

COUNTY OF



ALLEGHENY

March 12, 2021

Michael Rhoads  
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, 2020 through December 31, 2020 (2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> Quarters)**

Dear Mr. Rhoads:

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, third, and fourth quarters of 2020, April 1, 2020, through December 31, 2020. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$383,450.00**. Pursuant to SOA, V. Civil Penalty Payment, Paragraph A, 90 percent of that amount, or **\$345,105.00**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$38,345.00**, shall constitute a civil penalty and 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



DEBRA BOGEN, MD, DIRECTOR  
**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/HEALTHDEPARTMENT](http://WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT)



The demand for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from April 1, 2020 through December 31, 2020. 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, 2020 through December 31, 2020.

If you have any questions concerning this demand for stipulated penalties, please contact Shannon Sandberg, ACHD Air Quality 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  
Air Quality Manager  
Compliance and Enforcement Section  
Air Quality Program

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



Settlement Order and Agreement  
#190604

Stipulated Penalty  
Q2, Q3, Q4 2020

March 12, 2021



## Total Stipulated Penalties: U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
<b>Q2 2020</b>					
Apr 2020	\$1,000	\$43,500	\$6,625	\$1,400	\$52,525
May 2020	\$3,000	\$34,625	\$4,625	\$1,400	\$43,650
Jun 2020	\$1,500	\$36,250	\$3,625	\$6,200	\$47,575
<b>Total</b>	<b>\$5,500</b>	<b>\$114,375</b>	<b>\$9,625</b>	<b>\$9,000</b>	<b>\$138,500</b>
<b>Q3 2020</b>					
Jul 2020	\$1,000	\$34,125	\$4,625	\$4,000	\$43,750
Aug 2020	\$5,000	\$37,250	\$3,625	\$6,000	\$51,875
Sep 2020	\$3,500	\$24,250	\$5,125	\$4,000	\$36,875
<b>Total</b>	<b>\$9,500</b>	<b>\$95,625</b>	<b>\$8,125</b>	<b>\$14,000</b>	<b>\$127,250</b>
<b>Q4 2020</b>					
Oct 2020	\$1,875	\$40,750	\$2,625	\$4,000	\$49,250
Nov 2020	\$2,625	\$37,375	\$2,625	\$3,200	\$45,825
Dec 2020	\$4,250	\$23,250	\$2,625	\$3,000	\$33,125
<b>Total</b>	<b>\$8,750</b>	<b>\$101,375</b>	<b>\$2,625</b>	<b>\$10,200</b>	<b>\$122,950</b>
<b>Total</b>	<b>\$23,750</b>	<b>\$311,375</b>	<b>\$15,125</b>	<b>\$33,200</b>	<b>\$383,450</b>



### Quarterly Compliance (ACHD and Method 303 Inspections)

Quarter (Year)	ACHD Total Compliant	ACHD Total Inspections (w/o HO Doors)	ACHD % Compliance	Total M303 Compl Insps	Total M303 Inspections	Method 303 % Compliance	Total Compliant Insp (ACHD and M303)	Total Inspections (ACHD and M303)	Percent Compliance
Q2 2020	1269	1331	95.34%	3635	3640	99.86%	4904	4971	98.65%
Q3 2020	1216	1255	96.89%	3674	3680	99.84%	4890	4935	99.09%
Q4 2020	1034	1074	96.28%	3674	3680	99.84%	4708	4754	99.03%
<b>Total</b>	<b>3519</b>	<b>3660</b>	<b>96.15%</b>	<b>10983</b>	<b>11000</b>	<b>99.85%</b>	<b>14502</b>	<b>14660</b>	<b>98.92%</b>

### Average Percent Compliance

Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of 2 Quarters
Q2 2020	98.132%	98.652%	98.392%
Q3 2020	98.652%	99.088%	98.870%
Q4 2020	99.088%	99.032%	99.060%



