

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

January 14, 2020

CERTIFIED MAIL - 9489 0090 0027 6037 9427 77

Michael Rhodes  
United States Steel Corporation  
Clairton Plant  
400 State Street  
Clairton, PA 15025

**RE: United States Steel – Clairton Plant; Demand for Stipulated Penalties Under Settlement Agreement and Order #190604 Section IX. Stipulated Penalties - April 1, 2019 through September 30, 2019 (2nd and 3rd Quarters)**

Dear Mr. Rhodes:

The Department is seeking enforcement of stipulated penalties pursuant to Section IX of Settlement Agreement and Order #190604 (SAO). The Department has determined that United States Steel is in violation of Article XXI, § 2102.03.c and various provisions of § 2105.21, of the ACHD's Rules and Regulations by failing to meet the applicable requirements stated in Article XXI, § 2105.21 and ACHD Installation Permit #0052-I011b.

The stipulated penalties were calculated pursuant to Section IX, SOA from the violations observed by the Department's Coke Oven Process Technicians and Method 303 contractor, and including data reported by U.S. Steel, at your company's Clairton Plant, during the second and third quarters of 2019, April 1, 2019, through September 30, 2019. The violations and associated penalties are set forth in the attachments.

The Department is claiming **\$743,625.00** in penalties. Pursuant to SOA, V. Civil Penalty Payment, Paragraph A, 90 percent of the stipulated penalties **\$669,262.50** is to be paid to the Community Benefit Trust and 10 percent of the stipulated penalties **\$74,362.50** is to be paid to the Allegheny Clean Air Fund. Payments are to be made within thirty (30) days of receipt of this order. Payment to the Clean Air Fund shall be made by corporate check, or the like, and made payable to the "Allegheny County Clean Air Fund", and sent to Air Quality Program Manager, Allegheny County Health Department, 301 39th Street, Bldg. #7, Pittsburgh, PA 15201



**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

301 39<sup>TH</sup> STREET, CLACK HEALTH CENTER, BUILDING 7

PITTSBURGH, PA 15201-1811

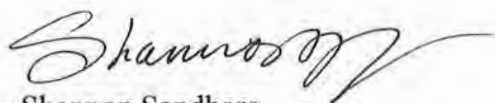
PHONE (412) 578-8103 • FAX (412) 578-8144

24-HR (412) 687-ACHD (2243) • [WWW.ALLEGHENYCOUNTY.US](http://WWW.ALLEGHENYCOUNTY.US)

The demand for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from April 1, 2019 through September 30, 2019. Also, this letter in no way precludes the Department from issuing demands for other stipulated penalties for other violations which may have occurred from April 1, 2019 through September 30, 2019.

If you have any questions concerning this demand for stipulated penalties, please contact Shannon Sandberg, ACHD Air Quality Acting Enforcement Section Chief, at 412-578-7969 or by email at: [Shannon.Sandberg@AlleghenyCounty.us](mailto:Shannon.Sandberg@AlleghenyCounty.us). Thank you for your prompt attention to this matter.

Sincerely,



Shannon Sandberg  
ACHD Air Quality Acting Enforcement Chief

cc: Mike Dzurinko ([MDzurinko@uss.com](mailto:MDzurinko@uss.com))  
Jonelle Scheetz ([JSScheetz@uss.com](mailto:JSScheetz@uss.com))  
Nicole Heinichen ([NLHeinichen@uss.com](mailto:NLHeinichen@uss.com))  
Dean DeLuca, Air Quality Program Manager  
AQ Documents File

Stipulated Penalty Base Amount from #190604  
 except High Opacity Doors: \$750

\$1,500

**CHARGING**

Date 2019	Battery	Seconds	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
1-Apr	C	97	ACHD	1.75	major			\$3,750
10-Apr	14	77.5	Keramida	1.40	moderate			\$2,250
18-Apr	B	79	Keramida	1.42	moderate			\$2,250
24-Apr	C	80	ACHD	1.44	moderate			\$2,250
9-May	B	116	ACHD	2.09	major			\$3,750
13-May	2	102	ACHD	1.35	moderate			\$2,250
13-May	B	106.5	Keramida	1.92	major			\$3,750
15-May	15	108	ACHD	1.95	major			\$3,750
19-May	B	520	Keramida	9.37	major			\$3,750
22-May	B	79.5	Keramida	1.43	moderate			\$2,250
22-May	C	133	ACHD	2.40	major			\$3,750
23-May	B	129	ACHD	2.32	major			\$3,750
28-May	B	72	ACHD	1.30	moderate			\$2,250
11-Jun	B	90	Keramida	1.62	major			\$3,750
11-Jun	C	215	Keramida	3.87	major			\$3,750
12-Jun	15	77	ACHD	1.39	moderate			\$2,250
14-Jun	C	85	ACHD	1.53	major			\$3,750
17-Jun	C	68	ACHD	1.23	moderate			\$2,250
<b>Count:</b>		<b>18</b>					<b>subtotal</b>	<b>\$55,500</b>

\* No penalty because at least 1 charge from the same oven was observed on both inspections.

