

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

November 28, 2022

CERTIFIED MAIL – 9489 0090 0027 6045 1974 73

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, 2022 through March 31, 2022 (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 2022, January 1, 2022 through March 31, 2022. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$458,225.00**. Pursuant to the SOA, Section V. ("Civil Penalty Payment"), Paragraph A, 90 percent of that amount, or **\$412,402.50**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$45,822.50**, 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 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 January 1, 2022 through March 31, 2022. 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, 2022 through March 31, 2022.

If you have any questions concerning this demand for stipulated penalties, please contact Allason Holt, Program Manager -- Compliance and Enforcement Program, at 412-578-8122 or by email at: Allason.Holt@AlleghenyCounty.US. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Allason Holt". The signature is fluid and cursive, with a large initial "A" and "H".

Allason Holt
Program Manager -- Compliance and Enforcement Program

cc: Mark Jeffrey (MJeffrey@uss.com)
Mike Dzurinko (MDzurinko@uss.com)
Jonelle Scheetz (JSScheetz@uss.com)

AQ Documents File

Quarters Selected for Report

Q1 2022

\$458,225

Total Penalty

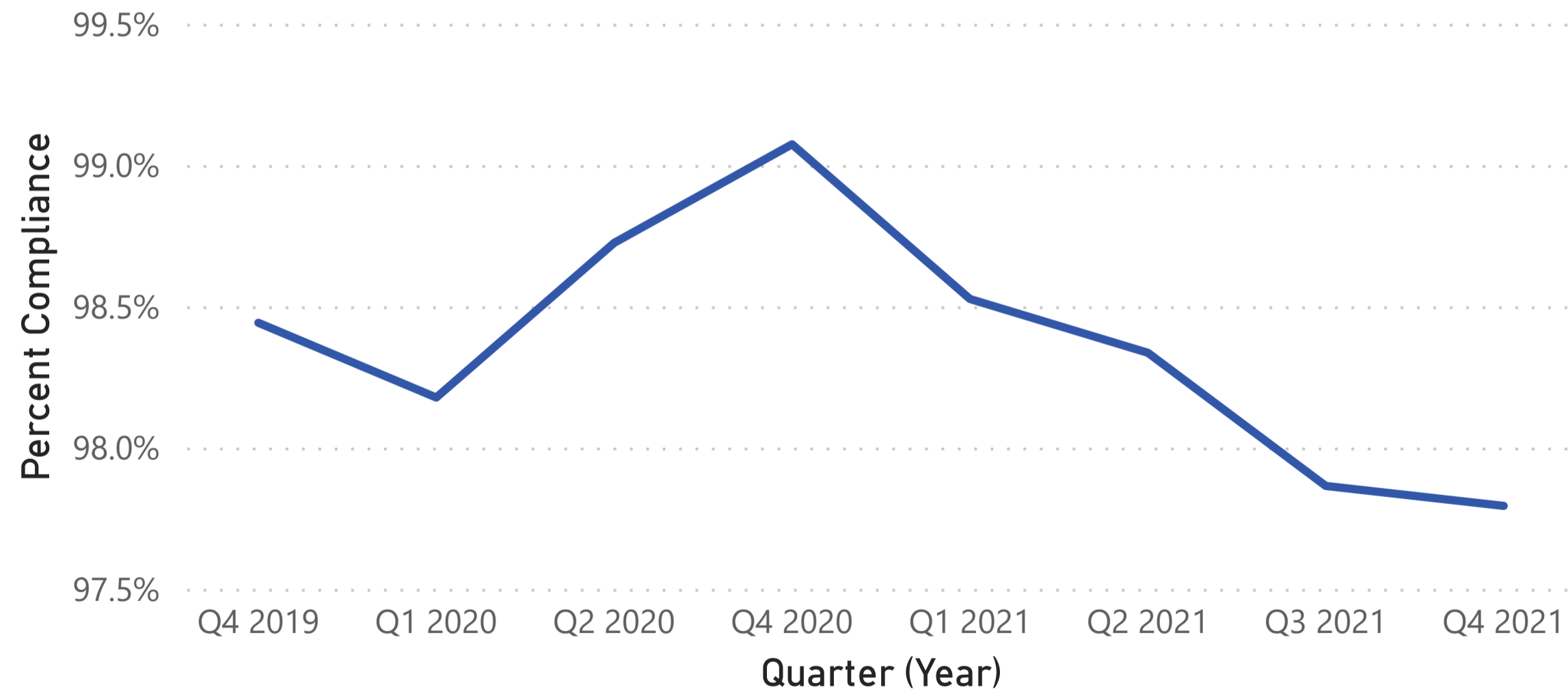
U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections
 Stipulated Penalties **COA 190604**
 (Q1 2022)

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
▲					
☐ Q1 2022					
Jan 2022	\$6,750	\$73,750	\$27,000	\$2,200	\$109,700
Feb 2022	\$12,000	\$137,000	\$42,250	\$600	\$191,850
Mar 2022	\$16,000	\$108,625	\$30,250	\$1,800	\$156,675
Total	\$34,750	\$319,375	\$99,500	\$4,600	\$458,225
Total	\$34,750	\$319,375	\$99,500	\$4,600	\$458,225

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 2022	454	548	82.85%	3709	3724	99.60%	4163	4272	97.45%
Q4 2021	364	445	81.80%	3670	3680	99.73%	4034	4125	97.79%
Total	818	993	82.38%	7379	7404	99.66%	8197	8397	97.62%

Quarterly Compliance



Average Percent Compliance

Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters
Q4 2020	99.128%	99.074%	99.101%
Q1 2021	99.074%	98.526%	98.800%
Q2 2021	98.526%	98.336%	98.431%
Q1 2020	98.442%	98.177%	98.310%
Q4 2019	98.375%	98.442%	98.408%
Q3 2021	98.336%	97.864%	98.100%
Q2 2020	98.177%	98.725%	98.451%
Q4 2021	97.864%	97.794%	97.829%
Q1 2022	97.794%	97.449%	97.621%

Quarter (Year)

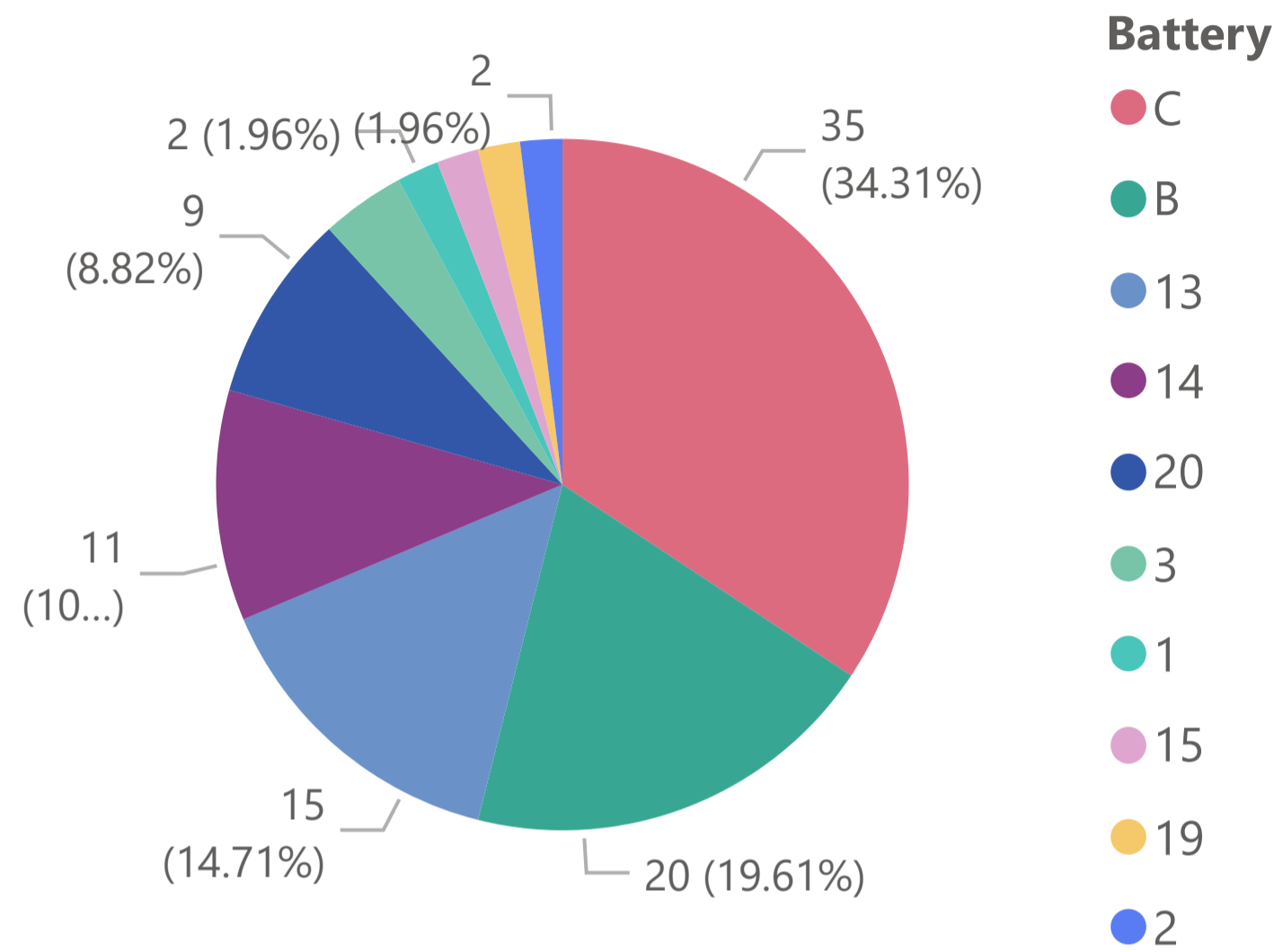
All ▼

Penalty Summary for ACHD Inspections

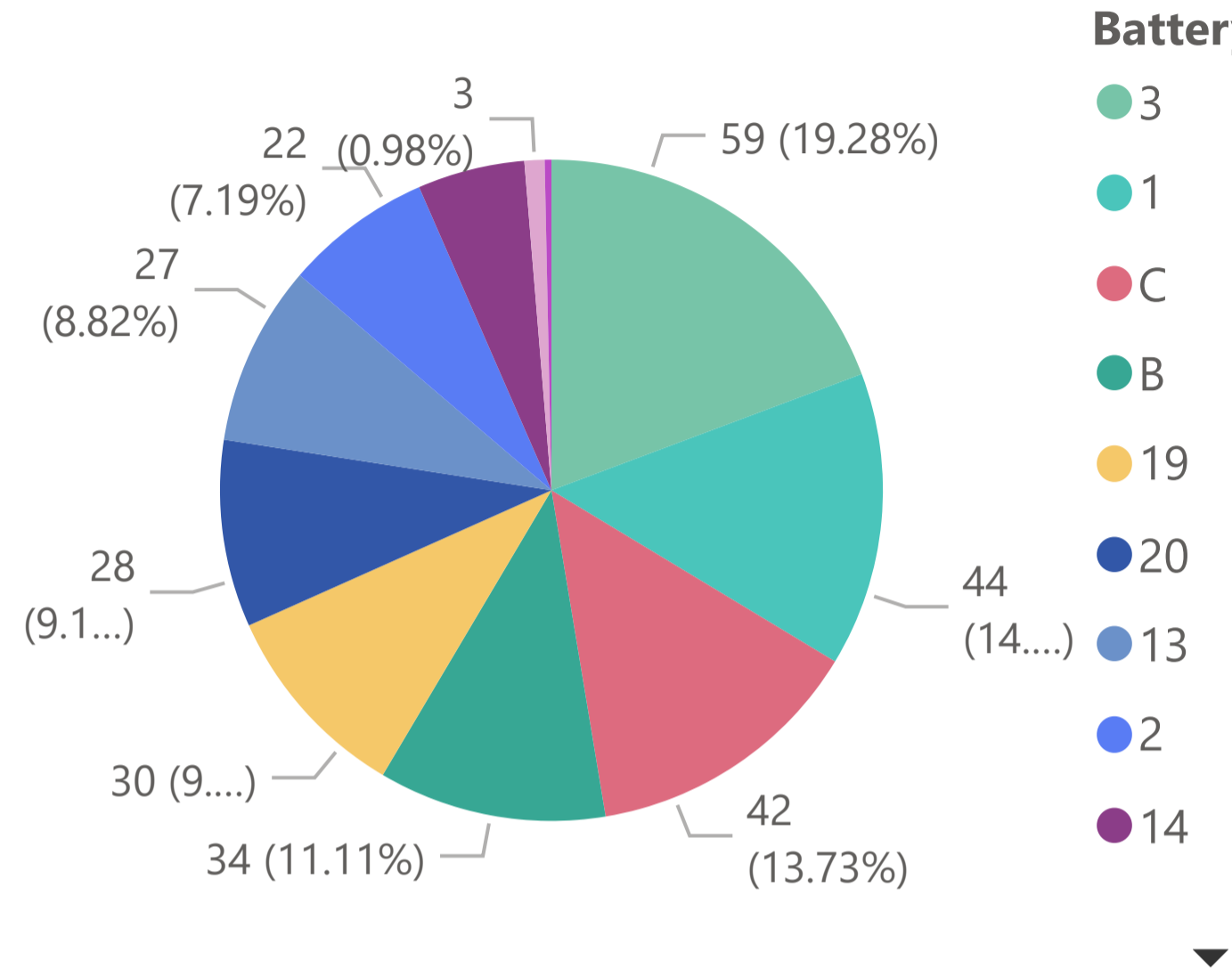
Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD HO Door Penalty	ACHD Total Penalties
▲									
☐ Q1 2022									
Jan 2022	\$8,250	\$14,250	\$24,500	\$11,750	\$0	\$0	\$3,750	\$11,250	\$73,750
Feb 2022	\$7,500	\$19,750	\$40,000	\$24,750	\$3,750	\$0	\$0	\$41,250	\$137,000
Mar 2022	\$3,750	\$25,500	\$29,250	\$10,500	\$3,750	\$6,250	\$0	\$29,625	\$108,625
Total	\$19,500	\$59,500	\$93,750	\$47,000	\$7,500	\$6,250	\$3,750	\$82,125	\$319,375
Total	\$19,500	\$59,500	\$93,750	\$47,000	\$7,500	\$6,250	\$3,750	\$82,125	\$319,375

