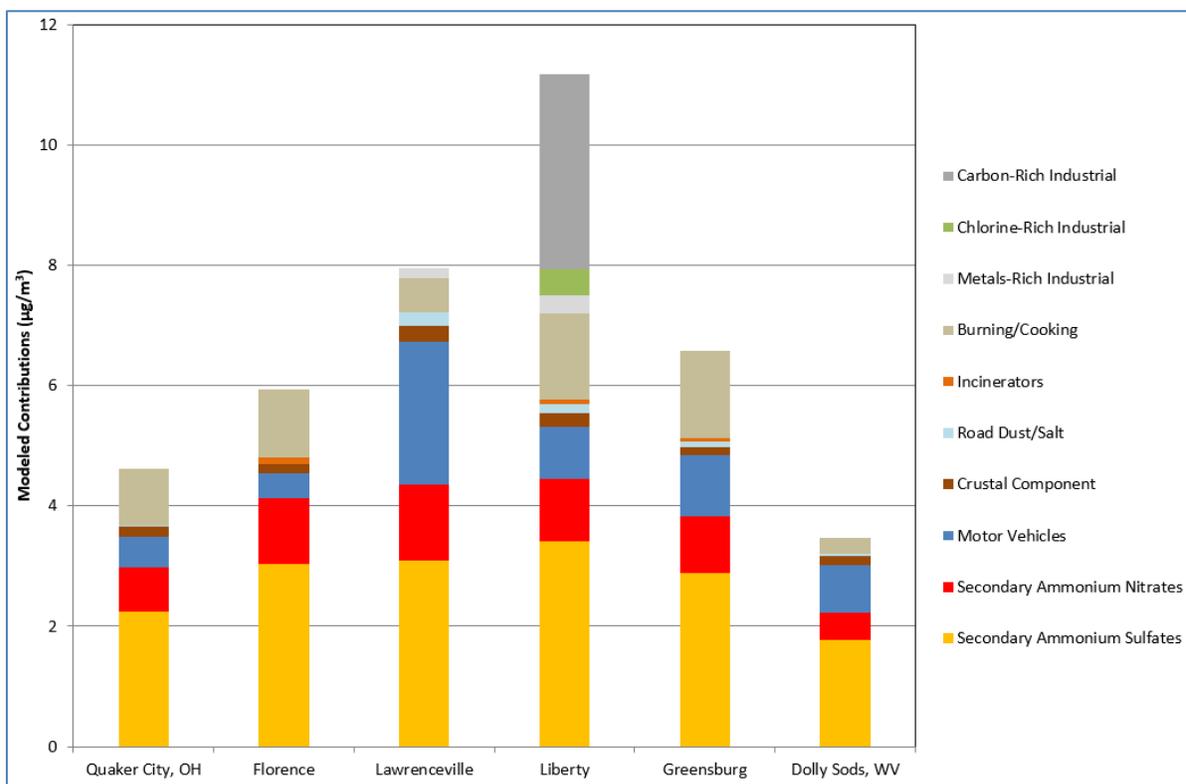


There are several aspects of the Liberty excess species. There is negligible or no excess of nitrate, fine soil, or trace elements, so these species are not contributing to PM<sub>2.5</sub>

exceedances. Ammonium is usually associated with other species, but it is in higher proportion than what would be needed for ammonium sulfate. Sulfate and organic carbon can include both primary and secondary portions, but the elemental carbon excess is primary in nature. Last, chlorine is unique to the Mon Valley compared to Lawrenceville, and it may exist in primary form as hydrochloric acid (HCl) or associated with other species.

Speciation data can also be used with source apportionment tools such as EPA’s Positive Matrix Factorization (PMF)<sup>4</sup> model to determine source factors that are contributing to specific species concentrations. Figure 5 below shows the PMF results sites in the tri-state region, based on speciation data from 2009-2017. (These results were also included in the ACHD PM<sub>2.5</sub> SIP for the 2012 PM<sub>2.5</sub> NAAQS.)

**Figure 5. PMF PM<sub>2.5</sub> Source Factors, Tri-State Sites, 2009-2017**



The PMF results show that most of the secondary formation from species such as sulfate and nitrate are consistent throughout the Pittsburgh region. (Note: Florence is in Washington County, and Greensburg is in Westmoreland County.) Lawrenceville shows the highest contributions from motor vehicles, which should be expected as it is the most urban site with speciation data. Liberty shows noticeable differences from the rest of the region for the source factors attributed as carbon-rich and chlorine-rich industrial, based on the make-up of species (as shown in Figure 4 above). These source factors are the

<sup>4</sup> Available at: <https://www.epa.gov/air-research/positive-matrix-factorization-model-environmental-data-analyses>

driving components for the Liberty excess and exceedances of the 24-hour PM<sub>2.5</sub> NAAQS, and they are not contributing to other monitoring sites in the tri-state region.

Additionally, results from the CAMx modeling (as described above in Section 2.2) showed that primary PM<sub>2.5</sub> was the largest contributor to the Liberty excess, as the results shown in Figure 2 above included both primary and secondary formation from all source sectors. The peak modeled contours in the Mon Valley were due to primary emissions from point sources.

There is some amount of localized transformation of precursors that is occurring within the Mon Valley, as well as other sections of the county, specifically for secondary organic aerosols (SOA) from VOC. EPA's PM<sub>2.5</sub> Precursor Guidance<sup>5</sup> indicates that SOA remains the least understood component of PM<sub>2.5</sub> and continues to be a significant topic of research and investigation. However, SOA typically comprises a higher percentage of the organic carbon portion of PM<sub>2.5</sub> mass in the summer than in the winter. Exceedances in the Mon Valley generally occur during cool conditions with strong inversions present.

ACHD's analysis of the composition of PM<sub>2.5</sub>, as it relates to determining the source applicability of this regulation and whether to include minor sources and sources from outside the Mon Valley in the requirement to submit episode plans, is that the majority of the excess PM<sub>2.5</sub> in the Mon Valley is primary in nature and is caused by point source emissions from within the area. Given that is the case, the regulation is being applied to PM<sub>2.5</sub>/PM<sub>10</sub> sources described in Section 2.4 below.

#### 2.4 Sources Subject to the Regulation

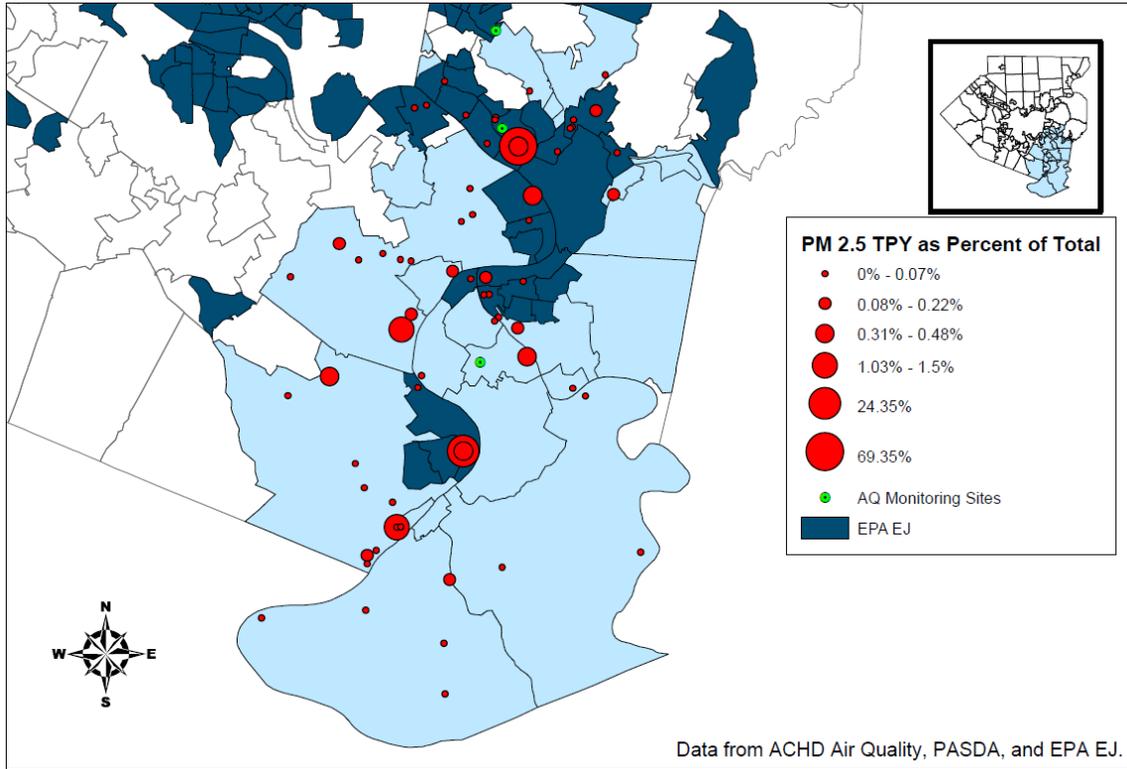
Sources made subject to the regulation are sources of both PM<sub>2.5</sub> and PM<sub>10</sub>, since PM<sub>10</sub> includes PM<sub>2.5</sub> by definition, and some minor sources do not have an inventory for PM<sub>2.5</sub>.

Major, synthetic minor, and minor sources over specific permitted values were considered for applicability. The figures below show the permitted facilities in the Mon Valley and their percentage of the emissions of PM<sub>2.5</sub> and PM<sub>10</sub> in the Mon Valley.

