

COUNTY OF



ALLEGHENY

March 15, 2023

CERTIFIED MAIL – 9489 0090 0027 6045 5251 53

Matt DeLibero
Director, Environmental, Reliability, & Operational Excellence
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, 2022 through June 30, 2022 (2nd Quarter 2022)

Dear Mr. DeLibero:

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 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 quarter of 2022, April 1, 2022 through June 30, 2022. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$307,800.00**. Pursuant to the SOA, Section V. ("Civil Penalty Payment"), Paragraph A, 90 percent of that amount, or **\$277,020.00**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$30,780.00**, 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.



**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, 2022 through June 30, 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 April 1, 2022 through June 30, 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 long horizontal stroke extending to the right.

Allason Holt
Program Manager -- Compliance and Enforcement Program

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

AQ Documents File

Quarters Selected for Report

Q2 2022

\$307,800

Total Penalty

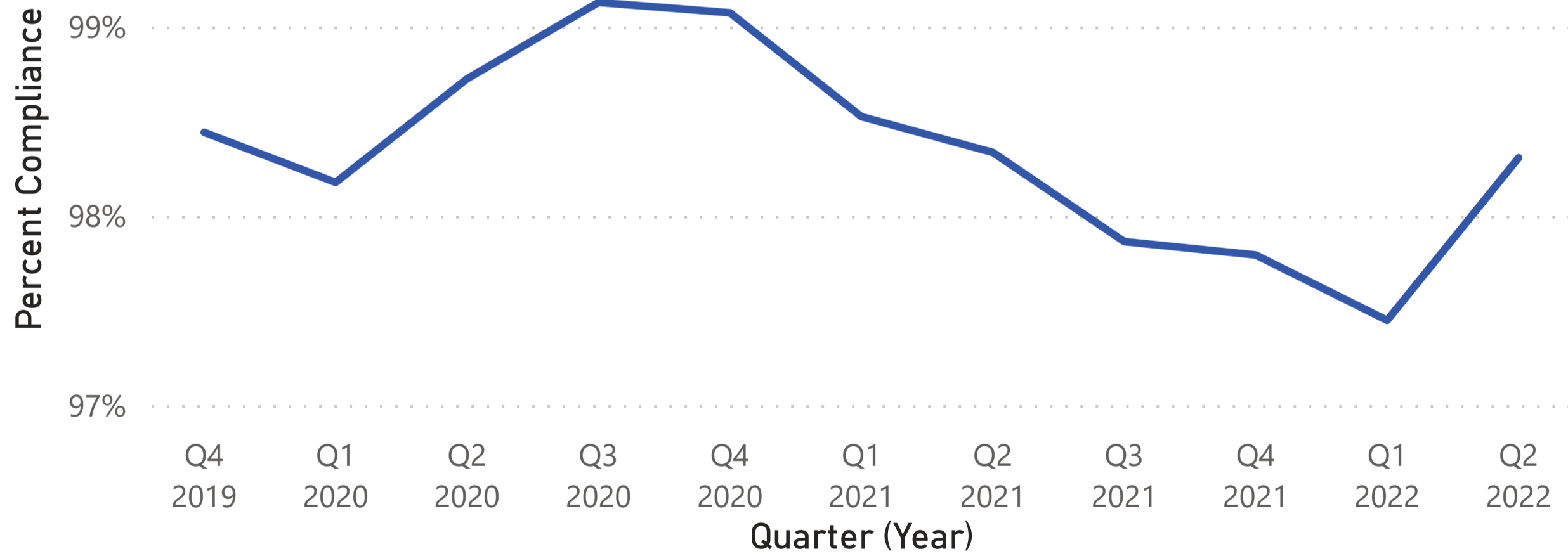
U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections
 Stipulated Penalties **COA 190604**
 (Q2 2022)

| Quarter (Year) | Penalty from Method 303 Inspections | Penalty from ACHD Inspections | Penalty from USS Inspections | COMs Penalty | Total Penalty |
|------------------|--|----------------------------------|---------------------------------|----------------|------------------|
| ▲ | | | | | |
| ☐ Q2 2022 | | | | | |
| Apr 2022 | \$12,500 | \$45,750 | \$13,500 | \$2,200 | \$73,950 |
| May 2022 | \$8,250 | \$65,375 | \$26,250 | \$3,600 | \$103,475 |
| Jun 2022 | \$7,500 | \$104,125 | \$15,750 | \$3,000 | \$130,375 |
| Total | \$28,250 | \$215,250 | \$55,500 | \$8,800 | \$307,800 |
| Total | \$28,250 | \$215,250 | \$55,500 | \$8,800 | \$307,800 |

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% |
| Q2 2022 | 377 | 437 | 86.27% | 3631 | 3640 | 99.75% | 4008 | 4077 | 98.31% |
| Total | 831 | 985 | 84.37% | 7340 | 7364 | 99.67% | 8171 | 8349 | 97.87% |

