

November 7, 2018

Allegheny County Board of Health
c/o Allegheny County Health Department
542 Fourth Avenue
Pittsburgh, PA 15219

Re: Air Quality in Lawrenceville & McConway and Torley Operating Permit

Dear Esteemed Members of the Allegheny County Board of Health,

On behalf of Lawrenceville United and Lawrenceville Corporation, we're writing today about the recently released operating permit for McConway and Torley in Lawrenceville and general air quality concerns in the neighborhood.

Lawrenceville United's (LU) mission is to improve and protect quality of life for all Lawrenceville residents. Lawrenceville Corporation (LC) serves as the catalyst and conduit for responsible growth and reinvestment in the Lawrenceville community. In 2017, LU and LC worked with the Allegheny County Health Department to host informational community meetings about the air quality permitting process generally and about the McConway & Torley draft operating permit specifically, so that residents and stakeholders could be informed in advance of the public comment period and provide meaningful feedback to ACHD—and also to us as their representative community organizations. We thank ACHD's air quality program for its engagement throughout that process—specifically, JoAnn Truchan and David Good were very generous with their time.

However, after almost a year since the public comment period closed, we're disappointed that the requests that we made to ACHD in our joint comments and that were echoed by residents have largely been rejected or ignored by the final operating permit, without any communication from ACHD on these matters that might be addressed outside the scope of the operating permit.

Residents of Lawrenceville have good reason to care about air quality in the neighborhood. While Allegheny County is home to some of the worst air quality in the nation, Lawrenceville is home to some of the largest emitters of air pollution in the county. At the same time, Lawrenceville is a dense residential community of over 10,000 residents, including significant populations of older adults, children, and folks from lower socioeconomic backgrounds, who are placed at greater risk by pollutants and poor air quality. We're asking that ACHD do more to ensure that the health of our residents is protected.

Specifically as it relates to our comments on the operating permit for McConway and Torley, we're disappointed that ACHD disagrees with the community's request that fence-line monitoring continue and we urge ACHD to consider continuing the toxic metal study, at least in a more limited form. The pattern of the study has been mostly reassuring and is important to verifying the impact that McConway and Torley's facility improvements appear to be making, which is good for relationships between the foundry and the community. Yet there have also been recent spikes in chromium levels,

volatility on a daily basis, and a steady climb in the manganese levels in 2018 that counter this overall trend and that have yet to be explained by ACHD. Until that is done, residents deserve to have access to ongoing information to concentrations of these toxic metals in Lawrenceville, and fence-line monitoring should continue in some way.

Additionally, odor complaints are still not being addressed by ACHD. As our public comments noted, Lawrenceville's zip code has one of the highest number of smell complaints of any zip code in the County, and nearly half of those complaints within the span of a year identified industrial sources as the cause of those complaints, and many of them specifically identified McConway and Torley. Residents have reported this to be at times preventive to spending time outdoors and to induce stinging/watering of the eyes. The operating permit's condition that McConway and Torley has to do a daily monitor of odors around the property is meaningless if the ACHD won't enforce the high number of odor complaints it receives or work with the foundry around improved odor control technology.

Finally, as part of the community process we did with the Air Quality department last year, residents requested that the ACHD's epidemiology team engage with the neighborhood around the impacts of air pollution on the community's health and to take a deeper look at statistics that are areas of concern in the neighborhood, like high rates of adults with cancer and COPD, as well as high levels of childhood asthma at our neighborhood public schools. After a year, we still have yet to receive any communications from the ACHD epidemiology team or to receive a response to our request for further study and analysis. There shouldn't be such a disconnect between the air quality permitting process and health trends in the neighborhood, but now that the permitting process for McConway and Torley is concluded, we again reiterate our request that the ACHD work with the community to devote further study and analysis to these health trends, possibly through the air quality funds that ACHD manages.

Thank you and we look forward to a response.

Sincerely,



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cc: ACHD Director Dr. Karen Hacker, County Executive Rich Fitzgerald, Allegheny County Councilwoman Denise Ranalli Russell, Mayor William Peduto, Chief of Staff Dan Gilman, Chief Resilience Officer Grant Ervin, Councilwoman Deb Gross, City Council District 7 Chief of Staff Bethani Cameron