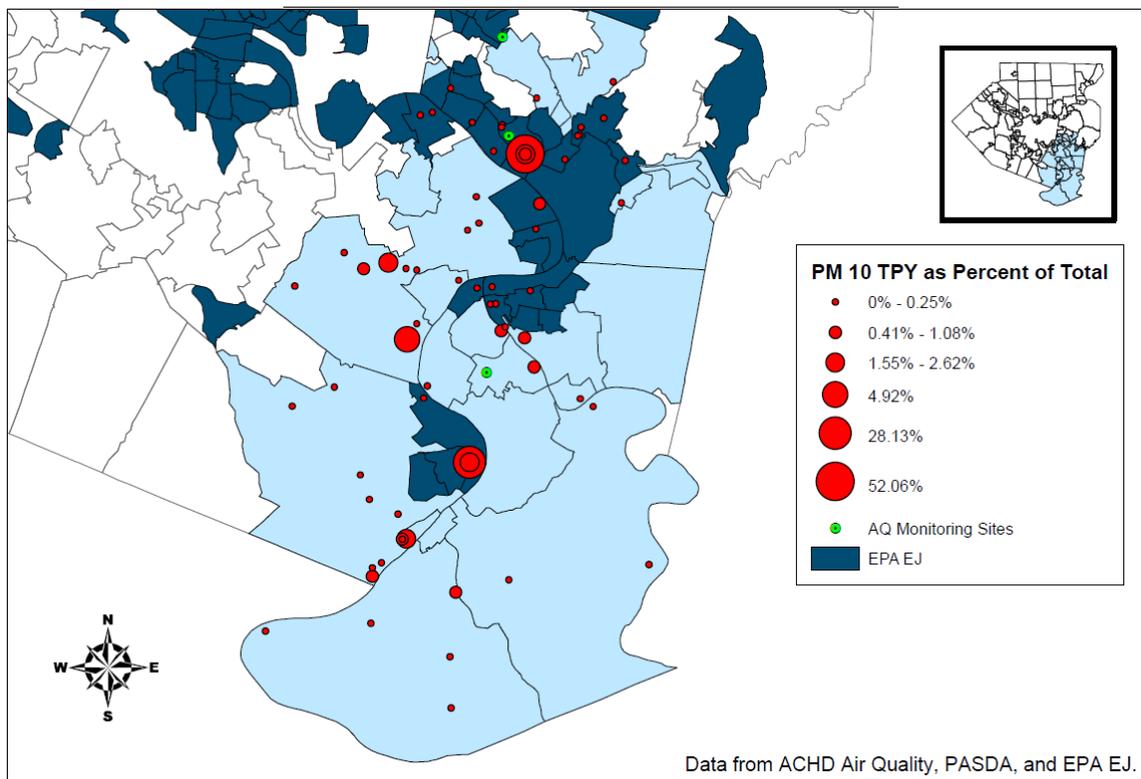
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<sup>5</sup> Available at: <https://www.epa.gov/pm-pollution/pm25-precursor-demonstration-guidance>

**Figure 6. PM<sub>2.5</sub> Emissions (% of total), by Permitted Facilities in Mon Valley**



**Figure 7. PM<sub>10</sub> Emissions (% of total), by Permitted Facilities in Mon Valley**



Based on a review of sources located within the Mon Valley and their permit limits for both PM<sub>10</sub> and PM<sub>2.5</sub>, cutoff levels were established at 10 tons/year for PM<sub>10</sub> and 6.5 tons/year for PM<sub>2.5</sub>. These levels were deemed to contribute enough emissions to the Mon Valley to warrant requiring the sources to submit plans meant to reduce emissions in the event of episodic conditions in the Mon Valley. The following tables list the sources that will be subject to the regulation as of this writing:

***Table 3. Facilities with both PM<sub>2.5</sub> tons/year limit of 6.5 or greater and PM<sub>10</sub> tons/year limit of 10 or greater***

Company Name
U.S. Steel-Edgar Thomson Plant
U.S. Steel-Clairton Coke Works Plant
TMS (USS-Edgar Thomson)
Eastman Chemical Resins, Inc.
DURA-Bond (Duquesne)
DURA-Bond (Liberty)
U.S. Steel Irvin Plant

***Table 4. Facilities with only PM<sub>10</sub> tons/year limit of 10 or greater***

Company Name
Clairton Slag, Inc.
LaFarge Corporation (Duquesne Plant)
C.P. Industries – Christy Park Plant
Keywell Metals LLC. West Mifflin
Kelly Run Sanitation Landfill
Braddock Recovery, Inc.
ELG Metals, Inc. – McKeesport
Mid-Continental Coal & Coke Company
NCP Carbon (Jefferson Hills Site)
TMS (USS- Clairton)
Fritz Enterprises (USS Edgar Thomson)

## 2.5 Mon Valley Air Pollution Mitigation Plan

The singular Plan that each applicable source shall submit will have a Mon Valley Air Pollution Watch Phase, and a Mon Valley Air Pollution Warning Phase.

Subsections 2106.06.e, f, and g of the new regulation discuss aspects of a Mon Valley Air Pollution Mitigation Plan, including Plan content, submission schedules, review process, when the Plan is effective and handling Plan changes.

### **3. Documentation of Public Hearing and Certifications**

- a. Public hearing notice
- b. Transmittals of hearing notice to EPA & PA DEP
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**NOTICE OF VIRTUAL PUBLIC HEARING AND PUBLIC COMMENT PERIOD  
FOR PROPOSED AMENDMENTS TO  
ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS  
ARTICLE XXI, AIR POLLUTION CONTROL**

The Allegheny County Board of Health will hold a virtual public hearing on Wednesday, June 9, 2021, at 5:00 PM to take testimony on proposed modifications to Allegheny County Health Department Article XXI, along with the corresponding sections of County Ordinance 16782, that will add a new section, §2106.06, “Mon Valley Air Pollution Episode” and a related portion of §2105.50, “Open Burning.”

These changes will be submitted as revisions to Allegheny County’s portion of the Pennsylvania PM2.5 State Implementation Plan as delineated in the associated Technical Support Documents.

The proposed SIP revision is available on the Allegheny County Health Department (ACHD) Air Quality web site at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips). Written copies may be obtained by contacting Paulette Poulet, at [paulette.poulet@alleghenycounty.us](mailto:paulette.poulet@alleghenycounty.us) or 412-578-8103.

The hearing will be held virtually in compliance with safety precautions due to the COVID-19 pandemic.

- Information on how to view or register to speak at the hearing is available on the ACHD’s Air Quality website at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips).
- You must register to present testimony no less than 24 hours in advance of the virtual hearing.
- Testimony is limited to 3 minutes. Witnesses are requested to submit written copies of the testimony by email to [aqcomments@alleghenycounty.us](mailto:aqcomments@alleghenycounty.us).

The Board will also accept written comments, beginning on Monday, May 10, 2021, and concluding at 11:59 PM on Wednesday, June 9, 2021, by mail to ACHD Air Program, 301 39th Street, Bldg. 7, Pittsburgh, PA 15201-1811, or by email to [aqcomments@alleghenycounty.us](mailto:aqcomments@alleghenycounty.us).

Please contact Paulette Poulet, at [paulette.poulet@alleghenycounty.us](mailto:paulette.poulet@alleghenycounty.us) or 412-578-8103, if you have any questions or if you have any difficulty registering for the hearing.

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

May 10, 2021

Ms. Christina Fernandez, Director  
Air Protection Division  
Region III (3AP00)  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Ms. Fernandez:

Attached is a Notice of Public Hearing for proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, regarding the addition of new §2106.06, Mon Valley Air Pollution Episode along with a related change to §2105.50, Open Burning.

This proposed new air quality regulation is aimed at emission mitigation requirements for industry operating in the portion of the county known as the “Mon Valley” during weather-related pollution episodes. The goal is to have emission reduction plans in place that could be implemented within 24 hours of notice from ACHD. Such “Mon Valley Air Pollution Warning Plans” will include measures to reduce emissions to minimize the impact on public health.

These revisions will also be submitted as changes to Allegheny County’s portion of the Pennsylvania State Implementation Plan under our Revision Tracking Number 97, as delineated in the Technical Support Document.

Information regarding the proposed SIP change may also be found on the ACHD website at: [Regulations and SIPs | Air Quality | Health Department | Allegheny County](#)

The public comment period begins May 10, 2021 and concludes June 9, 2021 at 11:59 pm. The public hearing will be held June 9, 2021. Your comments are welcome.

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**ALLEGHENY COUNTY HEALTH DEPARTMENT • AIR QUALITY PROGRAM**  
301 39<sup>TH</sup> STREET BUILDING #7 • PITTSBURGH, PA 15201-1811  
PHONE (412) 578-8103 • FAX (412) 578-8144

ACHD SIP97 Hearing Notice Letter  
May 10, 2021

Sincerely,



Sandra Etzel, Section Head  
Planning & Data Analysis

cc: Jayme Graham (ACHD)

Email Attachments

- Public Hearing Notice



Public\_Hearing\_Notice\_Mon Valley Episode

- Proposed Article XXI/SIP Revision 97



SIP 97.Proposed Rev  
to Article XXI.Mon Val



May 10, 2021

Mr. Mark Hammond, Director  
Bureau of Air Quality  
Department of Environmental Protection  
Rachel Carson Building  
400 Market Street  
P O Box 8468  
Harrisburg, PA 17105-8468

Dear Mr. Hammond:

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ACHD SIP97 Hearing Notice Letter  
May 10, 2021

Sincerely,



Sandra Etzel, Section Head  
Planning & Data Analysis

cc: Jayme Graham (ACHD)  
Kirit Dalal  
Steve Hepler

Email Attachments

- Public Hearing Notice



Public\_Hearing\_Notice\_Mon Valley Episode

- Proposed Article XXI/SIP Revision 97



SIP 97.Proposed Revision to Article XXI.Mon Val

No. \_\_\_\_\_ Term, \_\_\_\_\_

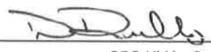
**Proof of Publication of Notice in Pittsburgh Post-Gazette**

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

**09 of May, 2021**

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



PG Publishing Company

Sworn to and subscribed before me this day of:  
May 10, 2021



Commonwealth of Pennsylvania - Notary Seal  
Patricia A. Haluka, Notary Public  
Allegheny County  
My commission expires December 4, 2024  
Commission number 1387348  
Member, Pennsylvania Association of Notaries

**STATEMENT OF ADVERTISING COSTS**  
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PITTSBURGH PA 15219

To PG Publishing Company

Total ----- \$121.50

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PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

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CLINTON, PA 15026  
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of  
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By \_\_\_\_\_

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

\_\_\_\_\_  
Attorney For

**COPY OF NOTICE  
OR PUBLICATION**

**NOTICE OF VIRTUAL  
PUBLIC HEARING AND  
PUBLIC COMMENT  
PERIOD**

**FOR PROPOSED  
AMENDMENTS TO  
ALLEGHENY COUNTY  
HEALTH DEPARTMENT  
RULES AND  
REGULATIONS**

**ARTICLE XXI, AIR  
POLLUTION CONTROL**

The Allegheny County Board of Health will hold a virtual public hearing on Wednesday, June 9, 2021, at 5:00 PM to take testimony on proposed modifications to Allegheny County Health Department Article XXI, along with the corresponding sections of County Ordinance 16782, that will add a new section, §2106.06, "Non Valley Air Pollution Episodes" and a related portion of §2105.50, "Open Burning."

These changes will be submitted as revisions to Allegheny County's portion of the Pennsylvania PM2.5 State Implementation Plan as delineated in the associated Technical Support Documents. The proposed SIP revision is available on the Allegheny County Health Department (ACHD) Air Quality web site at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips). Written copies may be obtained by contacting ACHD at [accomments@alleghenycountypa.gov](mailto:accomments@alleghenycountypa.gov) or 412-378-8103.

