

**PENNENVIRONMENT MEMBERS ARE HARMED
BY DEFENDANTS' VIOLATIONS**

264. Members of PennEnvironment live near, own property near, and spend time shopping and recreating near the Plant.

265. At least one PennEnvironment member lives less than 1,000 feet from the Plant. Other members live less than 1.5 miles from the Plant.

266. PennEnvironment members reside in the towns of Monessen, Monongahela, and Donora.

267. As of October 2015, at least 100 citizen complaints (including many filed by PennEnvironment members) had been made to the PADEP about airborne odors, smoke, soot, and debris coming from the Plant.

268. Many of the citizen complaints made to PADEP cite a "rotten egg smell" to describe odors coming from the Plant.

269. Citizens who filed complaints about the Plant reside in Monessen or in one of six neighboring towns: Monongahela, Donora, Belle Vernon, Charleroi, Wickerham Manor-Fisher, and New Eagle.

270. Plaintiff's members experience noxious odors emitted from the Plant, including rotten egg odors, sewer-like odors, sulfur smells, and tar and gasoline-type odors.

271. Plaintiff's members experience difficulty breathing, exacerbated asthma, and other respiratory irritation that they attribute to emissions from the Plant.

272. Plaintiff's members have had airborne soot from the Plant deposited on their property. The soot gets inside their homes, is aesthetically displeasing, is difficult to clean, and may corrode metal and other surfaces. Plaintiffs' members have a reasonable fear that the soot from the Plant is unhealthy to contact or to breathe.

273. Plaintiff's members believe the conditions and symptoms described in ¶¶ 268-272 are caused by the Plant's air emissions and violations, based on one or more of the following factors: the proximity of the Plant to their homes or to the places where they experience these impacts; the wind direction at the time they experience these impacts; visual observations of smoke, soot, or dust emissions from the Plant; the fact that the odors they experience are consistent with materials used or produced at the Plant; and the absence of any other possible sources of such emissions or odors in the area.

274. The pollutants the Plant emitted during the alleged violations cause the types of symptoms and conditions Plaintiff's members have experienced.

275. The onset of the symptoms and conditions Plaintiff's members have experienced coincides with the date of the re-opening of the Plant in April 2014.

276. Plaintiff's members want to breathe as little air pollution from the Plant as possible, and certainly do not want to breathe illegally emitted air pollutants.

277. Plaintiff's members are reasonably concerned that the air pollution from the Plant's violations threatens their health and their families' health.

278. The odors and soot emitted from the Plant diminish Plaintiff's members' enjoyment of their homes, backyards, and neighborhoods.

279. The air pollution from the Plant's violations causes Plaintiff's members to visit the city of Monessen and its downtown area less frequently than they otherwise would.

280. Plaintiff's members are harmed by monitoring violations at the Plant, as the failure to properly monitor the emission of air pollutants denies them valuable information about the Plant's true impact on the surrounding area and the Plant's compliance or non-compliance with emission limits.