Non-Compliant Coke Oven Inspections Performed by ACHD

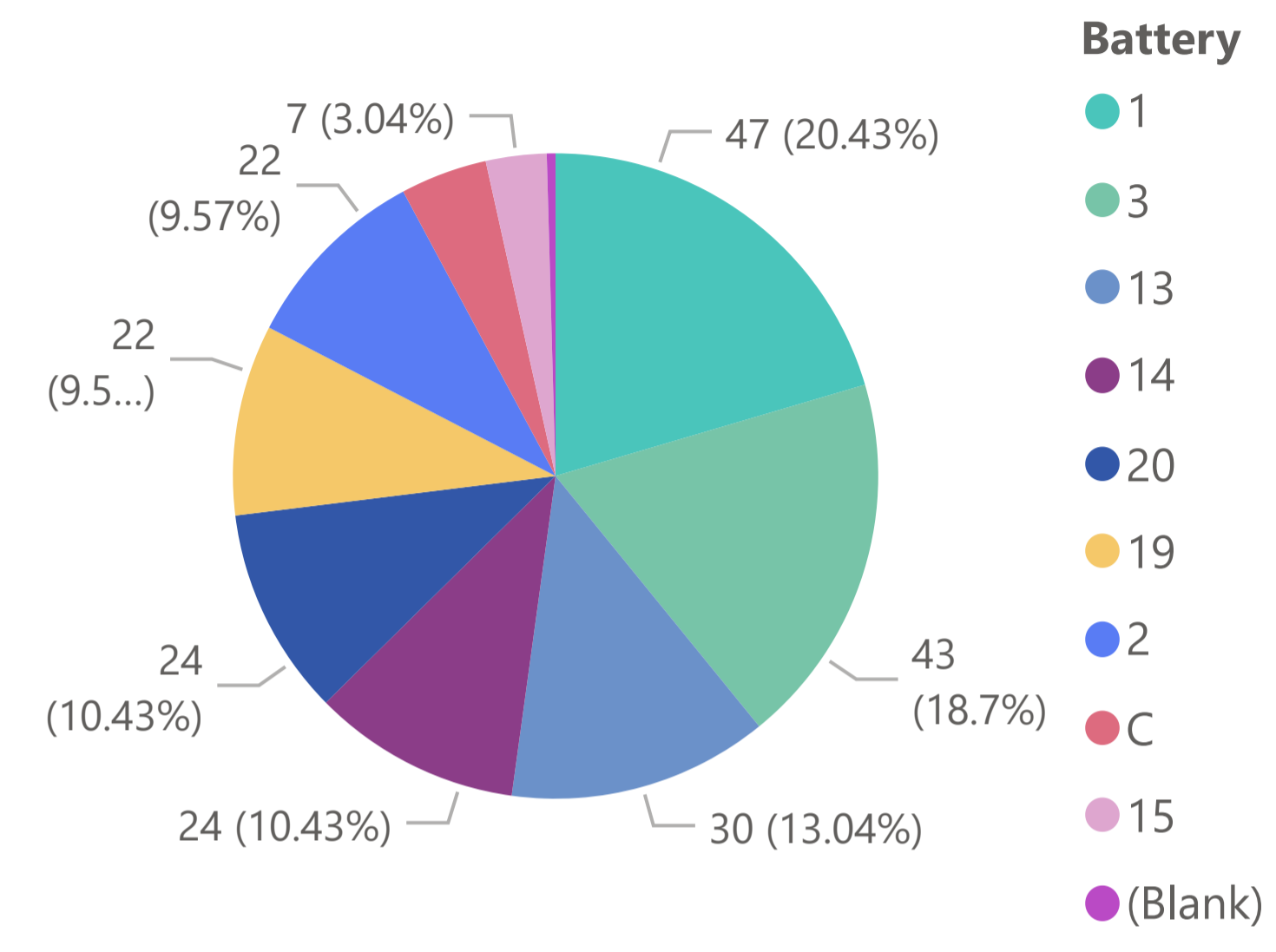
Charging Violations by Battery



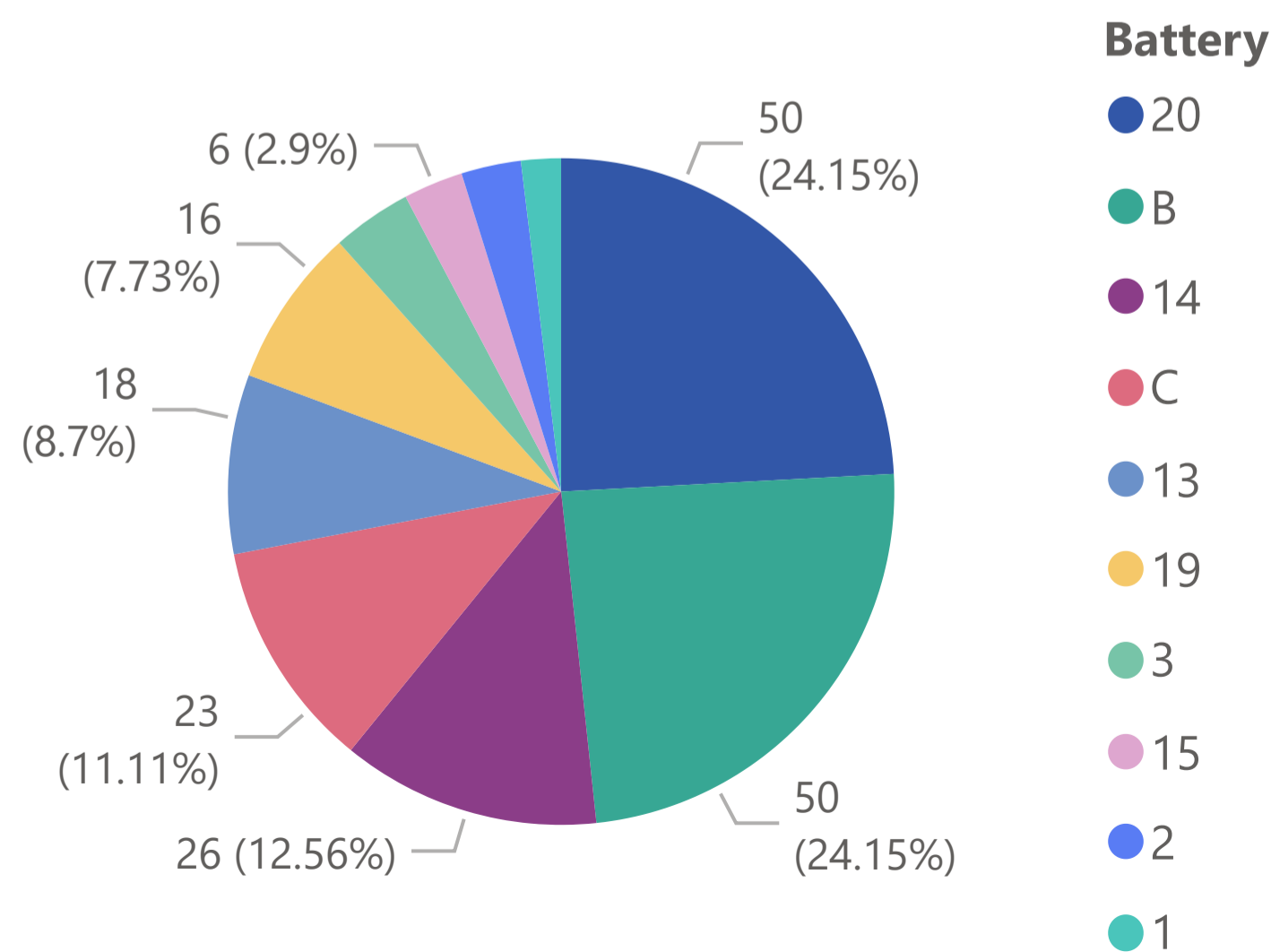
Push Violations by Battery



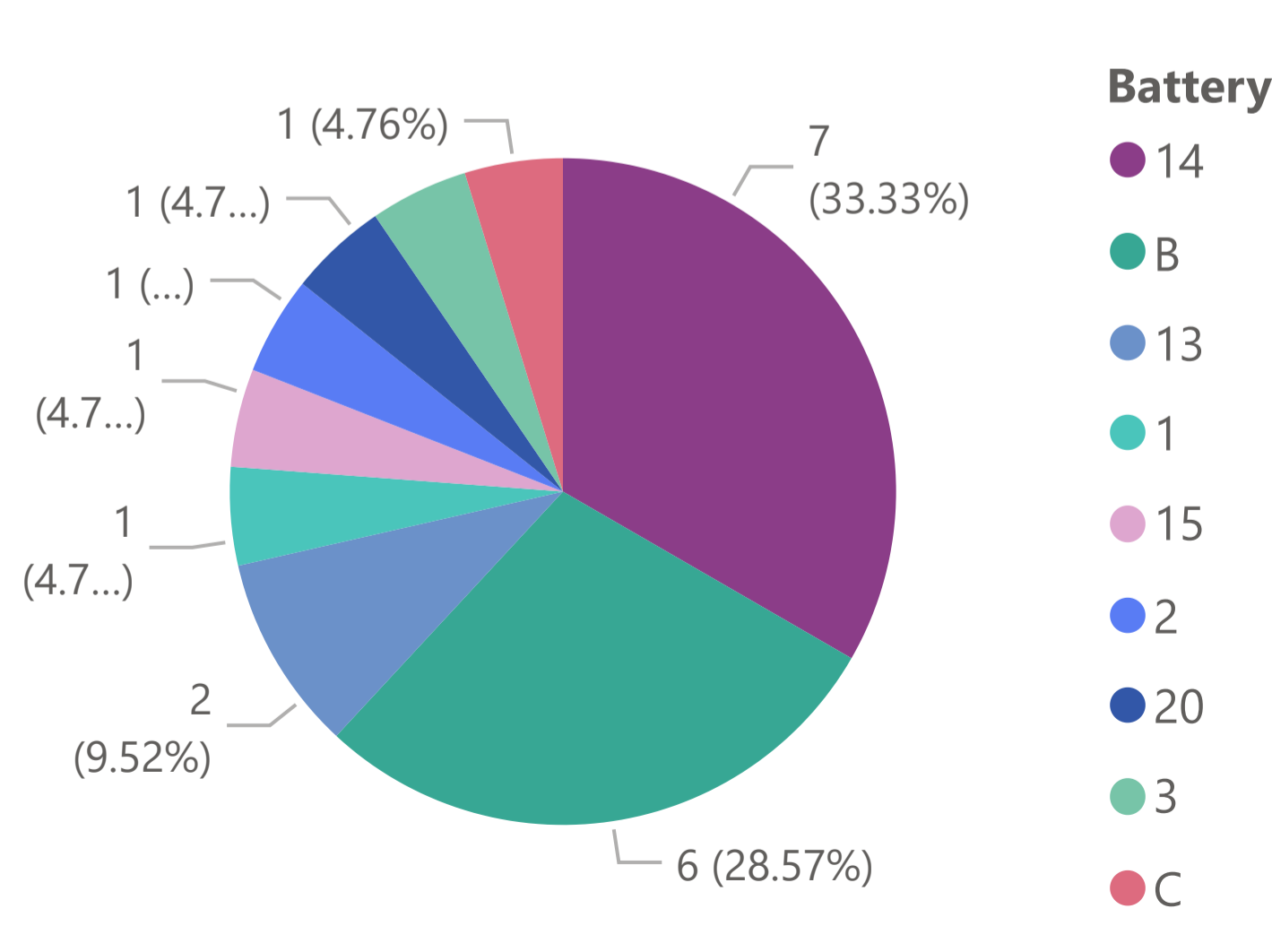
Travel Violations by Battery



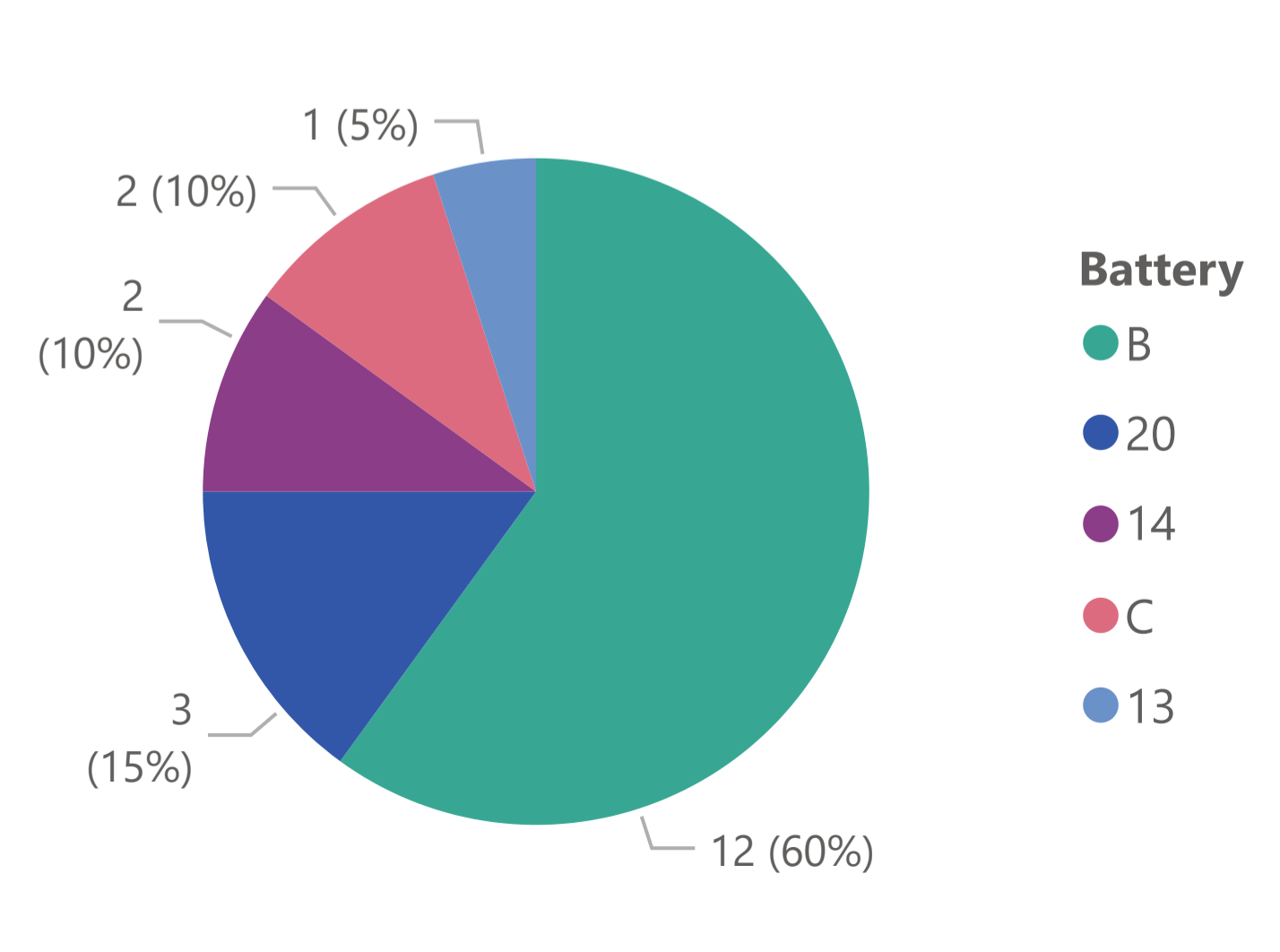
Soak Violations by Battery



Topside (Offtakes) Violations by Battery



Topside (Lids) Violation by Battery



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 2022	1/24/2022	C	77	1.39	Moderate	1.50	\$2,250			\$2,250
Q1 2022	1/28/2022	14	79	1.42	Moderate	1.50	\$2,250			\$2,250
Q1 2022	1/31/2022	19	120	1.59	Major	2.50	\$3,750			\$3,750
Q1 2022	2/11/2022	C	836	15.06	Major	2.50	\$3,750			\$3,750
Q1 2022	2/14/2022	13	90	1.62	Major	2.50	\$3,750			\$3,750
Q1 2022	3/7/2022	C	135	2.43	Major	2.50	\$3,750			\$3,750
Total										\$19,500

Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Oven	Battery	pusher / coke (if viol.)	Severity of Violation	Soaking Penalty Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Soaking Penalty
Q1 2022	1/18/2022	A10	B	C	low	1.00	\$1,500			\$1,500
Q1 2022	1/18/2022	A12	B	C	low	1.00	\$1,500			\$1,500
Q1 2022	1/18/2022	A14	B	C	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/20/2022	A27	20	C	major	2.50	\$3,750			\$3,750
Q1 2022	1/20/2022	A27	20	P	low	1.00	\$1,500			\$1,500
Q1 2022	1/20/2022	A29	20	C	low	1.00	\$1,500			\$1,500
Q1 2022	1/24/2022	C49	C	P	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/8/2022	C15	20	C	major	2.50	\$3,750			\$3,750
Q1 2022	2/9/2022	B16	B	C	major	2.50	\$3,750			\$3,750
Q1 2022	2/9/2022	B24	B	C	major	2.50	\$3,750			\$3,750
Q1 2022	2/17/2022	C23	19	C	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/17/2022	C27	19	C	major	2.50	\$3,750			\$3,750
Q1 2022	2/22/2022	C18	20	C	moderate	1.50	\$2,250	\$250		\$2,500
Q1 2022	3/2/2022	A25	B	C	major	2.50	\$3,750			\$3,750
Q1 2022	3/2/2022	A31	B	C	major	2.50	\$3,750			\$3,750
Q1 2022	3/2/2022	B37	B	C	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/3/2022	A3	3	C	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/7/2022	C82	C	P	major	2.50	\$3,750			\$3,750
Q1 2022	3/8/2022	A24	20	C	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/17/2022	A25	20	P	low	1.00	\$1,500			\$1,500
Q1 2022	3/25/2022	C63	C	P	major	2.50	\$3,750			\$3,750
Q1 2022	3/28/2022	B15	19	P	moderate	1.50	\$2,250			\$2,250
Total								\$250		\$59,500

ACHD Non-Compliant Push Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Push Max Opacity	ACHD Push Severity of Violation	Push Penalty Multiplier	Push Penalty	H2S Penalty	SO2 Penalty	ACHD Push Penalty
Q1 2022	1/10/2022	3	A22	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/19/2022	19	A13	50	moderate	1.50	\$2,250	\$250		\$2,500
Q1 2022	1/19/2022	19	A17	100	major	2.50	\$3,750	\$250		\$4,000
Q1 2022	1/20/2022	20	A19	25	low	1.00	\$1,500			\$1,500
