

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

June 4, 2021

**CERTIFIED MAIL – 9489 0090 0027 6047 4905 65**

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 - January 1, 2021 through March 31, 2021 (1st Quarter)**

Dear Mr. Rhoads:

The Allegheny County Health 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, of the SAO 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 first quarter of 2021, January 1, 2021 through March 31, 2021. The violations and associated penalties are set forth in the attachments.

The Department has calculated a penalty in the amount of \$201,500.00. Pursuant to the SOA, Section V. ("Civil Penalty Payment"), Paragraph A, 90 percent of that amount, or \$181,350.00, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, \$20,150.00, shall constitute a civil penalty and is to be paid to the Allegheny County 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 January 1, 2021 through March 31, 2021. Also, this letter in no way precludes the Department from issuing demands for other stipulated penalties for other violations which may have occurred from January 1, 2021 through March 31, 2021.

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. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Shannon Sandberg". The signature is written in a cursive style.

Shannon Sandberg  
Air Quality Manager  
Compliance and Enforcement Section  
Air Quality Program

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



Consent Order and Agreement #190604

1st Quarter Stipulated Penalties

U.S. Steel Clairton Facility

June 4, 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    |
|----------------|-------------------------------------|-------------------------------|------------------------------|----------------|------------------|
| ▲              |                                     |                               |                              |                |                  |
| ☐ Q1 2021      |                                     |                               |                              |                |                  |
| Jan 2021       | \$5,000                             | \$36,125                      | \$0                          | \$3,200        | \$44,325         |
| Feb 2021       | \$0                                 | \$42,750                      | \$0                          | \$2,800        | \$45,550         |
| Mar 2021       | \$3,250                             | \$87,375                      | \$18,000                     | \$3,000        | \$111,625        |
| <b>Total</b>   | <b>\$8,250</b>                      | <b>\$166,250</b>              | <b>\$18,000</b>              | <b>\$9,000</b> | <b>\$201,500</b> |
| <b>Total</b>   | <b>\$8,250</b>                      | <b>\$166,250</b>              | <b>\$18,000</b>              | <b>\$9,000</b> | <b>\$201,500</b> |



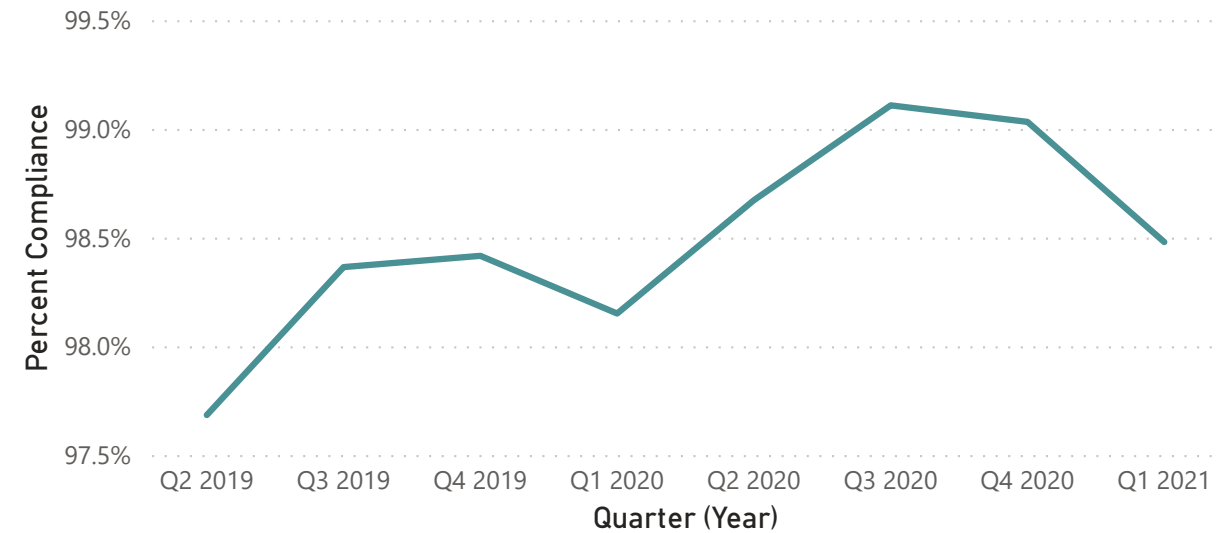
### Quarterly Compliance (ACHD and Method 303 Inspections)

