

COUNTY OF



ALLEGHENY

March 2, 2022

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, 2021 through December 31, 2021 (2nd, 3rd, and 4th 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 quarter of 2022, April 1, 2021 through December 31, 2021. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$859,300.00**. Pursuant to SOA, V. Civil Penalty Payment, Paragraph A, 90 percent of that amount, or **\$773,370.00**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$85,930.00**, 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 39TH 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



The demand for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from April 1, 2021 through December 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 April 1, 2021 through December 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,



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

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

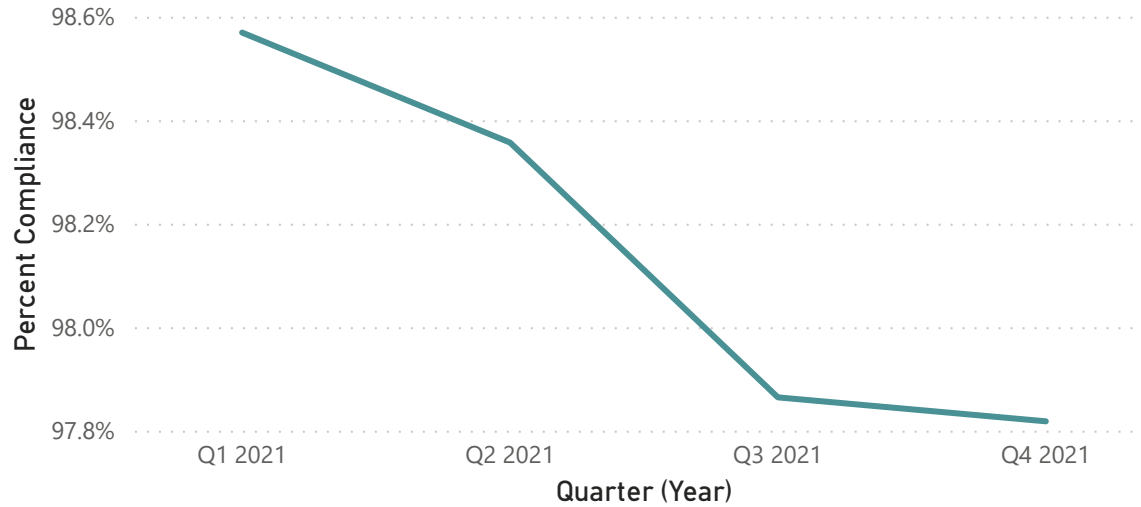
U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections
Stipulated Penalties
#190604
(Q1, Q2, and Q3 2021)

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
▲					
☐ Q2 2021					
Apr 2021	\$3,500	\$58,625	\$6,500	\$8,200	\$76,825
May 2021	\$3,750	\$33,625	\$6,000	\$5,400	\$48,775
Jun 2021	\$11,500	\$54,875	\$14,750	\$5,600	\$86,725
Total	\$18,750	\$147,125	\$27,250	\$19,200	\$212,325
☐ Q3 2021					
Jul 2021	\$15,000	\$65,625	\$13,500	\$1,800	\$95,925
Aug 2021	\$7,500	\$90,250	\$18,000	\$3,400	\$119,150
Sep 2021	\$4,000	\$32,625	\$30,000	\$2,200	\$68,825
Total	\$26,500	\$188,500	\$61,500	\$7,400	\$283,900
☐ Q4 2021					
Oct 2021	\$10,500	\$67,875	\$15,750	\$1,800	\$95,925
Nov 2021	\$3,750	\$125,875	\$26,250	\$2,600	\$158,475
Dec 2021	\$10,000	\$51,625	\$44,250	\$2,800	\$108,675
Total	\$24,250	\$245,375	\$86,250	\$7,200	\$363,075
Total	\$69,500	\$581,000	\$175,000	\$33,800	\$859,300

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	1216	1281	94.93%	3607	3612	99.86%	4823	4893	98.57%
Q2 2021	1038	1107	93.77%	3631	3640	99.75%	4669	4747	98.36%
Q3 2021	699	785	89.04%	3792	3804	99.68%	4491	4589	97.86%
Q4 2021	365	445	82.02%	3670	3680	99.73%	4035	4125	97.82%
Total	3318	3618	91.71%	14700	14736	99.76%	18018	18354	98.17%

Quarterly Compliance



Average Percent Compliance

Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters
Q1 2021	99.094%	98.569%	98.832%
Q2 2021	98.569%	98.357%	98.463%
Q3 2021	98.357%	97.864%	98.111%
Q4 2021	97.864%	97.818%	97.841%

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
☐ Q2 2021									
Apr 2021	\$11,250	\$1,500	\$17,250	\$10,000	\$0	\$0	\$2,500	\$16,125	\$58,625
May 2021	\$5,500	\$3,500	\$7,000	\$6,000	\$0	\$0	\$1,250	\$10,375	\$33,625
Jun 2021	\$3,750	\$5,000	\$21,500	\$10,500	\$1,000	\$0	\$1,500	\$11,625	\$54,875
Total	\$20,500	\$10,000	\$45,750	\$26,500	\$1,000	\$0	\$5,250	\$38,125	\$147,125
☐ Q3 2021									
Jul 2021	\$4,250	\$6,250	\$11,250	\$12,000	\$0	\$1,500	\$0	\$30,375	\$65,625
Aug 2021	\$10,000	\$0	\$36,500	\$19,250	\$0	\$0	\$2,500	\$22,000	\$90,250
Sep 2021	\$5,000	\$4,500	\$11,000	\$8,000	\$0	\$1,500	\$0	\$2,625	\$32,625
Total	\$19,250	\$10,750	\$58,750	\$39,250	\$0	\$3,000	\$2,500	\$55,000	\$188,500
☐ Q4 2021									
Oct 2021	\$9,750	\$7,000	\$19,500	\$14,500	\$1,500	\$2,500	\$0	\$13,125	\$67,875
Nov 2021	\$19,750	\$10,000	\$49,000	\$18,750	\$0	\$1,500	\$4,000	\$22,875	\$125,875
Dec 2021	\$9,000	\$2,500	\$19,000	\$16,750	\$0	\$0	\$0	\$4,375	\$51,625
Total	\$38,500	\$19,500	\$87,500	\$50,000	\$1,500	\$4,000	\$4,000	\$40,375	\$245,375
Total	\$78,250	\$40,250	\$192,000	\$115,750	\$2,500	\$7,000	\$11,750	\$133,500	\$581,000