Q1 2022	1/25/2022	2	A7	45	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/26/2022	14	A19	40	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/28/2022	19	B6	90	major	2.50	\$3,750			\$3,750
Q1 2022	1/31/2022	19	B20	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/31/2022	19	C1	100	major	2.50	\$3,750			\$3,750
Q1 2022	2/7/2022	3	B20	50	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/7/2022	3	B18	70	major	2.50	\$3,750			\$3,750
Q1 2022	2/7/2022	3	B30	70	major	2.50	\$3,750			\$3,750
Q1 2022	2/8/2022	20	A4	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/8/2022	20	C17	45	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/8/2022	20	C21	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/8/2022	20	A2	60	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/9/2022	B	A3	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/10/2022	13	A2	100	major	2.50	\$3,750			\$3,750
Q1 2022	2/15/2022	13	A25	25	low	1.00	\$1,500			\$1,500
Q1 2022	2/17/2022	19	C17	100	major	2.50	\$3,750			\$3,750
Q1 2022	2/17/2022	19	C25	100	major	2.50	\$3,750			\$3,750
Q1 2022	2/22/2022	20	C20	35	low	1.00	\$1,500	\$250		\$1,750
Q1 2022	2/23/2022	1	A2	60	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/24/2022	C	C78	70	major	2.50	\$3,750			\$3,750
Q1 2022	3/2/2022	B	A25	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/3/2022	3	A23	35	low	1.00	\$1,500			\$1,500
Q1 2022	3/7/2022	C	C84	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/7/2022	C	C80	60	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/7/2022	C	C78	65	major	2.50	\$3,750			\$3,750
Q1 2022	3/9/2022	1	A2	65	major	2.50	\$3,750			\$3,750

Total **\$750** **\$80,250**

Non-Compliant ACHD Doors Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Doors	Severity Value	Door Leak Severity of Violation	Door Leak Penalty Multiplier	Door Penalty	H2S Penalty	SO2 Penalty	ACHD Doors Penalty
Q1 2022	2/7/2022	3	8.87%	1.11	Low	1.00	\$1,500			\$1,500
Q1 2022	2/11/2022	C	4.22%	1.41	Moderate	1.50	\$2,250			\$2,250
Q1 2022	3/7/2022	C	4.61%	1.53	Major	2.50	\$3,750			\$3,750
Total										\$7,500

Non-Compliant ACHD Topside (Lid) Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Lids	Severity Value	Severity of Violation	Topsides (Lid)	Penalty Multiplier	Topside(Lids)	H2S Penalty	SO2 Penalty	ACHD Lid Penalty
Q1 2022	3/7/2022	C	0.73	1.22	Moderate		1.50				\$2,250
Q1 2022	3/14/2022	13	1.72	1.72	Major		2.50		\$250		\$4,000
Total									\$250		\$6,250

Non-Compliant ACHD Topside (Offtake) Inspections and Penalties

Quarter (Year)	Date	Battery	Percent Leaking Offtakes	Severity Value	Severity of Violation	Topside (offtake) Penalty Multiplier	Topside Offtake Penalty	SO2 Penalty	Topside Offtake H2S Penalty	ACHD Total Offtake Penalty
Q1 2022	1/28/2022	14	6.90	1.72	Major	2.50	\$3,750			\$3,750
Total										\$3,750