Quarterly Compliance



Average Percent Compliance

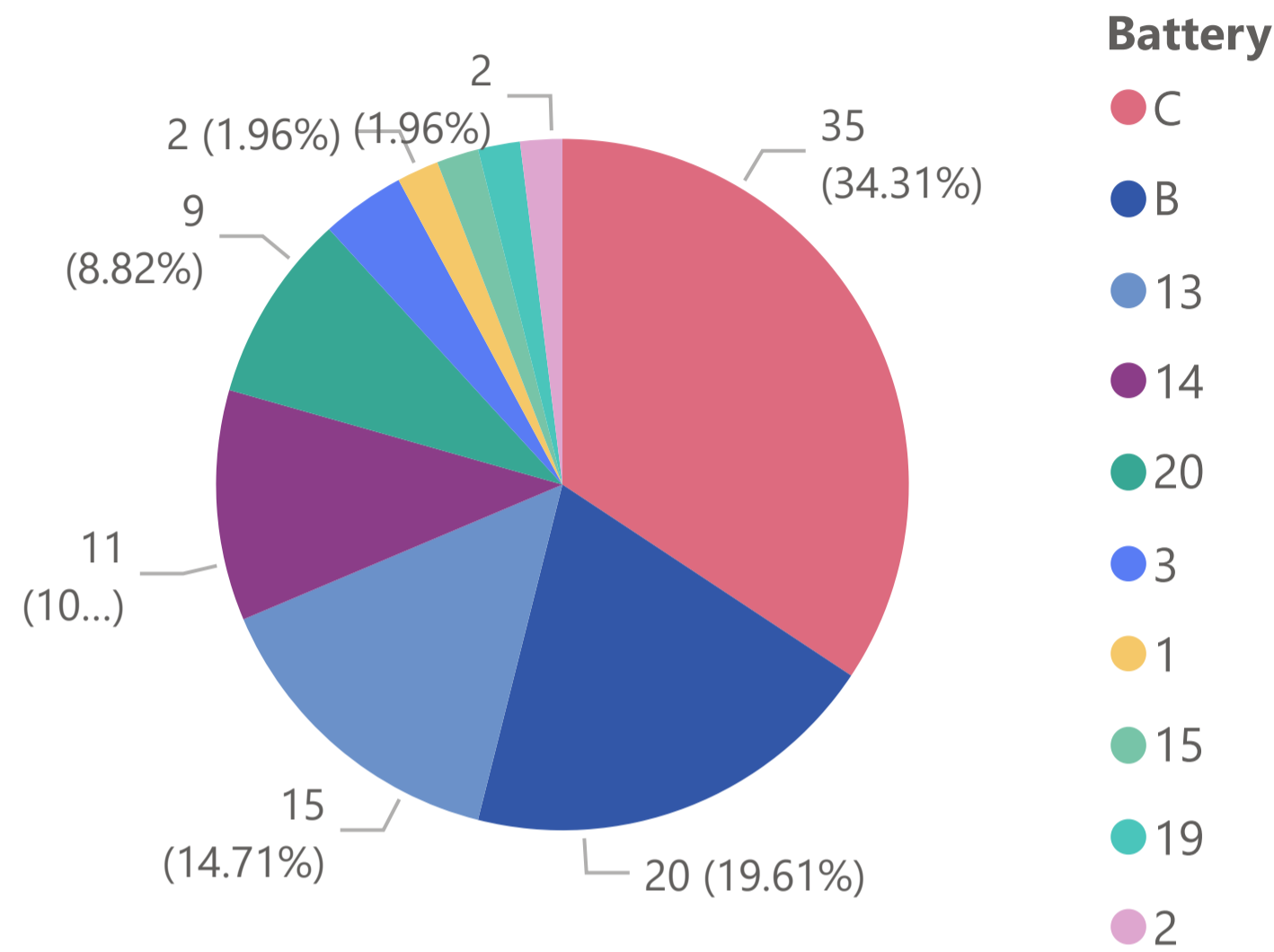
| Quarter (Year) | Quarterly Compliance (1 previous Q) | Quarterly Compliance (current Qs) | Compliance Average of Current and Previous Quarters |
|----------------|-------------------------------------|-----------------------------------|---|
| Q4 2019 | 98.375% | 98.442% | 98.408% |
| Q1 2020 | 98.442% | 98.177% | 98.310% |
| Q2 2020 | 98.177% | 98.725% | 98.451% |
| Q3 2020 | 98.725% | 99.128% | 98.927% |
| Q4 2020 | 99.128% | 99.074% | 99.101% |
| Q1 2021 | 99.074% | 98.525% | 98.799% |
| Q2 2021 | 98.525% | 98.336% | 98.430% |
| Q3 2021 | 98.336% | 97.864% | 98.100% |
| Q4 2021 | 97.864% | 97.794% | 97.829% |
| Q1 2022 | 97.794% | 97.110% | 97.452% |

Penalty Summary for ACHD Inspections

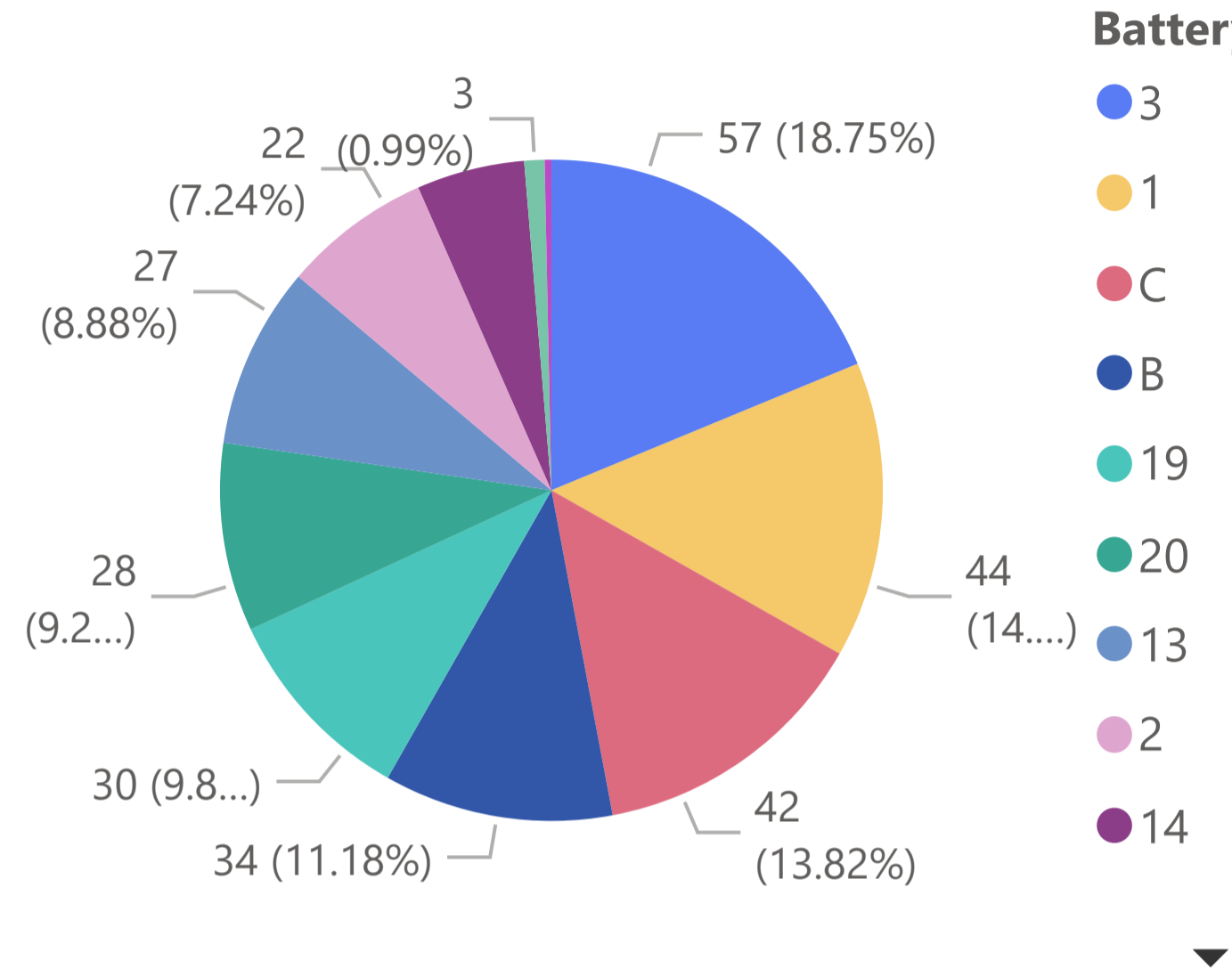
| Quarter (Year) | ACHD Charging Penalty | ACHD Soaking Penalty | ACHD Push Penalty | ACHD Travel Penalty | ACHD Doors Penalty | ACHD Lid Penalty | ACHD Offtake Penalty | ACHD HO Door Penalty | ACHD Total Penalties |
|---|-----------------------|----------------------|-------------------|---------------------|--------------------|------------------|----------------------|----------------------|----------------------|
| ▲ ☐ Q2 2022 | | | | | | | | | |
| Apr 2022 | \$1,500 | \$0 | \$21,000 | \$7,500 | \$0 | \$0 | \$1,500 | \$14,250 | \$45,750 |
| May 2022 | \$9,000 | \$13,500 | \$14,250 | \$8,250 | \$3,750 | \$0 | \$0 | \$16,625 | \$65,375 |
| Jun 2022 | \$8,250 | \$0 | \$31,000 | \$25,750 | \$4,000 | \$0 | \$3,750 | \$31,375 | \$104,125 |
| Total | \$18,750 | \$13,500 | \$66,250 | \$41,500 | \$7,750 | \$0 | \$5,250 | \$62,250 | \$215,250 |
| Total | \$18,750 | \$13,500 | \$66,250 | \$41,500 | \$7,750 | \$0 | \$5,250 | \$62,250 | \$215,250 |