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 2021	4/6/2021	3	86	1.14	Low	1.00	\$1,000	\$250		\$1,250
Q2 2021	4/14/2021	13	62	1.12	Low	1.00	\$1,000			\$1,000
Q2 2021	5/5/2021	B	66	1.19	Low	1.00	\$1,000			\$1,000
Q2 2021	5/10/2021	C	62	1.12	Low	1.00	\$1,000			\$1,000
Q2 2021	5/26/2021	20	66	1.19	Low	1.00	\$1,000			\$1,000
Q2 2021	6/28/2021	13	63	1.14	Low	1.00	\$1,000	\$250		\$1,250
Q2 2021	4/20/2021	14	68	1.23	Moderate	1.50	\$1,500			\$1,500
Q2 2021	4/12/2021	C	539	9.71	Major	2.50	\$2,500			\$2,500
Q2 2021	4/22/2021	C	178	3.21	Major	2.50	\$2,500			\$2,500
Q2 2021	4/26/2021	1	142	1.88	Major	2.50	\$2,500			\$2,500
Q2 2021	5/13/2021	3	122	1.62	Major	2.50	\$2,500			\$2,500
Q2 2021	6/9/2021	C	116	2.09	Major	2.50	\$2,500			\$2,500
Total										\$20,500

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 2021	7/7/2021	C	59	1.06	Low	1.00	\$1,000	\$250		\$1,250
Q3 2021	7/14/2021	14	67	1.21	Moderate	1.50	\$1,500			\$1,500
Q3 2021	7/26/2021	13	71	1.28	Moderate	1.50	\$1,500			\$1,500
Q3 2021	8/4/2021	C	853	15.37	Major	2.50	\$2,500			\$2,500
Q3 2021	8/18/2021	20	96	1.73	Major	2.50	\$2,500			\$2,500
Q3 2021	8/19/2021	13	68	1.23	Moderate	1.50	\$1,500			\$1,500
Q3 2021	8/27/2021	B	140	2.52	Major	2.50	\$2,500			\$2,500
Q3 2021	8/30/2021	1	78	1.03	Low	1.00	\$1,000			\$1,000
Q3 2021	9/2/2021	C	148	2.67	Major	2.50	\$2,500			\$2,500
Q3 2021	9/22/2021	13	69	1.24	Moderate	1.50	\$1,500			\$1,500
Q3 2021	9/30/2021	14	62	1.12	Low	1.00	\$1,000			\$1,000
Total										\$19,250

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 2021	10/4/2021	B	473	8.52	Major	2.50	\$3,750			\$3,750
Q4 2021	10/12/2021	C	249	4.49	Major	2.50	\$3,750			\$3,750
Q4 2021	10/18/2021	13	70	1.26	Moderate	1.50	\$2,250			\$2,250
Q4 2021	11/1/2021	B	218	3.93	Major	2.50	\$3,750			\$3,750
Q4 2021	11/2/2021	C	68	1.23	Moderate	1.50	\$2,250			\$2,250
Q4 2021	11/17/2021	B	91	1.64	Major	2.50	\$3,750	\$250		\$4,000
Q4 2021	11/19/2021	C	124	2.23	Major	2.50	\$3,750			\$3,750
Q4 2021	11/22/2021	14	75	1.35	Moderate	1.50	\$2,250			\$2,250
Q4 2021	11/30/2021	B	145	2.61	Major	2.50	\$3,750			\$3,750
Q4 2021	12/9/2021	13	85	1.53	Major	2.50	\$3,750			\$3,750
Q4 2021	12/15/2021	B	121	2.18	Major	2.50	\$3,750			\$3,750
Q4 2021	12/17/2021	14	56	1.01	Low	1.00	\$1,500			\$1,500
Total										\$38,500

Quarter (Year)	Total Number of Charging Violations	ACHD Total Charging Penalty
Q2 2021	12	\$20,500
Q3 2021	11	\$19,250
Q4 2021	12	\$38,500
Total	35	\$78,250

Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Oven	Battery	pusher / coke (if viol.)	Severity of Violation	Penalty Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Soaking Penalty
Q2 2021	4/26/2021	B29	20	C	moderate	1.50	\$1,500			\$1,500
Q2 2021	5/5/2021	B21	B	P	major	2.50	\$2,500			\$2,500
Q2 2021	5/26/2021	B3	B	C	low	1.00	\$1,000			\$1,000
Q2 2021	6/2/2021	C21	20	C	low	1.00	\$1,000			\$1,000
Q2 2021	6/23/2021	A18	B	C	major	2.50	\$2,500			\$2,500
Q2 2021	6/30/2021	B10	20	C	moderate	1.50	\$1,500			\$1,500
Q3 2021	7/1/2021	B2	20	C	major	2.50	\$2,500			\$2,500
Q3 2021	7/27/2021	C20	20	C	low	1.00	\$1,000	\$250		\$1,250
Q3 2021	7/27/2021	C22	20	C	low	1.00	\$1,000	\$250		\$1,250
Q3 2021	7/28/2021	C25	19	C	low	1.00	\$1,000	\$250		\$1,250
Q3 2021	9/20/2021	A38	B	C	major	2.50	\$2,500			\$2,500
Q3 2021	9/21/2021	C3	20	C	low	1.00	\$1,000			\$1,000
Q3 2021	9/21/2021	C5	20	C	low	1.00	\$1,000			\$1,000
Q4 2021	10/6/2021	C17*	19	C	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/6/2021	C21	19	C	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/13/2021	B5	20	C	moderate	1.50	\$2,250	\$250		\$2,500
Q4 2021	11/1/2021	B13	B	C	major	2.50	\$3,750			\$3,750
Q4 2021	11/16/2021	C19	20	C	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/17/2021	A15	B	C	major	2.50	\$3,750	\$250		\$4,000
Q4 2021	12/16/2021	C21	C	P	moderate	1.50	\$2,250	\$250		\$2,500
Total										\$40,250