### Penalty Summary for ACHD Inspections

Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD HO Door Penalty	ACHD Total Penalties
<b>Q2 2020</b>									
Apr 2020	\$3,500	\$17,500	\$0	\$0	\$5,000	\$10,000	\$0	\$7,500	\$43,500
May 2020	\$5,000	\$7,500	\$5,250	\$2,500	\$6,500	\$4,500	\$0	\$3,375	\$34,625
Jun 2020	\$4,750	\$7,000	\$1,000	\$1,250	\$8,250	\$7,250	\$0	\$6,750	\$36,250
<b>Total</b>	<b>\$13,250</b>	<b>\$32,000</b>	<b>\$6,250</b>	<b>\$3,750</b>	<b>\$19,750</b>	<b>\$21,750</b>	<b>\$0</b>	<b>\$17,625</b>	<b>\$114,375</b>
<b>Q3 2020</b>									
Jul 2020	\$1,500	\$11,500	\$5,000	\$1,500	\$4,500	\$3,000	\$0	\$7,125	\$34,125
Aug 2020	\$8,500	\$2,500	\$1,000	\$0	\$4,000	\$2,500	\$0	\$18,750	\$37,250
Sep 2020	\$7,500	\$0	\$2,500	\$2,000	\$4,000	\$4,500	\$0	\$3,750	\$24,250
<b>Total</b>	<b>\$17,500</b>	<b>\$14,000</b>	<b>\$8,500</b>	<b>\$3,500</b>	<b>\$12,500</b>	<b>\$10,000</b>	<b>\$0</b>	<b>\$29,625</b>	<b>\$95,625</b>
<b>Q4 2020</b>									
Oct 2020	\$5,375	\$4,250	\$3,125	\$750	\$3,875	\$3,750	\$0	\$19,625	\$40,750
Nov 2020	\$4,250	\$3,250	\$4,250	\$2,875		\$1,375	\$2,125	\$19,250	\$37,375
Dec 2020	\$6,750	\$3,000	\$0	\$0	\$9,375	\$1,500	\$0	\$2,625	\$23,250
<b>Total</b>	<b>\$16,375</b>	<b>\$10,500</b>	<b>\$7,375</b>	<b>\$3,625</b>	<b>\$13,250</b>	<b>\$6,625</b>	<b>\$2,125</b>	<b>\$41,500</b>	<b>\$101,375</b>
<b>Total</b>	<b>\$47,125</b>	<b>\$56,500</b>	<b>\$22,125</b>	<b>\$10,875</b>	<b>\$45,500</b>	<b>\$38,375</b>	<b>\$2,125</b>	<b>\$88,750</b>	<b>\$311,375</b>



### Non-Compliant ACHD Charge Inspections and Penalties

Quarter (Year)	Date	Battery	Duration of readings (seconds)	Charge Severity Value	Charging Severity of Violation	Charging Penalty Multiplier	Charging Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	ACHD Total Charging Penalty
Q2 2020	4/6/2020	C	62	1.12	Low	1.00	\$1,000			\$1,000
Q2 2020	4/30/2020	20	88	1.59	Major	2.50	\$2,500			\$2,500
Q2 2020	5/4/2020	13	62	1.12	Low	1.00	\$1,000			\$1,000
Q2 2020	5/26/2020	C	96	1.73	Major	2.50	\$2,500			\$2,500
Q2 2020	5/28/2020	B	67	1.21	Moderate	1.50	\$1,500			\$1,500
Q2 2020	6/1/2020	14	57	1.03	Low	1.00	\$1,000	\$250		\$1,250
Q2 2020	6/10/2020	20	116	2.09	Major	2.50	\$2,500			\$2,500
Q2 2020	6/11/2020	13	63	1.14	Low	1.00	\$1,000			\$1,000
<b>Total</b>						<b>13.00</b>	<b>\$13,000</b>	<b>\$250</b>		<b>\$13,250</b>



### Non-Compliant ACHD Charge Inspections and Penalties

Quarter (Year)	Date	Battery	Duration of readings (seconds)	Charge Severity Value	Charging Severity of Violation	Charging Penalty Multiplier	Charging Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	ACHD Total Charging Penalty
Q3 2020	7/28/2020	3	98	1.30	Moderate	1.50	\$1,500			\$1,500
Q3 2020	8/5/2020	B	89	1.60	Major	2.50	\$2,500			\$2,500
Q3 2020	8/25/2020	B	112	2.02	Major	2.50	\$2,500			\$2,500
Q3 2020	8/26/2020	14	60	1.08	Low	1.00	\$1,000			\$1,000
Q3 2020	8/27/2020	C	99	1.78	Major	2.50	\$2,500			\$2,500
Q3 2020	9/8/2020	13	73	1.32	Moderate	1.50	\$1,500			\$1,500
Q3 2020	9/14/2020	14	104	1.87	Major	2.50	\$2,500			\$2,500
Q3 2020	9/21/2020	20	148	2.67	Major	2.50	\$2,500			\$2,500
Q3 2020	9/23/2020	13	57	1.03	Low	1.00	\$1,000			\$1,000
<b>Total</b>						<b>17.50</b>	<b>\$17,500</b>			<b>\$17,500</b>





### Non-Compliant ACHD Charge Inspections and Penalties

Quarter (Year)	Date	Battery	Duration of readings (seconds)	Charge Severity Value	Charging Severity of Violation	Charging Penalty Multiplier	Charging Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	ACHD Total Charging Penalty
Q4 2020	10/9/2020	C	107	1.93	Major	2.50	\$1,875			\$1,875
Q4 2020	10/21/2020	14	57	1.03	Low	1.00	\$750			\$750
Q4 2020	10/22/2020	20	59	1.06	Low	1.00	\$750			\$750
Q4 2020	10/23/2020	C	66	1.19	Low	1.00	\$750	\$250	\$1,000	\$2,000
Q4 2020	11/4/2020	B	475	8.56	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/10/2020	14	110	1.98	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	12/1/2020	1	162	2.15	Major	2.50	\$1,875			\$1,875
Q4 2020	12/9/2020	C	1403	25.28	Major	2.50	\$1,875			\$1,875
Q4 2020	12/14/2020	14	145	2.61	Major	2.50	\$1,875			\$1,875
Q4 2020	12/29/2020	C	70	1.26	Moderate	1.50	\$1,125			\$1,125
<b>Total</b>						<b>19.50</b>	<b>\$14,625</b>	<b>\$750</b>	<b>\$1,000</b>	<b>\$16,375</b>



### Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	max non-flame opacity	pusher / coke (if viol.)	Severity of Violation	Penalty Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Total Soaking Penalty
Q2 2020	4/1/2020	B	A30	60	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/1/2020	B	A30	50	P	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/1/2020	B	A35	60	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/1/2020	B	A35	60	P	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/1/2020	B	B2	100	C	major	2.50	\$2,500			\$2,500
Q2 2020	4/17/2020	B	B13	40	P	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/17/2020	B	A21	70	P	major	2.50	\$2,500			\$2,500
Q2 2020	4/29/2020	B	B27	40	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/30/2020	20	C6	25	C	low	1.00	\$1,000			\$1,000
Q2 2020	4/30/2020	20	C8	100	C	major	2.50	\$2,500			\$2,500
Q2 2020	5/6/2020	B	B31	100	C	major	2.50	\$2,500			\$2,500
Q2 2020	5/6/2020	B	B36	100	P	major	2.50	\$2,500			\$2,500
Q2 2020	5/28/2020	B	A29	70	C	major	2.50	\$2,500			\$2,500
Q2 2020	6/10/2020	20	C16	60	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/10/2020	20	C24	40	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/10/2020	20	C28	50	C	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/10/2020	20	C16	70	P	major	2.50	\$2,500			\$2,500
<b>Total</b>								<b>\$32,000</b>			<b>\$32,000</b>



### Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	max non-flame opacity	pusher / coke (if viol.)	Severity of Violation	Penalty Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Total Soaking Penalty
Q3 2020	7/16/2020	B	A29	65	C	major	2.50	\$2,500			\$2,500
Q3 2020	7/17/2020	20	B20	100	P	major	2.50	\$2,500			\$2,500
Q3 2020	7/17/2020	20	B22	70	C	major	2.50	\$2,500			\$2,500
Q3 2020	7/17/2020	20	C1	100	C	major	2.50	\$2,500			\$2,500
Q3 2020	7/29/2020	20	C18	60	P	moderate	1.50	\$1,500			\$1,500
Q3 2020	8/5/2020	B	B35	100	C	major	2.50	\$2,500			\$2,500
<b>Total</b>								<b>\$14,000</b>			<b>\$14,000</b>



### Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	max non-flame opacity	pusher / coke (if viol.)	Severity of Violation	Penalty Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Total Soaking Penalty
Q4 2020	10/20/2020	20	B23	80	C	major	2.50	\$1,875			\$1,875
Q4 2020	10/23/2020	C	C26	40	P	moderate	1.50	\$1,125	\$250	\$1,000	\$2,375
Q4 2020	11/4/2020	B	B32	60	C	moderate	1.50	\$1,125	\$250		\$1,375
Q4 2020	11/12/2020	20	B10	75	P	major	2.50	\$1,875			\$1,875
Q4 2020	12/2/2020	B	B7	90	C	major	2.50	\$1,875			\$1,875
Q4 2020	12/3/2020	B	B12	50	C	moderate	1.50	\$1,125			\$1,125
<b>Total</b>								<b>\$9,000</b>	<b>\$500</b>	<b>\$1,000</b>	<b>\$10,500</b>



### ACHD Non-Compliant Push Inspections and Penalties

Quarter (Year)	Date	Battery	Max Opacity	ACHD Push Severity of Violation	Push Penalty Multiplier	Push Penalty	H2S Penalty	SO2 Penalty	Total Push Penalty
Q2 2020	4/1/2020	B	25	low	1.00	\$1,000			\$1,000
Q2 2020	4/6/2020	C	25	low	1.00	\$1,000			\$1,000
Q2 2020	4/7/2020	3	30	low	1.00	\$1,000			\$1,000
Q2 2020	4/15/2020	3	30	low	1.00	\$1,000			\$1,000
Q2 2020	4/24/2020	C	25	low	1.00	\$1,000			\$1,000
Q2 2020	5/1/2020	19	50	moderate	1.50	\$1,500			\$1,500
Q2 2020	5/12/2020	B	30	low	1.00	\$1,000			\$1,000
Q2 2020	5/19/2020	C	20	low	1.00	\$1,000			\$1,000
Q2 2020	5/26/2020	C	40	moderate	3.00	\$3,000			\$3,000
Q2 2020	6/1/2020	14	25	low	1.00	\$1,000	\$250		\$1,250
Q2 2020	6/3/2020	B	55	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/15/2020	19	60	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/23/2020	19	100	major	2.50	\$2,500			\$2,500
Q2 2020	6/30/2020	B	40	moderate	1.50	\$1,500			\$1,500
<b>Total</b>					<b>19.50</b>	<b>\$19,500</b>	<b>\$250</b>		<b>\$19,750</b>