**DOORS**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
1-Apr	C	3.18%	Keramida	1.06	low			\$1,500
24-Apr	C	3.13%	ACHD	1.04	low			\$1,500
22-May	C	3.57%	ACHD	1.19	low			\$1,500
31-May	14	6.48%	Keramida	1.30	moderate			\$2,250
11-Jun	C	5.33%	Keramida	1.78	major			\$3,750
27-Jun	1	8.85%	ACHD	1.11	low			\$1,500
<b>Count:</b>		<b>6</b>					<b>subtotal</b>	<b>\$12,000</b>

**DOORS >40% (30% for Battery C) - ACHD**

Date 2019	Battery	Oven #	Opacity	Time Observed	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
5-Apr	C	C3	50	1039	1.43	moderate			\$1,125
9-Apr	1	B22	90	1159	2.00	major			\$1,875
9-Apr	1	B24	80	1200	1.78	major	\$250		\$2,125
9-Apr	1	B26	45	1201	1.00	low	\$250		\$1,000
11-Apr	3	A20	50	709	1.11	low			\$750
11-Apr	3	A22	75	709	1.67	major			\$1,875
11-Apr	3	A26	45	1012	1.00	low			\$750
17-Apr	14	B12	50	755	1.11	low			\$750
24-Apr	C	C18	45	740	1.29	moderate			\$1,125
24-Apr	C	C60	100	731	2.86	major			\$1,875
24-Apr	C	C62	100	731	2.86	major			\$1,875
24-Apr	C	C66	50	732	1.43	moderate			\$1,125
1-May	C	C14	65	944	1.86	major			\$1,875
6-May	14	B29	75	1004	1.67	major	\$250		\$2,125
9-May	B	B34	55	714	1.22	moderate			\$1,125
10-May	19	C24	70	853	1.56	major			\$1,875
14-May	1	B9	50	814	1.11	low			\$750
14-May	1	B11	45	815	1.00	low			\$750
15-May	14	B29	50	937	1.11	low			\$750
15-May	14	B28	50	937	1.11	low			\$750
15-May	14	B16	50	938	1.11	low			\$750
15-May	14	A27	45	951	1.00	low	\$250		\$1,000
15-May	15	B11	45	1001	1.00	low			\$750
15-May	15	B5	45	1001	1.00	low			\$750
15-May	15	A14	55	1002	1.22	moderate			\$1,125
22-May	C	C54	70	1211	2.00	major			\$1,875
22-May	C	C60	35	1211	1.00	low			\$750
22-May	13	A20	50	1035	1.11	low			\$750
24-May	2	B11	45	743	1.00	low			\$750
24-May	2	B24	70	728	1.56	major			\$1,875
24-May	2	B16	100	728	2.22	major			\$1,875
24-May	3	B25	80	732	1.78	major			\$1,875
24-May	3	A9	60	735	1.33	moderate			\$1,125
3-Jun	20	A24	60	956	1.33	moderate			\$1,125
4-Jun	B	B33	50	725	1.11	low			\$750
4-Jun	B	B35	60	726	1.33	moderate			\$1,125
5-Jun	14	B9	50	1011	1.11	low			\$750
5-Jun	14	B30	45	1012	1.00	low			\$750
5-Jun	C	C59	80	1126	2.29	major			\$1,875