The hearing will be held virtually in compliance with safety precautions due to the COVID-19 pandemic.

Information on how to view or register to speak at the hearing is available on the ACHD Air Quality website at [www.alleghenycounty.us/regs-sips](http://www.alleghenycounty.us/regs-sips).

You must register to present testimony no less than 24 hours in advance of the virtual hearing.

Testimony is limited to 3 minutes. Witnesses are requested to submit written copies of the testimony by email to [accomments@alleghenycountypa.gov](mailto:accomments@alleghenycountypa.gov).

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Please contact ACHD at 412-378-8103, if you have any questions or if you have any difficulty registering for the hearing.



**SUMMARY OF COMMENTS AND RESPONSES**

for

Proposed SIP Revision 97

Article XXI, §2106.06, Mon Valley Air Pollution Episode  
And  
§2105.50, Open Burning

Public Comment Period: May 10 to June 9, 2021

Public Hearing: June 9, 2021

	<b>Name</b>	<b>Comment</b>	<b>Response</b>
		<b>Support of regulation</b>	
1	Group 2	Please do all that you can to ensure that residents in the Mon Valley area are protected from industrial air pollution during periods of inclement weather expected to impact public health.	Thank you for your comment.
2	Matthew Mehalik, Ph.D., Breathe Project	It is clear that our county’s air pollution regulations, inspections, and enforcement all need to become more robust, strident, and effective. For these reasons the Breathe Project encourages ACHD to maximize its efforts to protect the health of Mon Valley and Allegheny County residents by finalizing moving forward with these episodic regulations with suggestions to strengthen them.	Thank you for your comment.
3	Ned Mulcahy, GASP	In January of 2020, ACHD announced it would propose a new air quality regulation sometime in 2020 aimed at emission mitigation requirements for industry operating in the county during weather related pollution episodes. Considering all that has happened in the last year, we just want ACHD and the staff to know we appreciate their efforts and getting the regulation based on that promise. Eighteen months is a very good turn around time in any circumstance.	Thank you for your comment.

4	GASP, David Bertenthal, Kate St. John	As for the regulation itself, [we are] largely in support of its approach and aims.	Thank you for your comment.
5	Group 1, Group 4, Gregory Hancock, Kim Payne Elizabeth Schongar	I am glad to see ACHD taking action to reduce pollution from Mon Valley plants, especially during days with dangerous air quality.	Thank you for your comment.
6	Benjamin Waltz	Updating and prioritizing these proposed changes to a very outdated public health system seems like an all to obvious and ultimately admirable issue for Allegheny County to tackle. This past year has showed the importance of sound public health communication, particularly when it comes to those with respiratory challenges and the immunocompromised. The ongoing problem of pollution, intertwined with environmental justice, burdening a society's most vulnerable with the indiscretions of for profit companies, cannot continue to be tacitly accepted by law makers, politicians, and public officials. Ensuring safe and breathable air quality is pivotal for a healthier populous. I hope those in charge will continue to push forward on more aggressive standards in air quality for all inhabitants with alveoli in Allegheny County.	Thank you for your comment.
7	GASP	GASP believes the proposed Mon Valley Air Pollution Episode rule is a long-overdue revision to the existing "Air Pollution Episodes" section of Article XXI. The ACHD TSD as well as Surface Temperature Inversion Analysis the Department published in 2020 establish that atmospheric inversions have been and continue to be a significant factor in exceedances of the federal, health-based NAAQS in	The existing episode regulations in Article XXI are set by federal regulation. This proposed regulation is clearly more stringent.

		Allegheny County. GASP therefore largely supports both the goals and approach of the Proposed Rule.	
		<b>Strengthen regulation</b>	
8	Kelly Kuzemchak	Studies have shown time and time again that children who live near the facilities in our area that emit these pollutants have higher rates of asthma compared to the national average... staying in this region would put my future children at high risk for health problems if stricter regulations are not put into place or enforced.	Thank you for your comment - that is one of the major intents of this regulation.
9	Jay Ting Walker	I urge the Allegheny County, Health Department, ACHD, to strengthen its proposed Mon Valley Air Pollution Episode regulation so that they protect the health of our residents as much as possible.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
10	Group 3	I urge the Allegheny County Health Department (ACHD) to strengthen its proposed "Mon Valley Air Pollution Episode" regulations so that they protect the health of our residents as much as possible.	The proposed new Article XXI Section 2106.06, "Mon Valley Air Pollution Episode" regulation presents a more than 10-fold strengthening of Article XXI regulations addressing air pollution levels in the Mon Valley. Prior to this proposal, the levels of air pollutants at which various stages of alert were initiated were 10 or more times the existing NAAQS. This newly proposed regulation will call for actions to be taken at one times the existing NAAQS for PM2.5. This regulation strengthens existing regulations by a factor of 10 or more when weather traps pollution close to the ground.

11	GASP	GASP takes the position that the Mon Valley PM2.5 threshold Level and its role in determining when pollution mitigations measures must begin in the Watch and Warning phases of proposed rule are not adequately protective of public health. GASP believes ACHD must provide a more stringent and / or additional threshold level in light of available research on the adverse health impacts associated ambient air concentrations of PM2.5 the existing Threshold would fail to address.	The intent of this regulation is to limit the frequency and strength of high 24-hour values. The basis for action, therefore, is based on this time limit. By looking at a "running" 24-hour value the ACHD will anticipate quicker action than using the federal standard of a midnight-to-midnight measurement.
12	April Clisura	It would be better if the regulations spelled out that reductions in emissions during the inversion need to be significant enough to undo the predicted exceedances. It would also be better if the warning period would begin BEFORE the level of 2.5 exceeds the Federal standard since inversions are predictable. There is also a question if these regulations will be enforceable.	As this is a new requirement, there will be some internal work on reviewing plans. The wide range of sizes and types of sources made it difficult to establish apriori a blueprint for reductions.
13	Kathy Lawson , Andy Homol	Although these changes are generally positive, they remain inadequate to fully protect the health of Mon Valley residents and reduce air pollution when weather conditions exacerbate exposure to poor air. Sorry ACHD - you could do more!!	This regulation is only part of an overall strategy to control PM2.5 levels in the affected areas.
14	Riley Mahon	Despite the overwhelming consensus tonight that these regulations need to be stronger, we are left here with a relatively toothless regulation that, from my perspective, seems to be designed to calm people into thinking something is being done when nothing meaningful is being done.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
		<b>Impact area</b>	

15	Group 3, Matt Nemeth, Breathe Project, Jonathan Eberle	These regulations should apply to particulate matter throughout the entire county and include emissions sources located throughout the county. Air pollution episodes don't just affect the Mon Valley area specified in the regulations.	PM-2.5 is affected by regional and local pollution. Currently, the only ACHD monitor that shows exceedances of the 24-HR PM-2.5 NAAQS is the Liberty monitor, which is significantly impacted by outflows of Mon Valley emissions. As such, this regulation focuses on the local sources of pollution in the Mon Valley within Allegheny County.
16	Christopher W. Hardin United States Steel Corporation	Limiting applicability to only the Mon Valley area does not take into consideration recent monitoring data that has shown exceedances of the PM2.5 limit during inversion events, e.g., a November 2020 inversion event resulted in a PM2.5 exceedance at the Avalon monitor, which is not located in the Mon Valley. By limiting to only Mon Valley sources, ACHD is leaving the potential for other future monitor exceedances in other areas within Allegheny County. U. S. Steel requests that ACHD expand the applicability of the rule to all sources of PM2.5 in Allegheny County.	In these rare occurrences, such as 11/8/2020, ACHD believes that local emission reductions would not have made a significant improvement, and that area remains well within the federal health standards. The intent of this regulation is to limit multi-day exceedances.
17	Cindy Meckel	I, too, would like to see it go all the way across the county, not just for the Mon Valley.	PM2.5 is affected by regional and local pollution. This regulation focuses on the local pollution coming from the Mon Valley within Allegheny County, in the municipalities identified in Subsection d of this regulation. ACHD could consider expanding this regulation in the future if values of any monitor outside of the Mon Valley violates the 24-hour PM2.5 NAAQS.

18	April Clisura	I also think other areas of Allegheny County should be included in this regulation. Even though there is less of a correlation between industry and PM 2.5 exceedances in Lawrenceville, for example, there is still an impact and it should be addressed.	PM2.5 is affected by regional and local pollution. This regulation focuses on the local pollution coming from the Mon Valley within Allegheny County, in the municipalities identified in Subsection d of this regulation. ACHD could consider expanding this regulation in the future if values of any monitor outside of the Mon Valley violates the 24-hour PM2.5 NAAQS.
19	Matthew Mehalik, Ph.D., Breathe Project	The regulations should expand the mitigation requirements to a larger geographic region in Allegheny County to cover the region’s second most polluting airshed, the Neville Island area, because of the frequent, documented air pollution problems that occur in that geographic sub- region. Even though the bulk of the episodes show the highest impacts at the Liberty, Braddock, and Parkway monitors, the Lawrenceville and Avalon monitors also records high levels of PM 2.5 that drives the Air Quality index for the region enough times to consider the need to revise the regulations to make them applicable to the Neville Island airshed sub-region, including during night-time inversions. The Lawrenceville monitor drove the regional AQI , based on PM 2.5, 216 days out of 1096 days (20% of the time) over the 3-year period of 2016 – 2018. Similarly, the Avalon monitor drive the AQI, based on PM 2.5, 41 days (5% of the time) over the same period. This information points to the need to expand the program to the region’s second most polluted airshed in the region.	PM2.5 is affected by regional and local pollution. This regulation focuses on the local pollution coming from the Mon Valley within Allegheny County, in the municipalities identified in Subsection d of this regulation. ACHD could consider expanding this regulation throughout Allegheny County if values at any monitor outside of the Mon Valley violate the 24-hour PM2.5 NAAQS.