### ACHD Non-Compliant Push Inspections and Penalties

Quarter (Year)	Date	Battery	Max Opacity	ACHD Push Severity of Violation	Push Penalty Multiplier	Push Penalty	H2S Penalty	SO2 Penalty	Total Push Penalty
Q3 2020	7/2/2020	B	25	low	1.00	\$1,000			\$1,000
Q3 2020	7/31/2020	1	35	low	1.00	\$1,000			\$1,000
Q3 2020	7/31/2020	14	65	major	2.50	\$2,500			\$2,500
Q3 2020	8/6/2020	20	30	low	1.00	\$1,000			\$1,000
Q3 2020	8/11/2020	C	45	moderate	1.50	\$1,500			\$1,500
Q3 2020	8/18/2020	3	45	moderate	1.50	\$1,500			\$1,500
Q3 2020	9/10/2020	13	50	moderate	1.50	\$1,500			\$1,500
Q3 2020	9/15/2020	C	60	moderate	1.50	\$1,500			\$1,500
Q3 2020	9/28/2020	3	35	low	1.00	\$1,000			\$1,000
<b>Total</b>					<b>12.50</b>	<b>\$12,500</b>			<b>\$12,500</b>



### ACHD Non-Compliant Push Inspections and Penalties

Quarter (Year)	Date	Battery	Max Opacity	ACHD Push Severity of Violation	Push Penalty Multiplier	Push Penalty	H2S Penalty	SO2 Penalty	Total Push Penalty
Q4 2020	10/14/2020	1	30	low	1.00	\$750			\$750
Q4 2020	10/23/2020	C	75	major	2.50	\$1,875	\$250	\$1,000	\$3,125
Q4 2020	12/2/2020	B	45	moderate	1.50	\$1,125			\$1,125
Q4 2020	12/2/2020	B	60	moderate	1.50	\$1,125			\$1,125
Q4 2020	12/2/2020	B	65	major	2.50	\$1,875			\$1,875
Q4 2020	12/3/2020	3	35	low	1.00	\$750			\$750
Q4 2020	12/7/2020	2	45	moderate	1.50	\$1,125			\$1,125
Q4 2020	12/9/2020	C	65	major	2.50	\$1,875			\$1,875
Q4 2020	12/14/2020	14	35	low	1.00	\$750			\$750
Q4 2020	12/30/2020	1	35	low	1.00	\$750			\$750
<b>Total</b>					<b>16.00</b>	<b>\$12,000</b>	<b>\$250</b>	<b>\$1,000</b>	<b>\$13,250</b>



### Non-Compliant ACHD Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	travel max opacity	ACHD Travel Severity of Violation	Travel Penalty Multiplier	Travel Penalty	H2S Penalty	SO2 Penalty	Total Travel Penalty
Q2 2020	4/1/2020	13	A20	25	low	1.00	\$1,000			\$1,000
Q2 2020	4/7/2020	3	B6	30	low	1.00	\$1,000			\$1,000
Q2 2020	4/14/2020	1	A27	25	low	1.00	\$1,000			\$1,000
Q2 2020	4/15/2020	3	B17	30	low	1.00	\$1,000			\$1,000
Q2 2020	4/15/2020	3	B8	40	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/22/2020	14	A14	30	low	1.00	\$1,000			\$1,000
Q2 2020	4/23/2020	20	C23	20	low	1.00	\$1,000			\$1,000
Q2 2020	4/23/2020	3	B8	40	moderate	1.50	\$1,500			\$1,500
Q2 2020	4/27/2020	1	A2	30	low	1.00	\$1,000			\$1,000
Q2 2020	5/5/2020	3	B27	35	low	1.00	\$1,000			\$1,000
Q2 2020	5/18/2020	1	A11	30	low	1.00	\$1,000			\$1,000
Q2 2020	5/20/2020	13	A30	45	moderate	1.50	\$1,500			\$1,500
Q2 2020	5/27/2020	1	C2	30	low	1.00	\$1,000			\$1,000
Q2 2020	6/1/2020	14	B1	25	low	1.00	\$1,000	\$250		\$1,250
Q2 2020	6/11/2020	13	A21	45	moderate	1.50	\$1,500			\$1,500
Q2 2020	6/25/2020	3	B23	30	low	1.00	\$1,000		\$1,000	\$2,000
Q2 2020	6/25/2020	3	B14	40	moderate	1.50	\$1,500		\$1,000	\$2,500
<b>Total</b>						<b>19.50</b>	<b>\$19,500</b>	<b>\$250</b>	<b>\$2,000</b>	<b>\$21,750</b>