Date	Battery	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount		
6-Jun	15	A30	100	1157	2.22	major	\$1,875		
6-Jun	15	A28	85	1158	1.89	major	\$1,875		
12-Jun	1	B14	50	1017	1.11	low	\$750		
12-Jun	1	B22	70	1022	1.56	major	\$1,875		
14-Jun	C	C65	100	1018	2.86	major	\$1,875		
17-Jun	1	B8	80	1305	1.78	major	\$1,875		
21-Jun	3	A25	60	951	1.33	moderate	\$1,125		
21-Jun	3	A29	80	953	1.78	major	\$1,875		
24-Jun	13	B29	45	755	1.00	low	\$750		
24-Jun	20	C25	50	942	1.11	low	\$750		
25-Jun	1	B24	50	809	1.11	low	\$750		
27-Jun	1	A4	90	745	2.00	major	\$1,875		
27-Jun	1	A11	65	745	1.44	moderate	\$1,125		
27-Jun	1	B28	100	749	2.22	major	\$1,875		
27-Jun	2	A4	75	741	1.67	major	\$1,875		
27-Jun	3	A3	45	736	1.00	low	\$750		
27-Jun	3	A17	55	738	1.22	moderate	\$1,125		
27-Jun	3	A18	70	738	1.56	major	\$1,875		
<b>Count:</b>							57	<b>subtotal</b>	<b>\$73,750</b>

**OFFTAKES**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount	
15-May	15	4.31%	ACHD	1.08	low			\$1,500	
1-Jun	15	7.76%	Keramida	1.94	major			\$3,750	
6-Jun	20	4.32%	Keramida	1.08	low			\$1,500	
14-Jun	C *	6.10%	ACHD	#N/A	#N/A			duplicate *	
14-Jun	C	8.64%	Keramida	2.88	major			\$3,750	
24-Jun	13	5.08%	ACHD	1.27	moderate			\$2,250	
<b>Count:</b>							6	<b>subtotal</b>	<b>\$12,750</b>

\* Duplicate inspection on same date

**LIDS**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount	
18-Apr	C	0.99%	Keramida	1.650	major			\$3,750	
25-Apr	B	2.43%	Keramida	2.43	major			\$3,750	
22-May	C	0.74%	ACHD	1.23	moderate			\$2,250	
<b>Count:</b>							3	<b>subtotal</b>	<b>\$9,750</b>

**PUSHING**

Date 2019	Battery	Oven	Max Opacity (%)	ACHD or USS	Severity	H2S exceed.	SO2 exceed.	amount
1-Apr	C	C24	70	ACHD	major			\$3,750
1-Apr	C	C26	55	ACHD	moderate			\$2,250
1-Apr	C	C36	50	ACHD	moderate			\$2,250
4-Apr	2	A23	30	USSteel	low	\$250		\$1,750
8-Apr	1	A4	35	ACHD	low			\$1,500
11-Apr	3	B1	40	ACHD	moderate			\$2,250
11-Apr	3	B5	35	ACHD	low			\$1,500
11-Apr	B	A3	60	ACHD	moderate			\$2,250
12-Apr	1	A5	25	ACHD	low			\$1,500
15-Apr	1	B17	70	ACHD	major			\$3,750
16-Apr	B	B34	40	ACHD	moderate			\$2,250
18-Apr	1	A31	30	USSteel	low			\$1,500
22-Apr	3	B09	30	USSteel	low			\$1,500
29-Apr	13	A11	30	ACHD	low			\$1,500
2-May	3	B16	40	ACHD	moderate			\$2,250
2-May	3	B20	25	ACHD	low			\$1,500
6-May	13	A28	50	ACHD	moderate	\$250		\$2,500
6-May	13	B3	25	ACHD	low	\$250		\$1,750
13-May	2	A7	40	ACHD	moderate			\$2,250
13-May	C	C18	50	ACHD	moderate			\$2,250
21-May	19	A25	30	USSteel	low			\$1,500
24-May	1	A06	60	USSteel	moderate			duplicate *
24-May	1	A02	35	USSteel	low			duplicate *
24-May	1	A2	35	ACHD	low			\$1,500
24-May	1	A6	60	ACHD	moderate			\$2,250
26-May	13	A17	20	USSteel	low			\$1,500
26-May	14	B16	30	USSteel	low			\$1,500
28-May	19	B08	30	USSteel	low			\$1,500
28-May	13	A2	60	ACHD	moderate			\$2,250
2-Jun	13	A05	30	USSteel	low			\$1,500
3-Jun	2	A24	30	USSteel	low			\$1,500
4-Jun	14	A16	30	ACHD	low			\$1,500
5-Jun	14	A26	70	ACHD	major			\$3,750
5-Jun	19	B27	100	ACHD	major			\$3,750
6-Jun	1	A14	100	USSteel	major			\$3,750
6-Jun	15	A22	70	ACHD	major			\$3,750
6-Jun	1	A4	65	ACHD	major			\$3,750
10-Jun	13	A8	35	ACHD	low			\$1,500
12-Jun	13	B21	30	USSteel	low			\$1,500