Quarter (Year)	Total Number of Soaking Violations	ACHD Soaking Penalty
Q2 2021	6	\$10,000
Q3 2021	7	\$10,750
Q4 2021	7	\$19,500
Total	20	\$40,250

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	ACHD Push Penalty
Q4 2021	11/5/2021	20	B8	70	major	2.50	\$3,750		\$250	\$4,000
Q4 2021	10/6/2021	19	C1	70	major	2.50	\$3,750			\$3,750
Q4 2021	10/14/2021	1	A18	65	major	2.50	\$3,750			\$3,750
Q4 2021	10/28/2021	14	B10	80	major	2.50	\$3,750			\$3,750
Q4 2021	11/2/2021	C	C52	65	major	2.50	\$3,750			\$3,750
Q4 2021	11/2/2021	C	C54	70	major	2.50	\$3,750			\$3,750
Q4 2021	11/16/2021	20	C17	65	major	2.50	\$3,750			\$3,750
Q4 2021	11/29/2021	1	A9	65	major	2.50	\$3,750			\$3,750
Q4 2021	12/2/2021	19	C3	70	major	2.50	\$3,750			\$3,750
Q4 2021	12/7/2021	3	A24	85	major	2.50	\$3,750			\$3,750
Q4 2021	12/8/2021	2	B26	70	major	2.50	\$3,750			\$3,750
Q4 2021	11/8/2021	3	A27	50	moderate	1.50	\$2,250	\$250		\$2,500
Q4 2021	10/8/2021	3	A15	40	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/12/2021	C	C80	55	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/12/2021	C	C1	60	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/1/2021	B	B13	55	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/2/2021	C	C50	50	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/4/2021	14	B22	40	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/16/2021	20	C9	50	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/19/2021	C	C68	60	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/22/2021	14	B4	50	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/29/2021	1	A19	45	moderate	1.50	\$2,250			\$2,250
Q4 2021	12/7/2021	3	A18	45	moderate	1.50	\$2,250			\$2,250
Q4 2021	12/8/2021	2	C1	55	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/8/2021	3	A31	25	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	11/8/2021	3	A29	35	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	11/9/2021	19	B3	25	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	11/18/2021	19	C6	30	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	11/24/2021	3	A2	35	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	12/13/2021	2	B6	30	low	1.00	\$1,500	\$250		\$1,750
Q4 2021	10/5/2021	2	B9	30	low	1.00	\$1,500			\$1,500
Q4 2021	11/3/2021	13	A27	30	low	1.00	\$1,500			\$1,500
Q4 2021	11/15/2021	1	A18	35	low	1.00	\$1,500			\$1,500
Q4 2021	12/7/2021	3	A22	35	low	1.00	\$1,500			\$1,500

Total **\$87,500**

Quarter (Year)	Total Push Violations	ACHD Push Penalty
Q2 2021	28	\$45,750
Q3 2021	35	\$58,750
Q4 2021	34	\$87,500
Total	97	\$192,000

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 2021	7/12/2021	1	B10	30	low	1.00	\$1,000			\$1,000
Q3 2021	7/12/2021	1	B4	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	7/12/2021	20	C9	30	low	1.00	\$1,000			\$1,000
Q3 2021	7/14/2021	1	B20	25	low	1.00	\$1,000			\$1,000
Q3 2021	7/14/2021	14	A24	20	low	1.00	\$1,000			\$1,000
Q3 2021	7/22/2021	1	A18	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	7/22/2021	1	A24	55	moderate	1.50	\$1,500			\$1,500
Q3 2021	7/26/2021	2	B26	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	7/29/2021	3	A16	30	low	1.00	\$1,000			\$1,000
Q3 2021	7/29/2021	3	A14	35	low	1.00	\$1,000			\$1,000
Q3 2021	8/2/2021	1	B4	25	low	1.00	\$1,000			\$1,000
Q3 2021	8/2/2021	1	B10	30	low	1.00	\$1,000			\$1,000
Q3 2021	8/3/2021	13	B1	35	low	1.00	\$1,000			\$1,000
Q3 2021	8/10/2021	1	A21	55	moderate	1.50	\$1,500			\$1,500
Q3 2021	8/16/2021	13	A14	25	low	1.00	\$1,000			\$1,000
Q3 2021	8/17/2021	19	B16	75	major	2.50	\$2,500			\$2,500
Q3 2021	8/18/2021	20	C28	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	8/19/2021	13	A20	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	8/19/2021	13	A29	75	major	2.50	\$2,500			\$2,500
Q3 2021	8/19/2021	14	A3	30	low	1.00	\$1,000			\$1,000
Q3 2021	8/24/2021	1	A16	60	moderate	1.50	\$1,500	\$250		\$1,750
Q3 2021	8/30/2021	1	B25	55	moderate	1.50	\$1,500			\$1,500
Q3 2021	8/31/2021	2	A27	45	moderate	1.50	\$1,500			\$1,500
Q3 2021	9/7/2021	2	A25	30	low	1.00	\$1,000			\$1,000
Q3 2021	9/7/2021	2	A31	40	moderate	1.50	\$1,500			\$1,500
Q3 2021	9/10/2021	3	A2	20	low	1.00	\$1,000			\$1,000
Q3 2021	9/14/2021	1	A5	35	low	1.00	\$1,000			\$1,000
Q3 2021	9/15/2021	19	C17	25	low	1.00	\$1,000			\$1,000
Q3 2021	9/30/2021		B21	100	major	2.50	\$2,500			\$2,500
Total										\$39,250