### Non-Compliant ACHD Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	travel max opacity	ACHD Travel Severity of Violation	Travel Penalty Multiplier	Travel Penalty	H2S Penalty	SO2 Penalty	Total Travel Penalty
Q3 2020	7/13/2020	2	A21	35	low	1.00	\$1,000			\$1,000
Q3 2020	7/31/2020	1	A24	25	low	1.00	\$1,000			\$1,000
Q3 2020	7/31/2020	14	A19	25	low	1.00	\$1,000			\$1,000
Q3 2020	8/10/2020	1	A1	40	moderate	1.50	\$1,500			\$1,500
Q3 2020	8/18/2020	2	A22	30	low	1.00	\$1,000			\$1,000
Q3 2020	9/9/2020	1	A22	40	moderate	1.50	\$1,500			\$1,500
Q3 2020	9/10/2020	13	A30	60	moderate	1.50	\$1,500			\$1,500
Q3 2020	9/11/2020	14	B1	45	moderate	1.50	\$1,500			\$1,500
<b>Total</b>						<b>10.00</b>	<b>\$10,000</b>			<b>\$10,000</b>



### Non-Compliant ACHD Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	travel max opacity	ACHD Travel Severity of Violation	Travel Penalty Multiplier	Travel Penalty	H2S Penalty	SO2 Penalty	Total Travel Penalty
Q4 2020	10/8/2020	2	B2	45	moderate	1.50	\$1,125			\$1,125
Q4 2020	10/21/2020	3	B3	25	low	1.00	\$750			\$750
Q4 2020	10/22/2020	19	C26	50	moderate	1.50	\$1,125			\$1,125
Q4 2020	10/27/2020	1	A21	20	low	1.00	\$750			\$750
Q4 2020	11/10/2020	14	B1	40	moderate	1.50	\$1,125	\$250		\$1,375
Q4 2020	12/3/2020	3	B6	30	low	1.00	\$750			\$750
Q4 2020	12/16/2020	20	B23	35	low	1.00	\$750			\$750
<b>Total</b>						<b>8.50</b>	<b>\$6,375</b>	<b>\$250</b>		<b>\$6,625</b>



### Non-Compliant ACHD Doors Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Doors	Severity Value	Severity of Violation	Penalty Multiplier	Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total Door Penalty
Q4 2020	11/4/2020	B	23.33%	4.67	Major	2.50	\$1,875	\$250		\$2,125
<b>Total</b>			<b>23.33%</b>	<b>4.67</b>		<b>2.50</b>	<b>\$1,875</b>	<b>\$250</b>		<b>\$2,125</b>



### Non-Compliant ACHD Topside (Lid) Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Lids	Severity Value	Severity of Violation	Penalty Multiplier	H2S Penalty	SO2 Penalty	ACHD Total Lid Penalty
Q2 2020	5/7/2020	20	3.20	3.20	Major	2.50	\$250		\$2,750
Q2 2020	5/12/2020	B	2.00	2.00	Major	2.50			\$2,500
Q2 2020	6/18/2020	B	1.01	1.01	Low	1.00			\$1,000
Q3 2020	7/2/2020	B	4.05	4.05	Major	2.50			\$2,500
Q3 2020	7/29/2020	20	3.92	3.92	Major	2.50			\$2,500
Q3 2020	8/25/2020	B	1.01	1.01	Low	1.00			\$1,000
Q3 2020	9/4/2020	B	1.67	1.67	Major	2.50			\$2,500
Q4 2020	10/23/2020	C	0.96	1.61	Major	2.50	\$250	\$1,000	\$3,125
Q4 2020	11/4/2020	B	2.36	2.36	Major	2.50	\$250		\$2,125
Q4 2020	11/9/2020	C	2.17	3.61	Major	2.50	\$250		\$2,125
<b>Total</b>			<b>22.36</b>			<b>22.00</b>	<b>\$1,000</b>	<b>\$1,000</b>	<b>\$22,125</b>



### Non-Compliant ACHD Topside (Offtake) Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Offtakes	Severity Value	Severity of Violation	Penalty Multiplier	Topside Offtake Penalty	SO2 Penalty	H2S Penalty	ACHD Total Offtake Penalty
Q2 2020	5/12/2020	B	8.00	2.00	Major	2.50	\$2,500			\$2,500
Q2 2020	6/1/2020	14	4.10	1.02	Low	1.00	\$1,000		\$250	\$1,250
Q3 2020	7/16/2020	B	6.00	1.50	Moderate	1.50	\$1,500			\$1,500
Q3 2020	9/4/2020	B	4.67	1.17	Low	1.00	\$1,000			\$1,000
Q3 2020	9/9/2020	1	5.47	1.09	Low	1.00	\$1,000			\$1,000
Q4 2020	10/1/2020	B	4.05	1.01	Low	1.00	\$750			\$750
Q4 2020	11/4/2020	B	4.73	1.18	Low	1.00	\$750		\$250	\$1,000
Q4 2020	11/24/2020	B	6.08	1.52	Major	2.50	\$1,875			\$1,875
<b>Total</b>						<b>11.50</b>	<b>\$10,375</b>		<b>\$500</b>	<b>\$10,875</b>