| 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 |
|----------------|----------------------|---------------------------------------|-------------------|------------------------|------------------------|-------------------------|--------------------------------------|-----------------------------------|--------------------|
| ▲              |                      |                                       |                   |                        |                        |                         |                                      |                                   |                    |
| Q1 2021        | 1003                 | 1070                                  | 93.74%            | 3596                   | 3600                   | 99.89%                  | 4599                                 | 4670                              | 98.48%             |
| <b>Total</b>   | <b>1003</b>          | <b>1070</b>                           | <b>93.74%</b>     | <b>3596</b>            | <b>3600</b>            | <b>99.89%</b>           | <b>4599</b>                          | <b>4670</b>                       | <b>98.48%</b>      |

### Average Percent Compliance

| Quarter (Year) | Quarterly Compliance (1 previous Q) | Quarterly Compliance (current Qs) | Compliance Average of Current and Previous Quarters |
|----------------|-------------------------------------|-----------------------------------|---|
| ▲              |                                     |                                   |   |
| Q4 2020        | 99.108%                             | 99.032%                           | 99.070%   |
| Q1 2021        | 99.032%                             | 98.480%                           | 98.756%   |

### Percent Compliance by Quarter (Year)





### Penalty Summary for ACHD Inspections

| Quarter (Year) | ACHD Charging Penalty | ACHD Soaking Penalty | ACHD Push Penalty | ACHD Travel Penalty | ACHD Doors Penalty | ACHD Lid Penalty | ACHD Offtake Penalty | ACHD HO Door Penalty | ACHD Total Penalties |
|----------------|-----------------------|----------------------|-------------------|---------------------|--------------------|------------------|----------------------|----------------------|----------------------|
| ☐ Q1 2021      |                       |                      |                   |                     |                    |                  |                      |                      |                      |
| Jan 2021       | \$8,500               | \$3,000              | \$10,500          | \$4,500             | \$1,000            | \$0              | \$0                  | \$8,625              | \$36,125             |
| Feb 2021       | \$1,000               | \$6,000              | \$13,000          | \$13,000            | \$0                | \$0              | \$0                  | \$9,750              | \$42,750             |
| Mar 2021       | \$4,250               | \$2,500              | \$25,250          | \$11,750            | \$2,750            | \$0              | \$0                  | \$40,875             | \$87,375             |
| <b>Total</b>   | <b>\$13,750</b>       | <b>\$11,500</b>      | <b>\$48,750</b>   | <b>\$29,250</b>     | <b>\$3,750</b>     | <b>\$0</b>       | <b>\$0</b>           | <b>\$59,250</b>      | <b>\$166,250</b>     |
| <b>Total</b>   | <b>\$13,750</b>       | <b>\$11,500</b>      | <b>\$48,750</b>   | <b>\$29,250</b>     | <b>\$3,750</b>     | <b>\$0</b>       | <b>\$0</b>           | <b>\$59,250</b>      | <b>\$166,250</b>     |