Non-Compliant ACHD Doors >40% Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	opacity	H.O. Doors Severity of Violation	H.O Door Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total HO Door Penalty
Q1 2022	1/5/2022	1	C2	50	Low	1.00	\$750			\$750
Q1 2022	1/5/2022	3	A27	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	1/5/2022	1	B27	80	Major	2.50	\$1,875			\$1,875
Q1 2022	1/5/2022	1	B9	100	Major	2.50	\$1,875			\$1,875
Q1 2022	1/10/2022	3	A10	45	Low	1.00	\$750			\$750
Q1 2022	1/18/2022	B	B17	75	Major	2.50	\$1,875			\$1,875
Q1 2022	1/25/2022	2	A26	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	1/25/2022	2	A7	75	Major	2.50	\$1,875			\$1,875
Q1 2022	2/1/2022	3	A17	50	Low	1.00	\$750			\$750
Q1 2022	2/1/2022	1	B26	55	Moderate	1.50	\$2,250			\$2,250
Q1 2022	2/1/2022	1	A4	60	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/1/2022	3	B28	65	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/1/2022	3	A23	70	Major	2.50	\$1,875			\$1,875
Q1 2022	2/1/2022	1	B21	70	Major	2.50	\$1,875			\$1,875
Q1 2022	2/7/2022	3	B8	50	Low	1.00	\$750			\$750
Q1 2022	2/7/2022	3	B2	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/7/2022	3	A7	60	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/7/2022	3	A9	65	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/7/2022	1	A8	75	Major	2.50	\$1,875			\$1,875
Q1 2022	2/7/2022	3	B10	75	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C51	50	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/11/2022	C	C14	65	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C46	65	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C48	70	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C56	70	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C44	75	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C52	75	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C49	80	Major	2.50	\$1,875			\$1,875
Q1 2022	2/11/2022	C	C50	90	Major	2.50	\$1,875			\$1,875
Q1 2022	2/23/2022	2	B21	60	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/24/2022	C	C84	60	Major	2.50	\$1,875			\$1,875

Non-Compliant ACHD Doors >40% Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	opacity	H.O. Doors Severity of Violation	H.O Door Penalty Multiplier	H.O. Door Penalty	H2S Penalty	SO2 Penalty	ACHD Total HO Door Penalty
Q1 2022	2/28/2022	2	B15	45	Low	1.00	\$750			\$750
Q1 2022	2/28/2022	2	A26	50	Low	1.00	\$750			\$750
Q1 2022	2/28/2022	3	A26	50	Low	1.00	\$750			\$750
Q1 2022	2/28/2022	2	A6	50	Low	1.00	\$750			\$750
Q1 2022	2/28/2022	2	A26	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	2/28/2022	2	C2	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/2/2022	B	A15	50	Low	1.00	\$750			\$750
Q1 2022	3/3/2022	3	B27	50	Low	1.00	\$750			\$750
Q1 2022	3/3/2022	3	C2	100	Major	2.50	\$1,875			\$1,875
Q1 2022	3/4/2022	1	B22	45	Low	1.00	\$750			\$750
Q1 2022	3/4/2022	2	A22	50	Low	1.00	\$1,500			\$1,500
Q1 2022	3/4/2022	2	A30	55	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/4/2022	2	B18	60	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/4/2022	1	B18	75	Major	2.50	\$1,875			\$1,875
Q1 2022	3/4/2022	1	B20	75	Major	2.50	\$1,875			\$1,875
Q1 2022	3/7/2022	C	C34	35	Low	1.00	\$750			\$750
Q1 2022	3/7/2022	C	C62	40	Low	1.00	\$750			\$750
Q1 2022	3/7/2022	C	C50	50	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/7/2022	C	C39	60	Major	2.50	\$1,875			\$1,875
Q1 2022	3/7/2022	C	C70	65	Major	2.50	\$1,875			\$1,875
Q1 2022	3/7/2022	C	C55	75	Major	2.50	\$1,875			\$1,875
Q1 2022	3/7/2022	C	C68	80	Major	2.50	\$1,875			\$1,875
Q1 2022	3/7/2022	C	C56	85	Major	2.50	\$1,875			\$1,875
Q1 2022	3/25/2022	C	C25	45	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/25/2022	C	C22	50	Moderate	1.50	\$1,125			\$1,125
Q1 2022	3/25/2022	C	C41	55	Major	2.50	\$1,875			\$1,875
Q1 2022	3/29/2022	3	A24	75	Major	2.50	\$1,875			\$1,875

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

Quarter (Year)	M303 TTL Charge Viol	M303 TTL Door Viol	M303 TTL Lid Viol	M303 TTL Offtake Viol	Method 303 Total Non-Compliant Inspections
Q1 2022	3	8	1	3	15
Jan 2022	2			1	3
Feb 2022	1	2		2	5
Mar 2022	0	6	1		7
Total	3	8	1	3	15

Quarter (Year) Total M303 Compl Insps Total M303 Inspections Method 303 % Compliance Method 303 Total Penalty

Q1 2022	3709	3724	99.60%	\$34,750
Total	3709	3724	99.60%	\$34,750

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
Q1 2022	1/23/2022	20			Moderate				\$2,250			\$2,250
Q1 2022	1/23/2022	C			Moderate				\$2,250			\$2,250
Q1 2022	1/27/2022	14						Moderate	\$2,250			\$2,250
Q1 2022	2/1/2022	20						Low	\$1,500			\$1,500
Q1 2022	2/2/2022	2				Low			\$1,500			\$1,500
Q1 2022	2/7/2022	C				Low			\$1,500			\$1,500
Q1 2022	2/24/2022	20						Major	\$3,750			\$3,750
Q1 2022	2/24/2022	B			Major				\$3,750			\$3,750
Q1 2022	3/5/2022	3				Low			\$1,500			\$1,500
Q1 2022	3/5/2022	C					Major		\$3,750			\$3,750
Q1 2022	3/9/2022	C				Major			\$3,750			\$3,750
Q1 2022	3/11/2022	B				Low			\$1,500			\$1,500
Q1 2022	3/12/2022	B				Low			\$1,500			\$1,500
Q1 2022	3/18/2022	C				Low			\$1,500	\$250		\$1,750
Q1 2022	3/31/2022	C				Moderate			\$2,250			\$2,250
Total										\$250		\$34,750

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
Q1 2022	31	\$55,500	28	\$44,000	\$99,500
Total	31	\$55,500	28	\$44,000	\$99,500

USS Non-Compliant Pushing Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Opacity	Push Severity of Violation	Push Penalty Multiplier	USS Push Penalty	H2S Exceedance Penalty (push)	SO2 Exceedance Penalty (Push)	USS Total Push Penalty
Q1 2022	1/5/2022	20	C18	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/10/2022	19	C6	40	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/11/2022	20	C17	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/13/2022	1	B31	40	moderate	1.50	\$2,250			\$2,250
Q1 2022	1/16/2022	13	A3	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/16/2022	20	A18	20	low	1.00	\$1,500			\$1,500
Q1 2022	1/21/2022	19	A17	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/25/2022	19	B8	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/31/2022	20	A1	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/31/2022	20	C26	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/2/2022	19	B22	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/7/2022	3	B12	100	major	2.50	\$3,750			\$3,750
Q1 2022	2/8/2022	19	A25	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/11/2022	14	A19	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/15/2022	2	B17	40	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/15/2022	20	A11	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/16/2022	19	C7	30	low	1.00	\$1,500	250		\$1,500
Q1 2022	2/20/2022	19	A24	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/23/2022	19	B27	55	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/27/2022	20	C1	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/28/2022	20	C15	30	low	1.00	\$1,500			\$1,500
Q1 2022	2/28/2022	3	A27	60	moderate	1.50	\$2,250			\$2,250
Total							\$39,000			\$39,000

USS Non-Compliant Pushing Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Opacity	Push Severity of Violation	Push Penalty Multiplier	USS Push Penalty	H2S Exceedance Penalty (push)	SO2 Exceedance Penalty (Push)	USS Total Push Penalty
Q1 2022	3/2/2022	20	B5	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/6/2022	1	A4	60	moderate	1.50	\$2,250			\$2,250
Q1 2022	3/8/2022	14	A27	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/13/2022	19	B19	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/20/2022	20	C9	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/22/2022	19	B22	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/22/2022	20	A18	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/24/2022	20	C8	100	major	2.50	\$3,750			\$3,750
Q1 2022	3/27/2022	20	B10	30	low	1.00	\$1,500			\$1,500
Total							\$16,500			\$16,500

USS Non-Compliant Travel Inspections and Penalties

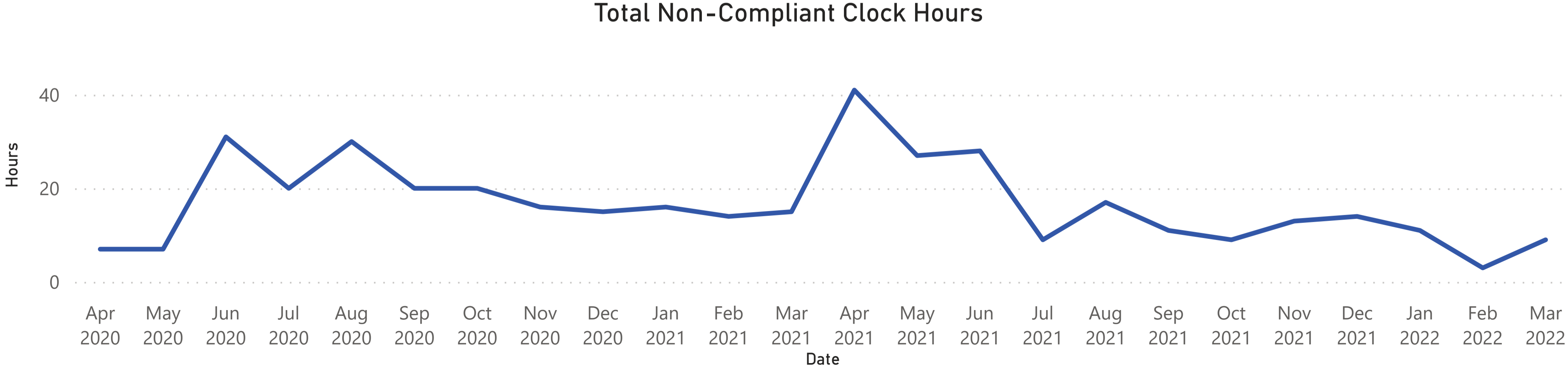
Quarter (Year)	Date	Battery	Oven	Opacity	Travel Severity of Violation	Travel Penalty Multiplier	USS Travel Penalty	H2S Exceedance Penalty (travel)	SO2 Exceedance Penalty (travel)	USS Total Travel Penalty
Q1 2022	1/10/2022	19	C6	20	low	1.00	\$1,500			\$1,500
Q1 2022	1/11/2022	20	C17	20	low	1.00	\$1,500			\$1,500
Q1 2022	1/16/2022	13	A3	15	low	1.00	\$1,500			\$1,500
Q1 2022	1/16/2022	20	A18	15	low	1.00	\$1,500			\$1,500
Q1 2022	1/20/2022	14	A27	30	low	1.00	\$1,500			\$1,500
Q1 2022	1/21/2022	19	A17	20	low	1.00	\$1,500			\$1,500
Q1 2022	1/25/2022	19	B8	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/2/2022	19	B22	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/7/2022	20	B18	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/7/2022	3	B12	60	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/8/2022	19	A25	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/11/2022	14	A19	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/12/2022	14	A19	40	moderate	1.50	\$2,250			\$2,250
Q1 2022	2/16/2022	19	C7	20	low	1.00	\$1,500	\$250		\$1,750
Q1 2022	2/20/2022	19	A24	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/27/2022	14	A8	25	low	1.00	\$1,500			\$1,500
Q1 2022	2/27/2022	20	C1	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/28/2022	20	C15	20	low	1.00	\$1,500			\$1,500
Q1 2022	2/28/2022	3	A27	30	low	1.00	\$1,500			\$1,500
Total						20.00				\$30,250