### Non-Compliant ACHD Doors >40% Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	opacity	Severity of Violation	Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total HO Door Penalty
Q2 2020	4/1/2020	B	A38	50	Low	1.00	\$750			\$750
Q2 2020	4/1/2020	B	B30	50	Low	1.00	\$750			\$750
Q2 2020	4/6/2020	C	C72	55	Major	2.50	\$1,875			\$1,875
Q2 2020	4/6/2020	C	C78	45	Moderate	1.50	\$1,125			\$1,125
Q2 2020	4/15/2020	14	B20	65	Moderate	1.50	\$1,125			\$1,125
Q2 2020	4/21/2020	C	C45	50	Moderate	1.50	\$1,125			\$1,125
Q2 2020	4/28/2020	19	A18	50	Low	1.00	\$750			\$750
Q2 2020	5/8/2020	19	C10	50	Low	1.00	\$750			\$750
Q2 2020	5/11/2020	14	B27	85	Major	2.50	\$1,875			\$1,875
Q2 2020	5/27/2020	1	C2	50	Low	1.00	\$750			\$750
Q2 2020	6/8/2020	1	A20	70	Major	2.50	\$1,875			\$1,875
Q2 2020	6/8/2020	1	B18	60	Moderate	1.50	\$1,125			\$1,125
Q2 2020	6/10/2020	20	C28	70	Major	2.50	\$1,875			\$1,875
Q2 2020	6/19/2020	19	B11	75	Major	2.50	\$1,875			\$1,875
<b>Total</b>						<b>23.50</b>	<b>\$17,625</b>			<b>\$17,625</b>



### Non-Compliant ACHD Doors >40% Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	opacity	Severity of Violation	Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total HO Door Penalty
Q3 2020	7/6/2020	C	C26	100	Major	2.50	\$1,875			\$1,875
Q3 2020	7/6/2020	C	C36	50	Moderate	1.50	\$1,125			\$1,125
Q3 2020	7/8/2020	3	C1	60	Moderate	1.50	\$1,125			\$1,125
Q3 2020	7/15/2020	C	C75	35	Low	1.00	\$750			\$750
Q3 2020	7/27/2020	C	C23	45	Moderate	1.50	\$1,125			\$1,125
Q3 2020	7/30/2020	C	C3	50	Moderate	1.50	\$1,125			\$1,125
Q3 2020	8/4/2020	13	B26	50	Low	1.00	\$750			\$750
Q3 2020	8/5/2020	B	B15	60	Moderate	1.50	\$1,125			\$1,125
Q3 2020	8/10/2020	1	A28	80	Major	2.50	\$1,875			\$1,875
Q3 2020	8/12/2020	1	A23	70	Major	2.50	\$1,875			\$1,875
Q3 2020	8/13/2020	C	C64	90	Major	2.50	\$1,875			\$1,875
Q3 2020	8/13/2020	C	C54	95	Major	2.50	\$1,875			\$1,875
Q3 2020	8/19/2020	C	C70	85	Major	2.50	\$1,875			\$1,875
Q3 2020	8/24/2020	20	A16	50	Low	1.00	\$750			\$750
Q3 2020	8/24/2020	20	B12	75	Major	2.50	\$1,875			\$1,875
Q3 2020	8/24/2020	19	C27	90	Major	2.50	\$1,875			\$1,875
Q3 2020	8/25/2020	C	C23	50	Moderate	1.50	\$1,125			\$1,125
Q3 2020	8/26/2020	14	B22	85	Major	2.50	\$1,875			\$1,875
Q3 2020	9/9/2020	1	A20	55	Moderate	1.50	\$1,125			\$1,125
Q3 2020	9/23/2020	13	B30	100	Major	2.50	\$1,875			\$1,875
Q3 2020	9/28/2020	C	C28	40	Low	1.00	\$750			\$750
<b>Total</b>						<b>39.50</b>	<b>\$29,625</b>			<b>\$29,625</b>