| Quarter (Year) | Charging Violations | Soaking Violations | Door Violations | Push Violations | Travel Violations | Lid Violations | Offtake Violations | H.O. Door Violations | ACHD Documented Violations |
|----------------|---------------------|--------------------|-----------------|-----------------|-------------------|----------------|--------------------|----------------------|----------------------------|
| ☐ Q1 2021      | <b>7</b>            | <b>7</b>           | <b>2</b>        | <b>29</b>       | <b>22</b>         |                |                    | <b>65</b>            | <b>67</b>                  |
| Mar 2021       | 2                   | 2                  | 1               | 15              | 9                 |                |                    | 36                   | 29                         |
| Feb 2021       | 1                   | 3                  |                 | 7               | 9                 |                |                    | 17                   | 20                         |
| Jan 2021       | 4                   | 2                  | 1               | 7               | 4                 |                |                    | 12                   | 18                         |
| <b>Total</b>   | <b>7</b>            | <b>7</b>           | <b>2</b>        | <b>29</b>       | <b>22</b>         |                |                    | <b>65</b>            | <b>67</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 |
|----------------|-----------|---------|--------------------------------|-----------------------|--------------------------------|-----------------------------|------------------|------------------------|------------------------|-----------------------------|
| Q1 2021        | 1/8/2021  | C       | 108                            | 1.95                  | Major                          | 2.50                        | \$2,500          |                        |                        | \$2,500                     |
| Q1 2021        | 1/11/2021 | 14      | 111                            | 2.00                  | Major                          | 2.50                        | \$2,500          |                        |                        | \$2,500                     |
| Q1 2021        | 1/14/2021 | B       | 86                             | 1.55                  | Major                          | 2.50                        | \$2,500          |                        |                        | \$2,500                     |
| Q1 2021        | 1/21/2021 | 20      | 56                             | 1.01                  | Low                            | 1.00                        | \$1,000          |                        |                        | \$1,000                     |
| Q1 2021        | 2/23/2021 | 13      | 61                             | 1.10                  | Low                            | 1.00                        | \$1,000          |                        |                        | \$1,000                     |
| Q1 2021        | 3/10/2021 | C       | 73                             | 1.32                  | Moderate                       | 1.50                        | \$1,500          | \$250                  |                        | \$1,750                     |
| Q1 2021        | 3/19/2021 | B       | 91                             | 1.64                  | Major                          | 2.50                        | \$2,500          |                        |                        | \$2,500                     |
| <b>Total</b>   |           |         |                                |                       |                                | <b>13.50</b>                | <b>\$13,500</b>  | <b>\$250</b>           |                        | <b>\$13,750</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 |
|----------------|-----------|---------|------|-----------------------|--------------------------|-----------------------|--------------------|-----------------|-------------|-------------|----------------------------|
| Q1 2021        | 1/5/2021  | 20      | C14  | 40                    | C                        | moderate              | 1.50               | \$1,500         |             |             | \$1,500                    |
| Q1 2021        | 1/21/2021 | 20      | C27  | 50                    | C                        | moderate              | 1.50               | \$1,500         |             |             | \$1,500                    |
| Q1 2021        | 2/2/2021  | 20      | B2   | 70                    | C                        | major                 | 2.50               | \$2,500         |             |             | \$2,500                    |
| Q1 2021        | 2/2/2021  | 20      | B4   | 100                   | C                        | major                 | 2.50               | \$2,500         |             |             | \$2,500                    |
| Q1 2021        | 2/5/2021  | 20      | A6   | 30                    | C                        | low                   | 1.00               | \$1,000         |             |             | \$1,000                    |
| Q1 2021        | 3/1/2021  | 20      | B23  | 45                    | C                        | moderate              | 1.50               | \$1,500         |             |             | \$1,500                    |
| Q1 2021        | 3/4/2021  | 20      | B10  | 30                    | P                        | low                   | 1.00               | \$1,000         |             |             | \$1,000                    |
| <b>Total</b>   |           |         |      |                       |                          |                       |                    | <b>\$11,500</b> |             |             | <b>\$11,500</b>            |





### ACHD Non-Compliant Push Inspections and Penalties

| Quarter (Year) | Date      | Battery | Oven | Max Opacity | ACHD Push Severity of Violation | Push Penalty Multiplier | Push Penalty    | H2S Penalty  | SO2 Penalty | Total Push Penalty |
|----------------|-----------|---------|------|-------------|---------------------------------|-------------------------|-----------------|--------------|-------------|--------------------|
| Q1 2021        | 1/7/2021  | B       | A30  | 45          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 1/8/2021  | C       | C19  | 25          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 1/8/2021  | C       | C13  | 35          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 1/8/2021  | C       | C17  | 50          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 1/14/2021 | B       | A38  | 45          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 1/14/2021 | B       | A34  | 60          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 1/14/2021 | B       | A32  | 70          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 2/2/2021  | 20      | A19  | 60          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 2/4/2021  | 19      | A25  | 80          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 2/4/2021  | 3       | A26  | 40          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 2/5/2021  | 20      | C29  | 35          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 2/8/2021  | 13      | A2   | 45          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 2/10/2021 | 19      | A4   | 70          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 2/18/2021 | 13      | A16  | 100         | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/1/2021  | 13      | B1   | 35          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 3/1/2021  | 13      | B10  | 50          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 3/1/2021  | 13      | A5   | 100         | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/4/2021  | B       | A38  | 35          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 3/4/2021  | B       | B4   | 35          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 3/9/2021  | 2       | C1   | 30          | low                             | 1.00                    | \$1,000         | \$250        |             | \$1,250            |
| Q1 2021        | 3/12/2021 | 20      | A3   | 100         | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/16/2021 | 3       | A9   | 45          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 3/16/2021 | 3       | A15  | 65          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/17/2021 | 19      | B10  | 50          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 3/22/2021 | 19      | C17  | 70          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/22/2021 | 3       | B8   | 65          | major                           | 2.50                    | \$2,500         |              |             | \$2,500            |
| Q1 2021        | 3/23/2021 | 3       | A31  | 30          | low                             | 1.00                    | \$1,000         |              |             | \$1,000            |
| Q1 2021        | 3/23/2021 | 3       | A29  | 50          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| Q1 2021        | 3/26/2021 | 1       | B30  | 45          | moderate                        | 1.50                    | \$1,500         |              |             | \$1,500            |
| <b>Total</b>   |           |         |      |             |                                 | <b>48.50</b>            | <b>\$48,500</b> | <b>\$250</b> |             | <b>\$48,750</b>    |