USS Non-Compliant Travel Inspections and Penalties

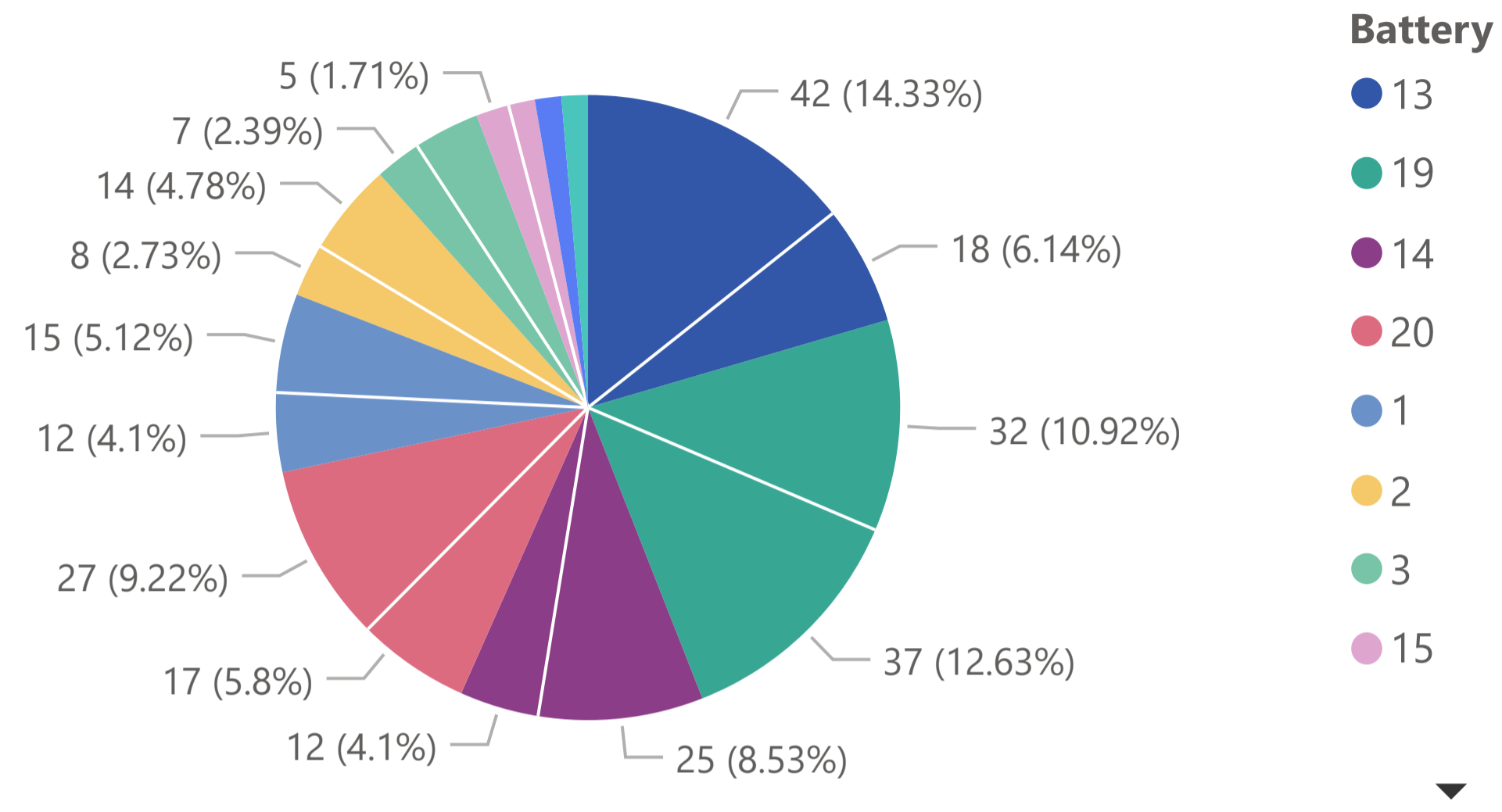
Quarter (Year)	Date	Battery	Oven	Opacity	Travel Severity of Violation	Travel Penalty Multiplier	USS Travel Penalty	H2S Exceedance Penalty (travel)	SO2 Exceedance Penalty (travel)	USS Total Travel Penalty
Q1 2022	3/6/2022	1	A4	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/6/2022	14	A20	20	low	1.00	\$1,500			\$1,500
Q1 2022	3/10/2022	14	A20	30	low	1.00	\$1,500			\$1,500
Q1 2022	3/18/2022	14	A22	30	low	1.00	\$1,500	\$250		\$1,750
Q1 2022	3/22/2022	19	B22	20	low	1.00	\$1,500			\$1,500
Q1 2022	3/22/2022	20	A18	20	low	1.00	\$1,500			\$1,500
Q1 2022	3/24/2022	20	C8	20	low	1.00	\$1,500			\$1,500
Q1 2022	3/27/2022	20	B10	20	low	1.00	\$1,500			\$1,500
Q1 2022	3/28/2022	14	A14	20	low	1.00	\$1,500			\$1,500
Total						9.00				\$13,750

Continuous Opacity Monitor Non-Compliant Clock Hours

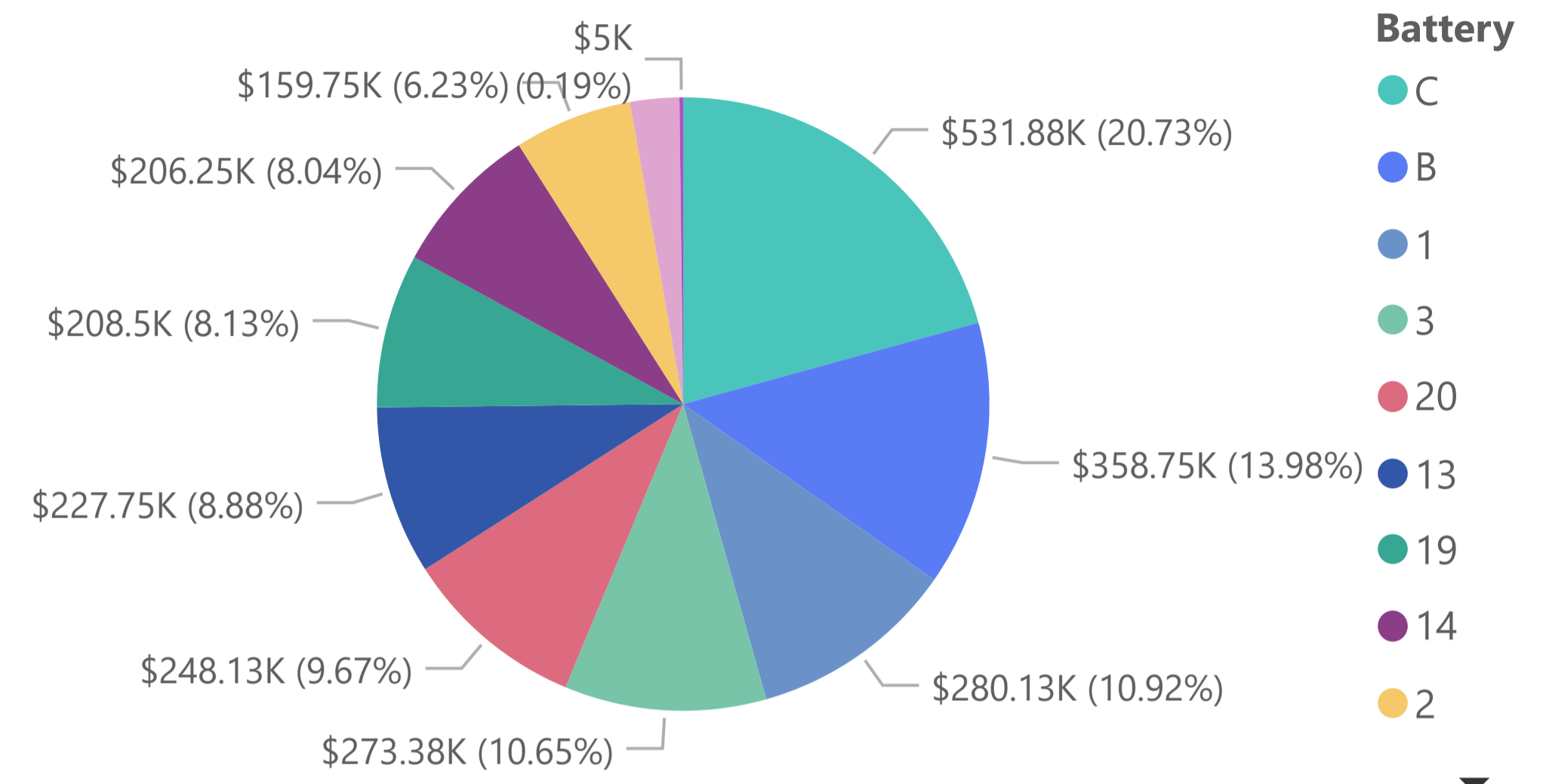
Quarter (Year)	Battery 1	Battery 2	Battery 3	Battery 13	Battery 14	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
<input type="checkbox"/> Q1 2022	0	1	2	6	3	0	1	5	5	0	23	\$4,600
Jan 2022	0	0	1	2	1	0	0	4	3	0	11	\$2,200
Feb 2022	0	1	0	0	1	0	0	1	0	0	3	\$600
Mar 2022	0	0	1	4	1	0	1	0	2	0	9	\$1,800
Total	0	1	2	6	3	0	1	5	5	0	23	\$4,600



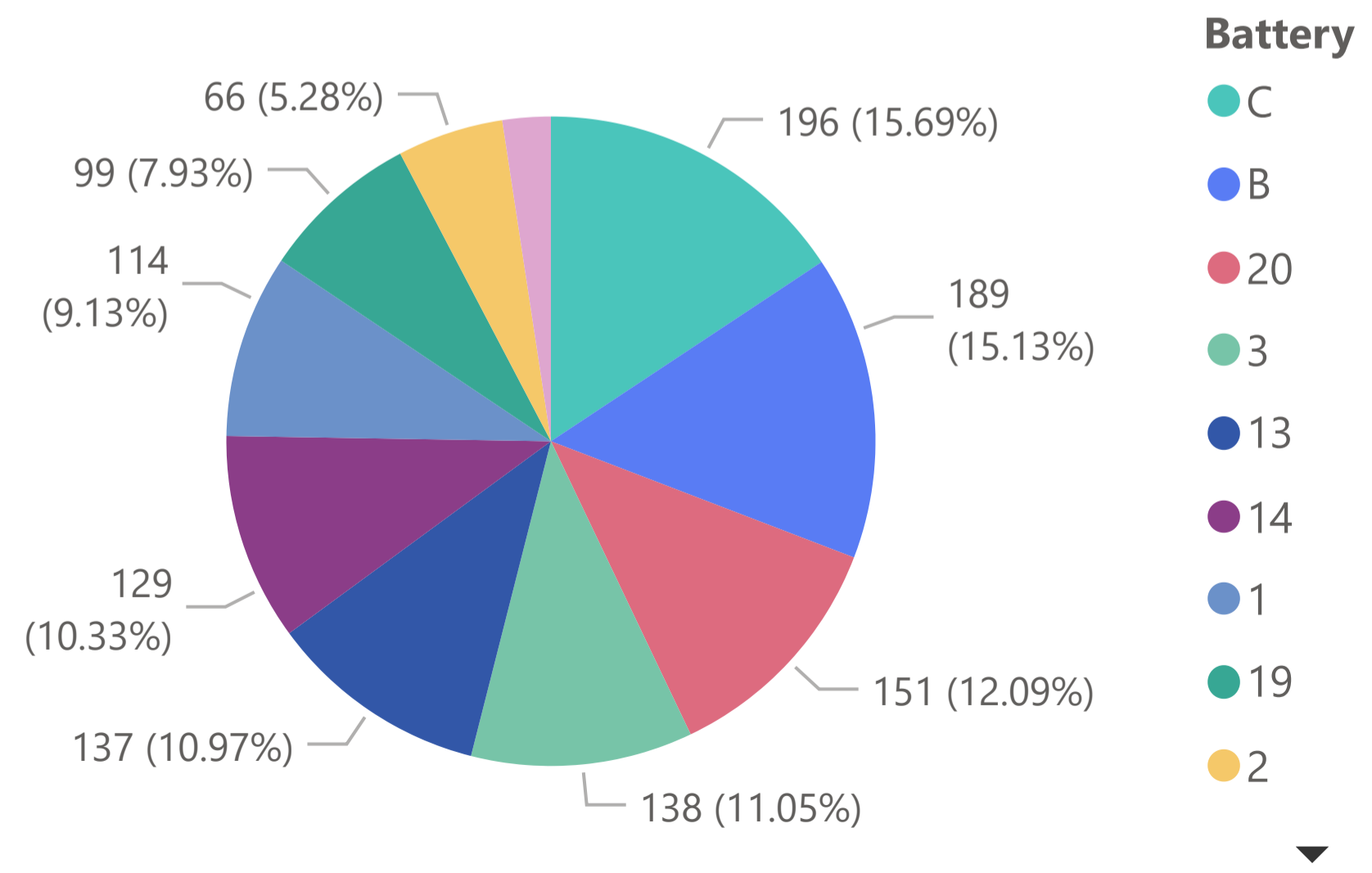
Non-Compliant Inspections: USS Push and Travel Inspections