### Non-Compliant ACHD Doors >40% Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	opacity	Severity of Violation	Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total HO Door Penalty
Q4 2020	10/1/2020	B	A18	80	Major	2.50	\$1,875			\$1,875
Q4 2020	10/1/2020	B	A18	55	Moderate	1.50	\$1,125			\$1,125
Q4 2020	10/1/2020	B	B8	65	Moderate	1.50	\$1,125			\$1,125
Q4 2020	10/8/2020	3	A14	95	Major	2.50	\$1,875			\$1,875
Q4 2020	10/9/2020	C	C52	65	Major	2.50	\$1,875			\$1,875
Q4 2020	10/9/2020	C	C47	75	Major	2.50	\$1,875			\$1,875
Q4 2020	10/9/2020	C	C52	90	Major	2.50	\$1,875			\$1,875
Q4 2020	10/9/2020	C	C7	50	Moderate	1.50	\$1,125			\$1,125
Q4 2020	10/9/2020	C	C82	50	Moderate	1.50	\$1,125			\$1,125
Q4 2020	10/14/2020	1	B20	50	Low	1.00	\$750			\$750
Q4 2020	10/23/2020	C	C24	45	Moderate	1.50	\$1,125	\$250	\$1,000	\$2,375
Q4 2020	10/27/2020	1	B31	50	Low	1.00	\$750			\$750
Q4 2020	10/27/2020	1	A28	70	Major	2.50	\$1,875			\$1,875
Q4 2020	11/4/2020	B	A5	45	Low	1.00	\$750	\$250		\$1,000
Q4 2020	11/4/2020	B	B15	45	Low	1.00	\$750	\$250		\$1,000
Q4 2020	11/4/2020	B	A13	50	Low	1.00	\$750	\$250		\$1,000
Q4 2020	11/4/2020	B	A15	50	Low	1.00	\$750	\$250		\$1,000
Q4 2020	11/4/2020	B	A21	70	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/4/2020	B	A25	85	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/4/2020	B	A18	60	Moderate	1.50	\$1,125	\$250		\$1,375
Q4 2020	11/4/2020	B	B10	65	Moderate	1.50	\$1,125	\$250		\$1,375
Q4 2020	11/9/2020	C	C20	70	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/9/2020	C	C55	90	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/9/2020	C	C60	100	Major	2.50	\$1,875	\$250		\$2,125
Q4 2020	11/27/2020	1	A28	90	Major	2.50	\$1,875			\$1,875
Q4 2020	12/2/2020	B	B26	50	Low	1.00	\$750			\$750
Q4 2020	12/2/2020	B	B11	55	Moderate	1.50	\$1,125			\$1,125
Q4 2020	12/14/2020	13	A9	50	Low	1.00	\$750			\$750
<b>Total</b>						<b>50.00</b>	<b>\$37,500</b>	<b>\$3,000</b>	<b>\$1,000</b>	<b>\$41,500</b>





### Method 303 Inspection and Penalty Summary

Quarter (Year)	Total M303 Compl Insps	Total M303 Inspections	Method 303 % Compliance	Method 303 Total Penalty
Q2 2020	3635	3640	99.86%	\$5,500
Q3 2020	3674	3680	99.84%	\$9,500
Q4 2020	3674	3680	99.84%	\$8,750
<b>Total</b>	<b>10983</b>	<b>11000</b>	<b>99.85%</b>	<b>\$23,750</b>



### Non-Compliant Method 303 Charge Inspections and Penalty

Quarter (Year)	Date	Battery	Charge (1-4)	Charge(1-4) Severity of Violation	Charge (2-5)	Charge(2-5) Severity of Violation	Sum of Charges	Laer Battery Charge Severity of Violation	Method 303 Penalty	SO2 Penalty	H2S Penalty	Total Method 303 Penalty
Q2 2020	4/17/2020	3	11.50		86.50	Low	88.50		\$1,000			\$1,000
Q2 2020	5/27/2020	20	16.00		60.00		62.00	Low	\$1,000			\$1,000
Q2 2020	5/30/2020	20	56.00		56.50		57.50	Low	\$1,000			\$1,000
Q3 2020	8/15/2020	B	144.50		148.50		150.00	Major	\$2,500			\$2,500
Q3 2020	9/26/2020	13	12.50		124.50		126.50	Major	\$2,500			\$2,500
Q4 2020	12/12/2020	14	56.50		56.00		57.50	Low	\$750		\$250	\$1,000
<b>Total</b>									<b>\$8,750</b>		<b>\$250</b>	<b>\$9,000</b>



### Non-Compliant Method 303 Door Inspections and Penalty

Quarter (Year)	Date	Battery	Doors %Leaking	Door Severity Value	Door Severity of Violation	Method 303 Penalty	SO2 Penalty	H2S Penalty	Total Method 303 Penalty
Q4 2020	11/2/2020	C	4.76%	1.59	Major	\$1,875			\$1,875
Q4 2020	12/29/2020	B	6.42%	1.28	Moderate	\$1,125			\$1,125
<b>Total</b>						<b>\$3,000</b>			<b>\$3,000</b>



**Non-Compliant Method 303 Topside (Lid) Inspections and Penalty**

Quarter (Year)	Date	Battery	Lids %Leaking	Lid Leak Severity Value	Lid Leaks Severity of Violation	Method 303 Penalty	SO2 Penalty	H2S Penalty	Total Method 303 Penalty
Q3 2020	8/18/2020	C	0.72	1.20	Moderate	\$1,500			\$1,500
Q4 2020	10/13/2020	C	1.67	2.78	Major	\$1,875			\$1,875
Q4 2020	12/11/2020	C	1.19	1.98	Major	\$1,875		\$250	\$2,125
<b>Total</b>						<b>\$5,250</b>		<b>\$250</b>	<b>\$5,500</b>



### Non-Compliant Method 303 Topside (Offtake) Inspection and Penalty

Quarter (Year)	Date	Battery	Offtakes %Leaking	Offtake Leak Severity Value	Offtake Leaks Severity of Violation	Method 303 Penalty	H2S Penalty	SO2 Penalty	Total Method 303 Penalty
Q2 2020	5/4/2020	20	4.60	1.15	Low	\$1,000			\$1,000
Q2 2020	6/8/2020	B	5.56	1.39	Moderate	\$1,500			\$1,500
Q3 2020	7/17/2020	B	4.17	1.04	Low	\$1,000			\$1,000
Q3 2020	8/8/2020	1	5.47	1.09	Low	\$1,000			\$1,000
Q3 2020	9/23/2020	B	4.17	1.04	Low	\$1,000			\$1,000
Q4 2020	11/25/2020	14	4.31	1.08	Low	\$750			\$750
<b>Total</b>						<b>\$6,250</b>			<b>\$6,250</b>