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 2021	10/5/2021	2	B9	60	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/13/2021	20	B11	40	moderate	1.50	\$2,250	\$250		\$2,500
Q4 2021	10/14/2021	1	A18	55	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/18/2021	13	A14	30	low	1.00	\$1,500			\$1,500
Q4 2021	10/27/2021	2	A3	40	moderate	1.50	\$2,250			\$2,250
Q4 2021	10/28/2021	14	B10	80	major	2.50	\$3,750			\$3,750
Q4 2021	11/2/2021	C	C50	20	low	1.00	\$1,500			\$1,500
Q4 2021	11/2/2021	C	C54	20	low	1.00	\$1,500			\$1,500
Q4 2021	11/4/2021	14	B22	40	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/10/2021	2	B11	35	low	1.00	\$1,500			\$1,500
Q4 2021	11/15/2021	1	A18	35	low	1.00	\$1,500			\$1,500
Q4 2021	11/16/2021	20	C17	35	low	1.00	\$1,500			\$1,500
Q4 2021	11/16/2021	20	C9	35	low	1.00	\$1,500			\$1,500
Q4 2021	11/22/2021	14	B4	50	moderate	1.50	\$2,250			\$2,250
Q4 2021	11/23/2021	13	B30	35	low	1.00	\$1,500			\$1,500
Q4 2021	11/29/2021	1	A19	30	low	1.00	\$1,500			\$1,500
Q4 2021	11/29/2021	1	A9	60	moderate	1.50	\$2,250			\$2,250
Q4 2021	12/2/2021	19	C3	40	moderate	1.50	\$2,250			\$2,250
Q4 2021	12/6/2021	20	B18	25	low	1.00	\$1,500			\$1,500
Q4 2021	12/7/2021	3	A22	30	low	1.00	\$1,500			\$1,500
Q4 2021	12/7/2021	3	A24	80	major	2.50	\$3,750			\$3,750
Q4 2021	12/8/2021	2	C1	45	moderate	1.50	\$2,250			\$2,250
Q4 2021	12/8/2021	2	B26	65	major	2.50	\$3,750			\$3,750
Q4 2021	12/13/2021	2	B6	35	low	1.00	\$1,500	\$250		\$1,750

Quarter (Year)	Total Travel Violations	ACHD Travel Penalty
Q4 2021	24	\$50,000
Q3 2021	29	\$39,250
Q2 2021	20	\$26,500
Total	73	\$115,750

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 2021	4/12/2021	C	C53	45	Moderate	1.50	\$1,125			\$1,125
Q2 2021	4/12/2021	C	C36	60	Major	2.50	\$1,875			\$1,875
Q2 2021	4/12/2021	C	C54	60	Major	2.50	\$1,875			\$1,875
Q2 2021	4/12/2021	C	C55	100	Major	2.50	\$1,875			\$1,875
Q2 2021	4/19/2021	B	A37	70	Major	2.50	\$1,875			\$1,875
Q2 2021	4/19/2021	B	B36	90	Major	2.50	\$1,875			\$1,875
Q2 2021	4/22/2021	C	C54	45	Moderate	1.50	\$1,125			\$1,125
Q2 2021	4/22/2021	C	C29	75	Major	2.50	\$1,875			\$1,875
Q2 2021	4/26/2021	1	A21	50	Low	1.00	\$750			\$750
Q2 2021	4/26/2021	1	B20	75	Major	2.50	\$1,875			\$1,875
Q2 2021	5/4/2021	1	B25	50	Low	1.00	\$750			\$750
Q2 2021	5/10/2021	C	C9	45	Moderate	1.50	\$1,125			\$1,125
Q2 2021	5/11/2021	1	A26	50	Low	1.00	\$750			\$750
Q2 2021	5/11/2021	1	B4	80	Major	2.50	\$1,875			\$1,875
Q2 2021	5/12/2021	19	A22	75	Major	2.50	\$1,875			\$1,875
Q2 2021	5/12/2021	19	A6	80	Major	2.50	\$1,875			\$1,875
Q2 2021	5/19/2021	13	A28	90	Major	2.50	\$1,875	\$250		\$2,125
Q2 2021	6/1/2021	20	B16	50	Low	1.00	\$750			\$750
Q2 2021	6/1/2021	20	B18	50	Low	1.00	\$750			\$750
Q2 2021	6/4/2021	1	B12	50	Low	1.00	\$750			\$750
Q2 2021	6/9/2021	C	C24	70	Major	2.50	\$1,875			\$1,875
Q2 2021	6/9/2021	C	C26	70	Major	2.50	\$1,875			\$1,875
Q2 2021	6/9/2021	C	C25	75	Major	2.50	\$1,875			\$1,875
Q2 2021	6/9/2021	C	C23	95	Major	2.50	\$1,875			\$1,875
Q2 2021	6/10/2021	3	B2	45	Low	1.00	\$750			\$750
Q2 2021	6/23/2021	B	A13	55	Moderate	1.50	\$1,125			\$1,125