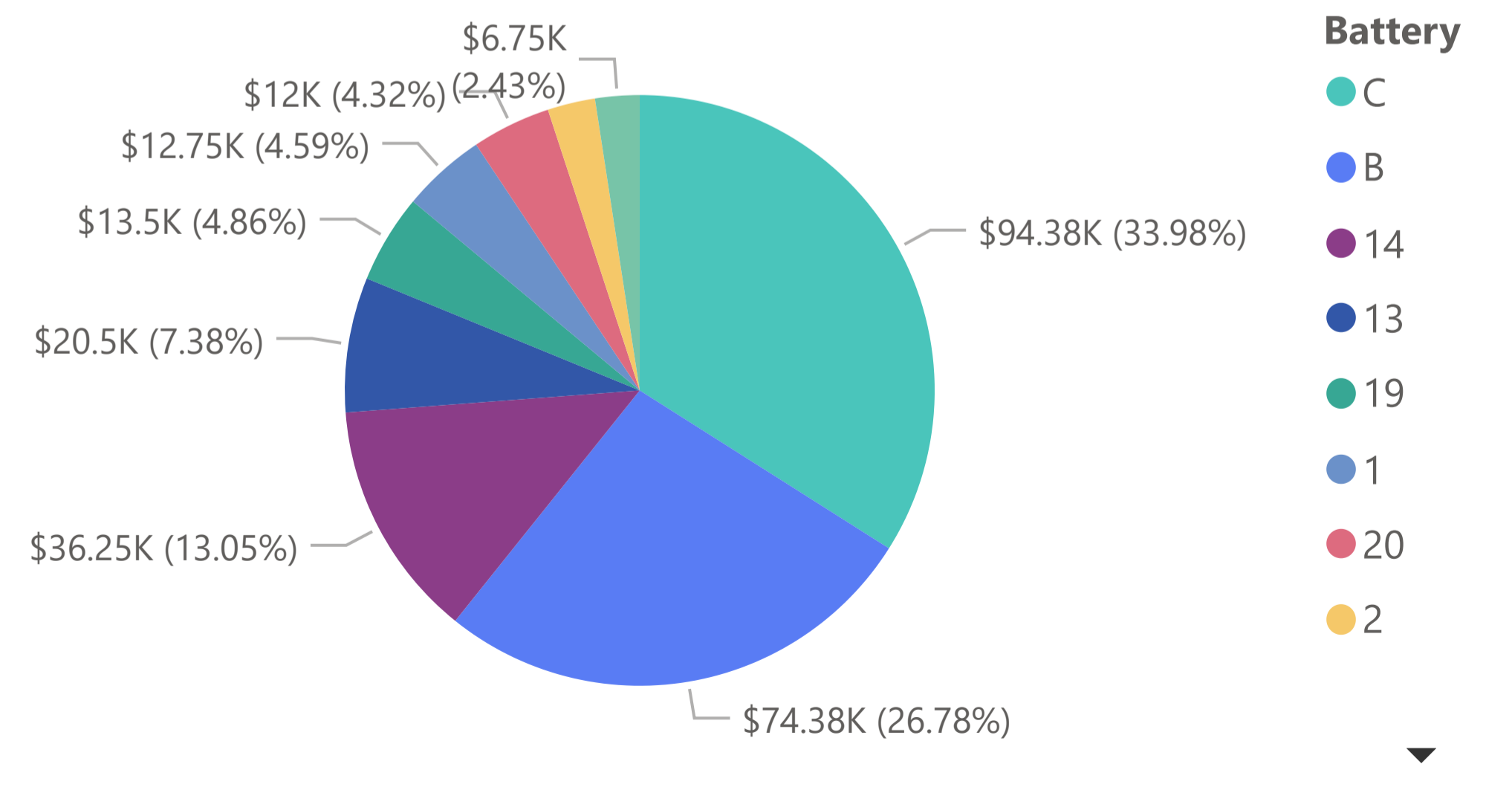
ACHD Total Penalties



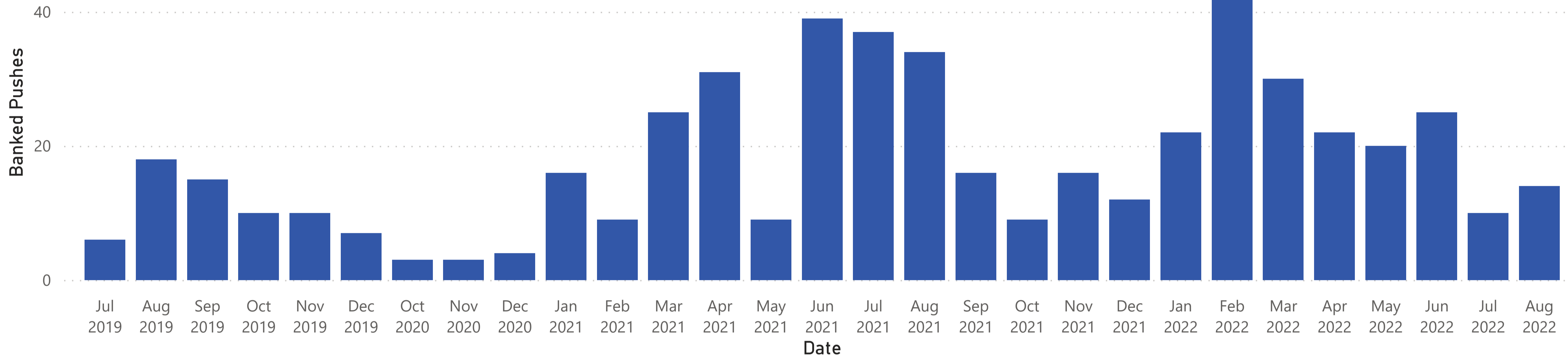
Total Non-Compliant Inspections



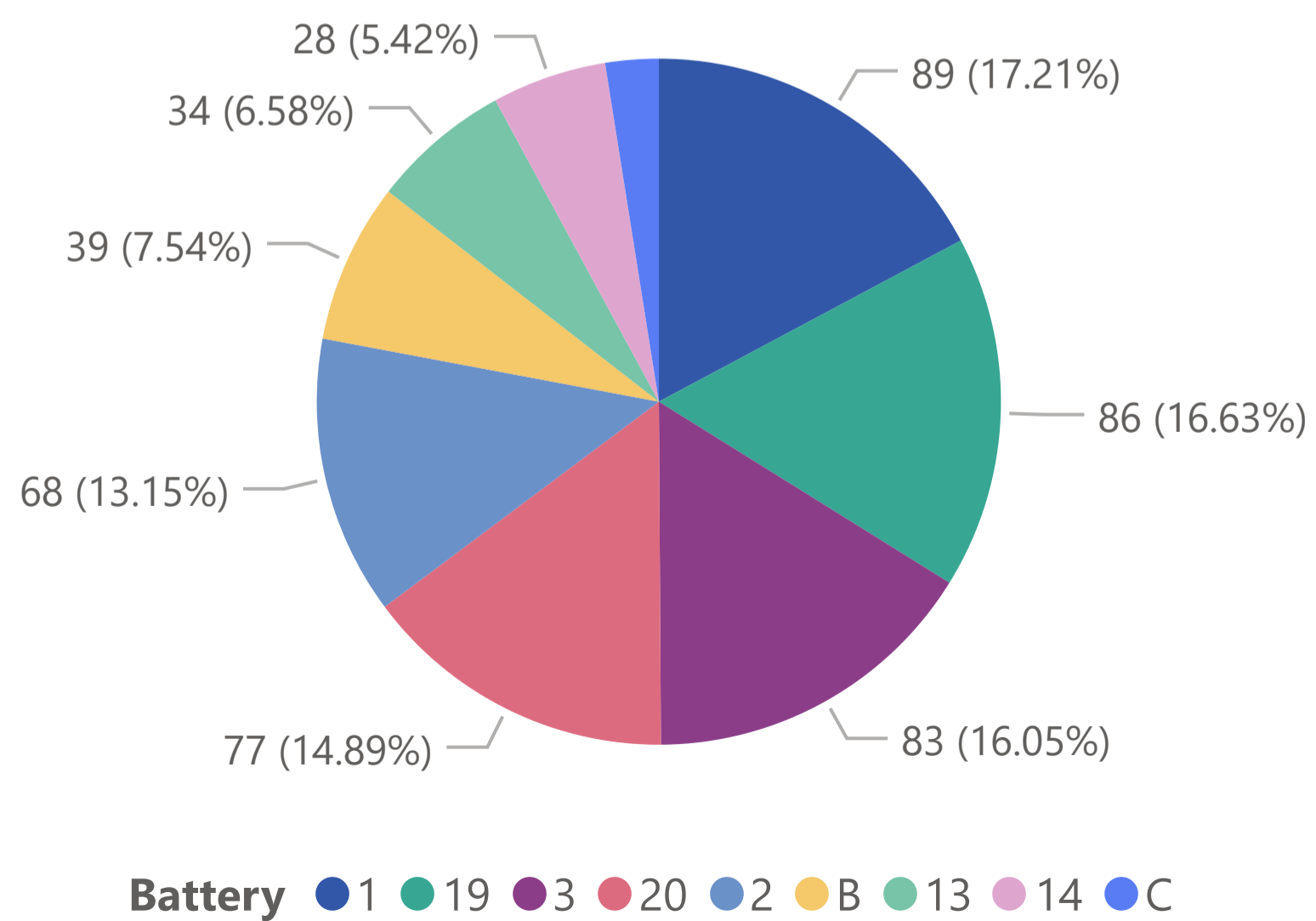
Method 303 Total Penalty



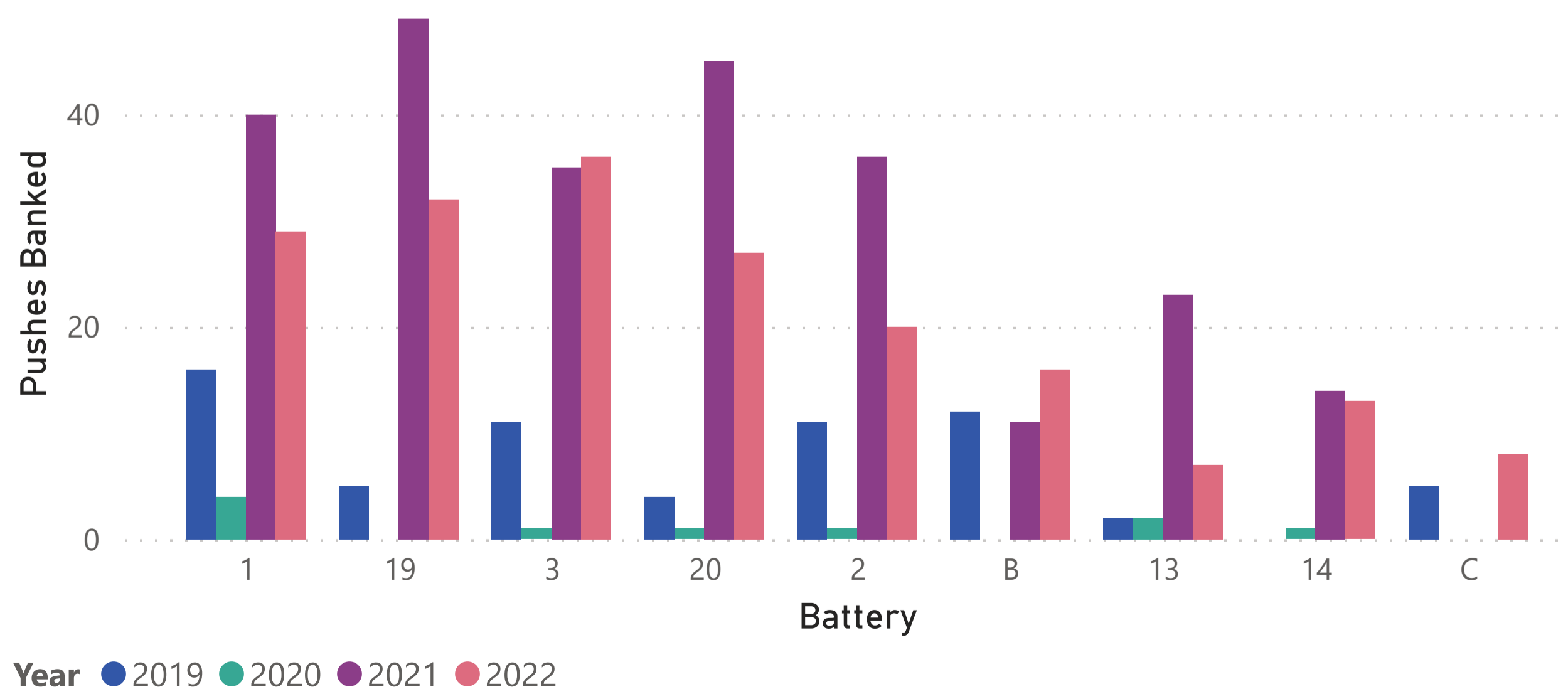