20	Christopher D. Ahlers, Clean Air Council	The Department should revise the proposed regulations to account for receptors outside Allegheny County receiving pollution from sources within Allegheny County. A prominent concern involves the pending application for an installation permit for a natural gas-fired power plant for Allegheny Energy Center, in the southeast corner of the county. The Department should revise the proposed regulations to account for receptors outside the Mon Valley that would suffer from air pollution episodes resulting from pollution from sources within the Mon Valley.	This is beyond the scope of the proposed regulation, to protect citizens within Allegheny County.
		<b>Monitoring/ forecasting</b>	
21	Jonathan Eberle	Your proposed “episodic” regulations rely upon measurements from the Liberty Monitor. Unfortunately the Liberty monitor location is inadequate to protect health and the data is biased. Can the County Health Dept. scientifically prove in a peer reviewed manner that the Liberty monitor is in an “ideal” location to protect health and enforce air quality when compared to other data? Are additional monitoring sites and methods needed to accurately measure air quality in the Mon Valley? The Liberty monitor is not in an ideal location, and is physically situated behind over 40 stories of geological obstruction and elevation in relation to the Clairton Coke works.	The proper location of Liberty as a representative site for peak population exposure of PM concentrations in the Mon Valley has been demonstrated through many years of monitoring and meteorological and modeling studies, including most recently the PM2.5 SIP, which has been approved by the EPA and is available on the ACHD web site.
22	Jonathan Eberle	I implore you to provide clean air enforcement results to your constituents, by expanding the Air Quality Monitoring program with every resource necessary to competently protect the health and economy of the I implore you to region. This can be accomplished by moving the Liberty Monitor and/or adding additional monitors in Glassport and Elizabeth, by providing fence-line monitoring from	ACHD's overall monitoring network is fully assessed every 5 years, most recently in 2020. Additionally, the network is evaluated annually, allowing for adjustments that do not interfere with the overall assessment.

		known pollution sources, by providing 24/7 onsite monitoring of repeated air pollution violators and delinquents, and lastly by actualizing your jurisdiction for the first time in history to protect our regions health in a scientific manner.	
23	Art Thomas	I think there should be more effort to control Clairton through independent testing and monitoring and let that knowledge be known to the people by way of TV, maybe even electronic science coming in town, you know, condition in air, stay home, don't go outside, you know, get under the covers or whatever. We don't have any notification of what's happening.	The intent of this proposed regulation is to improve upon notifications, as well as emissions reductions.
24	Fred Bickerton	Certified monitors need to be installed and maintained at no cost to the Health Department at previous locations, north, south, east and west of all sources to document the exposure and provide better identification as to who the polluters are.	This is beyond the scope of the proposed regulation, but ACHD will consider this comment upon annual review of the monitoring network.
25	Christopher D. Ahlers, Clean Air Council	As for what constitutes the “forecast” that is the basis for the “watch,” the Department is vague. In the technical support document, the Department states that it plans to build an infrastructure to model and forecast inversion events: The Department should explain in detail what this proposed infrastructure would involve. It should discuss how this relates to any forecasts that are already performed by the Department or the Pennsylvania Department of Environmental Protection on a daily basis, and it should identify how the proposed regulations would go above and beyond what is already required.	Air pollution forecasting involves multi-level analysis that begins with accurate forecasting of the weather, then laying on air flows of pollutants and knowledge of local sources. It is also constantly improving. Including forecasting procedures in the regulation would limit ACHD's ability to take advantage of new research and more accurate forecasting by requiring repeated regulatory changes.

26	Group 3	There are questions regarding how ACHD will exercise its discretion regarding a forecast of an air pollution episode, and how this forecast differs from current air quality reporting requirements.	A Watch is the same as a forecasted Orange or Red day, as presently forecasted by the state. The Warning starts at an exceedance level and will include analysis by knowledgeable personnel on when the meteorological conditions are expected to "break."
27	Jay Ting Walker	There are questions regarding how ACHD will exercise its discretion regarding a forecast of an air pollution episode and how this forecast occurs from current air quality reporting requirement.	A Watch is the same as a forecasted Orange or Red day, as presently forecasted by the state. The Warning starts at an exceedance level and will include analysis by knowledgeable personnel on when the meteorological conditions are expected to "break."
28	Angela M. Kilbert, PennFuture	More information is needed on the proposed forecasting of inversion events and on the mechanism for notification. The Department has not provided information on the proposed forecasting of inversions events sufficient for the public to meaningfully comment on this critical aspect of the proposed rule. In the proposed rule, the Department provides that it will rely on the air quality forecast provided by the Pennsylvania Department of Environmental Protection for determining Mon Valley Air Pollution Episodes. Proposed Revision, Article XXI § 2106.06(b). However, the Director of the Department "may approve a change in the air quality forecast provider or methodology." Id. The Department notes that it "plans to build an infrastructure to model and forecast inversion events as a necessary component for effective regulation implementation." Technical Support Document at 1. "The enhanced meteorological forecasting is expected	Air pollution forecasting involves multi-level analysis that begins with accurate forecasting of the weather, then laying on air flows of pollutants and knowledge of local sources. It is also constantly improving. Including forecasting procedures in the regulation would limit ACHD's ability to take advantage of new research and more accurate forecasting by requiring repeated regulatory changes.

		to be accompanied by additional public notifications.” Id. The forecast of an inversion event is a vital component of the process required to trigger a Watch and a Warning. Without more information on the proposed new forecasting model, the public is not able to provide informed comment on the air pollution episode rule that is dependent on meteorological forecasting.	
29	Christopher D. Ahlers, Clean Air Council	The Department should clarify how the proposed Watch and Warning procedures would be different from the reporting of Orange Days Under the Air Quality Index, already required under existing regulations. When the Department proposes to create a “warning” where there is an exceedance of the daily standard of 35 micrograms per cubic meter, it is merely affixing another label to the reporting of an orange day.	The procedures to call a Watch are the same as a forecasted Orange day. The only difference is that the Watch will require action by the source. Both require restrictions on backyard burning. The Warning is more involved, using actual monitored PM2.5 values.
30	Myron Arnowitz Clean Water Action	One of the key issues with the rule is that monitors must register a 24 hour exceedance of the PM2.5 standard in order for the Warning phase requirements to be effective. While we appreciate that using a rolling 24 hour average will assist in facilitating a timely Warning during a pollution episode, there is a need for a shorter time period trigger, especially at the beginning of an episode. While there is no regulatory standard for shorter exposure to PM2.5, EPA has noted that there is a strong correlation between short term PM2.5 values and 24 hour averages. This correlation could be used to effectively trigger the warning phase after a period of time shorter than 24 hours. Using a shorter term average for moving to the Warning phase has advantages both for getting industries to reduce emissions earlier in the pollution episode, making it more likely that ambient air quality could be improved.	The ACHD will continue to evaluate data to determine whether a shorter term level could predict a 24-hour exceedance, and, if useful, may modify the regulation in the future.

		In addition, it could result in earlier warning to the public about dangerous air quality, helping to reduce their exposure to dangerous levels of air pollutants.	
31	Ned Mulcahy, GASP	There is no clear basis for requiring that pollution reduction measures only begin if or after the 24-hour NAAQS is exceeded. In 2015, in the ozone NAAQS update, the EPA cautioned against using the AQI categories as a guide for making policy decisions on controlling emission sources, when poor air quality is forecasted. EPA stated that state, local and tribal agencies should consider whether nonvoluntary emissions or activity curtailments are necessary as opposed to a sweep of voluntary measures, for days when the AQI is forecasted to be on the lower end of the moderate category. Importantly, the moderate category for PM2.5 is 12.1 to 35.4 per cubic meter.	The intent of this regulation is to minimize the number and extent of 24-hour high readings that are the basis for the federal health standards.
32	Ned Mulcahy, GASP	Even if the ACHD sticks with the NAAQS level, they should consider an additional threshold level for shorter term high levels of PM2.5. The 2019 NAAQS reviewed by EPA noted that short-term levels could pose harm. EPA dismissed any change to that methodology for calculating compliance, saying essentially that that would only occur in already mounting areas. First, as noted above -- that was not necessary. And, two, on April 24th, of this year, three hours at Liberty averaged 100 micrograms per cubic meter. That should be harms and ACHD's duty is to protect the health, safety and welfare of its citizens.	The ACHD will continue to examine shorter term limits, but at present we do not have a time length and level to add to this regulation.
		<b>Notifications</b>	

33	Angelo Taranto, ACCAN	We also recommend that the Mon Valley Air Pollution Watch and Warning notifications go to all Allegheny County residents. Mon Valley Air Pollution travels throughout the County posing hazardous conditions to residents, particularly vulnerable residents, throughout the County.	Paragraph h.2 has been modified to state that the ACHD will notify all the municipalities identified in Subsection d, "and any other municipality that requests to be notified..."
34	Christopher W. Hardin United States Steel Corporation	Suggestions such as limiting transportation, carpooling, requesting people to work remotely if possible, could be incorporated into the notification requirements and Allegheny Alerts system.	The notification may include these and other considerations. The regulation itself will not dictate the messaging.
35	Carol Wivell	I am asking for a very simple addition to the Mon Valley Episodic Plan regarding alerts and notifications – like half a sentence-worth x2. Ideally this would have already been written into the language of the Plan in order to specify that a burn ban notification is to be communicated consistently, every episode. The messaging essentially should be: The Mon Valley air quality situation is predicted to be <b>ESPECIALLY BAD. INDUSTRY</b> must alter behavior accordingly with their specified approved plans, and <b>YOU, Mr./Ms. Citizen,</b> must also alter behavior accordingly by <b>NOT BURNING! PLEASE USE THIS OPPORTUNITY</b> to educate people with this Mon Valley Episodic Plan. As public understanding grows, stronger political resolve to further restrict residential wood smoke pollution should follow. Vulnerable people need such relief.	The notification may include these and other considerations. The regulation itself will not dictate the messaging.
36	Group 1, Jonathon Eberle	I also want to make sure that the public throughout Allegheny County is notified when air quality is dangerous. People should receive direct notifications when the air can make us sick, and we should make sure that schools and day cares are aware.	Thank you for your comment. This is an intent of this regulation. Anyone can register to receive notices directly.

37	Group 2	No actual reductions in pollution emissions are required during the Watch phase, a period when all signs – and ACHD officials – are pointing to a period of poor air quality.	The sources are required to include a plan to review their equipment for proper operations during a Watch.
38	Group 2	Residents deserve timely information on these events so we can make plans to mitigate our exposure to these harmful air pollutants.	Residents who register will receive notice of a forecasted - potential - next day high level.
39	Group 4	I want to make sure that the public throughout Allegheny County is notified when air quality is dangerous. People should receive direct notifications when the air can make us sick, and we should make sure that schools and day cares are aware.	Thank you for your comment. This is one intent of this regulation. Anyone can register to receive notices directly.
40	Group 5 & Myron Arnowitz, Clean Water Action	ACHD should provide greater specificity on its plans to notify the public of air pollution episodes. Studies have shown that pollution from the Mon Valley regularly travels throughout Allegheny County. As such, a broader geography than just the Mon Valley communities should be included. In addition to municipal governments, ACHD should also provide direct notification to school districts, state elected officials and other similar entities that can help more broadly disseminate the notifications. ACHD should also identify and use all available tools at their disposal for reaching the public, including but not limited to social media, Allegheny Alerts, direct contact with print and television media, reverse 911, etc. People with underlying health conditions are more vulnerable to poor air quality and deserve to be able to easily access the information they need to protect themselves.	Paragraph h.2 has been modified to state that ACHD will notify all the municipalities identified in Subsection d, "and any other municipality that requests to be notified.." Anyone may sign up for the Allegheny Alerts system for notification. Other means of notifying the public will be pursued, as available and appropriate.