12-Jun	19	B08	30	USSteel	low			\$1,500
19-Jun	13	A01	30	USSteel	low			\$1,500
20-Jun	1	A20	30	USSteel	low			\$1,500
20-Jun	2	B29	25	ACHD	low			\$1,500
<b>Count:</b>		<b>43</b>					<b>subtotal</b>	<b>\$86,250</b>

**TRAVEL**

Date 2019	Battery	Oven	Max Opacity (%)	ACHD or USS	Severity	H2S exceed.	SO2 exceed.	amount
4-Apr	2	A23	15	USSteel	low	\$250		\$1,750
4-Apr	13	A02	30	USSteel	low	\$250		\$1,750
4-Apr	14	B01	35	USSteel	low	\$250		\$1,750
8-Apr	1	A4	25	ACHD	low			\$1,500
12-Apr	1	A5	25	ACHD	low			\$1,500
14-Apr	1	B31	30	USSteel	low			\$1,500
15-Apr	1	B17	30	ACHD	low			\$1,500
18-Apr	1	A31	20	USSteel	low			\$1,500
22-Apr	3	B09	15	USSteel	low			\$1,500
22-Apr	14	A31	40	ACHD	moderate			\$2,250
22-Apr	14	B8	30	ACHD	low			\$1,500
22-Apr	19	B8	30	ACHD	low			\$1,500
1-May	19	C05	20	USSteel	low			\$1,500
5-May	19	A04	30	USSteel	low			\$1,500
5-May	19	A02	30	USSteel	low			\$1,500
6-May	13	A28	50	ACHD	moderate	\$250		\$2,500
9-May	14	B2	40	ACHD	moderate			\$2,250
9-May	14	B4	55	ACHD	moderate			\$2,250
21-May	19	A25	20	USSteel	low			\$1,500
22-May	14	B03	20	USSteel	low			\$1,500
24-May	1	A08	40	USSteel	moderate			duplicate *
24-May	1	A8	40	ACHD	moderate			\$2,250
24-May	19	A25	20	USSteel	low			duplicate *
24-May	19	A25	20	ACHD	low			\$1,500
26-May	13	A17	15	USSteel	low			\$1,500
26-May	14	B16	20	USSteel	low			\$1,500
28-May	13	A2	50	ACHD	moderate			\$2,250
28-May	19	B08	20	USSteel	low			\$1,500
3-Jun	2	A24	20	USSteel	low			\$1,500
5-Jun	14	A24	25	USSteel	low			\$1,500
5-Jun	14	A26	40	ACHD	moderate			\$2,250
5-Jun	19	B27	90	ACHD	major			\$3,750
6-Jun	1	A14	50	USSteel	moderate			\$2,250
6-Jun	1	A4	25	ACHD	low			\$1,500
6-Jun	15	A22	60	ACHD	moderate			\$2,250
9-Jun	14	B26	30	USSteel	low			\$1,500
10-Jun	19	A25	30	ACHD	low			\$1,500
12-Jun	13	B21	20	USSteel	low			\$1,500
12-Jun	14	A07	20	USSteel	low			\$1,500
12-Jun	19	B08	20	USSteel	low			\$1,500
19-Jun	13	A01	15	USSteel	low			\$1,500
20-Jun	1	A20	15	USSteel	low			\$1,500
27-Jun	15	B5	20	ACHD	low			\$1,500
<b>Count:</b>		<b>43</b>					<b>subtotal</b>	<b>\$71,500</b>