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

Quarter (Year)	Date	Battery	Oven	opacity	Severity of Violation	Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD HO Door Penalty
Q3 2021	7/2/2021	B	B24	45	Low	1.00	\$750			\$750
Q3 2021	7/6/2021	19	A18	50	Low	1.00	\$750			\$750
Q3 2021	7/7/2021	C	C55	75	Major	2.50	\$1,875	\$250		\$2,125
Q3 2021	7/7/2021	C	C73	90	Major	2.50	\$1,875	\$250		\$2,125
Q3 2021	7/8/2021	2	B7	80	Major	2.50	\$1,875			\$1,875
Q3 2021	7/8/2021	2	B11	90	Major	2.50	\$1,875			\$1,875
Q3 2021	7/8/2021	2	B4	60	Moderate	1.50	\$1,125			\$1,125
Q3 2021	7/9/2021	3	A18	75	Major	2.50	\$1,875			\$1,875
Q3 2021	7/9/2021	3	A14	60	Moderate	1.50	\$1,125			\$1,125
Q3 2021	7/13/2021	C	C1	35	Low	1.00	\$750			\$750
Q3 2021	7/13/2021	C	C5	60	Major	2.50	\$1,875			\$1,875
Q3 2021	7/13/2021	C	C2	75	Major	2.50	\$1,875			\$1,875
Q3 2021	7/13/2021	C	C4	75	Major	2.50	\$1,875			\$1,875
Q3 2021	7/13/2021	C	C3	80	Major	2.50	\$1,875			\$1,875
Q3 2021	7/13/2021	C	C66	50	Moderate	1.50	\$1,125			\$1,125
Q3 2021	7/16/2021	20	B3	70	Major	2.50	\$1,875			\$1,875
Q3 2021	7/28/2021	19	A17	45	Low	1.00	\$750	\$250		\$1,000
Q3 2021	7/29/2021	3	A6	45	Low	1.00	\$750			\$750
Q3 2021	7/29/2021	3	A8	50	Low	1.00	\$750			\$750
Q3 2021	7/29/2021	3	A4	75	Major	2.50	\$1,875			\$1,875
Q3 2021	7/29/2021	3	B26	55	Moderate	1.50	\$1,125			\$1,125
Q3 2021	8/2/2021	1	B11	45	Low	1.00	\$750			\$750
Q3 2021	8/2/2021	1	B29	70	Major	2.50	\$1,875			\$1,875
Q3 2021	8/2/2021	1	B2	75	Major	2.50	\$1,875			\$1,875
Q3 2021	8/2/2021	1	B29	100	Major	2.50	\$1,875			\$1,875
Q3 2021	8/3/2021	2	A2	45	Low	1.00	\$750			\$750
Q3 2021	8/3/2021	2	A6	50	Low	1.00	\$750			\$750
Q3 2021	8/3/2021	1	A21	70	Major	2.50	\$1,875			\$1,875
Q3 2021	8/9/2021	3	B17	75	Major	2.50	\$1,875			\$1,875
Q3 2021	8/9/2021	3	B19	80	Major	2.50	\$1,875			\$1,875
Q3 2021	8/9/2021	3	B5	60	Moderate	1.50	\$1,125			\$1,125
Q3 2021	8/10/2021	1	A19	45	Low	1.00	\$750			\$750
Q3 2021	8/10/2021	1	A9	45	Low	1.00	\$750			\$750
Q3 2021	8/10/2021	1	A17	50	Low	1.00	\$750			\$750
Q3 2021	8/10/2021	1	A3	55	Moderate	1.50	\$1,125			\$1,125
Q3 2021	8/23/2021	14	A26	85	Major	2.50	\$1,875			\$1,875
Q3 2021	8/24/2021	1	A4	70	Major	2.50	\$1,875	\$250		\$2,125
Q3 2021	9/7/2021	2	A15	45	Low	1.00	\$750			\$750
Q3 2021	9/7/2021	2	A17	55	Moderate	1.50	\$1,125			\$1,125
Q3 2021	9/20/2021	B	A12	50	Low	1.00	\$750			\$750

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 2021	10/5/2021	2	A29	45	Low	1.00	\$750			\$750
Q4 2021	10/5/2021	2	B11	70	Major	2.50	\$1,875			\$1,875
Q4 2021	10/5/2021	2	B9	65	Moderate	1.50	\$1,125			\$1,125
Q4 2021	10/12/2021	C	C77	65	Major	2.50	\$1,875			\$1,875
Q4 2021	10/12/2021	C	C60	75	Major	2.50	\$1,875			\$1,875
Q4 2021	10/12/2021	C	C66	75	Major	2.50	\$1,875			\$1,875
Q4 2021	10/12/2021	C	C62	80	Major	2.50	\$1,875			\$1,875
Q4 2021	10/12/2021	C	C62	95	Major	2.50	\$1,875			\$1,875
Q4 2021	11/1/2021	B	B3	50	Low	1.00	\$750			\$750
Q4 2021	11/1/2021	B	B24	75	Major	2.50	\$1,875			\$1,875
Q4 2021	11/1/2021	B	B6	60	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/8/2021	3	A25	55	Moderate	1.50	\$1,125	\$250		\$1,375
Q4 2021	11/10/2021	2	A14	45	Low	1.00	\$750			\$750
Q4 2021	11/10/2021	2	A22	45	Low	1.00	\$750			\$750
Q4 2021	11/10/2021	2	A26	45	Low	1.00	\$750			\$750
Q4 2021	11/10/2021	2	A10	55	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/10/2021	1	B30	55	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/15/2021	1	A4	50	Low	1.00	\$750			\$750
Q4 2021	11/15/2021	1	B7	75	Major	2.50	\$1,875			\$1,875
Q4 2021	11/15/2021	1	A6	80	Major	2.50	\$1,875			\$1,875
Q4 2021	11/15/2021	1	A8	55	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/15/2021	1	A4	65	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/15/2021	1	A9	65	Moderate	1.50	\$1,125			\$1,125
Q4 2021	11/18/2021	19	B23	85	Major	2.50	\$1,875	\$250		\$2,125
Q4 2021	11/24/2021	3	A12	60	Moderate	1.50	\$1,125	\$250		\$1,375
Q4 2021	11/29/2021	1	B27	100	Major	2.50	\$1,875			\$1,875
Q4 2021	12/13/2021	1	A11	45	Low	1.00	\$750	\$250		\$1,000
Q4 2021	12/13/2021	1	A19	45	Low	1.00	\$750	\$250		\$1,000
Q4 2021	12/13/2021	1	A20	45	Low	1.00	\$750	\$250		\$1,000
Q4 2021	12/13/2021	1	B11	65	Moderate	1.50	\$1,125	\$250		\$1,375

Quarter (Year)	Total High Opacity Door Penalty	ACHD High Opacity Door Penalty
Q2 2021		26
Q4 2021		30
Q3 2021		40
Total		96

\$38,125
\$40,375
\$55,000
\$133,500

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"/> Q2 2021	4			5	9
Apr 2021	1			1	2
May 2021	1			1	2
Jun 2021	2			3	5
<input type="checkbox"/> Q3 2021	6	2	2	2	12
Jul 2021	6			1	7
Aug 2021	0	1	2		3
Sep 2021	0	1		1	2
<input type="checkbox"/> Q4 2021	5	2		3	10
Oct 2021	1	1		3	5
Nov 2021	1				1
Dec 2021	3	1			4
Total	15	4	2	10	31