### Non-Compliant ACHD Travel Inspections and Penalties

| Quarter (Year) | Date      | Battery | Oven | travel max<br>opacity | ACHD Travel<br>Severity of<br>Violation | Travel Penalty<br>Multiplier | Travel Penalty  | H2S<br>Penalty | SO2<br>Penalty | Total Travel<br>Penalty |
|----------------|-----------|---------|------|-----------------------|---|------------------------------|-----------------|----------------|----------------|-------------------------|
| Q1 2021        | 1/8/2021  | C       | C19  | 25                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 1/8/2021  | C       | C13  | 35                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 1/21/2021 | 20      | C25  | 40                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 1/21/2021 | C       | C1   | 25                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 2/2/2021  | 20      | A19  | 70                    | major                                   | 2.50                         | \$2,500         |                |                | \$2,500                 |
| Q1 2021        | 2/4/2021  | 3       | A26  | 30                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 2/5/2021  | 20      | C29  | 40                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 2/8/2021  | 13      | A2   | 40                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 2/10/2021 | 13      | A23  | 25                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 2/10/2021 | 19      | A4   | 35                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 2/16/2021 | 20      | B4   | 30                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 2/18/2021 | 13      | A16  | 100                   | major                                   | 2.50                         | \$2,500         |                |                | \$2,500                 |
| Q1 2021        | 2/18/2021 | 2       | C1   | 30                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 3/1/2021  | 13      | A5   | 55                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 3/8/2021  | 1       | A31  | 35                    | low                                     | 1.00                         | \$1,000         | \$250          |                | \$1,250                 |
| Q1 2021        | 3/12/2021 | 20      | A3   | 55                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 3/16/2021 | 3       | A15  | 25                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 3/17/2021 | 19      | B10  | 25                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 3/17/2021 | 2       | B7   | 45                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 3/22/2021 | 19      | C17  | 45                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| Q1 2021        | 3/22/2021 | 3       | B8   | 20                    | low                                     | 1.00                         | \$1,000         |                |                | \$1,000                 |
| Q1 2021        | 3/23/2021 | 3       | A29  | 40                    | moderate                                | 1.50                         | \$1,500         |                |                | \$1,500                 |
| <b>Total</b>   |           |         |      |                       |   | <b>29.00</b>                 | <b>\$29,000</b> | <b>\$250</b>   |                | <b>\$29,250</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 |
|----------------|-----------|---------|-----------------------|----------------|-----------------------|--------------------|----------------|--------------|-------------|-------------------------|
| Q1 2021        | 1/21/2021 | C       | 3.05%                 | 1.02           | Low                   | 1.00               | \$1,000        |              |             | \$1,000                 |
| Q1 2021        | 3/10/2021 | C       | 9.26%                 | 3.09           | Major                 | 2.50               | \$2,500        | \$250        |             | \$2,750                 |
| <b>Total</b>   |           |         |                       |                |                       | <b>3.50</b>        | <b>\$3,500</b> | <b>\$250</b> |             | <b>\$3,750</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 |
|----------------|------|---------|----------------------|----------------|-----------------------|--------------------|-------------|-------------|------------------------|
|----------------|------|---------|----------------------|----------------|-----------------------|--------------------|-------------|-------------|------------------------|