**SOAKING >20% (>10% for Battery C) - ACHD**

Date 2019	Battery	Oven #	Time Observed	Pusher/Coke (side)	Max. Non-flame Opacity	Severity	H2S exceed.	SO2 exceed.	amount
1-Apr	C	C24	744	P	60	moderate			\$2,250
1-Apr	C	C26	809	P	80	major			\$3,750
2-Apr	14	A1	850	C	50	moderate			\$2,250
2-Apr	14	A3	859	P	30	low			\$1,500
2-Apr	14	A5	910	C	50	moderate			\$2,250
15-Apr	1	B21	920	P	40	moderate			\$2,250
16-Apr	B	A3	758	P	60	moderate			\$2,250
16-Apr	B	A3	758	C	40	moderate			\$2,250
22-Apr	14	A27	742	C	40	moderate			\$2,250
22-Apr	14	B2	908	P	50	moderate			\$2,250
22-Apr	14	B2	908	C	40	moderate			\$2,250
23-Apr	3	B3	904	C	70	major			\$3,750
24-Apr	C	C72	851	P	60	moderate			\$2,250
29-Apr	13	A11	860	C	45	moderate			\$2,250
1-May	1	B1	913	P	40	moderate			\$2,250
2-May	3	B14	708	P	100	major			\$3,750
2-May	3	B14	708	C	100	major			\$3,750
8-May	19	A6	859	C	40	moderate			\$2,250
9-May	B	A21	724	P	50	moderate			\$2,250
9-May	14	B2	832	C	60	moderate			\$2,250
9-May	14	B4	845	C	35	low			\$1,500
14-May	19	C11	907	P	80	major			\$3,750
14-May	19	C11	907	C	100	major			\$3,750
16-May	C	C1	726	P	100	major			\$3,750

20-May	20	B5	731	P	50	moderate		\$2,250
20-May	20	B7	750	P	40	moderate		\$2,250
20-May	20	C14	942	P	40	moderate		\$2,250
22-May	C	C45	821	P	30	low		\$1,500
22-May	C	C57	957	P	60	moderate		\$2,250
22-May	C	C59	1018	P	70	major		\$3,750
23-May	B	A35	912	C	50	moderate		\$2,250
28-May	13	A4	759	P	70	major		\$3,750
31-May	2	A30	933	C	45	moderate		\$2,250
5-Jun	14	A28	828	C	60	moderate		\$2,250
5-Jun	14	A30	839	C	60	moderate		\$2,250
10-Jun	19	A23	713	C	100	major		\$3,750
10-Jun	19	A25	744	C	60	moderate		\$2,250
12-Jun	1	B20	930	C	40	moderate		\$2,250
17-Jun	14	B6	955	P	30	low		\$1,500
20-Jun	2	B27	732	P	60	moderate		\$2,250
24-Jun	13	A1	803	P	100	major		\$3,750
24-Jun	13	A9	856	C	60	moderate		\$2,250
27-Jun	2	A20	918	P	100	major		\$3,750
27-Jun	2	A20	918	C	40	moderate		\$2,250
27-Jun	15	B15	1050	P	30	low		\$1,500
<b>Count:</b>					<b>45</b>		<b>subtotal</b>	<b>\$115,500</b>

Combustion Stack COM Non-compliant Clock Hours

Battery	April	May	June	Total Clock Hours 2nd Qtr 2019	amount	
1	4	4	6	14	\$2,800	
2	7	7	7	21	\$4,200	
3	6	7	11	24	\$4,800	
13	3	3	2	8	\$1,600	
14	1	1	3	5	\$1,000	
15	14	2	5	21	\$4,200	
19	2	4	5	11	\$2,200	
20	4	3	4	11	\$2,200	
B	4	4	1	9	\$1,800	
C	1	2	1	4	\$800	
<b>Count:</b>	<b>46</b>	<b>37</b>	<b>45</b>	<b>128</b>	<b>\$25,600</b>	<b>subtotal</b>

Stipulated Penalty Base Amount from #190604  
 except High Opacity Doors: \$750

\$1,000

**CHARGING**

Date 2019	Battery	Seconds	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
2-Jul	B	112	ACHD	2.02	major	\$250		\$2,750
3-Jul	13	203.5	Keramida	3.67	major			\$2,500
15-Jul	C	122	ACHD	2.20	major			\$2,500
25-Jul	C	149	ACHD	2.68	major	\$250		\$2,750
16-Aug	C	64	ACHD	1.15	low			\$1,000
3-Sep	19	117.5	Keramida (Chrgs #1-4)	1.56	major			\$2,500
3-Sep	19	98.5	Keramida (Chrgs #2-5)	1.30	moderate			\$1,500
6-Sep	B	61	ACHD	1.10	low			\$1,000
11-Sep	C	111	ACHD	2.00	major	\$250		\$2,750
15-Sep	B	74.5	Keramida	1.34	moderate	\$250		\$1,750
23-Sep	C	59	ACHD	1.06	low			\$1,000
<b>Count:</b>		<b>11</b>					<b>subtotal</b>	<b>\$22,000</b>