### Summary of Penalties from USS Inspections

Quarter (Year)	Total USS Push Penalty	USS Travel Penalty	USS SIP Door Penalty	USS Total Penalty
Q2 2020	\$2,000	\$5,000	\$2,625	\$9,625
Q3 2020	\$3,500	\$2,000	\$2,625	\$8,125
Q4 2020			\$2,625	\$2,625
<b>Total</b>	<b>\$5,500</b>	<b>\$7,000</b>	<b>\$2,625</b>	<b>\$15,125</b>



### USS Non-Compliant Push Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	USS Reported Opacity	Push Severity of Violation	Push Penalty Multiplier	USS Push Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Push Penalty
Q2 2020	4/13/2020	13	A1	20	low	1.00	\$1,000			\$1,000
Q2 2020	4/17/2020	14	B15	30	low	1.00	\$1,000			\$1,000
Q3 2020	7/24/2020	13	A30	20	low	1.00	\$1,000			\$1,000
Q3 2020	8/18/2020	3	A30	35	low	1.00	\$1,000			\$1,000
Q3 2020	9/29/2020	1	A11	40	moderate	1.50	\$1,500			\$1,500
<b>Total</b>						<b>5.50</b>	<b>\$5,500</b>			<b>\$5,500</b>



### USS Non-Compliant Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	USS Reported Opacity	Travel Severity of Violation	Travel Penalty Multiplier	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Travel Penalty
Q2 2020	4/13/2020	13	A1	15	low	1.00	\$1,000			\$1,000
Q2 2020	4/24/2020	14	A29	30	low	1.00	\$1,000			\$1,000
Q2 2020	5/20/2020	13	A30	30	low	1.00	\$1,000			\$1,000
Q2 2020	5/20/2020	14	A29	30	low	1.00	\$1,000			\$1,000
Q2 2020	6/10/2020	13	A11	20	low	1.00	\$1,000			\$1,000
Q3 2020	7/24/2020	13	A30	15	low	1.00	\$1,000			\$1,000
Q3 2020	9/10/2020	14	A29	25	low	1.00	\$1,000			\$1,000
<b>Total</b>							<b>\$7,000</b>			<b>\$7,000</b>





### Non-Compliant USS Door Inspections and Penalties

Inspection Date	Battery	% Door Leak	Severity of Violation	Penalty Multiplier	Door Penalty	H2S Penalty	SO2 Penalty	USS SIP Door Penalty
10/21/2020	B	8.00	Major	2.50	\$1,875			\$1,875
11/24/2020	B	5.67	Low	1.00	\$750			\$750
<b>Total</b>		<b>13.67</b>		<b>3.50</b>	<b>\$2,625</b>			<b>\$2,625</b>



## Continuous Opacity Monitor Non-Compliant Clock Hours

Quarter (Year)	Battery 1	Battery 2	Battery 3	Battery 13	Battery 14	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
<b>Q2 2020</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>6</b>	<b>3</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>13</b>	<b>6</b>	<b>45</b>	<b>\$9,000</b>
4/1/2020	0	0	2	0	0	0	2	1	1	1	7	\$1,400
5/1/2020	0	1	1	0	2	0	1	0	1	1	7	\$1,400
6/1/2020	4	3	1	6	1	0	1	0	11	4	31	\$6,200
<b>Q3 2020</b>	<b>3</b>	<b>3</b>	<b>11</b>	<b>8</b>	<b>6</b>	<b>0</b>	<b>17</b>	<b>7</b>	<b>9</b>	<b>6</b>	<b>70</b>	<b>\$14,000</b>
7/1/2020	1	1	2	3	3	0	2	1	5	2	20	\$4,000
8/1/2020	2	1	6	3	1	0	8	4	3	2	30	\$6,000
9/20/2020	0	1	3	2	2	0	7	2	1	2	20	\$4,000
<b>Q4 2020</b>	<b>5</b>	<b>12</b>	<b>6</b>	<b>4</b>	<b>6</b>	<b>1</b>	<b>3</b>	<b>2</b>	<b>8</b>	<b>4</b>	<b>51</b>	<b>\$10,200</b>
10/20/2020	1	8	5	1	3	1	1	0	0	0	20	\$4,000
11/20/2020	1	2	1	2	2	0	1	0	7	0	16	\$3,200
12/20/2020	3	2	0	1	1	0	1	2	1	4	15	\$3,000
<b>Total</b>	<b>12</b>	<b>19</b>	<b>21</b>	<b>18</b>	<b>15</b>	<b>1</b>	<b>24</b>	<b>10</b>	<b>30</b>	<b>16</b>	<b>166</b>	<b>\$33,200</b>