

June 8, 2021

Submitted by Email & Given Testimony

Allegheny County Health Department
Attn: Section Chief [JoAnn Truchan, P.E.](#)
301 39th Street, Building #7
Pittsburgh, PA 15201-1811

Dear Section Chief Truchan,

We are writing on behalf of the members of our organization, Protect PT (Penn-Trafford), a nonprofit citizens group dedicated to ensuring the safety, security, and quality of life by engaging in education and advocacy in Westmoreland and Allegheny counties. Our members and every resident of Pennsylvania have a constitutional right to “clean air and pure water... for generations yet to come” under Article 1 Section 27 of the Pennsylvania Constitution. The Invenergy proposed Allegheny Energy Center 639 megawatt combined-cycle natural gas-fired power plant, permit number 0959-1001, in Elizabeth Township, Allegheny County is positioned close to the county line. The proposed power plant would not only increase pollution for the local community within the county, but also release pollution into environmental justice areas on the other side of the county line, outside the jurisdiction of the Allegheny County Health Department (ACHD).

Gas-fired power plants like Allegheny Energy Center are large, industrial facilities that emit air pollutants which cause increased risks for lung and heart diseases and cancers. The power plant would emit many air pollutants of concern, such as nitrogen oxides (NOx), fine particulates, and hazardous air pollutants such as benzene, formaldehyde, and toluene. All of these pollutants can cause adverse effects on human health and air quality. Allegheny County already consistently [fails to meet federal health-based standards](#) for air pollution and adding to this air pollution puts residents at even greater risk. Additionally, the community will not benefit from the electricity being generated, yet will bear the burden of public health and environmental degradation. The electricity would go directly into the PJM grid, which transports it in the electricity wholesale market for 13 states and Washington D.C.

Therefore, ACHD should modify the permit to require these additional conditions:

- ACHD will perform a cumulative impact risk assessment of air pollution from the plant and other nearby industrial facilities and operations, including all oil and gas infrastructure and other industrial sources of pollution. Allowing this power plant to continue without a proper assessment will add risk to vulnerable environmental justice

neighborhoods close to the site that deserves to understand the cumulative health risks posed by the power plant.

- ACHD will require continuous VOC monitoring at the plant instead of the current requirement of testing for VOC emissions once every two years. This information should be made available to the public by publishing multiple sources; in real-time to the community via the web, and via mail to area residents once quarterly. If exceedance of the ambient air quality standards established by Article XXI §2101.10 occur, ACHD should take swift action within 24 hours to correct operations at the plant to prove that they can provide and operate necessary control equipment or take necessary precautions to remain in compliance with permit standards as to not endanger the public's health, safety, or welfare.
- ACHD will lower the proposed limit on excess ammonia pollution resulting from controls for nitrogen oxide (NOx) emissions. When ammonia enters the body as a result of breathing, swallowing, or skin contact, it reacts to produce ammonium hydroxide, which is very corrosive and damages cells in the body. The ammonia limit should match similar requirements the Pennsylvania Department of Environmental Protection (DEP) recently included in a plan approval for the Renovo Energy Center in Clinton County. These two power plants are comparable, as they both use the same type of combustion turbine and the DEP has demonstrated that other comparable facilities can meet this ammonia requirement.
- ACHD will not negotiate fines or enforcement actions with Invenergy so that the operator is encouraged to comply with all ambient air quality standards established by Article XXI §2101.10 and not endanger the public health, safety, or welfare.

In conclusion, the proposed Allegheny Energy Center will jeopardize the public and environmental health of the region and negatively impact the overall quality of life of its residents. These large, industrial sites generate disturbing and disruptive levels of noise and light that will erode residents' wellbeing; this site in particular will create additional hardships for those residents living in Environmental Justice Areas. We urge you to include stronger air pollution thresholds and air monitoring requirements for the Allegheny Energy Center to limit the public health and environmental damage this site will cause.

Sincere Regards,



Gillian Graber
Executive Director