Method 303 Inspection and Penalty Summary

Quarter (Year)	Total M303 Compl Insp	Total M303 Inspections	Method 303 % Compliance	Method 303 Total Penalty
Q2 2021	3631	3640	99.75%	\$18,750
Q3 2021	3792	3804	99.68%	\$26,500
Q4 2021	3670	3680	99.73%	\$24,250
Total	11093	11124	99.72%	\$69,500

Method 303 Charging Inspections

Quarter (Year)	Date	Battery	Charge(1-4) Severity of Violation	Charge(2-5) Severity of Violation	Laer Battery Charge Severity of Violation	Door Severity of Violation	Lid Leaks Severity of Violation	Offtake Leaks Severity of Violation	Method 303 Penalty	H2S Penalty	SO2 Penalty	Method 303 Total Penalty
Q3 2021	7/1/2021	14						Major	\$2,500			\$2,500
Q3 2021	7/4/2021	13			Major				\$2,500			\$2,500
Q3 2021	7/6/2021	1	Moderate						\$1,500			\$1,500
Q3 2021	7/7/2021	14			Moderate				\$1,500	\$250		\$1,750
Q3 2021	7/11/2021	1	Moderate	Major					\$4,000			\$4,000
Q3 2021	7/27/2021	C			Major				\$2,500	\$250		\$2,750
Q3 2021	8/16/2021	C					Major		\$2,500			\$2,500
Q3 2021	8/23/2021	B				Major			\$2,500			\$2,500
Q3 2021	8/27/2021	C					Major		\$2,500			\$2,500
Q3 2021	9/18/2021	13						Moderate	\$1,500			\$1,500
Q3 2021	9/29/2021	C				Major			\$2,500			\$2,500
Total												\$26,500

Method 303 Charging Inspections

Quarter (Year)	Date	Battery	Charge(1-4) Severity of Violation	Charge(2-5) Severity of Violation	Laer Battery Charge Severity of Violation	Door Severity of Violation	Lid Leaks Severity of Violation	Offtake Leaks Severity of Violation	Method 303 Penalty	H2S Penalty	SO2 Penalty	Method 303 Total Penalty
Q4 2021	10/10/2021	C				Major			\$3,750			\$3,750
Q4 2021	10/18/2021	13						Low	\$1,500			\$1,500
Q4 2021	10/18/2021	14						Low	\$1,500			\$1,500
Q4 2021	10/21/2021	14						Low	\$1,500			\$1,500
Q4 2021	10/30/2021	B			Moderate				\$2,250			\$2,250
Q4 2021	11/28/2021	B			Major				\$3,750			\$3,750
Q4 2021	12/7/2021	1				Moderate			\$2,250			\$2,250
Q4 2021	12/7/2021	3	Moderate						\$2,250			\$2,250
Q4 2021	12/13/2021	19	Low	Major					\$5,250	\$250		\$5,500
Total												\$24,250

Quarter (Year)	Method 303 Total Non-Compliant Inspections	Method 303 Total Penalty
Q2 2021	9	\$18,750
Q3 2021	12	\$26,500
Q4 2021	10	\$24,250
Total	31	\$69,500

Summary of Penalties from USS Inspections

Quarter (Year)	Total USS Push Violations	Total USS Push Penalty	Total USS Travel Violations	Total USS Travel Penalty	USS Total Penalty
Q2 2021	7	\$8,000	17	\$19,250	\$27,250
Q3 2021	24	\$27,000	31	\$34,500	\$61,500
Q4 2021	28	\$46,500	26	\$39,750	\$86,250
Total	59	\$81,500	74	\$93,500	\$175,000

USS Non-Compliant Push and Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Agency	USS Reported Opacity	Push Severity of Violation	Travel Severity of Violation	USS Push Penalty	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Penalty
Q2 2021	4/1/2021	13	A4	U	30		low		\$1,000			\$1,000
Q2 2021	4/4/2021	1	A8	U	20		low		\$1,000			\$1,000
Q2 2021	4/4/2021	1	A8	U	30	low		\$1,000				\$1,000
Q2 2021	4/9/2021	1	B12	U	30	low		\$1,000				\$1,000
Q2 2021	4/21/2021	1	A19	U	40	moderate		\$1,500				\$1,500
Q2 2021	4/29/2021	13	A9	U	30		low		\$1,000			\$1,000
Q2 2021	5/8/2021	13	A5	U	30		low		\$1,000			\$1,000
Q2 2021	5/8/2021	13	A5	U	30	low		\$1,000				\$1,000
Q2 2021	5/13/2021	13	A12	U	20		low		\$1,000			\$1,000
Q2 2021	5/28/2021	1	A7	U	35		low		\$1,000			\$1,000
Q2 2021	5/30/2021	13	A5	U	30		low		\$1,000			\$1,000
Q2 2021	5/31/2021	13	A14	U	30		low		\$1,000			\$1,000
Q2 2021	6/2/2021	19	C18	U	20		low		\$1,000			\$1,000
Q2 2021	6/4/2021	13	A30	U	30		low		\$1,000			\$1,000
Q2 2021	6/5/2021	13	A30	U	15		low		\$1,000	\$250		\$1,250
Q2 2021	6/8/2021	13	A29	U	25		low		\$1,000			\$1,000
Q2 2021	6/13/2021	1	A9	U	20	low		\$1,000				\$1,000
Q2 2021	6/13/2021	13	A5	U	20		low		\$1,000			\$1,000
Q2 2021	6/13/2021	13	A5	U	30	low		\$1,000				\$1,000
Q2 2021	6/14/2021	19	B7	U	25		low		\$1,000			\$1,000
Q2 2021	6/15/2021	1	A11	U	30		low		\$1,000			\$1,000
Q2 2021	6/15/2021	1	A11	U	40	moderate		\$1,500				\$1,500
Q2 2021	6/26/2021	13	B13	U	80		major		\$2,500			\$2,500
Q2 2021	6/26/2021	13	B22	U	50		moderate		\$1,500			\$1,500