Non-Compliant Coke Oven Inspections Performed by ACHD

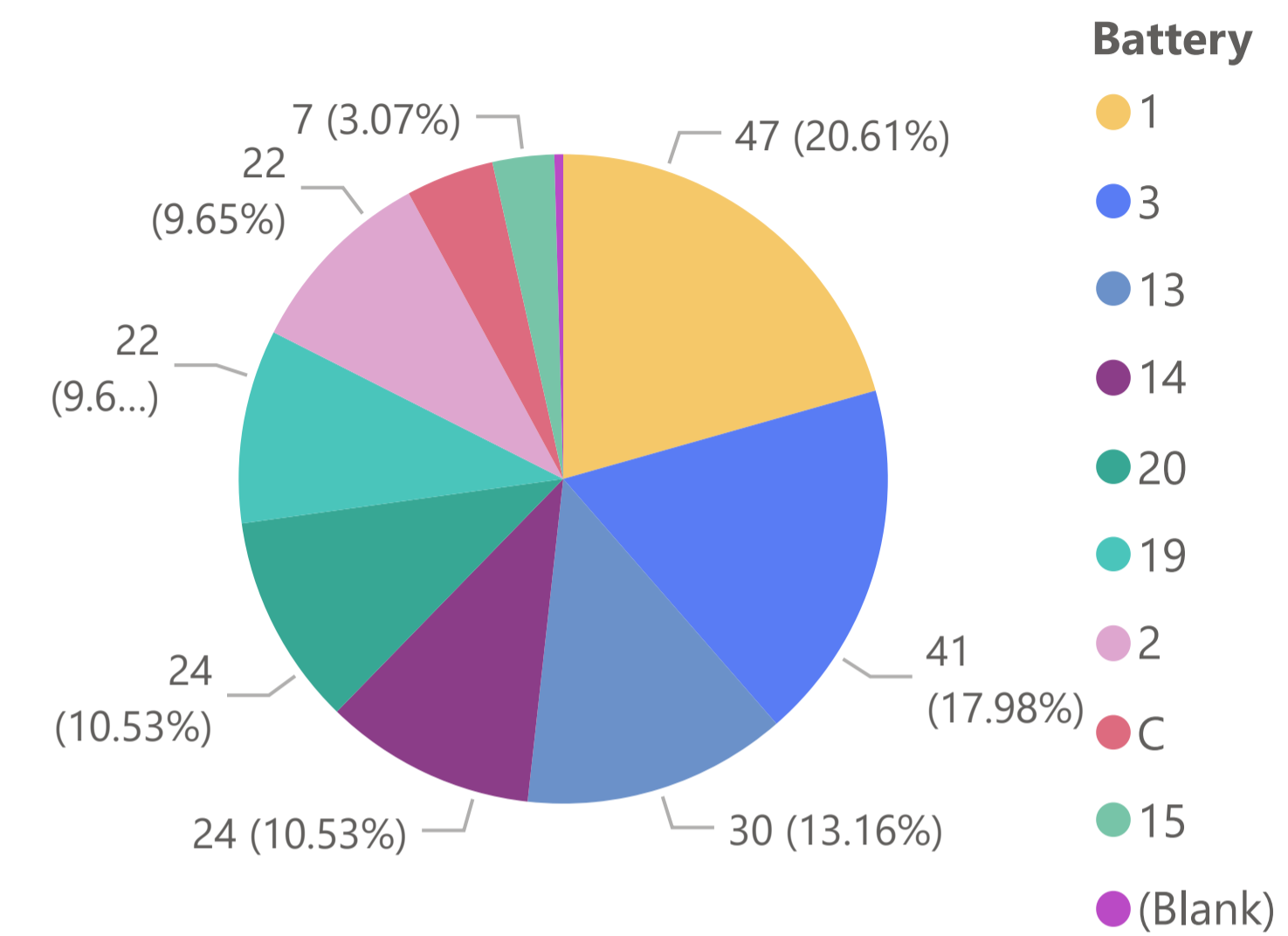
Charging Violations by Battery



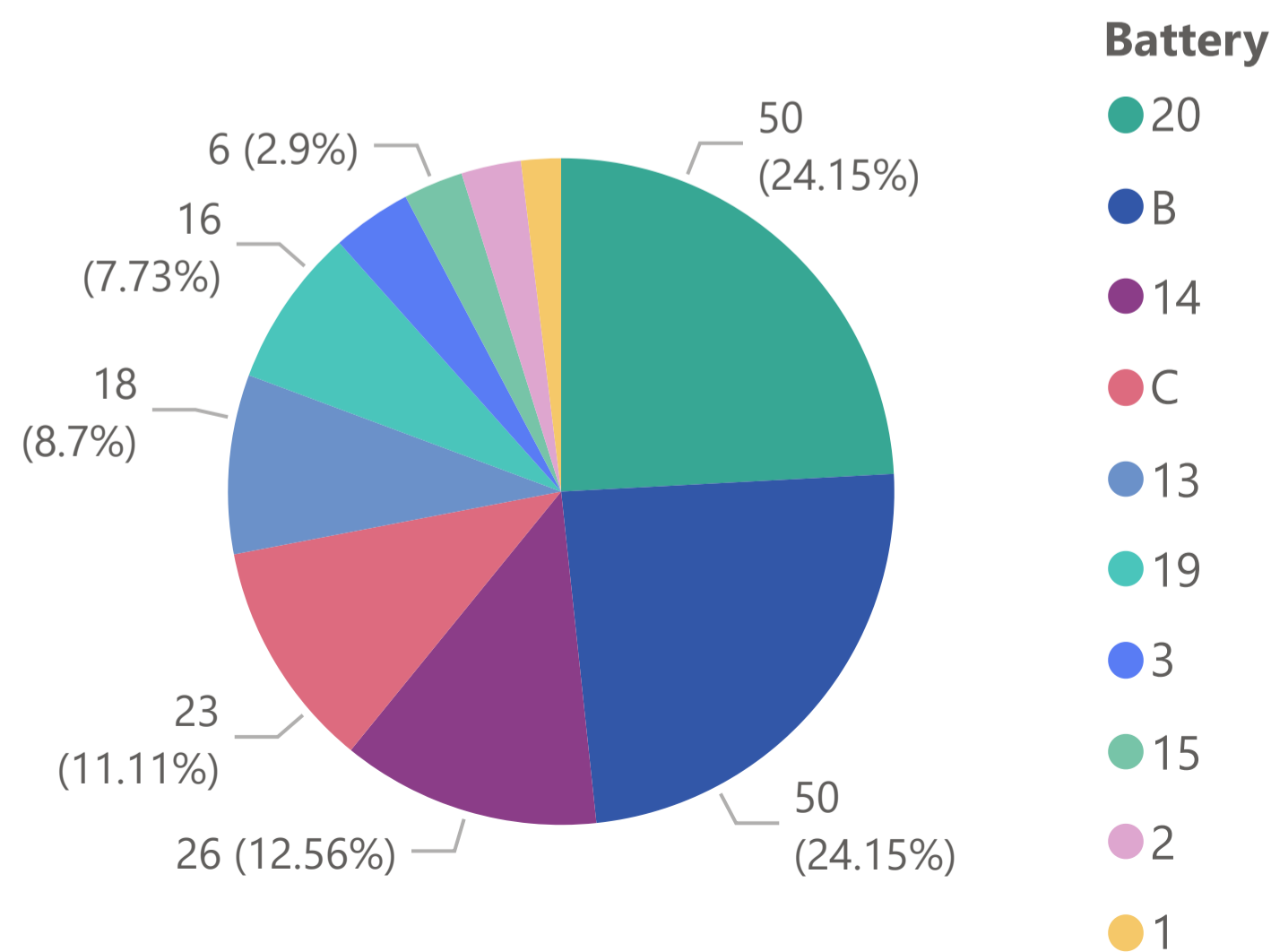
Push Violations by Battery



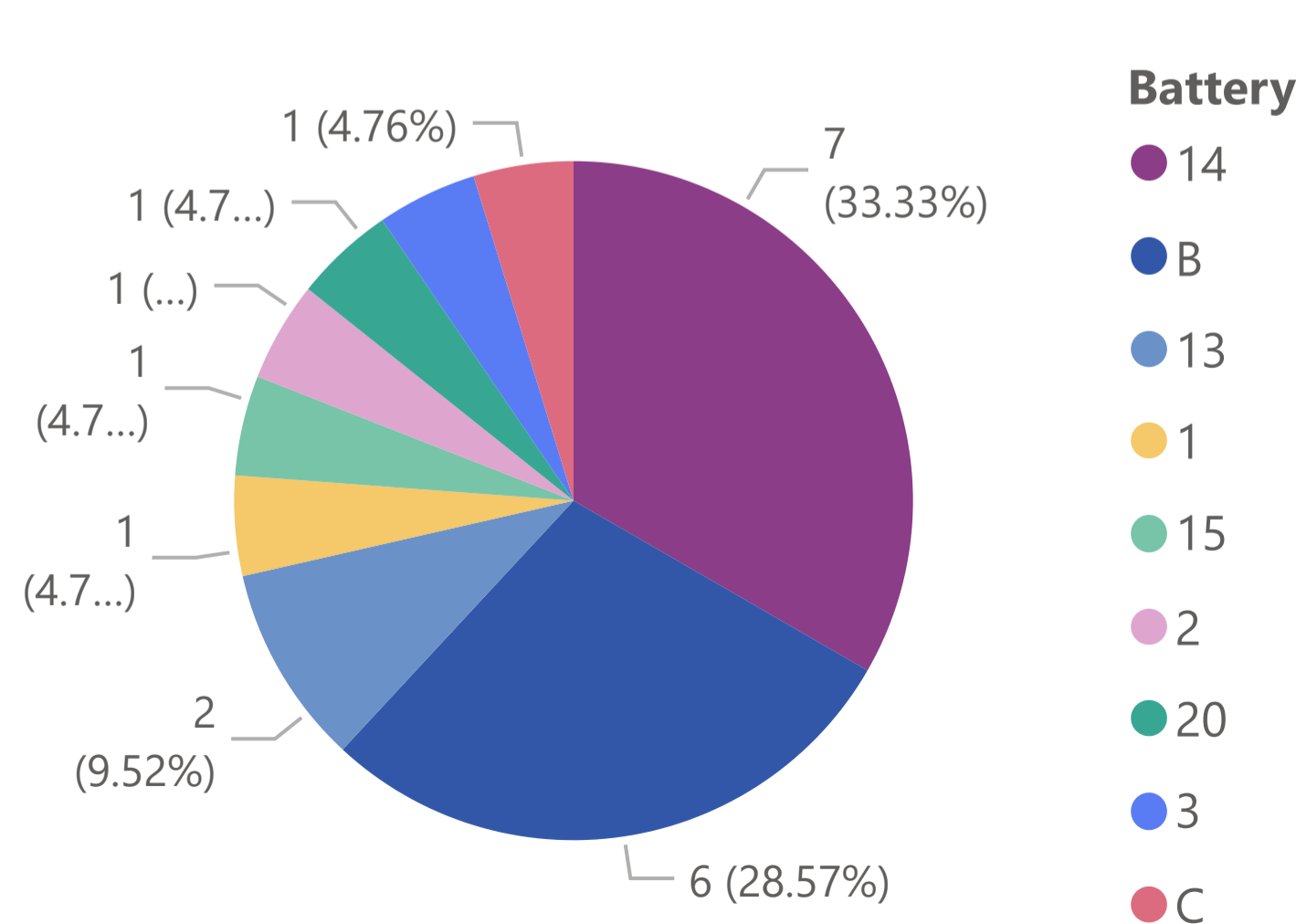
Travel Violations by Battery



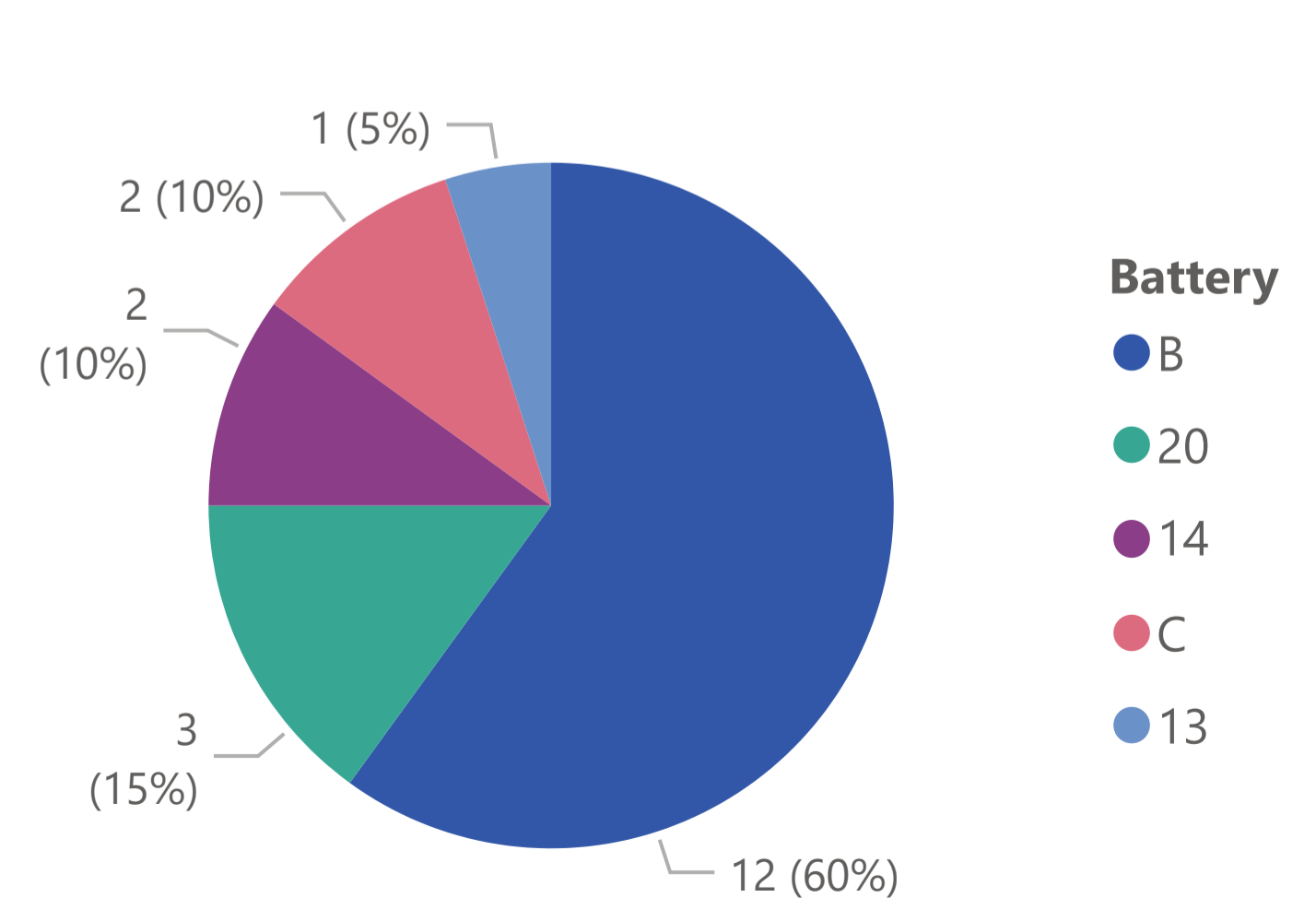
Soak Violations by Battery



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 |
|----------------|-----------|---------|--------------------------------|-----------------------|--------------------------------|-----------------------------|------------------|------------------------|------------------------|-----------------------------|
| Q2 2022 | 4/28/2022 | 3 | 87 | 1.15 | Low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/2/2022 | B | 65 | 1.17 | Low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/25/2022 | B | 100 | 1.80 | Major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/31/2022 | 13 | 96 | 1.73 | Major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/1/2022 | 14 | 73 | 1.32 | Moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/20/2022 | 20 | 121 | 2.18 | Major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/23/2022 | 2 | 94 | 1.25 | Moderate | 1.50 | \$2,250 | | | \$2,250 |
| Total | | | | | | | | | | \$18,750 |