41	Art Thomas	There's no notification, that's what really gets me. When they had the fire down there, I had to find out about it -- ... And there is no way of knowing what is being monitored down there, except going online or something. I believe that the condition of the air is Clairton should be just like or more explanation of it than Bethel Park. You can get the weather channel, you did get Bethel Park's quality count, you can get the condition of their air, the whole nine yards. And here we are, living in a war zone you might as well say and have to wait two weeks to find out what's going on. It's ridiculous....	The intent of this proposed regulation is to improve upon notifications, as well as emissions reductions.
42	Kelly Kuzemchak	Residents deserve timely information on these events so that we can make plans to mitigate our exposure to the harmful air pollutants.	Thank you for your comment - that is one of the major intents of this regulation.
		<b>Sources</b>	
43	Christopher W. Hardin United States Steel Corporation	All regional and nearby sources of PM2.5 contribute to elevated levels during extreme inversion events. ACHD should consider other broad reductions of PM2.5 other than open burning, such as reducing effects of mobile sources and other sources within and outside the county. Has ACHD attempted to work with PADEP to consider sources of PM2.5 just outside the county as well as assistance with restricting vehicles and other sources not under the purview of ACHD? If not, why not?	ACHD will continue to look at sources and solutions to its particulate issues. However, improvements that will have an immediate and direct impact will likely come from nearby primary sources of particulates.
44	Christopher W. Hardin United States Steel Corporation	U. S. Steel requests that the rule include recommending other certain voluntary actions (limit transportation, emissive activities, etc.) even if such actions are not enforceable.	The notification may include these and other considerations. The regulation itself will not dictate the messaging.

45	Christopher W. Hardin United States Steel Corporation	Given that PM2.5 is a regional pollutant, all sources of PM2.5 across Allegheny County may contribute to elevated concentrations during inversions as noted by increased PM2.5 concentrations during severe inversion events across all ACHD monitoring sites. U. S. Consider expanding applicability to all sources of PM2.5 in Allegheny County instead of only the municipalities identified in Subsection d. U. S. Steel requests that ACHD consider expanding applicability of the rule to include all major and synthetic minor sources in Allegheny County instead of only the municipalities identified in Subsection d.	PM2.5 is affected by regional and local pollution. This regulation focuses on the local pollution coming from the Mon Valley within Allegheny County, in the municipalities identified in Subsection d of this regulation. ACHD could consider expanding this regulation throughout Allegheny County if values at any monitor outside of the Mon Valley violate the 24-hour PM2.5 NAAQS.
46	Jay Ting Walker	These regulations should apply to particulate matter throughout the entire county, and include emission sources outside the area as well. Air pollution episodes don't just affect the Mon Valley area specified in the regulations.	Previous monitoring and modeling have demonstrated that the high levels of PM2.5 are within the communities included in this plan.
47	Christopher D. Ahlers, Clean Air Council	The Department Should Revise the Proposed Regulations to Account for Sources Outside the Mon Valley. There may be sources upwind of the Mon Valley that contribute to harmful levels of fine particulates during air pollution episodes in the Mon Valley. Air inversions may contribute to air pollution episodes, but there could be an air pollution episode whether or not there is an air inversion. The Department should amend the proposed regulations to account for sources outside the Mon Valley.	PM2.5 is affected by regional and local pollution. This regulation focuses on the local pollution coming from the Mon Valley within Allegheny County, in the municipalities identified in Subsection d of this regulation. ACHD could consider expanding this regulation throughout Allegheny County if values at any monitor outside of the Mon Valley violate the 24-hour PM2.5 NAAQS.

48	Christopher W. Hardin United States Steel Corporation	On page 7 of the Technical Support Document, Figure 5 shows Positive Matrix Factorization (PMF) PM2.5 source factors for tri-state monitoring sites, including the Liberty monitor. The proposed rule would only impact the local industrial sources in the Mon Valley, but not other contributors of PM2.5 such as motor vehicles and sources of secondary ammonium nitrates and secondary ammonium sulfates. According to Figure 5, approximately 50% of PM2.5 consisted of motor vehicle emissions and secondary ammonium nitrates and sulfates. A “county-wide” and beyond inversion mitigation approach would have more impact than a Mon-Valley specific rule that only targets local contributions. U. S. Steel requests that ACHD collaborate with PADEP, OEPA, WVDEP and others.	The existing Article XXI Sections 2106.03, "Episode Criteria," and 2106.04, "Episode Actions," are directed at both "County-wide" and "Localized" air pollution incidents. The newly proposed Mon Valley Air Pollution Episode regulation can be thought of as a "localized" air pollution regulation. The intent of this regulation is to minimize the number and extent of short term high readings that are, from all evidence available, caused primarily by local source contributions.
49	Christopher W. Hardin United States Steel Corporation	PM2.5 is a regional issue and regional sources of PM2.5 contribute to elevated levels. Has ACHD discussed mitigation efforts with upwind states, as well as PADEP? Given that ACHD has stated in the PM2.5 SIP that PM2.5 is generally 60-70% comprised of “background” pollution, has ACHD considered impacts of mobile sources and reduced background PM2.5 upwind of the Mon Valley area?	ACHD continues to evaluate sources of air contaminants and develops possible solutions to higher values. However, short-term high values are most often related to nearby sources. In most cases, temporary minimization of local source emissions should lower the measured concentrations. This was discussed further in the Technical Support Document.
50	Scott Taylor, Protect Elizabeth Township	It is our understanding that the most recent SIP submitted to the EPA did not include the pollution data from at least one source, the Allegheny Energy Center power plant proposed to be built in Elizabeth Township. Why? We know that this application was received at ACHD in March of 2019, and that communication with the applicant about this facility dates back to at least 2015. In addition, how will the Beaver County	The proposed Invenergy Allegheny County Energy power plant has yet to receive its Installation and Operating Permits. This source will be subject to this proposed Article XXI regulation upon startup. The Beaver County ethane cracker plant is outside of Allegheny County and ACHD has no jurisdiction

		ethane cracker plant contribute to this plan? Have those cumulative affects been analyzed for our region?	over it. ACHD did modeling of the ethane cracker plant showing minimal impacts on Allegheny County.
		<b>Mitigation plans</b>	
51	Matthew Mehalik, Ph.D., Breathe Project	The regulations should provide more public transparency on how the pollution mitigation plans, which emitters are required to submit, will be evaluated in terms of their predicted effectiveness at reducing PM 2.5 pollution. The current draft provides too little specificity about what emitters should prioritize in terms of mitigating their emissions during the watch and warning events in terms of predicted effectiveness. ACHD should consider the information that is provided in each facility's permit to evaluate each facility's sources of emissions in terms of the scale of the source of emissions and the feasibility for short-term operational changes to mitigate those sources. ACHD should consider making available to the public an assessment of the scale and feasibility of each of these plans, with proprietary information protected, but a scaled overall score in the form of a percentage, of predicted effectiveness as public information. A floor of at least a predicted 10 percent reduction during forecasted/watch events and a 20 percent reduction during warning events should be required.	Source curtailment plans shall be in writing and shall show the source of emissions, the approximate emissions rate and percentage of reductions to be achieved upon implementation, the time necessary after notification to implement the plan, and a brief description of the manner in which reductions will be achieved at the respective Stages of Levels of an air pollution episode.

52	Matthew Mehalik, Ph.D., Breathe Project	The regulations should provide more public transparency on how the mitigation plans will be evaluated as to their actual effectiveness in terms of verification of execution as well as impacts on reduction of pollution. Similarly, ACHD should specify how it will review data that it receives from polluting facilities as part of these facilities' permit requirements will be used to evaluate whether these sources deployed their plans to achieve the predicted reductions as specified in the plans. ACHD should consider providing a publicly- available score of performance in terms of predicted versus actual reductions. This score should be a percentage of actual reduction achieved as compared with the predicted reduction in the plans.	The plans will be required to include a reporting mechanism. Those reports will be evaluated, along with ACHD inspections, to evaluate actions and reductions.
53	Group 2	The Warning phase will only begin after a rolling 24-hour average level of pm2.5 exceeds the federal standard.	This is correct. It is sooner than the federal high 24-hour high, which is measured midnight-to-midnight only.
54	Abigail Ault	Just having notification is not really even enough. Staying indoors does not protect us from particulate matter. Industrial odors can be smelled strongly in homes in the area. The pollution levels need to be significantly lowered altogether. This region is not suitable for heavy industry. It is too densely populated, and the topography and weather patterns don't allow air toxins to dissipate properly.	The intent of this proposed regulation is to improve upon notifications, as well as emissions reductions.
55	Brian MacWhinney	It is great that ACHD is increasing their focus on what is clearly a basic public health crisis, particularly for the residents of the area closest to the Clairton Coke Works, along with other Mon Valley installations. Unfortunately, the proposed reductions during these periods of bad air are not yet spelled out. In fact, US Steel and other polluters need to state specifically what they will do when a poor air quality day is	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.

		expected. Anything less will just be window dressing.	
56	Group 2, Group 5	While the current draft of this new rule requires companies in the Mon Valley to prepare plans for how they could reduce emissions during an episode of poor air quality, there are no minimum requirements for emission reductions. ACHD must require minimum emission reductions in order to ensure this rule can be effective in protecting public health during these hazardous air pollution episodes.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
57	Avery Belenos	I am encouraged that the proposed amendments would require polluters to implement mitigation plans in response to episodes of high particulate matter in the air. However, I'm concerned that if the parameters of these mitigation plans are not delineated, polluting entities may be approved for plans that are little more than empty words, or that the severity of mitigation plans will be required inconsistently.	ACHD will be reviewing the proposed mitigation plans submitted by the companies when they are due. The parameters will be delineated in ACHD's response if needed.
58	Patricia Harris	It is unacceptable to allow companies to decide what pollution reductions are needed. If they cared about air quality they would have taken corrective steps already!	ACHD reserves the right to reject any company's plan if that plan is insufficient.
59	Jonathan Eberle	Who wouldn't be concerned that this new rule lets companies decide what pollution reductions are needed. I want to see ACHD enforce air pollution standards that are more stringent than EPA standards on nights and days when air quality could make people sick.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
60	Mark Paliotta	I believe that once a "Warning" is issued, facilities must undertake the actions listed in the mitigation plans they filed with ACHD. The specific actions will be catered to each facility and approved on a case-by-case basis. I am a business owner and I understand industry has its purpose. However, they	That is the very intent of this regulation.

		must be responsible and not compromise our health during the course of production.	
61	Group 3	Although I am glad to see that the county is attempting to address the serious air quality problems during air quality episodes, especially those involving temperature inversions, there are many aspects of the proposed regulations that should be improved in order to protect public health. While the proposed regulations require industry to develop plans for addressing exceedances of ACHD's threshold levels, they do not require specific control measures, but leave them up to industry to develop. In order to be effective, ACHD should include specific mandatory requirements for the US Steel facilities, which contribute the majority of emissions in the Mon Valley. This could include enhanced work practices and hot idling coke batteries.	ACHD reserves the right to reject any company's plan if that plan is insufficient.
62	Angela M. Kilbert	PennFuture welcomes the Department's efforts to strengthen the county's episodic weather regulations. However, the proposed regulations fail to provide for concrete emissions reductions and other requirements needed to protect the public health of communities in the Mon Valley during these dangerous weather inversion events. PennFuture remains concerned about the continued levels of harmful emissions from industrial polluters in the Mon Valley and believes the Department should be doing more to reduce emissions, particularly during bad weather events.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
63	Angela M. Kilbert, PennFuture	The Department should provide for concrete target levels of emissions reduction during a Warning and clarify language requiring sources to implement emissions reduction measures. the proposed rule fails to require sources to meet any specific	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do.

