



September 29, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Re: National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review; EPA-HQ-OAR-2002-0083

The undersigned health, medical and nursing organizations appreciate the opportunity to provide comment on the proposed updated standards to reduce hazardous air pollutants from iron and steel manufacturing facilities.

The hazardous air pollutants (HAP) emitted by integrated iron and steel mills include metals (including arsenic, chromium, lead, and mercury) and organic HAP (such as polycyclic organic matter, benzene, and carbon disulfide). Exposure to these substances has been demonstrated to cause adverse health effects, including cancer, chronic and acute disorders of the blood, heart, kidneys, reproductive system, and central nervous system.

EPA has stated, "Once taken into the body, lead distributes throughout the body in the blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system. Lead exposure also affects the oxygen carrying capacity of the blood. The lead effects most likely to be encountered in current populations are neurological effects in children. Infants and young children are especially sensitive to lead exposures, which may contribute to behavioral problems, learning deficits and lowered IQ."¹ CDC has also stated, "No safe blood lead level in children has been identified. Even low levels of lead in blood have been shown to negatively affect a child's intelligence, ability to pay attention, and academic achievement."²

We are grateful for U.S. EPA's proposed amendments on iron and steel manufacturing facilities and urge the agency to make these amendments even stronger in order to sufficiently protect the health of Americans, especially those living near these facilities.

To strengthen these amendments, we ask that you address the following three issues:

¹ Basic Information about Lead Air Pollution, EPA, available at <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>

² Health Effects of Lead Exposure, CDC, available at <https://www.cdc.gov/nceh/lead/prevention/health-effects.htm>

- First, regarding fugitive emissions from iron and steel manufacturing facilities, EPA should require that the roof vents be ducted to a control device, which would eliminate most of the fugitive emissions. In the proposed rule for copper smelters, which EPA published at almost the same time, EPA found that capturing fugitive emissions and ducting them to a control device is feasible and will yield substantial reductions. EPA should also require better work practices and the use of continuous opacity monitoring systems (COMS) or continuous emission monitoring system (CEMS) to measure fugitives instead of having visible emissions read every two weeks.
- Another improvement could come from further limits on the sinter plants at three Indiana mills. Sinter plants are unnecessary, but they account for more than 90% of all the stack emissions from the entire industry. Please set limits for sinter plants based on the use of a wet electrostatic precipitator (WESP) and activated carbon injection to ensure all the hazardous air pollutants that sinter plants emit are reduced to the maximum achievable degree, as the Clean Air Act requires.
- Lastly, the proposed rule does not include sufficient requirements for fence-line monitoring. While any fence-line monitoring requirement is an improvement, the proposed rule requires sampling just every 6th day for 24 hours. Since steel mill emissions can be episodic, monitoring can easily miss the mills' worst pollution. Please require more frequent sampling in order to give a more accurate representation of the air quality that nearby communities are actually exposed to. Moreover, EPA's rule does not require the fence-line monitors to be placed high enough to capture all the fugitive emissions from steel mills, much of which come from roof vents. Please require fence-line monitors to be placed at the same height as the roof vents, either on existing structures or structures built for the purpose.

We appreciate EPA's decision to propose updates to the existing standards for iron and steel manufacturing facilities, and we urge the agency strengthen the standards and quickly finalize them.

Signed,

Alliance of Nurses for Healthy Environments
American Lung Association
American Thoracic Society
National Association of Pediatric Nurse Practitioners