USS Non-Compliant Push and Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Agency	USS Reported Opacity	Push Severity of Violation	USS Push Penalty	Travel Severity of Violation	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Penalty
Q3 2021	7/1/2021	14	A1	U	15			low	\$1,000			\$1,000
Q3 2021	7/1/2021	14	A1	U	20	low	\$1,000					\$1,000
Q3 2021	7/5/2021	13	B21	U	30			low	\$1,000	\$250		\$1,250
Q3 2021	7/11/2021	13	A11	U	20			low	\$1,000			\$1,000
Q3 2021	7/12/2021	13	A11	U	20			low	\$1,000			\$1,000
Q3 2021	7/12/2021	13	A11	U	30	low	\$1,000					\$1,000
Q3 2021	7/12/2021	20	B24	U	30	low	\$1,000					\$1,000
Q3 2021	7/16/2021	19	B27	U	20			low	\$1,000			\$1,000
Q3 2021	7/20/2021	19	A15	U	20			low	\$1,000			\$1,000
Q3 2021	7/20/2021	19	A15	U	30	low	\$1,000					\$1,000
Q3 2021	7/22/2021	13	B17	U	20			low	\$1,000			\$1,000
Q3 2021	7/22/2021	13	B17	U	30	low	\$1,000					\$1,000
Q3 2021	7/28/2021	13	B18	U	15			low	\$1,000	\$250		\$1,250
Q3 2021	8/5/2021	1	A3	U	35	low	\$1,000					\$1,000
Q3 2021	8/7/2021	13	B22	U	75			major	\$2,500			\$2,500
Q3 2021	8/12/2021	2	B21	TESTING	25	low	\$1,000		\$0			\$1,000
Q3 2021	8/15/2021	13	A5	U	15			low	\$1,000			\$1,000
Q3 2021	8/15/2021	13	A5	U	30	low	\$1,000					\$1,000
Q3 2021	8/16/2021	19	B2	U	20			low	\$1,000			\$1,000
Q3 2021	8/16/2021	19	B2	U	30	low	\$1,000					\$1,000
Q3 2021	8/17/2021	19	B6	U	15			low	\$1,000			\$1,000
Q3 2021	8/18/2021	2	B17	U	30			low	\$1,000			\$1,000
Q3 2021	8/18/2021	2	B17	U	80	major	\$2,500					\$2,500
Q3 2021	8/19/2021	13	A29	U	15			low	\$1,000			\$1,000
Q3 2021	8/19/2021	13	A29	U	30	low	\$1,000					\$1,000
Q3 2021	8/19/2021	19	B20	U	15			low	\$1,000			\$1,000
Q3 2021	8/19/2021	19	B20	U	20	low	\$1,000					\$1,000
Q3 2021	8/23/2021	20	C25	U	20			low	\$1,000			\$1,000
Q3 2021	9/2/2021	13	A5	U	25			low	\$1,000			\$1,000
Q3 2021	9/2/2021	13	A5	U	30	low	\$1,000					\$1,000

USS Non-Compliant Push and Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Agency	USS Reported Opacity	Push Severity of Violation	USS Push Penalty	Travel Severity of Violation	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Penalty
Q3 2021	9/4/2021	13	A12	U	75			major	\$2,500			\$2,500
Q3 2021	9/7/2021	14	A18	U	15			low	\$1,000			\$1,000
Q3 2021	9/7/2021	14	A18	U	20	low	\$1,000					\$1,000
Q3 2021	9/8/2021	20	C10	U	25			low	\$1,000			\$1,000
Q3 2021	9/8/2021	20	C10	U	30	low	\$1,000					\$1,000
Q3 2021	9/12/2021	14	B17	U	30	low	\$1,000					\$1,000
Q3 2021	9/12/2021	19	B4	U	15			low	\$1,000			\$1,000
Q3 2021	9/12/2021	19	B4	U	30	low	\$1,000					\$1,000
Q3 2021	9/12/2021	20	C9	U	15			low	\$1,000			\$1,000
Q3 2021	9/12/2021	20	C9	U	30	low	\$1,000					\$1,000
Q3 2021	9/13/2021	14	B17	U	15			low	\$1,000			\$1,000
Q3 2021	9/13/2021	19	B10	U	15			low	\$1,000			\$1,000
Q3 2021	9/13/2021	19	B10	U	30	low	\$1,000					\$1,000
Q3 2021	9/13/2021	19	B8	U	15			low	\$1,000			\$1,000
Q3 2021	9/13/2021	19	B8	U	30	low	\$1,000					\$1,000
Q3 2021	9/16/2021	13	A12	U	30			low	\$1,000			\$1,000
Q3 2021	9/27/2021	14	A1	U	20			low	\$1,000			\$1,000
Q3 2021	9/27/2021	14	A1	U	30	low	\$1,000					\$1,000
Q3 2021	9/27/2021	14	A10	U	20			low	\$1,000			\$1,000
Q3 2021	9/27/2021	20	A5	U	15			low	\$1,000			\$1,000
Q3 2021	9/27/2021	20	A5	U	30	low	\$1,000					\$1,000
Q3 2021	9/30/2021	19	B6	U	30			low	\$1,000			\$1,000
Q3 2021	9/30/2021	19	B6	U	80	major	\$2,500					\$2,500
Q3 2021	9/30/2021	19	B8	U	15			low	\$1,000			\$1,000
Q3 2021	9/30/2021	19	B8	U	30	low	\$1,000					\$1,000