Total Instances of Banked Pushes



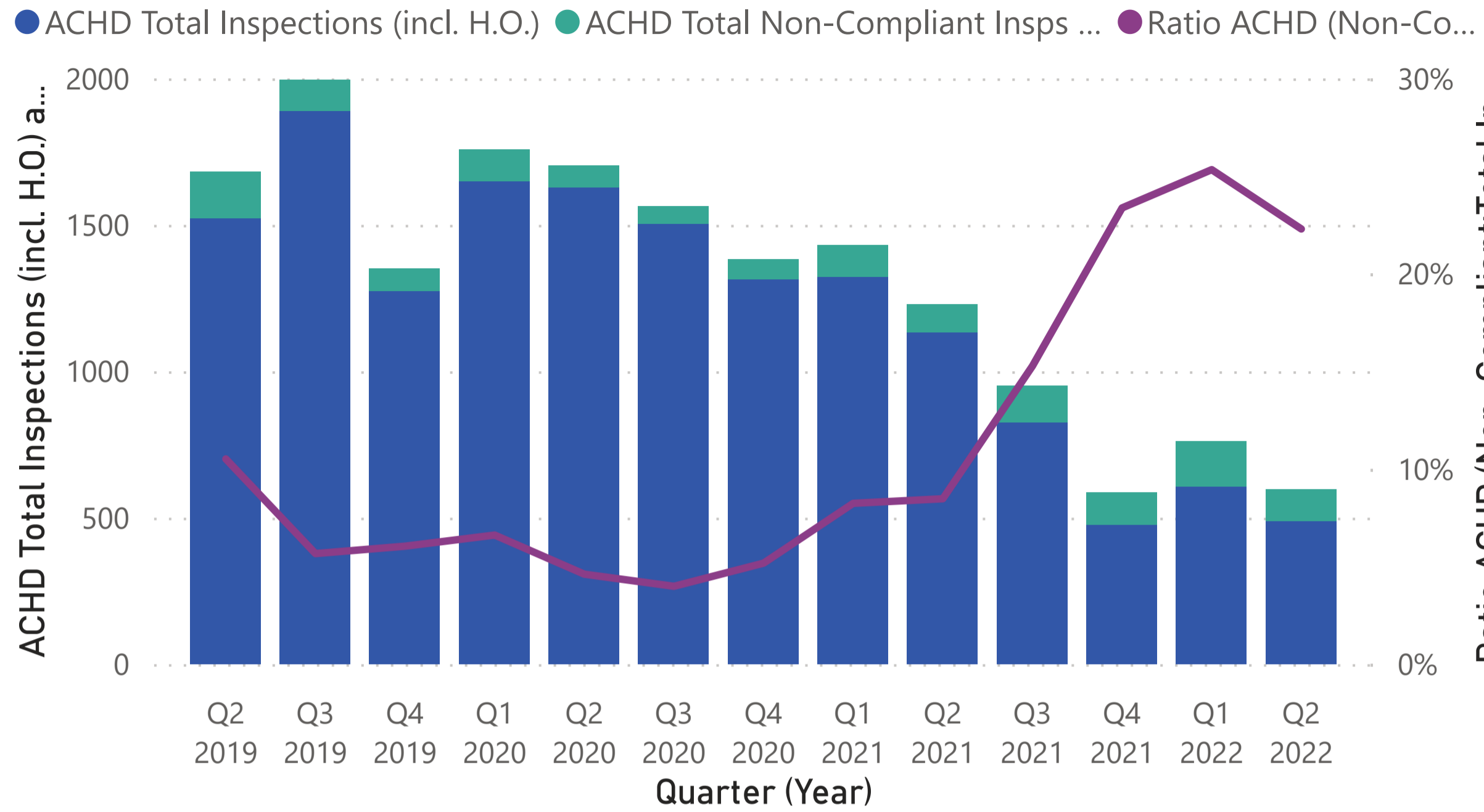
Pushes Banked by Battery



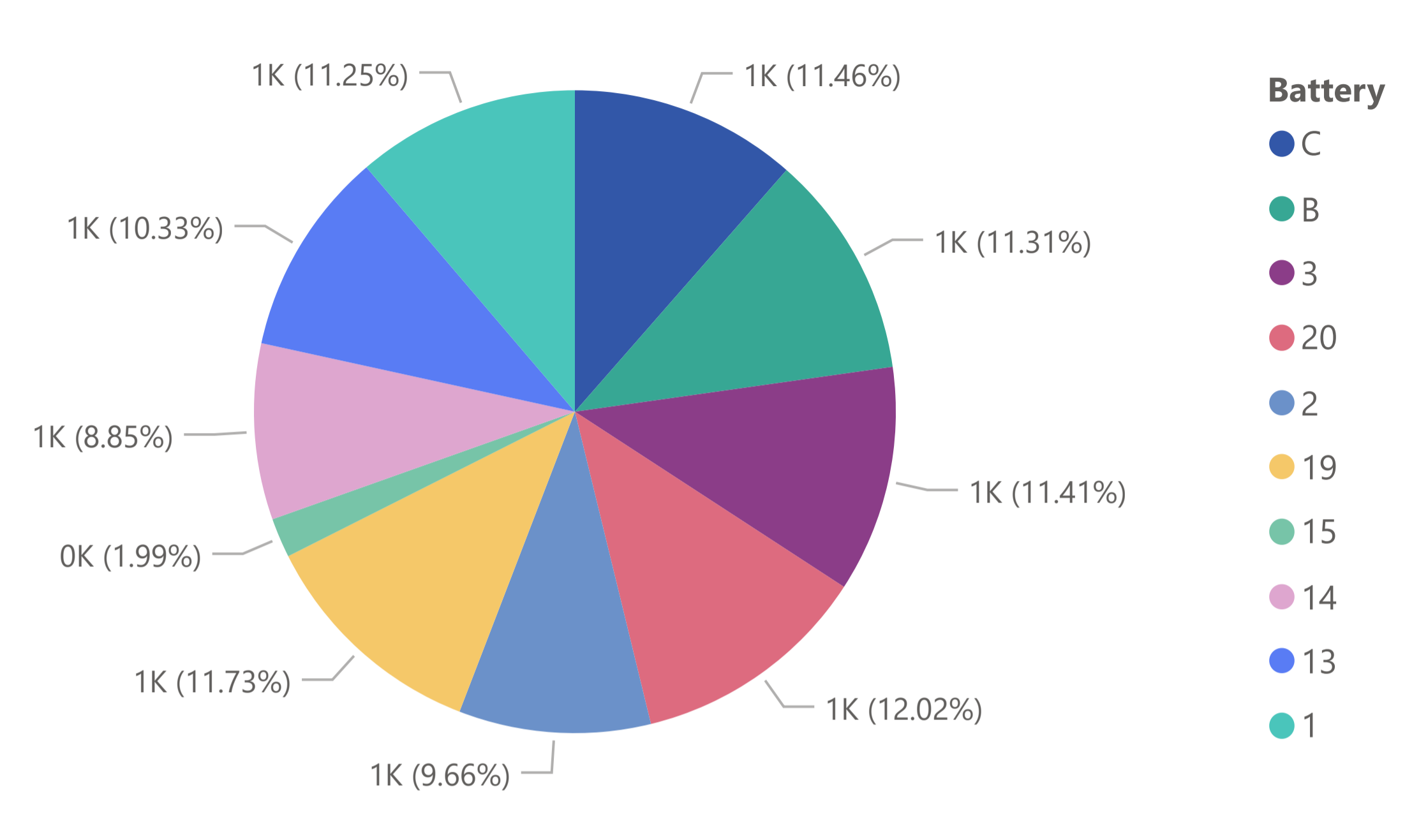
Pushes Banked by Battery and Year



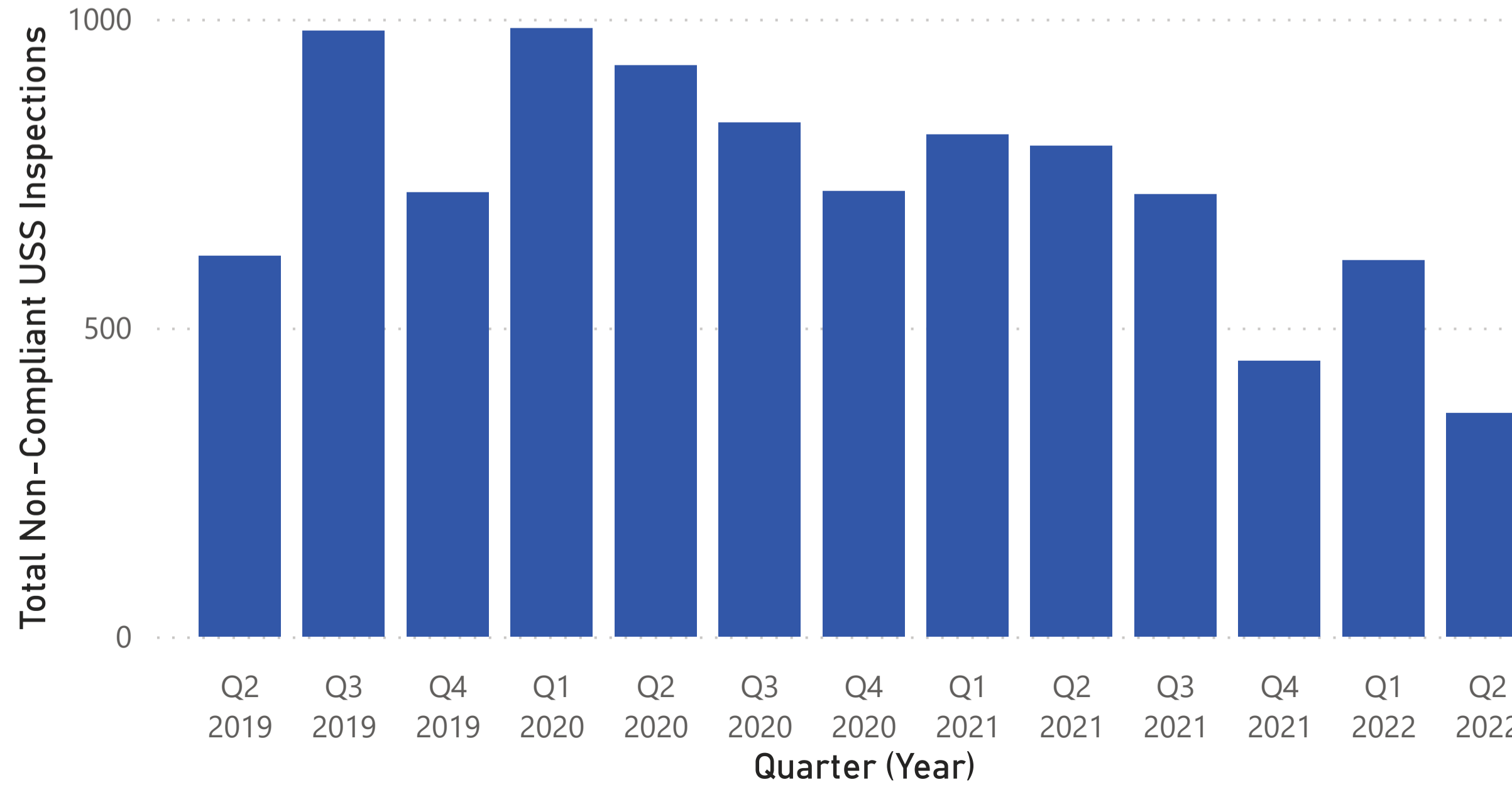
ACHD Total Inspections (SOA #190604)



