

Comments by Aarushi Pant, Allegheny County

Docket # M-2026-3059601

My name is Aarushi Pant and I am the Executive Director of Allegheny County Clean Air Now (ACCAN). ACCAN was formed in 2014 to give a voice to the residents living downwind from the DTE Energy's Shenango Coke Plant on Neville Island. For decades, residents of Avalon, Bellevue, Ben Avon, Emsworth, and Brighton Heights, in particular, were directly impacted by the pollution from Shenango. The coke plant was a major source polluter of carbon monoxide, nitrogen oxides, sulfur oxides, particulate matter and volatile organic compounds. Foul, poor quality air was a daily occurrence and it affected the health and well being of local residents. The Northgate School District, in the community, recorded the highest asthma rate in Pennsylvania. Nearby communities displayed increased rates of chronic diseases such as cancer.

ACCAN demanded that the Allegheny County Health Department (ACHD) and the Environmental Protection Agency (EPA) force Shenango to comply with federal and county regulations, limit production on "bad air days", record all air quality complaints, and impose an effective fine schedule. The group did this by attending and testifying at any and all meetings and public hearings, and meeting with regulators directly.

In December, 2015, DTE Energy announced the shutdown of the Shenango Coke Plant, citing market conditions as factors in the decision. However, ACCAN members believe that relentless community complaints about air quality violations played a key role in the corporate decision.

Retrospective health studies have since shown numerous community health benefits since Shenango's closure, including: improved asthma outcomes in elementary school students found by Dr. Deborah Gentile. Another study by the NYU Grossman School of Medicine found a 42 percent immediate decrease in cardiovascular emergency room visits, a 90 percent drop in local levels of sulfur dioxide, and 33 fewer annual heart-related hospitalizations. Another study by Dr. Yu and Dr. Thurston at NYU found an immediate 20 percent decrease in respiratory emergency room visits, an immediate 41 percent decrease in pediatric asthma emergency room visits, and a continued decrease in pediatric asthma visits each month through the end of the study period of 4 percent per month.

This shows that fossil fuel industrial sources of pollution are harmful to human health, and that when they are no longer operating, communities reap health benefits. This should be carefully considered with the potential redevelopment of coal, natural gas, and peaker plants to expand capacity to serve data centers and other large load customers.

In 2021, natural gas accounted for 2% of electricity production in Pennsylvania. By 2026, it was responsible for producing approximately 60% of PA's electricity. The surge represents the transition from coal to natural gas. Methane emissions from natural gas production are 86% more powerful than CO₂ at warming the atmosphere, so the trade off was never a solution, but whatever benefits it provided would be erased with the return to coal production. Even worse, natural gas production continues to increase to serve data centers, further exacerbating fossil fuel's climate impacts., The 12 coal plants on the list account for roughly 4,122 MW of the retired capacity under review, or enough energy to power 3 million homes. Pennsylvania currently has 13 operational coal plants that have a combined capacity of 5.22 GW. If redeveloped, the number and total capacity of operational coal plants in the state would nearly double. According to the Intergovernmental Panel on Climate Change (IPCC), coal is the single largest source of global temperature rise., The 21 coal, natural gas, and peaker plants identified in the report as candidates for redevelopment had a combined capacity of 4.8 GW when they were retired. That is enough energy to power 4 million homes. Of the 21 plants identified, 5 - 7 will eventually be redeveloped according to the PUC, but there's no reason to think that the number could be expanded as the number of data centers coming to PA grows.

The PATER report states, “Environmental considerations beyond existing site conditions were not evaluated as part of this analysis. Because the study focuses on redevelopment viability rather than specific redevelopment pathways, potential environmental impacts associated with future end uses, such as air emissions, water use, wastewater generation, and other permitting considerations, were outside the scope of this assessment. Such impacts would need to be evaluated as part of project-specific planning and environmental review processes.” (P. 102) The cumulative impacts should be understood before any individual redevelopment project begins. If a subset of the list of plants is selected for redevelopment, a cumulative impact statement must be a requirement before the overall redevelopment project is approved., The PATER report states, “...a site ranking methodology will be developed to support a rigorous ranking of attributes and options and to ensure that the methodology is structured to incorporate all the criteria that arise through discussions with the PA PUC, Team PA, and other key stakeholders.” P. 103 Team PA operates as a non-profit that supports the Governor's agenda. It has been deeply involved in development of energy and data center projects. Its involvement in ranking sites would constitute an unacceptable conflict of interest.

Thank you so much for your time and consideration. We would also request an extension on the comment period so more community members are able to provide their valuable input.