65

Total High Opacity Door Violations

\$59,250

Total Q1 2021 HO Door Penalty

Non-Compliant ACHD Doors >40% Inspections and Penalties (1 of 2)

| Quarter (Year) | Date      | Battery | Oven | opacity | Severity of Violation | Penalty Multiplier | H.O. Door Penalty | H2S Penalty | SO2 Penalty | ACHD Total HO Door Penalty |
|----------------|-----------|---------|------|---------|-----------------------|--------------------|-------------------|-------------|-------------|----------------------------|
| Q1 2021        | 1/6/2021  | 19      | C7   | 55      | Moderate              | 1.50               | \$1,125           |             |             | \$1,125                    |
| Q1 2021        | 1/8/2021  | C       | C16  | 55      | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| Q1 2021        | 1/8/2021  | C       | C15  | 75      | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| Q1 2021        | 1/21/2021 | C       | C80  | 90      | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| Q1 2021        | 1/28/2021 | 2       | B15  | 100     | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| Q1 2021        | 2/3/2021  | B       | A3   | 50      | Low                   | 1.00               | \$750             |             |             | \$750                      |
| Q1 2021        | 2/16/2021 | 14      | A10  | 45      | Low                   | 1.00               | \$750             |             |             | \$750                      |
| Q1 2021        | 2/16/2021 | 14      | A26  | 50      | Low                   | 1.00               | \$750             |             |             | \$750                      |
| Q1 2021        | 2/17/2021 | C       | C69  | 40      | Low                   | 1.00               | \$750             |             |             | \$750                      |
| Q1 2021        | 2/17/2021 | C       | C28  | 75      | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| Q1 2021        | 2/17/2021 | C       | C72  | 45      | Moderate              | 1.50               | \$1,125           |             |             | \$1,125                    |
| Q1 2021        | 2/17/2021 | C       | C26  | 50      | Moderate              | 1.50               | \$1,125           |             |             | \$1,125                    |
| Q1 2021        | 2/22/2021 | B       | B36  | 50      | Low                   | 1.00               | \$750             |             |             | \$750                      |
| Q1 2021        | 2/22/2021 | B       | A13  | 100     | Major                 | 2.50               | \$1,875           |             |             | \$1,875                    |
| <b>Total</b>   |           |         |      |         |                       | <b>24.50</b>       | <b>\$18,375</b>   |             |             | <b>\$18,375</b>            |



### Non-Compliant ACHD Doors >40% Inspections and Penalties (2 of 2)

| Quarter (Year) | Date      | Battery | Oven | opacity | Severity of Violation | Penalty Multiplier | H.O. Door Penalty | H2S Penalty    | SO2 Penalty | ACHD Total HO Door Penalty |
|----------------|-----------|---------|------|---------|-----------------------|--------------------|-------------------|----------------|-------------|----------------------------|
| Q1 2021        | 3/3/2021  | 3       | A1   | 45      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/3/2021  | 3       | A24  | 75      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/8/2021  | 1       | B25  | 50      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/8/2021  | 1       | B7   | 75      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/9/2021  | 2       | B28  | 50      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/9/2021  | 2       | C1   | 60      | Moderate              | 1.50               | \$1,125           | \$250          |             | \$1,375                    |
| Q1 2021        | 3/10/2021 | C       | C30  | 35      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/10/2021 | C       | C34  | 35      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/10/2021 | C       | C1   | 40      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/10/2021 | C       | C29  | 40      | Low                   | 1.00               | \$750             | \$250          |             | \$1,000                    |
| Q1 2021        | 3/10/2021 | C       | C33  | 55      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C29  | 60      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C7   | 65      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C31  | 70      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C6   | 70      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C27  | 75      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C33  | 80      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C31  | 90      | Major                 | 2.50               | \$1,875           | \$250          |             | \$2,125                    |
| Q1 2021        | 3/10/2021 | C       | C32  | 45      | Moderate              | 1.50               | \$1,125           | \$250          |             | \$1,375                    |
| Q1 2021        | 3/10/2021 | C       | C34  | 45      | Moderate              | 1.50               | \$1,125           | \$250          |             | \$1,375                    |
| Q1 2021        | 3/10/2021 | C       | C4   | 50      | Moderate              | 1.50               | \$1,125           | \$250          |             | \$1,375                    |
| Q1 2021        | 3/19/2021 | B       | A1   | 45      | Low                   | 1.00               | \$750             |                |             | \$750                      |
| Q1 2021        | 3/19/2021 | B       | B22  | 60      | Moderate              | 1.50               | \$1,125           |                |             | \$1,125                    |
| Q1 2021        | 3/23/2021 | 3       | A15  | 45      | Low                   | 1.00               | \$750             |                |             | \$750                      |
| Q1 2021        | 3/23/2021 | 3       | B23  | 50      | Low                   | 1.00               | \$750             |                |             | \$750                      |
| Q1 2021        | 3/26/2021 | 1       | A22  | 45      | Low                   | 1.00               | \$750             |                |             | \$750                      |
| Q1 2021        | 3/26/2021 | 1       | B18  | 55      | Moderate              | 1.50               | \$1,125           |                |             | \$1,125                    |
| Q1 2021        | 3/29/2021 | B       | B22  | 50      | Low                   | 1.00               | \$750             |                |             | \$750                      |
| Q1 2021        | 3/29/2021 | C       | C21  | 50      | Moderate              | 1.50               | \$1,125           |                |             | \$1,125                    |
| <b>Total</b>   |           |         |      |         |                       | <b>47.50</b>       | <b>\$35,625</b>   | <b>\$5,250</b> |             | <b>\$40,875</b>            |