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 |
|----------------|-----------|------|---------|--------------------------|-----------------------|----------------------------|-----------------|-------------|-------------|----------------------|
| Q2 2022 | 5/9/2022 | B2 | 19 | P | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/9/2022 | B4 | 19 | C | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/10/2022 | B26 | 20 | C | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/10/2022 | B26 | 20 | P | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Total | | | | | | | | | | \$13,500 |

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 |
|----------------|-----------|---------|------|------------------|---------------------------------|-------------------------|--------------|--------------|-------------|-------------------|
| Q2 2022 | 4/6/2022 | 20 | C19 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/6/2022 | 20 | C17 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/6/2022 | 20 | C29 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/18/2022 | 2 | A8 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/19/2022 | 1 | B8 | 90 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 4/27/2022 | 13 | A24 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/28/2022 | 3 | A25 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/28/2022 | 3 | B2 | 75 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/3/2022 | 14 | A29 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/9/2022 | 19 | A19 | 75 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/10/2022 | 20 | B20 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/11/2022 | 1 | A5 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/12/2022 | 13 | B7 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/31/2022 | 13 | A8 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/3/2022 | 1 | A4 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/3/2022 | 1 | A6 | 75 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/6/2022 | B | A26 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/8/2022 | 2 | A17 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/14/2022 | 3 | B1 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/14/2022 | 3 | B3 | 60 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/15/2022 | C | C1 | 65 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/20/2022 | 20 | C7 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/20/2022 | 20 | C5 | 75 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/27/2022 | 1 | A17 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/30/2022 | 20 | B29 | 65 | major | 2.50 | \$3,750 | \$250 | | \$4,000 |
| Total | | | | | | | | \$250 | | \$66,250 |

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 |
|----------------|-----------|---------|------|--------------------|-----------------------------------|---------------------------|----------------|-------------|-------------|----------------------|
| Q2 2022 | 4/6/2022 | 20 | C17 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/19/2022 | 1 | B8 | 50 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/28/2022 | 3 | A25 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/28/2022 | 3 | B2 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/3/2022 | 14 | A29 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/10/2022 | 20 | B20 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/11/2022 | 1 | A5 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/12/2022 | 13 | B7 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/31/2022 | 13 | A8 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/3/2022 | 1 | A4 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/3/2022 | 1 | A6 | 45 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/3/2022 | 2 | C2 | 65 | major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/14/2022 | 3 | B1 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/14/2022 | 3 | B3 | 55 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/15/2022 | C | C3 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/15/2022 | C | C1 | 60 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/20/2022 | 20 | C3 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/20/2022 | 20 | C7 | 50 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/27/2022 | 1 | A17 | 35 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/30/2022 | 20 | B29 | 65 | major | 2.50 | \$3,750 | \$250 | | \$4,000 |
| Total | | | | | | | | | | \$41,500 |

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 |
|----------------|-----------|---------|-----------------------|----------------|---------------------------------|------------------------------|--------------|--------------|-------------|--------------------|
| Q2 2022 | 5/23/2022 | C | 4.62% | 1.54 | Major | 2.50 | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/28/2022 | B | 7.81% | 1.56 | Major | 2.50 | \$3,750 | \$250 | | \$4,000 |
| Total | | | | | | | | \$250 | | \$7,750 |

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 |
|----------------|------|---------|----------------------|----------------|-----------------------|----------------|--------------------|---------------|-------------|-------------|------------------|
|----------------|------|---------|----------------------|----------------|-----------------------|----------------|--------------------|---------------|-------------|-------------|------------------|

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 |
|----------------|----------|---------|--------------------------|----------------|-----------------------|--------------------------------------|-------------------------|-------------|-----------------------------|----------------------------|
| Q2 2022 | 4/4/2022 | B | 4.17 | 1.04 | Low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/1/2022 | 14 | 8.20 | 2.05 | Major | 2.50 | \$3,750 | | | \$3,750 |
| Total | | | | | | | | | | \$5,250 |

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 |
|----------------|-----------|---------|------|---------|--|-----------------------------------|-------------------|-------------|-------------|-------------------------------|
| Q2 2022 | 4/4/2022 | B | A16 | 55 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 4/15/2022 | 1 | A3 | 55 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 4/15/2022 | 1 | B31 | 55 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 4/19/2022 | 1 | A5 | 45 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 4/19/2022 | 1 | B10 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 4/19/2022 | 1 | B10 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 4/28/2022 | 2 | B22 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 4/28/2022 | 3 | B17 | 65 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 4/28/2022 | 3 | A21 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 4/28/2022 | 2 | B18 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 4/28/2022 | 2 | B19 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 5/2/2022 | B | B13 | 85 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 5/10/2022 | 20 | C11 | 90 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 5/12/2022 | 13 | A27 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 5/12/2022 | 13 | B30 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 5/20/2022 | 2 | B10 | 55 | Moderate | 1.50 | \$1,125 | \$250 | | \$1,375 |
| Q2 2022 | 5/20/2022 | 2 | C1 | 55 | Moderate | 1.50 | \$1,125 | \$250 | | \$1,375 |
| Q2 2022 | 5/23/2022 | C | C15 | 40 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 5/23/2022 | C | C15 | 45 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 5/23/2022 | C | C5 | 45 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 5/23/2022 | C | C5 | 50 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 5/23/2022 | C | C13 | 100 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 5/25/2022 | B | A19 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 5/31/2022 | 13 | B13 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Total | | | | | | | \$30,375 | | | \$30,875 |