		<p>targets for emissions reductions in their Warning Mitigation Plans. It also does not designate any overall target levels for reductions designed to reasonably improve public health, safety, or welfare during an inversion event. As a result, the proposed rule gives industrial sources and the Department wide discretion in proposing and accepting emissions reductions measures.</p>	<p>ACHD will evaluate plans for their possible impacts.</p>
64	<p>Angela M. Kilbert, PennFuture</p>	<p>The Department should allow for public input on the Mitigation Plans. Under the proposed rule, Mon Valley Air Pollution Mitigation Plans for these facilities are reviewed and accepted by the Department without opportunity for public review or comment. The absence of public input opportunity is generally concerning, but with increased attention and outreach being promoted for environmental justice communities, the Department must do more to include these communities in the process and to ensure that additional burdens are not placed upon environmental justice communities. The impacted communities throughout the Mon Valley deserve an opportunity to weigh in on the plans for reducing emissions during inversion events.</p>	<p>It is the duty of ACHD to determine the adequacy of control plans.</p>
65	<p>Christopher D. Ahlers, Clean Air Council</p>	<p>The Department should provide assurances that it will exercise its discretion in favor of restrictions on emissions from U.S. Steel when the Department implements and enforces the proposed regulations. It is appropriate for the Department to improve the existing regulations for air pollution episodes, which set very lax thresholds for triggering action. In the case of fine particulates, the ambient concentration must exceed 350 ug/m<sup>3</sup> in order for alerts to be triggered. See Article XXI, Air Pollution Control Regulations, §2106.03 (Episode Criteria) (setting triggers for alerts at</p>	<p>The sources in Allegheny County already have controls and limits to meet federal health standards. This regulation is to determine additional limits and actions that could be taken during unusually high short-term events over multiple days. Sources are required to inspect all their equipment for proper operation during a watch, which is a prediction of only a possible high day. The existing episode criteria in Article XXI are delineated</p>

		concentrations between 350 ug/m3, 24-hour average and 500 ug/m3, 24-hour average). However, the proposed regulations are only so good as the Department exercises discretion in favor of reducing emissions from the three facilities of U.S. Steel -- by far the largest emitter of fine particulates in the Mon Valley.	by federal rule. This regulation is clearly more stringent than the federal episode requirements.
66	Christopher D. Ahlers, Clean Air Council	The Department should clarify how far it believes the settlement agreement extends, and whether it believes that it applies to virtually any action of the Department with respect to air emissions from the three facilities of U.S. Steel.	This regulation is not restricted by the 2019 settlement.
67	Christopher D. Ahlers, Clean Air Council	Rather than merely assert its discretion, the Department should revise the proposed regulations to include mandatory requirements for the three U.S. Steel facilities. There can be no dispute whose emissions are the main concern during air pollution episodes involving particulate matter in the Mon Valley. They are the three facilities of U.S. Steel. Based on the Air Emissions Report of the Department of Environmental Protection for the year 2019, it is not even a close question. Since this is largely a U.S. Steel problem, the Department should include mandatory requirements in the proposed regulations for the three U.S. Steel facilities. This should include enhanced work practice standards. In addition, the Department should incorporate the concept of "hot idle" into the proposed regulations.	Though the U. S. Steel Clairton Plant is a significant contributor to the PM2.5 levels, the plant is not the only source. Controls are needed by all the applicable sources.

68	Christopher D. Ahlers, Clean Air Council	The Department should go a step further by gathering additional information and evidence to support the development of additional limitations on the three U.S. Steel facilities during air pollution episodes. The Department should conduct an evaluation of how specific control measures (including “hot idle”) could reduce emissions, in what amounts, and in what periods of time. As drafted, the regulations leave too much to the discretion of U.S. Steel and the Department for this to be done in a meaningful way on a case-by-case basis.	ACHD continues to evaluate issues and possible improvements to the emissions at all Allegheny County sources.
69	Myron Arnowitz Clean Water Action	One critical area of the rule is the Pollution Mitigation Plans. While there are important suggested mitigation methods in the rule, there is no quantifiable requirement for emission reductions. ACHD must include a quantifiable required reduction in emissions in order to both make the plans effective and enforceable. CWA recommends that a minimum emission reduction of PM2.5 emissions of 5% on the first day of the episode should be included, with increases in emission reduction based on the length of the episode, and the severity of the PM2.5 levels. These minimums are critical to the overall effectiveness of the rule, and are entirely feasible for the plants in question.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
70	Fred Bickerton	The facility should be required to have significant curtailment of operations up to and including complete shutdown of operations during periods of inversion and poor air quality as measured by the certified monitors.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.

71	Ned Mulcahy	EPA's first air episode regulations were promulgated in 1971. A guidance document published at that time stated that since stagnant air masses will prevent dispersion of pollution, the only feasible method for protecting society is to minimize the flow of pollutants from emitters. It appears that pollution mitigation planned required under the Mon Valley rule will accomplish that, but we would encourage ACHD to consider amending the rule to spell out more clearly the level of reduction required.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
72	Katherine Kulanbaizel, Matt Nemeth, and Riley Mahon, David Bertenthal	The rules leave US Steel up to its own discretion as to how to limit pollution during inversions. I do appreciate what Allegheny Health Department is doing and I do thank you. However, it does seem like a half measure regulation for a corporation that has treated our air like a dumping ground for decades.	Though the U. S. Steel Clairton Plant is a significant contributor to the PM2.5 levels, the plant is not the only source. Controls are needed by all the applicable sources.
73	David Bertenthal	Is the Health Department so removed from the goings on at the [U.S. Steel Clairton] plant that they cannot specify a stringent plan of action to reduce pollution in this proposal?	Though the U. S. Steel Clairton Plant is a significant contributor to the PM2.5 levels, the plant is not the only source. Controls are needed by all the applicable sources. This regulation will require sources to determine what emissions changes can safely be made within a short time on a temporary basis.
74	Jay Ting Walker	While the proposed regulations require industry to develop plans for addressing exceedances of ACHD's threshold levels, they do not require specific control measures. They'll leave them up to industry to develop.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
75	Cheryl Hurt	We need you to put in place plans on the requirements. How will they be followed? How long will it take?	The plans will be in place until they are updated. There are instructions in the regulation for newly

			applicable sources and when conditions change at the plant.
76	Group 1, Group 4, Gregory Hancock, Cindy Meckel, Cheryl Hurt, Kim Meachum	I am concerned that this new rule lets companies decide what pollution reductions are needed. I want to see ACHD require at least a 5% reduction in pollution on days when air quality could make people sick. If dangerous air goes on for days, like it did last November, we should require greater pollution cuts. Companies like U.S. Steel can't be trusted to decide what's best for our health.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
77	Jay Ting Walker	ACHD should conduct an evaluation specific control measures, that will reduce emissions by a specific amount and incorporate them as a requirement in the proposed regulations.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
78	Jay Ting Walker	In order to be effective, ACHD should include specific mandatory requirements for the US Steel facilities, which contribute the majority of the emissions in the Mon Valley. This could include enhanced work practices and hot idling coke batteries.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
		<b>Watch and warning</b>	
79	David Bertenthal	The language is vague when it comes to what will happen during the warning or watch days. It looks like the labels will be retroactively applied based on exceedances, whether then taking action before the highly predictable inversions occur. The way it is now, it could possibly limit a multiple day event. But it isn't what we've been asking for. It's not proactive. It doesn't require reductions during the watch phase. It's reactive. And by the time there is a warning or exceedance, we'll be swimming in foul odor. AQI can be forecasted 24 hours in advance. US	The sources in Allegheny County already have controls and limits to meet the federal health standards. This regulation is to determine additional limits and actions that could be taken during unusually high short-term events over multiple days.

		Steel should be required to limit pollution during a watch phase.	
80	Angela M. Kilbert, PennFuture	The Department should require preventative measures to reduce emissions during the Watch phase when an inversion is forecasted. Under the proposed two-phased approach as discussed above, only the second Warning phase includes measures for facilities to reduce PM2.5 and PM10 emissions “to minimize the impact on public health, safety, or welfare.” Proposed Revision. The initial Watch phase only includes procedures to ensure the source is operating properly and air pollution control equipment is maintained in good working condition, and that the facility records and reports their actions during this time to the Department. Accordingly, the proposed rule does nothing to reduce emissions in order to prevent exceedances from happening, even when a prolonged inversion event is forecasted.	The sources in Allegheny County already have controls and limits to meet the federal health standards. This regulation is to determine additional limits and actions that could be taken during unusually high short-term events over multiple days. Sources are required to inspect all their equipment for proper operation during a watch, which is a prediction of only a possible high day.
81	Avery Belenos	Instantaneous spikes in PM should be addressed by plans rather than waiting for residents to suffer for 24 hours first. Public reporting should also be prompt so all residents, including individuals who are sensitive due to health conditions, can attempt to reduce their exposure to dangerous air pollution.”	Federal health standards are based on a 24-hour average. This regulation is more stringent in that it is initiated when a "running" 24-hour value is reached, rather than waiting for the federal measurement of a midnight-to-midnight reading.
82	Katherine Kulanbaizel, Matt Nemeth and Riley Mahon	I think that this regulation leaves the Allegheny County Health Department with too much discretion on when watch and warnings are triggered, and also on what pollution reduction plans will be accepted, because you could possibly accept the plans that are weaker.	The specifics as to calling a Watch or Warning are delineated in the proposed regulation. The only discretion is in the use of the best meteorological forecasts. As to the reduction plans, there will be great variability between what each source will be able to implement in a short time for a temporary basis. For that reason, there

			will need to be some discretion.
83	Kelly Kuzemchak	The mitigation plans and their requirements are not exactly spelled out. No actual reductions in pollution emissions are required during the watch phase, so there's just a lot that is very vague in the language.	It is difficult to determine what temporary emission reductions a source can make with short notice, and what a wide range of relatively small to very large sources can do. ACHD will evaluate plans for their possible impacts.
84	Angela M. Kilbert, PennFuture	The Department should clarify the language in the proposed rule that requires sources to immediately implement the procedures and measures of the Mitigation Plans during a Watch or Warning. The proposed rule states that when a Watch or Warning is issued, “[t]he Department shall notify all sources subject to this Section to implement the procedures and measures identified in either the Mon Valley Pollution Watch or Warning Phase.” The Department should clarify and strengthen language in the proposed rule to make it clear that sources are required to immediately implement the procedures and emissions reduction measures included in their respective Mitigation Plans at the start of a Warning or Watch.	ACHD is clarifying 2106.06.h.1 to state: "The Department shall notify all sources subject to this Section that they are required to implement the procedures and measures identified in either the Mon Valley Air Pollution Watch or Warning Phase." The words " that they are required" have been added to clarify the section as mentioned by the commenter.