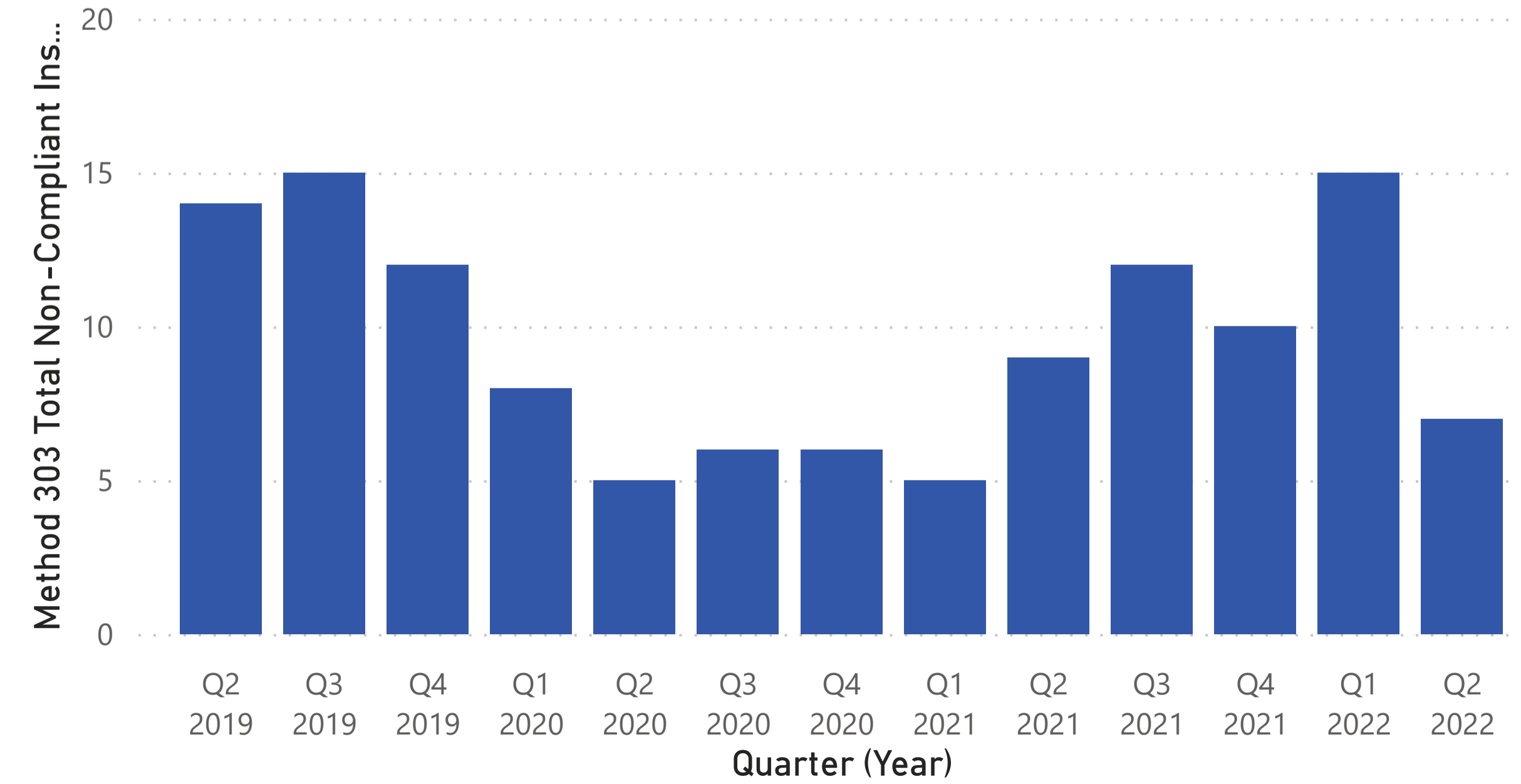
Non-Compliant Inspections (ACHD, M303, USS)



Non-Compliant Inspections Performed by U.S. Steel

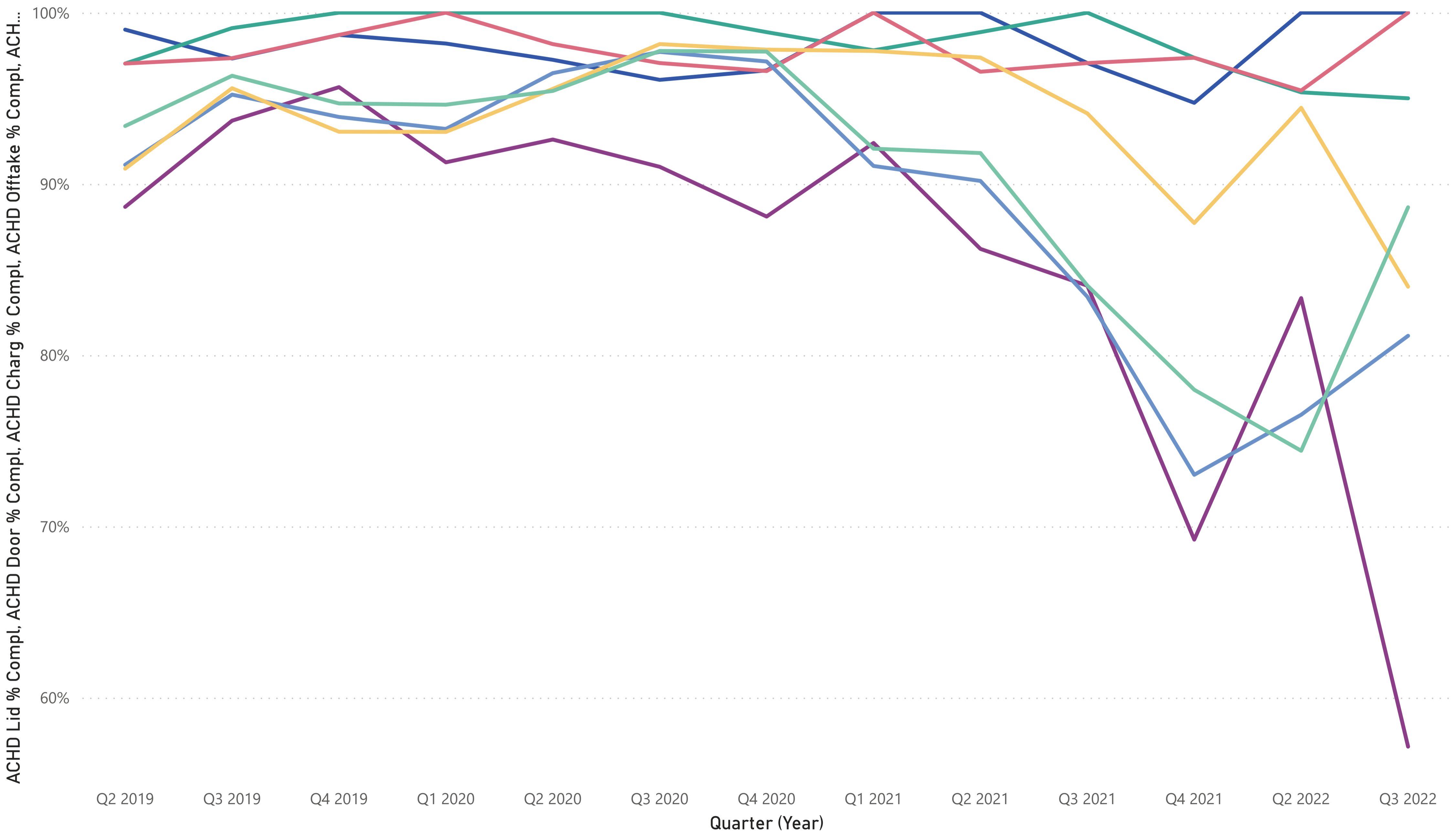


Method 303 Total Non-Compliant Inspections by Quarter (Year)



ACHD Lid % Compl, ACHD Door % Compl, ACHD Charg % Compl, ACHD Offtake % Compl, ACHD Push % Compl, ACHD Soaking % Compl and ACHD Travel % Compliance by Quarter (Year)

● ACHD Lid % Compl ● ACHD Door % Compl ● ACHD Charg % Compl ● ACHD Offtake % Compl ● ACHD Push % Compl ● ACHD Soaking % Compl ● ACHD Travel % Compliance



Quarter (Year)	Charge H2S Penalty	Doors H2S Penalty	H.O. Doors H2S Penalty	Push/Travel H2S Penalty	Soaking H2S Penalty	Topside(Lids) H2S Penalty	Topside Offtake H2S Penalty
<input type="checkbox"/> Q1 2019	\$750	\$250	\$1,500	\$2,250	\$1,750	\$250	
1/8/2019				\$500			
2/4/2019	\$250		\$250	\$500	\$750	\$250	
3/14/2019				\$250			
3/19/2019	\$250	\$250	\$750				
3/28/2019					\$250		
3/29/2019	\$250		\$500	\$1,000	\$750		
<input type="checkbox"/> Q2 2019			\$1,000	\$500			
4/9/2019			\$750				
5/6/2019			\$250	\$500			
<input type="checkbox"/> Q3 2019	\$750		\$500	\$1,500	\$500		
7/2/2019	\$250		\$250				
7/25/2019	\$250		\$250	\$250			
7/29/2019				\$500			
9/11/2019	\$250			\$250	\$500		
9/25/2019				\$500			
<input type="checkbox"/> Q4 2019						\$250	
10/24/2019						\$250	
<input type="checkbox"/> Q1 2020			\$750	\$250	\$1,000		
2/3/2020				\$250	\$500		
2/24/2020			\$500				
3/2/2020			\$250		\$500		
<input type="checkbox"/> Q2 2020	\$250				\$250	\$250	\$250
5/7/2020						\$250	
6/1/2020	\$250			\$250			\$250
<input type="checkbox"/> Q4 2020	\$750	\$250	\$3,000	\$500	\$500	\$750	\$250
10/23/2020	\$250		\$250	\$250	\$250	\$250	
11/4/2020	\$250	\$250	\$2,000		\$250	\$250	\$250
11/9/2020			\$750			\$250	
11/10/2020	\$250			\$250			
<input type="checkbox"/> Q1 2021	\$250	\$250	\$5,250	\$500			
3/3/2021			\$500				
3/8/2021			\$500	\$250			
3/9/2021			\$500	\$250			
3/10/2021	\$250	\$250	\$3,750				
<input type="checkbox"/> Q2 2021	\$500		\$250	\$1,750			\$250
4/5/2021				\$250			
4/6/2021	\$250			\$750			
4/28/2021				\$250			
5/19/2021			\$250				
5/21/2021							\$250
6/21/2021				\$250			
Total	\$3,750	\$1,000	\$18,000	\$11,500	\$5,750	\$1,750	\$1,000