### Method 303 Inspection and Penalty Summary

| Quarter (Year) | Total M303 Compl Insps | Total M303 Inspections | Method 303 % Compliance | Method 303 Total Penalty |
|----------------|------------------------|------------------------|-------------------------|--------------------------|
| Q1 2021        | 3596                   | 3600                   | 99.89%                  | \$8,250                  |
| <b>Total</b>   | <b>3596</b>            | <b>3600</b>            | <b>99.89%</b>           | <b>\$8,250</b>           |

### Method 303 Non-Compliant Inspections

| Quarter (Year)                          | M303 TTL Charge Viol | M303 TTL Door Viol | M303 TTL Lid Viol | M303 TTL Offtake Viol | Method 303 Total Non-Compliant Inspections |
|---|----------------------|--------------------|-------------------|-----------------------|--|
| <input type="checkbox"/> <b>Q1 2021</b> | <b>2</b>             |                    |                   | <b>2</b>              | <b>4</b>                                   |
| Jan 2021                                | 2                    |                    |                   |                       | 2  |
| Feb 2021                                | 0                    |                    |                   |                       | 0  |
| Mar 2021                                | 0                    |                    |                   | 2                     | 2  |
| <b>Total</b>                            | <b>2</b>             |                    |                   | <b>2</b>              | <b>4</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 |
|----------------|-----------|---------|--------------|-----------------------------------|--------------|-----------------------------------|----------------|---|--------------------|-------------|-------------|--------------------------|
| Q1 2021        | 1/14/2021 | C       | 153.50       |                                   | 48.50        |                                   | 157.50         | Major                                     | \$2,500            |             |             | \$2,500                  |
| Q1 2021        | 1/26/2021 | C       | 69.00        |                                   | 69.50        |                                   | 107.00         | Major                                     | \$2,500            |             |             | \$2,500                  |
| <b>Total</b>   |           |         |              |                                   |              |                                   |                |   | <b>\$5,000</b>     |             |             | <b>\$5,000</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 |
|----------------|------|---------|----------------|---------------------|----------------------------|--------------------|-------------|-------------|--------------------------|
|----------------|------|---------|----------------|---------------------|----------------------------|--------------------|-------------|-------------|--------------------------|



### 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 |
|----------------|------|---------|---------------|-------------------------|---------------------------------|--------------------|-------------|-------------|--------------------------|
|----------------|------|---------|---------------|-------------------------|---------------------------------|--------------------|-------------|-------------|--------------------------|



### 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 |
|----------------|-----------|---------|-------------------|-----------------------------|-------------------------------------|--------------------|--------------|-------------|--------------------------|
| Q1 2021        | 3/5/2021  | 1       | 6.25              | 1.25                        | Moderate                            | \$1,500            |              |             | \$1,500                  |
| Q1 2021        | 3/10/2021 | 14      | 5.00              | 1.25                        | Moderate                            | \$1,500            | \$250        |             | \$1,750                  |
| <b>Total</b>   |           |         |                   |                             |                                     | <b>\$3,000</b>     | <b>\$250</b> |             | <b>\$3,250</b>           |