85	Angela M. Kilbert PennFuture	<p>The Department should revise the definitions of Watch and Warning to prevent extended periods of exceedances before and after a Warning. a Warning is not triggered until the PM2.5 threshold level is exceeded during a rolling 24-hour averaging The Department must redraft the Warning trigger to avoid these inevitable prolonged periods of harmful exceedances. Period. A rolling 24-hour average is calculated by averaging data from the current hour and the previous 23 hours. That means that the Mon Valley could experience high levels of PM2.5 at the beginning of a bad weather event for a number of hours before the rolling 24-hour average actually exceeds the threshold to trigger a Warning. The rolling 24-hour average requirement will leave the communities of the Mon Valley vulnerable to harmful levels of PM2.5 while allowing industry to continue to churn out more air pollution unabated. This is clearly not consistent with the Department’s policy “to protect the air resources of the County by pollution prevent and pollution control to the degree necessary for the ... [p]rotection of the health, safety and welfare of all its citizens.” Article XX, § 2101.02(a)(1). The Department must redraft the Warning trigger to avoid these inevitable prolonged periods of harmful exceedances.</p>	<p>The intent of this regulation is to ameliorate or eliminate multiple high days. A rolling 24-hour value is much tighter, and is a far earlier notice than that of the federal standard of a block, or midnight-to-midnight average.</p>
86	Angela M. Kilbert, PennFuture	<p>The Department similarly does not provide sufficient information on the planned mechanism for issuance of a Watch or Warning and notification under the proposed rule. The Watch and Warning phases are both triggered by the Department issuing each phase. The implementation of the Mitigation Plans is triggered by the Department notifying all sources of a Watch or Warning... As discussed above, the issuance of a</p>	<p>Air pollution forecasting involves a multi-level analysis that begins with accurate forecasting of the weather, then laying on air flows of pollutants and knowledge of local sources. It is not practical to include a forecasting procedure in a regulation, as research continues to improve accurate</p>

		Watch or Warning are very time sensitive. However, the Department does not provide specific information on how it determines that there is a forecasted inversion event and issues a Watch or Warning, or how it plans to notify sources. These mechanisms are important components of how the proposed rule will be implemented, and they should be sufficiently explained to allow for informed public comment.	pollution forecasting, which would result in the need for continuous revisions to this regulation.
87	Christopher W. Hardin United States Steel Corporation	U. S. Steel requests that ACHD distinguish in the proposed rule that the 24-hr rolling PM2.5 average is an ACHD-only metric to be used for this rule and it is a different metric than the PM2.5 NAAQS, which is protective of public health. In addition, ACHD should identify that the Federal Equivalence Method (FEM) data is used as the Warning trigger, noting that the FEM is not the monitor that is used for attainment purposes, it is the Federal Reference Method (FRM) monitor. These clarifications are required such that the public does not think there is a violation every time a Warning Plan goes into effect.	For comparison to the NAAQS, the 24-hour average for PM2.5 is midnight to, but not including, midnight the next day in Local Standard Time. The ACHD agrees that a rolling 24-hour average that exceeds the NAAQS is technically not an exceedance of the NAAQS. At the Liberty site, the Federal Reference Method (FRM) monitor determines if an exceedance occurs. If the FRM monitor does not run, the Federal Equivalent Method (FEM) monitor is used to determine if an exceedance occurs.
		<b>Enforcement</b>	
88	Jay Ting Walker	It is not clear how, and to what extent ACHD would exercise its discretion to enforce compliance to proposed regulations.	All regulations are enforceable under ACHD Article XXI and Article XI, with its full range of remedies.
89	Kim Payne	Oversight should be at the county's discretion, not any producing company's.	ACHD reserves the right to reject any company's plan if that plan is insufficient.
90	NaTisha Washington	Citizen's (especially those living in the Mon Valley) health is under attack every day every time we have a bad air day. People should not have to suffer this summer with attacks towards their respiratory system. These communities do not have years to wait until something is done about this air	ACHD has proposed this regulation in an effort to support the Mon Valley communities and improve their air quality.

		<p>pollution. We need to hold the polluters more accountable for their contribution to this issue. Do the right thing by supporting and ensuring that these communities that are underserved, low income, and mostly black and brown aren't living in harmful conditions/environments that you all are supposed to ensure is not harming us. More needs to be done and it needs to be done soon. So as happy as we are with this first step we are a far way from the change needed.</p>	
91	Sharran and Gary Novak	<p>We also would like to see the enforcement locally and through out the state, to limit homeowners in their use of the popular fire pits and the type of fuel they use. Our neighborhood becomes unbreathable when one or more neighbors decide to light their fires outside and the smoke chocks the the air!!!</p>	<p>ACHD does not have jurisdiction outside of Allegheny County but ACHD's open burning regulations can be found in Article XXI §2105.50.</p>
92	Diana Ames	<p>The county's existing air pollution regulations are seriously inadequate and outdated. ACHD must take action to reduce air pollution generated chiefly by US Steel's Clairton Coke Works and other industries in Allegheny County, which regularly result in our air quality ranking among the worst in the country. On the days when it is predicted that atmospheric inversions will occur, and that air quality will be even more compromised, ACHD needs to require that US Steel and other sources actively curtail production by a defined percentage to achieve or face meaningful and substantial fines for failure to do so. Episodic inversions are predicted to increase in frequency due to climate change, so it is imperative that ACHD be proactive in protecting public health. Furthermore, the residents of Allegheny County must be promptly and directly warned about these</p>	<p>ACHD's coke oven standards are in Article XXI §2105.21 and are more stringent than the EPA's standards. ACHD has recently proposed additional changes to this section.</p>

		unhealthy air quality events, especially where it impacts children.	
93	Christopher D. Ahlers, Clean Air Council	The Department Should Revise the Proposed Regulations to Make Clear That Sources Are Subject to Injunctive Relief and Civil Penalties for Failure to Submit or Comply With a Plan.	Sources are aware they are subject to penalties for violations of Article XXI. These are detailed in Part I of Article XXI starting with §2109.01.
94	Group 3	It is not clear how and to what extent ACHD would exercise its discretion to enforce compliance with the proposed regulations. ACHD should conduct an evaluation of specific control measures that would reduce emissions by specific amounts, and incorporate them as requirements in the proposed regulations. This is an important opportunity for protecting public health and ACHD needs to make sure we get it right.	All regulations are enforceable under ACHD Article XXI and Article XI, with a full range of remedies.
95	Fred Bickerton	Facility managers and company officers need to be held personally responsible for compliance with curtailment requirements	This is beyond the scope of the proposed regulation.
96	Fred Bickerton	Penalties for noncompliance need to be significantly higher than the outdated structure presently used. Next to noncompliance hurts, it can go away.	ACHD has a significant enforcement policy, which includes a calculation mechanism for penalties. It is only a few years old, and has been updated.
		<b>Other</b>	
97	Jonathan Eberle	Historically the ACHD are incompetent regarding enforcement of pollution from Mon Valley sources, especially during days with dangerous air quality. What the ACHD does do well is pretend to serve the public interest while sheltering private interests with regulatory loopholes and willful omissions of fact. The whole point of local air quality enforcements is predicated on addressing the specific needs of the local population. The ACHD clearly is not doing this and instead continually slow walks even minimal EPA	All eight air quality monitors in Allegheny County meet federal air quality standards. This milestone means that the region is now in attainment with carbon monoxide, nitrogen oxide, ozone and particulate matter (PM2.5, PM10). There is still much left to be done.

		enforcements, let alone responding to local pollution hazards.	
98	Jonathan Eberle	If dangerous air goes on for days, like it did last November, we should have active programs that correlate emergency department visits and deaths, and hold local polluters accountable for health damages. Companies like U.S. Steel can't be trusted to decide what's best for our health.	Emergency response is beyond the scope of this regulation, but the ACHD takes this comment seriously.
99	Martha Raak	We are guaranteed clean air by the PA state Constitution. Mitigation must occur during the Watch period. This situation has gone on for far too long.	The sources in Allegheny County already have controls and limits to meet the federal health standards. This regulation is to determine additional limits and actions that could be taken during unusually high short-term events over multiple days.
100	Tere Bailey	I have felt that community impact is not being taken seriously as well as long term effects on the health and economic stability in the areas most severely impacted. I also feel there is racial disparity in this regard, having witnessed firsthand that the areas affected are overwhelmingly lower income and minority populations in Wilkinsburg and Clairton.	The changes proposed in this regulation should improve conditions in all the affected areas.
101	Tere Bailey	I have found that Hydrogen Sulfide Gas exposure is deadly long term. Just because we do not smell it does not make it safe. The county monitors sometimes report high particulates (PM2.5) even when the nose does not detect a problem. I would hope that the first steps in remediation and mitigation include a broad based education program so that people can begin connecting the dots on how this is affecting their health and quality of life.	This regulation deals with PM2.5. It will not resolve the H2S odor issue. The ACHD is working on this issue.