**DOORS**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
15-Jul	C	3.05%	Keramida	1.02	low			\$1,000
9-Aug	15	5.50%	Keramida	1.10	low			\$1,000
13-Aug	C	4.79%	ACHD	1.60	major			\$2,500
20-Sep	C	4.58%	Keramida	1.53	major			\$2,500
23-Sep	15	12.71%	Keramida	2.54	major			\$2,500
<b>Count:</b>		<b>5</b>					<b>subtotal</b>	<b>\$9,500</b>

**DOORS >40% (30% for Battery C) - ACHD**

Date 2019	Battery	Oven #	Opacity	Time Observed	Severity Value	Severity	H2S exceed.	SO2 exceed	amount
2-Jul	B	B17	50	715	1.11	low	\$250		\$1,000
9-Jul	1	B10	100	1132	2.22	major			\$1,875
17-Jul	19	C21	60	1004	1.33	moderate			\$1,125
19-Jul	3	A15	50	736	1.11	low			\$750
23-Jul	1	A1	50	1032	1.11	low			\$750
23-Jul	1	B30	60	1034	1.33	moderate			\$1,125
23-Jul	13	B11	60	841	1.33	moderate			\$1,125
24-Jul	B	B17	60	955	1.33	moderate			\$1,125
25-Jul	C	C61	40	934	1.14	low	\$250		\$1,000
1-Aug	1	B24	70	1040	1.56	major			\$1,875
1-Aug	15	A23	50	806	1.11	low			\$750
5-Aug	B	A2	45	716	1.00	low			\$750
7-Aug	C	C15	50	1146	1.43	moderate			\$1,125
9-Aug	3	B17	70	1115	1.56	major			\$1,875
13-Aug	C	C1	60	726	1.71	major			\$1,875
13-Aug	C	C3	80	727	2.29	major			\$1,875
13-Aug	C	C5	35	727	1.00	low			\$750
13-Aug	C	C7	40	727	1.14	low			\$750
13-Aug	C	C11	90	728	2.57	major			\$1,875
13-Aug	C	C13	85	728	2.43	major			\$1,875
13-Aug	C	C21	100	731	2.86	major			\$1,875
14-Aug	B	A2	90	726	2.00	major			\$1,875
15-Aug	2	A4	100	1141	2.22	major			\$1,875
19-Aug	15	A5	60	1046	1.33	moderate			\$1,125
20-Aug	20	B10	100	1016	2.22	major			\$1,875
30-Aug	20	B6	60	859	1.33	moderate			\$1,125
11-Sep	C	C23	100	730	2.86	major	\$250		\$2,125
13-Sep	13	B1	60	921	1.33	moderate			\$1,125
17-Sep	14	B18	70	1002	1.56	major			\$1,875
18-Sep	20	B22	60	940	1.33	moderate			\$1,125
19-Sep	2	A14	100	1024	2.22	major			\$1,875
23-Sep	19	A17	45	953	1.00	low			\$750
23-Sep	19	A9	55	954	1.22	moderate			\$1,125
24-Sep	20	B24	70	905	1.56	major			\$1,875
<b>Count:</b>			<b>34</b>				<b>subtotal</b>		<b>\$46,875</b>

**OFFTAKES**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
1-Jul	3	5.47%	Keramida	1.09	low			\$1,000
10-Jul	13	6.14%	ACHD	1.54	major			\$2,500
16-Jul	14	5.17%	ACHD	1.29	moderate			\$1,500
21-Jul	15	4.72%	Keramida	1.18	low			\$1,000
24-Jul	B	4.93%	ACHD	1.23	moderate			\$1,500
7-Sep	14	6.14%	Keramida	1.53	major			\$2,500
7-Sep	15	9.09%	Keramida	2.27	major			\$2,500
21-Sep	13	7.14%	Keramida	1.78	major			\$2,500
<b>Count:</b>		<b>8</b>					<b>subtotal</b>	<b>\$15,000</b>

**LIDS**

Date 2019	Battery	Percent Leaking (%)	ACHD or Keramida	Severity Value	Severity	H2S exceed.	SO2 exceed.	amount
8-Jul	B	1.67%	Keramida	1.670	major			\$2,500
18-Jul	1	2.46%	Keramida	1.230	moderate			\$1,500