USS Non-Compliant Push and Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Agency	USS Reported Opacity	Push Severity of Violation	USS Push Penalty	Travel Severity of Violation	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Penalty
Q4 2021	10/3/2021	13	A14	U	25			low	\$1,500			\$1,500
Q4 2021	10/7/2021	20	C24	U	25	low	\$1,500					\$1,500
Q4 2021	10/8/2021	2	B11	U	40	moderate	\$2,250					\$2,250
Q4 2021	10/10/2021	2	B27	U	25	low	\$1,500					\$1,500
Q4 2021	10/24/2021	19	B6	U	20			low	\$1,500			\$1,500
Q4 2021	10/24/2021	19	B6	U	30	low	\$1,500					\$1,500
Q4 2021	10/24/2021	19	B8	U	20			low	\$1,500			\$1,500
Q4 2021	10/24/2021	19	B8	U	30	low	\$1,500					\$1,500
Q4 2021	10/29/2021	13	A4	U	20			low	\$1,500			\$1,500
Q4 2021	10/29/2021	13	A4	U	30	low	\$1,500					\$1,500
Q4 2021	11/3/2021	19	B27	U	20			low	\$1,500			\$1,500
Q4 2021	11/3/2021	19	B27	U	30	low	\$1,500					\$1,500
Q4 2021	11/10/2021	14	A29	U	25			low	\$1,500			\$1,500
Q4 2021	11/14/2021	13	B4	U	20			low	\$1,500			\$1,500
Q4 2021	11/14/2021	13	B4	U	30	low	\$1,500					\$1,500
Q4 2021	11/17/2021	14	B1	U	15			low	\$1,500	\$250		\$1,750
Q4 2021	11/17/2021	14	B1	U	20	low	\$1,500			\$250		\$1,750
Q4 2021	11/18/2021	19	B29	U	30	low	\$1,500			\$250		\$1,750
Q4 2021	11/20/2021	19	C8	U	20			low	\$1,500			\$1,500
Q4 2021	11/20/2021	19	C8	U	30	low	\$1,500					\$1,500
Q4 2021	11/26/2021	19	C26	SURVEY	20	low	\$1,500		\$0			\$1,500
Q4 2021	11/29/2021	19	A27	U	20			low	\$1,500			\$1,500
Q4 2021	11/29/2021	19	A27	U	30	low	\$1,500					\$1,500
Q4 2021	11/29/2021	19	A29	U	15			low	\$1,500			\$1,500
Q4 2021	11/29/2021	19	A29	U	30	low	\$1,500					\$1,500
Q4 2021	11/30/2021	19	B10	U	20			low	\$1,500			\$1,500
Q4 2021	11/30/2021	19	B10	U	30	low	\$1,500					\$1,500
Q4 2021	12/1/2021	19	B20	U	25			low	\$1,500			\$1,500
Q4 2021	12/1/2021	19	B20	U	30	low	\$1,500					\$1,500
Q4 2021	12/6/2021	19	C21	U	30	low	\$1,500					\$1,500
Q4 2021	12/8/2021	14	B1	U	15			low	\$1,500			\$1,500
Q4 2021	12/8/2021	14	B1	U	20	low	\$1,500					\$1,500
Q4 2021	12/10/2021	13	A4	U	30			low	\$1,500			\$1,500
Q4 2021	12/10/2021	13	A4	U	60	moderate	\$2,250					\$2,250

USS Non-Compliant Push and Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Agency	USS Reported Opacity	Push Severity of Violation	USS Push Penalty	Travel Severity of Violation	USS Travel Penalty	H2S Exceedance Penalty	SO2 Exceedance Penalty	USS Total Penalty
Q4 2021	12/12/2021	13	B16	U	20			low	\$1,500			\$1,500
Q4 2021	12/12/2021	13	B16	U	30	low	\$1,500					\$1,500
Q4 2021	12/13/2021	14	A1	U	25			low	\$1,500	\$250		\$1,750
Q4 2021	12/13/2021	14	A1	U	30	low	\$1,500			\$250		\$1,750
Q4 2021	12/16/2021	14	A26	U	30			low	\$1,500	\$250		\$1,750
Q4 2021	12/16/2021	14	B4	U	30			low	\$1,500	\$250		\$1,750
Q4 2021	12/16/2021	20	B29	U	15			low	\$1,500	\$250		\$1,750
Q4 2021	12/20/2021	2	A31	U	15			low	\$1,500	\$250		\$1,750
Q4 2021	12/22/2021	20	C25	U	25			low	\$1,500			\$1,500
Q4 2021	12/22/2021	20	C25	U	50	moderate	\$2,250					\$2,250
Q4 2021	12/22/2021	20	C27	U	15			low	\$1,500			\$1,500
Q4 2021	12/22/2021	20	C27	U	30	low	\$1,500					\$1,500
Q4 2021	12/26/2021	13	A3	U	50			moderate	\$2,250			\$2,250
Q4 2021	12/26/2021	13	A3	U	55	moderate	\$2,250					\$2,250
Q4 2021	12/29/2021	19	B10	U	20	low	\$1,500					\$1,500
Q4 2021	12/29/2021	19	B8	U	30	low	\$1,500					\$1,500
Q4 2021	12/30/2021	20	C3	U	30	low	\$1,500					\$1,500
Q4 2021	12/30/2021	20	C5	U	20			low	\$1,500			\$1,500
Q4 2021	12/30/2021	20	C5	U	40	moderate	\$2,250					\$2,250

Quarter (Year)	Total USS Push Violations	Total USS Travel Violations	USS Total Penalty
Q3 2021	24	31	\$61,500
Q4 2021	28	26	\$86,250
Q2 2021	7	17	\$27,250
Total	59	74	\$175,000

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
Q2 2021	18	21	9	22	11	0	5	3	7	0	96	\$19,200
Apr 2021	4	11	1	14	7	0	1	0	3	0	41	\$8,200
May 2021	7	8	3	4	1	0	3	0	1	0	27	\$5,400
Jun 2021	7	2	5	4	3	0	1	3	3	0	28	\$5,600
Q3 2021	1	4	4	11	4	0	7	0	5	1	37	\$7,400
Jul 2021	1	0	0	4	1	0	2	0	1	0	9	\$1,800
Aug 2021	0	3	3	6	3	0	0	0	2	0	17	\$3,400
Sep 2021	0	1	1	1	0	0	5	0	2	1	11	\$2,200
Q4 2021	2	7	1	9	8	1	2	2	3	1	36	\$7,200
Oct 2021	1	2	1	2	2	0	0	0	1	0	9	\$1,800
Nov 2021	1	2	0	5	1	1	1	0	1	1	13	\$2,600
Dec 2021	0	3	0	2	5	0	1	2	1	0	14	\$2,800
Total	21	32	14	42	23	1	14	5	15	2	169	\$33,800

Total Non-Compliant Clock Hours