102	Tere Bailey	The necessity for an air quality monitoring station in Wilkinsburg cannot be understated. Since joining Smell Pittsburgh - it is obvious that the air inversions are occurring almost daily now. I would request that a community health advocacy/mitigation fund be established as well as a FORMAL REQUEST for Air Quality Monitoring in Wilkinsburg Borough. We need an AQ monitor here to provide a basis for our appeals - as soon as possible.	The Parkway East Near Road monitor is located along I-376 in Wilkinsburg Borough. The overall monitoring network is regularly under review, and ACHD will take this comment into consideration.
103	Alexandra Clerkin	I believe that we should continue to work towards stricter regulations to increase air quality control and subsequently decrease impact on climate change. It's important for us all to have access to clean air, and if you wouldn't drink water polluted with these particles, than we shouldn't be inhaling them either.	Thank you for your comment.
104	April Clisura	These proposed regulations are a much-needed step in mitigating the terrible air quality residents of the Mon Valley and adjacent areas experience during these predictable weather inversions.	Thank you for your comment.
105	Marla Ferreny	My neighbors and I would appreciate more action on this issue by the Health Dept. Thank you!	Thank you for your comment. This regulation should improve conditions in the affected areas.
106	Matt Peters	PA citizens have a right to clean air, as guaranteed in the state's Constitution Article 1 Section 27. The ACHD has routinely failed in this trust, allowing polluters to continue polluting while seeking to blame "wood smoke" and "weather" for chronic industrial malfeasance. These regulations are a small step towards assuring this right. Notification is not enough, merely informing us that our right to clean air is being violated does nothing to guarantee that right! Penalty and enforcement must be stringent enough to ensure compliance.	All eight air quality monitors in Allegheny County meet federal air quality standards. This milestone means that the region is now in attainment with carbon monoxide, nitrogen oxide, ozone and particulate matter (PM2.5, PM10). The ACHD continues to work to support the Pennsylvania Article.

107	Edward Kass	As a former resident of Clairton, I know first hand how the air quality affects daily life in the Mon Valley. Residents need ample notice of potential air quality issues to protect themselves and Allegheny County should spell out specific actions for US Steel to implement and reduce the pollution in our area.	This is the very intent of the proposed regulation.
108	Peri Unligil M.D.	As a physician with many patients who having chronic conditions and/or older ages making them especially vulnerable to the impacts of these air pollution spikes on their health, I thank you for proposing these 2 action phases but would also ask either that the Watch period be shortened or that some pre-emptive measures are taken during the Watch period to attenuate the impact of these episodes on the vulnerable.	The Watch phase is only a prediction of a potential high day.
109	Rebecca Thurston	This is critically important to protecting the health and well being of all of those in the region.	Thank you for your comment.
110	Christine Larson	These proposals are a positive step, but they must be enforced immediately, and the next step must be to STOP the harmful air pollutants. An average of 24 hours of exceeding the federal standard is too much, especially when weather conditions predict that the levels will be toxic. There are ways that this city is good for kids/families, but harming their healthy development with polluted air and more days inside/sedentary and possibly shortening their lives or our lives as parents is quite a big price to pay to live here.	Thank you for your comment. This is the ongoing work of the ACHD.

###	Chie Togami	We need regulations that result protect and ensure quality of life. Meeting numeric targets is worthless if we still can't breathe. Existing regulations MUST be strengthened to hold companies accountable, especially when weather traps pollution close to the ground.	The proposed new Article XXI Section 2106.06, "Mon Valley Air Pollution Episode" regulation, addresses this very concern. Prior to this proposal, the levels of air pollutants at which various stages of alert were initiated were 10 or more times the existing NAAQS. This newly proposed regulation will call for actions to be taken at one times the existing NAAQS for PM2.5. This regulation strengthens existing regulations by a factor of 10 or more when weather traps pollution close to the ground.
112	Maren Cooke	Two important trends to consider: thermal inversions are becoming more common due to climate change, and meteorology has developed to the point where they can be predicted. There is no excuse not to protect the people who live in river valleys from these elevated pollution levels. Thank you for revising these long-neglected regulations -- and please be sure to enforce them when the time comes!	Thank you for your comment.
113	Angelo Taranto, ACCAN	In addition, we request that, once these rules are adopted, the Health Department draft similar rules for other airsheds in the County. ACCAN is particularly concerned about that part of the Ohio River Valley that includes Neville Island. A 2018 inventory identified twenty-seven air pollution sources in that airshed, eight of which were Major Sources. With this concentration of air pollution sources, residents in our airshed deserve the protection that air pollution episode rules would provide.	Thank you for your comment.

114	Angelo Taranto, ACCAN	Another form of protection that Allegheny County residents deserve from the Health Department is quick and effective notification when acute industrial incidents release air pollution that is hazardous to residents. These notifications need to provide guidance on how residents can protect their health during these events.	This is not part of this regulation, but the ACHD continues to improve its notification of known health hazards.
115	Christopher W. Hardin United States Steel Corporation	U. S. Steel is committed to working with ACHD and key stakeholders to develop and implement a strategy so all in the regulated community (including U. S. Steel) can do their part to address the air quality issues that result from inversions. The issue is complex and requires a multi-faceted solution. U. S. Steel supports an open and transparent development of a science-based model to better predict inversions and their intensity.	Thank you for your comment.
116	group 5	Poor air quality has become a major issue that our constituents are concerned about, whether at the local, county, or state level. We are looking towards ACHD to carry out its mandate to fully protect the public's health from this significant problem for our region. This is not a question of getting to legal federal minimum standards, but a question of whether our children can go outside without worrying about asthma attacks or our parents won't suffer from another heart attack or stroke. We urge ACHD to look to solutions that ensure all Allegheny County residents, no matter what neighborhood they live in, or what their health condition is, will not have to worry about the air they breathe.	Thank you for your comment.
117	David Meckel	Somebody has to do something.	This proposed regulation requires actions to be taken by source operators in the Mon Valley to reduce emissions on days when weather conditions might combine with

			emissions to cause exceedances of the PM2.5 NAAQS.
118	Gregory Hancock	The US Steel Coke Plant MUST be permanently shut down. The pollution makes it very difficult to breathe. The Coke Plant is ruining the air, water and land quality in Clairton. The EPA MUST be informed about this highly toxic plant.	Thank you for your comment.
119	Matthew Mehalik, Ph.D., Breathe Project	The regulations should provide more public transparency as to how they will be revised once they are determined to require revision. ACHD should also provide information about how different effectiveness achievement scores will be used to communicate with polluting facilities that either their predicted plan and/or actual mitigation performance requires revisions and improvements in their plans. This information should be made available to the public to review. A floor of a minimum of an 80 percent achievement of actual reductions versus predicted should be required.	Paragraph g.2 is transparent in stating that, if a submitted mitigation plan is found not acceptable upon review by the ACHD, then the ACHD will issue an order specifying the changes or additions necessary to make the plan acceptable. In general, Article XXI requires that reviews be conducted on various plans and permits. However, Article XXI does not typically delineate the specific methodologies of conducting such reviews.
120	Angela M. Kilbert	Under the proposed rule, the Department will terminate a Watch or Warning when the conditions are no longer met. Again, the conditions for a Warning would no longer be met if the atmospheric conditions were forecasted to end less than 24 hours later. This means that the Department could terminate a Warning, allowing facilities to ramp emissions back up to normal levels, even though conditions that allow for harmful exceedances of PM2.5 are still present for the next 23 hours. The Department must revise the proposed Watch and Warning requirements to avoid these loopholes that allow for extended periods of exceedances without recourse.	The sources in Allegheny County already have controls and limits to meet the federal health standards. This regulation is to determine additional limits and actions that could be taken during unusually high short-term events over multiple days.

121	Christopher W. Hardin United States Steel Corporation	U. S. Steel request that ACHD provide their basis for the pollutant emission thresholds to be included in the rule. ACHD notes in the Technical Support Document that these levels were deemed to contribute enough emissions to the Mon Valley to warrant requiring the sources to submit plans meant to reduce emissions in the event of episodic conditions in the Mon Valley. Perhaps there are other intermittent sources that only emit at certain times of day, including during inversion events, that have lower ton per year emissions that should be included in the applicability. Has ACHD explored these potential sources?	ACHD tested several levels of emission rates to determine an adequate limit for applicability. The program also evaluated sources that had intermittent emission units, but found that there were too few in the applicable Mon Valley area to include a shorter term (hourly) emission applicability limit.
122	Scott Taylor Protect Elizabeth Township	Every government agency, elected or appointed, at some point in their applicable governing policy make note to recognize the Environmental Rights Amendment (“ERA”) of the Pennsylvania Constitution and their obligation to protect those rights. The ACHD is no different in this regard.	ACHD agrees. This regulation is part of that commitment.
123	Isabelle Toomey, Gregory Hancock	Every loophole in the proposed regulations is one US Steel will exploit. How many times have they been fined? They can afford the fee! US Steel has shown that it will pull out of long promised investments rather than stop polluting. Let's not make it too easy with loopholes or lack of clarity and steps. US Steel pollutes us on Christmas (well past the FEDERAL LIMIT), through inversions (MANY, and again, well past the FEDERAL LIMIT), on weekends after so many of us put in long hours of work throughout the week, on weekdays, mornings, nights. The smell events were fewer during the pandemic... but not by a significant enough amount (worrying, during a pandemic where a virus attacked people's lungs). While we do need timely information so we can mitigate	ACHD is aware of the mentioned concerns. ACHD believes this regulation will improve the air quality in the Mon Valley through the requirement for sources to use ACHD-approved mitigation plans during high pollution episodes.

		our exposure (and again, PM2.5 will get in your house even with the doors and windows closed), we also need our worse neighbor to change drastically.	
124	James Bursley	I urge the Board of Health to enact aggressive, proactive restrictions on industrial pollution so the city will become more livable and attractive to current and potential residents and businesses.	Thank you for your comment.
125	Jonathan Eberle	The Health Department does not have 24 hour visual inspectors on site at the Mon Valley works, and therefore these facilities increase overnight emissions beyond legal limits as a part of routine business.	Thank you for your comment. ACHD will take this concern under further consideration.

**CERTIFICATION of APPROVAL and ADOPTION**

To the best of my knowledge, information, and belief, I the undersigned hereby certify that the amendments revising §2105.50, and adding §2106.06, of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control, adopted by the Allegheny County Board of Health on July 14, 2021, ratified by the Allegheny County Council on September 14, 2021 (Ordinance 14-21-OR, Bill No. 11987-21), approved by the Allegheny County Chief Executive on September 15, 2021, and effective September 25, 2021, as a revision to the County's Portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the National Ambient Air Quality Standards, were duly and properly enacted as prescribed by the Local Health Administration Law and the Allegheny County Home Rule Charter, and as such, are fully and legally enforceable by the Allegheny County Health Department and the County of Allegheny as provided for by the within authority.

  
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Jason Willis, Esq.  
Solicitor  
Allegheny County Health Department