18-Jul	B	1.03%	ACHD	1.030	low			\$1,000
24-Jul	B	1.06%	ACHD	1.060	low			\$1,000
23-Aug	B	1.35%	ACHD	1.351	moderate			\$1,500
12-Sep	B	2.70%	Keramida	2.700	major			\$2,500
23-Sep	B	1.39%	Keramida	1.390	moderate			\$1,500
27-Sep	C	2.22%	Keramida	3.700	major			\$2,500
<b>Count:</b> 8								<b>subtotal</b> <b>\$14,000</b>

**PUSHING**

Date 2019	Battery	Oven	Max Opacity (%)	ACHD or USS	Severity	H2S exceed.	SO2 exceed.	amount
1-Jul	2	A24	30	USSteel	low			\$1,000
3-Jul	19	B10	30	USSteel	low			\$1,000
12-Jul	14	B01	35	USSteel	low			\$1,000
14-Jul	19	B28	30	USSteel	low			\$1,000
17-Jul	1	A24	60	USSteel	moderate			\$1,500
23-Jul	13	A2	60	ACHD	moderate			\$1,500
25-Jul	13	A28	40	ACHD	moderate	\$250		\$1,750
29-Jul	13	A5	65	ACHD	major	\$250		\$2,750
29-Jul	13	A05 **	30	USSteel	low	\$250		duplicate
31-Jul	15	A20	60	ACHD	moderate			\$1,500
31-Jul	15	A20 **	60	USSteel	moderate			duplicate
1-Aug	15	B24	35	ACHD	low			\$1,000
5-Aug	B	A14	30	ACHD	low			\$1,000
5-Aug	B	A16	35	ACHD	low			\$1,000
9-Aug	3	B13	45	ACHD	moderate			\$1,500
13-Aug	2	B10	30	USSteel	low			\$1,000
14-Aug	B	A26	40	ACHD	moderate			\$1,500
14-Aug	B	A26 **	40	USSteel	moderate			duplicate
14-Aug	2	B18	30	USSteel	low			\$1,000
20-Aug	19	B14	35	ACHD	low			\$1,000
20-Aug	15	A03	40	USSteel	moderate			\$1,500
20-Aug	15	A01	60	USSteel	moderate			\$1,500
20-Aug	20	B10	40	USSteel	moderate			\$1,500
23-Aug	B	A4	25	ACHD	low			\$1,000
27-Aug	C	C82	40	ACHD	moderate			\$1,500
27-Aug	C	C84	70	ACHD	major			\$2,500
28-Aug	2	B29	30	USSteel	low			\$1,000
30-Aug	20	C23	75	ACHD	major			\$2,500
1-Sep	2	B29	50	USSteel	moderate			\$1,500
10-Sep	19	B06	45	USSteel	moderate			\$1,500
10-Sep	20	B14	40	USSteel	moderate			\$1,500
10-Sep	19	B04	40	USSteel	moderate			\$1,500
10-Sep	20	B12	30	USSteel	low			\$1,000
10-Sep	19	B10	60	USSteel	moderate			\$1,500
10-Sep	20	B18	35	USSteel	low			\$1,000
10-Sep	19	B08	45	USSteel	moderate			\$1,500
10-Sep	20	B16	35	USSteel	low			\$1,000
12-Sep	15	A8	70	ACHD	major			\$2,500
12-Sep	3	A1	30	ACHD	low			\$1,000
12-Sep	3	A01 **	30	USSteel	low			duplicate
12-Sep	15	A08 **	70	USSteel	major			duplicate
19-Sep	2	A6	35	ACHD	low			\$1,000
25-Sep	3	B18	30	ACHD	low	\$250		\$1,250
25-Sep	3	B20	40	ACHD	moderate	\$250		\$1,750
27-Sep	19	A7	30	ACHD	low			\$1,000
29-Sep	2	A22	50	USSteel	moderate			\$1,500
<b>Count:</b> 41								<b>subtotal</b> <b>\$57,000</b>

\*\* Push observed twice.