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 |
|----------------|-----------|---------|------|---------|--|-----------------------------------|-------------------|-------------|-------------|-------------------------------|
| Q2 2022 | 6/3/2022 | 1 | A21 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 6/3/2022 | 1 | B17 | 55 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 6/3/2022 | 1 | B19 | 70 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/6/2022 | B | A32 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 6/8/2022 | 2 | B3 | 70 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/9/2022 | 19 | A10 | 75 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/15/2022 | C | C42 | 65 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/20/2022 | 20 | C1 | 90 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/23/2022 | 1 | B1 | 45 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 6/23/2022 | 2 | B8 | 45 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 6/23/2022 | 1 | B31 | 50 | Low | 1.00 | \$750 | | | \$750 |
| Q2 2022 | 6/23/2022 | 3 | B10 | 60 | Moderate | 1.50 | \$1,125 | | | \$1,125 |
| Q2 2022 | 6/23/2022 | 3 | B16 | 70 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/23/2022 | 2 | B28 | 100 | Major | 2.50 | \$1,875 | | | \$1,875 |
| Q2 2022 | 6/28/2022 | B | A15 | 45 | Low | 1.00 | \$750 | \$250 | | \$1,000 |
| Q2 2022 | 6/28/2022 | B | B24 | 55 | Moderate | 1.50 | \$1,125 | \$250 | | \$1,375 |
| Q2 2022 | 6/28/2022 | B | A17 | 75 | Major | 2.50 | \$1,875 | \$250 | | \$2,125 |
| Q2 2022 | 6/28/2022 | B | A18 | 75 | Major | 2.50 | \$1,875 | \$250 | | \$2,125 |
| Q2 2022 | 6/29/2022 | 3 | A28 | 70 | Major | 2.50 | \$1,875 | \$250 | | \$2,125 |
| Q2 2022 | 6/30/2022 | 20 | B25 | 65 | Moderate | 1.50 | \$1,125 | \$250 | | \$1,375 |
| Q2 2022 | 6/30/2022 | 20 | C14 | 90 | Major | 2.50 | \$1,875 | \$250 | | \$2,125 |
| Total | | | | | | | \$29,625 | | | \$31,375 |

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 |
|----------------|----------------------|--------------------|-------------------|-----------------------|--|
| Q2 2022 | 3 | 2 | | 4 | 9 |
| Apr 2022 | 1 | | | 3 | 4 |
| May 2022 | 1 | 2 | | | 3 |
| Jun 2022 | 1 | | | 1 | 2 |
| Total | 3 | 2 | | 4 | 9 |

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

| | | | | |
|--------------|-------------|-------------|---------------|-----------------|
| Q2 2022 | 3631 | 3640 | 99.75% | \$28,250 |
| Total | 3631 | 3640 | 99.75% | \$28,250 |

Method 303 Non-Compliant Inspections and Penalties

| 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 |
|----------------|-----------|---------|---|---|---|-------------------------------|---------------------------------------|---|-----------------------|--------------|----------------|-----------------------------|
| Q2 2022 | 4/5/2022 | 20 | | | | | | Major | \$3,750 | | | \$3,750 |
| Q2 2022 | 4/5/2022 | B | | | Moderate | | | | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/23/2022 | 20 | | | | | | Major | \$3,750 | \$250 | | \$4,000 |
| Q2 2022 | 4/23/2022 | 19 | | | | | | Moderate | \$2,250 | \$250 | | \$2,500 |
| Q2 2022 | 5/7/2022 | 3 | | Moderate | | | | | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/19/2022 | B | | | | Major | | | \$3,750 | | | \$3,750 |
| Q2 2022 | 5/25/2022 | C | | | | Moderate | | | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/15/2022 | B | | | Major | | | | \$3,750 | | | \$3,750 |
| Q2 2022 | 6/27/2022 | 19 | | | | | | Major | \$3,750 | | | \$3,750 |
| Total | | | | | | | | | | \$500 | | \$28,250 |

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 2022 | 17 | \$29,250 | 17 | \$26,250 | \$55,500 |
| Total | 17 | \$29,250 | 17 | \$26,250 | \$55,500 |

USS Non-Compliant Pushing Inspections and Penalties

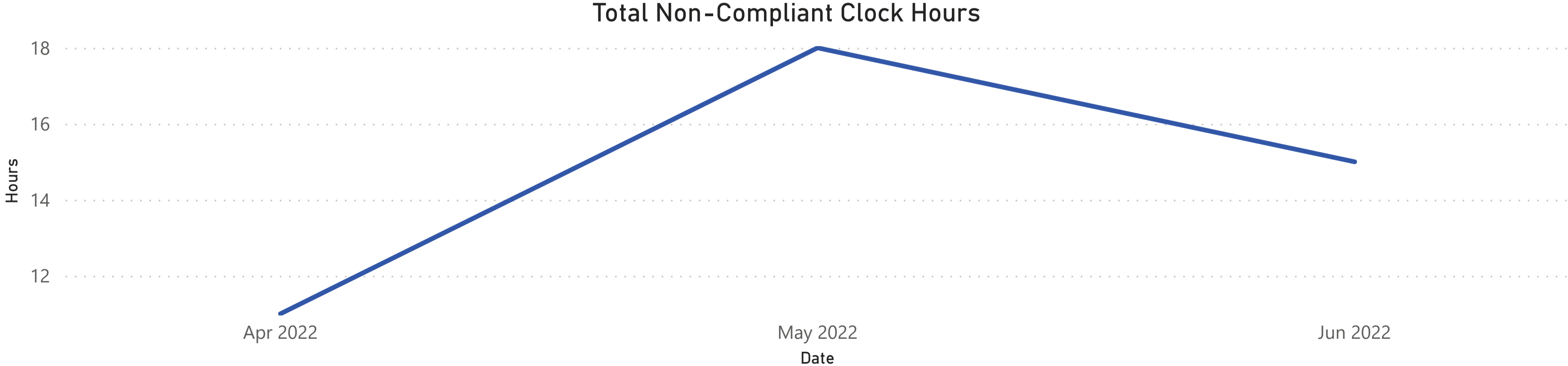
| Quarter (Year) | Date | Battery | Oven | Opacity | Push Severity of Violation | Push Penalty Multiplier | USS Push Penalty | H2S Exceedance Penalty (push) | SO2 Exceedance Penalty (Push) | USS Total Push Penalty |
|----------------|-----------|---------|------|---------|----------------------------|-------------------------|------------------|-------------------------------|-------------------------------|------------------------|
| Q2 2022 | 4/6/2022 | 1 | C2 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 4/10/2022 | 13 | A23 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/19/2022 | 19 | B29 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/26/2022 | 19 | B6 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/27/2022 | 2 | B13 | 60 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/3/2022 | 20 | C7 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/4/2022 | 14 | A23 | 50 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/5/2022 | 19 | B29 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/9/2022 | 20 | A27 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/12/2022 | 20 | C21 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/19/2022 | 1 | A23 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/23/2022 | 19 | B29 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/30/2022 | 19 | B21 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/6/2022 | 1 | A12 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/9/2022 | 13 | A29 | 50 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 6/13/2022 | 19 | C23 | 25 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/20/2022 | 20 | B24 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Total | | | | | | | \$29,250 | | | \$29,250 |