### Summary of Penalties from USS Inspections

| Quarter (Year) | Total USS Push Penalty | Total USS Travel Penalty | USS SIP Door Penalty | USS Total Penalty |
|----------------|------------------------|--------------------------|----------------------|-------------------|
| Q1 2021        | \$8,750                | \$9,250                  |                      | \$18,000          |
| <b>Total</b>   | <b>\$8,750</b>         | <b>\$9,250</b>           |                      | <b>\$18,000</b>   |

| Quarter (Year)                          | Total Non-Compliant USS Inspections |
|---|-------------------------------------|
| <input type="checkbox"/> <b>Q1 2021</b> | <b>40</b>                           |
| Jan 2021                                | 4                                   |
| Feb 2021                                | 9                                   |
| Mar 2021                                | 27                                  |
| <b>Total</b>                            | <b>40</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 |
|----------------|-----------|---------|------|----------------------|----------------------------|-------------------------|------------------|------------------------|------------------------|------------------------|
| Q1 2021        | 3/8/2021  | 1       | A23  | 30                   | low                        | 1.00                    | \$1,000          | \$250                  |                        | \$1,250                |
| Q1 2021        | 3/21/2021 | 1       | A4   | 30                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| Q1 2021        | 3/22/2021 | 2       | B29  | 30                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| Q1 2021        | 3/23/2021 | 13      | A16  | 60                   | moderate                   | 1.50                    | \$1,500          |                        |                        | \$1,500                |
| Q1 2021        | 3/28/2021 | 1       | A4   | 20                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| Q1 2021        | 3/28/2021 | 3       | A5   | 30                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| Q1 2021        | 3/28/2021 | 3       | A9   | 30                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| Q1 2021        | 3/29/2021 | 1       | A4   | 20                   | low                        | 1.00                    | \$1,000          |                        |                        | \$1,000                |
| <b>Total</b>   |           |         |      |                      |                            | <b>8.50</b>             | <b>\$8,500</b>   | <b>\$250</b>           |                        | <b>\$8,750</b>         |



### USS Non-Compliant Travel Inspections and Penalties

| Quarter (Year) | Date      | Battery | Oven | Agency | USS Reported Opacity | Travel Severity of Violation | Travel Penalty Multiplier | USS Travel Penalty | H2S Exceedance Penalty | SO2 Exceedance Penalty | USS Total Travel Penalty |
|----------------|-----------|---------|------|--------|----------------------|------------------------------|---------------------------|--------------------|------------------------|------------------------|--------------------------|
| Q1 2021        | 3/8/2021  | 1       | A23  | U      | 15                   | low                          | 1.00                      | \$1,000            | \$250                  |                        | \$1,250                  |
| Q1 2021        | 3/12/2021 | 14      | A28  | U      | 30                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/21/2021 | 1       | A4   | U      | 15                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/23/2021 | 13      | A16  | U      | 30                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/28/2021 | 1       | A4   | U      | 15                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/28/2021 | 3       | A5   | U      | 25                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/28/2021 | 3       | A9   | U      | 15                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/29/2021 | 1       | A4   | U      | 15                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| Q1 2021        | 3/31/2021 | 13      | A4   | U      | 20                   | low                          | 1.00                      | \$1,000            |                        |                        | \$1,000                  |
| <b>Total</b>   |           |         |      |        |                      |                              |                           | <b>\$9,000</b>     | <b>\$250</b>           |                        | <b>\$9,250</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 |
|-----------------|---------|-------------|-----------------------|--------------------|--------------|-------------|-------------|----------------------|
|-----------------|---------|-------------|-----------------------|--------------------|--------------|-------------|-------------|----------------------|





### 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>Q1 2021</b> | <b>2</b>  | <b>3</b>  | <b>4</b>  | <b>15</b>  | <b>8</b>   | <b>0</b>   | <b>1</b>   | <b>2</b>   | <b>9</b>  | <b>1</b>  | <b>45</b>                       | <b>\$9,000</b> |
| Jan 2021       | 0         | 2         | 0         | 5          | 3          | 0          | 1          | 0          | 4         | 1         | 16                              | \$3,200        |
| Feb 2021       | 0         | 0         | 1         | 6          | 2          | 0          | 0          | 0          | 5         | 0         | 14                              | \$2,800        |
| Mar 2021       | 2         | 1         | 3         | 4          | 3          | 0          | 0          | 2          | 0         | 0         | 15                              | \$3,000        |
| <b>Total</b>   | <b>2</b>  | <b>3</b>  | <b>4</b>  | <b>15</b>  | <b>8</b>   | <b>0</b>   | <b>1</b>   | <b>2</b>   | <b>9</b>  | <b>1</b>  | <b>45</b>                       | <b>\$9,000</b> |

Total Non-Compliant Clock Hours by Month (Year)