**TRAVEL**

Date 2019	Battery	Oven	Max Opacity (%)	ACHD or USS	Severity	H2S exceed.	SO2 exceed.	amount
1-Jul	2	A24	15	USSteel	low			\$1,000
3-Jul	19	B10	25	USSteel	low			\$1,000
11-Jul	13	A14	15	USSteel	low			\$1,000
14-Jul	19	B28	20	USSteel	low			\$1,000
17-Jul	1	A24	40	USSteel	moderate			\$1,500
18-Jul	15	B17	65	ACHD	major			\$2,500
18-Jul	15	B17 **	65	USSteel	major			duplicate
29-Jul	3	A1	45	ACHD	moderate	\$250		\$1,750
29-Jul	13	A05	15	USSteel	low	\$250		\$1,250
31-Jul	15	A20	70	ACHD	major			\$2,500
31-Jul	15	A20 **	70	USSteel	major			duplicate
5-Aug	13	A31	25	ACHD	low			\$1,000
9-Aug	3	B13	30	ACHD	low			\$1,000
12-Aug	14	A17	30	ACHD	low			\$1,000
13-Aug	2	B10	15	USSteel	low			\$1,000
15-Aug	2	B30	40	ACHD	moderate			\$1,500
20-Aug	19	B10	30	ACHD	low			\$1,000
20-Aug	15	A03	30	USSteel	low			\$1,000
20-Aug	15	A01	30	USSteel	low			\$1,000
26-Aug	1	A6	40	ACHD	moderate			\$1,500
28-Aug	2	B29	20	USSteel	low			\$1,000
30-Aug	20	C23	65	ACHD	major			\$2,500
1-Sep	2	B29	30	USSteel	low			\$1,000
3-Sep	13	A16	30	ACHD	low			\$1,000
9-Sep	15	B17	30	ACHD	low			\$1,000



10-Sep	19	B04	20	USSteel	low		\$1,000		
11-Sep	2	A24	15	ACHD	low	\$250	\$1,250		
12-Sep	15	A12	25	ACHD	low		\$1,000		
12-Sep	15	A12 **	25	USSteel	low		duplicate		
29-Sep	2	A22	30	USSteel	low		\$1,000		
<b>Count:</b>							27	subtotal	<b>\$34,250</b>

\*\* Travel observed twice.

**SOAKING >20% (>10% for Battery C) - ACHD**

Date 2019	Battery	Oven #	Time Observed	Pusher/Coke (side)	Max. Non-flame Opacity	Severity	H2S exceed.	SO2 exceed.	amount
11-Jul	14	B9	744	P	60	moderate			\$1,500
11-Jul	14	B9	744	C	40	moderate			\$1,500
16-Jul	14	B28	955	P	100	major			\$2,500
16-Jul	15	A1	1026	C	60	moderate			\$1,500
22-Jul	13	A24	1007	P	45	moderate			\$1,500
30-Jul	20	B23	734	P	60	moderate			\$1,500
31-Jul	B	B18	856	P	45	moderate			\$1,500
5-Aug	13	A31	921	C	30	low			\$1,000
8-Aug	15	B1	825	C	30	low			\$1,000
14-Aug	B	A18	740	C	30	low			\$1,000
15-Aug	19	A7	913	C	100	major			\$2,500
16-Aug	13	B28	822	P	50	moderate			\$1,500
20-Aug	2	A29	845	C	40	moderate			\$1,500
21-Aug	B	A8	738	P	50	moderate			\$1,500
23-Aug	B	A4	958	P	80	major			\$2,500
28-Aug	13	B15	732	P	40	moderate			\$1,500
28-Aug	13	B17	759	P	60	moderate			\$1,500
29-Aug	3	B28	837	C	80	major			\$2,500
3-Sep	13	A12	757	C	70	major			\$2,500
11-Sep	C	C29	754	P	75	major	\$250		\$2,750
11-Sep	C	C39	1109	P	70	major	\$250		\$2,750
16-Sep	13	A22	904	C	40	moderate			\$1,500
17-Sep	14	B1	807	P	90	major			\$2,500
17-Sep	14	B3	822	P	90	major			\$2,500
18-Sep	14	A24	824	P	35	low			\$1,000
18-Sep	14	A26	824	P	40	moderate			\$1,500
23-Sep	19	C19	846	C	60	moderate			\$1,500
<b>Count:</b>							27	subtotal	<b>\$48,000</b>

**Combustion Stack COM Non-compliant Clock Hours**

Battery	July	August	September	Total Clock Hours 2nd Qtr 2019	amount
1	5	2	4	11	\$2,200
2	13	12	10	35	\$8,600
3	4	5	10	19	\$3,800
13	2	2	6	10	\$2,000
14	4	2	8	14	\$2,800
15	3	10	11	24	\$4,800
19	3	9	10	22	\$4,400
20	13	1	1	15	\$3,000
B	5	5	2	12	\$2,400
C	0	1	1	2	\$400
<b>Count:</b>	52	49	63	164	<b>\$34,400</b>

\* Note: 33 hrs. @ \$200 & 2 hrs. @ \$1000 = \$8,600