**GROUP AGAINST SMOG AND POLLUTION COMMENTS ON EPA-HQ-OAR-2002-0085 and EPA-HQ-OAR-2003-0051**

The Group Against Smog and Pollution (GASP) vehemently opposes the EPA’s recent decision to delay the full implementation of revised National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Coke Ovens and Coke Oven Batteries.

This rollback directly impacts the health and safety of frontline communities in our region, specifically those living near U.S. Steel’s Clairton Coke Works and Cleveland Cliffs’ Monessen Coke Works.

This delay, following a similar decision for Integrated Iron and Steelmaking facilities, means that facilities will be authorized to emit greater amounts of hazardous air pollutants for an extended period.

The specific delays announced are deeply concerning:

* The critical requirement for fenceline monitors to detect benzene levels. Benzene is a known carcinogen, and delaying its monitoring directly puts public health at risk.
* New limits for emissions of hazardous air pollutants from coke oven pushing, quenching, and battery stacks, which would impact the Pittsburgh region disproportionately.
* New limits on leaking coke oven doors, lids, and offtake piping, which has been an issue with U.S. Steel’s Mon Valley Works facilities.

While the EPA justifies these delays based on industry assertions regarding the time needed for facility modifications, engineering, permitting, and construction, these are not new or unforeseen challenges. Industry groups continually seek to delay compliance, and the EPA's acceptance of these arguments undermines the very purpose of establishing protective emission standards.

According to the agency, the delay would provide industry with a savings of $4.2 to $4.4 million. What the EPA has *not* provided, however, is an estimate of the additional pollution that will be inflicted upon our communities as a direct consequence of these delays - an egregious omission. This lack of transparency regarding the public health cost is alarming and unacceptable.

The communities surrounding coke oven facilities have historically borne a disproportionate burden of toxic air pollution. These revisions were a crucial step toward reducing exposure to hazardous air pollutants linked to serious health issues, including various cancers and respiratory diseases.

Pushing back these deadlines means extending the period during which our residents are exposed to higher levels of these dangerous substances.

GASP urges the EPA to prioritize public health over industry convenience. We demand that the EPA reverse these unjustified delays and enforce the original compliance deadlines for the coke oven NESHAPs. The health of our communities cannot wait.