USS Non-Compliant Travel Inspections and Penalties

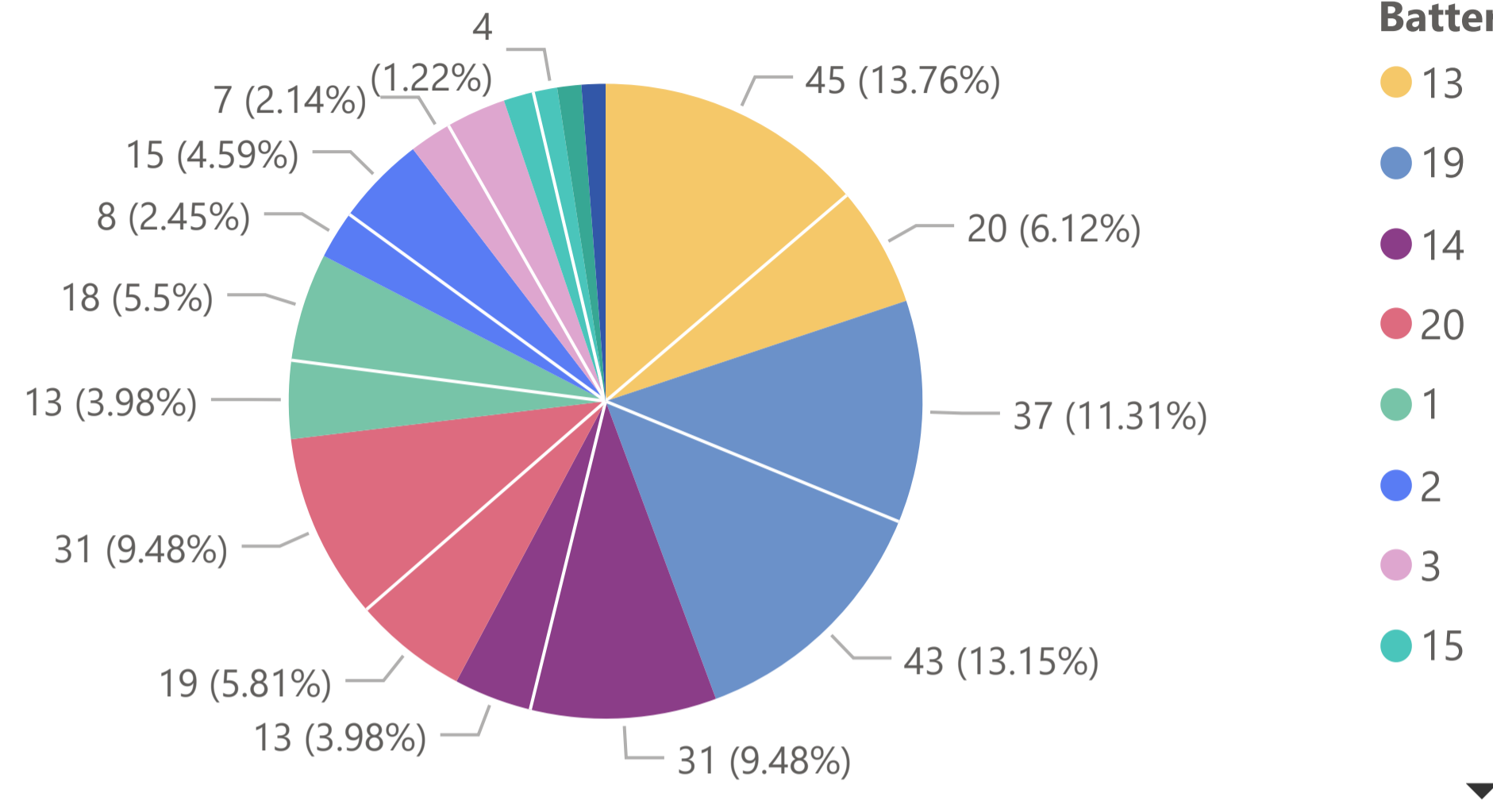
| Quarter (Year) | Date | Battery | Oven | Opacity | Travel Severity of Violation | Travel Penalty Multiplier | USS Travel Penalty | H2S Exceedance Penalty (travel) | SO2 Exceedance Penalty (travel) | USS Total Travel Penalty |
|----------------|-----------|---------|------|---------|------------------------------|---------------------------|--------------------|---------------------------------|---------------------------------|--------------------------|
| Q2 2022 | 4/10/2022 | 13 | A23 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/19/2022 | 19 | B29 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 4/26/2022 | 19 | B6 | 15 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/3/2022 | 20 | C7 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/4/2022 | 14 | A23 | 40 | moderate | 1.50 | \$2,250 | | | \$2,250 |
| Q2 2022 | 5/5/2022 | 19 | B29 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/7/2022 | 14 | A27 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/16/2022 | 14 | A26 | 25 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/17/2022 | 14 | A26 | 25 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/18/2022 | 13 | B3 | 25 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 5/18/2022 | 14 | B4 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/6/2022 | 1 | A12 | 15 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/9/2022 | 13 | A29 | 25 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/13/2022 | 19 | C23 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/20/2022 | 19 | B11 | 20 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/20/2022 | 20 | B24 | 15 | low | 1.00 | \$1,500 | | | \$1,500 |
| Q2 2022 | 6/27/2022 | 14 | B4 | 30 | low | 1.00 | \$1,500 | | | \$1,500 |
| Total | | | | | | 17.50 | | | | \$26,250 |

Continuous Opacity Monitor Non-Compliant Clock Hours

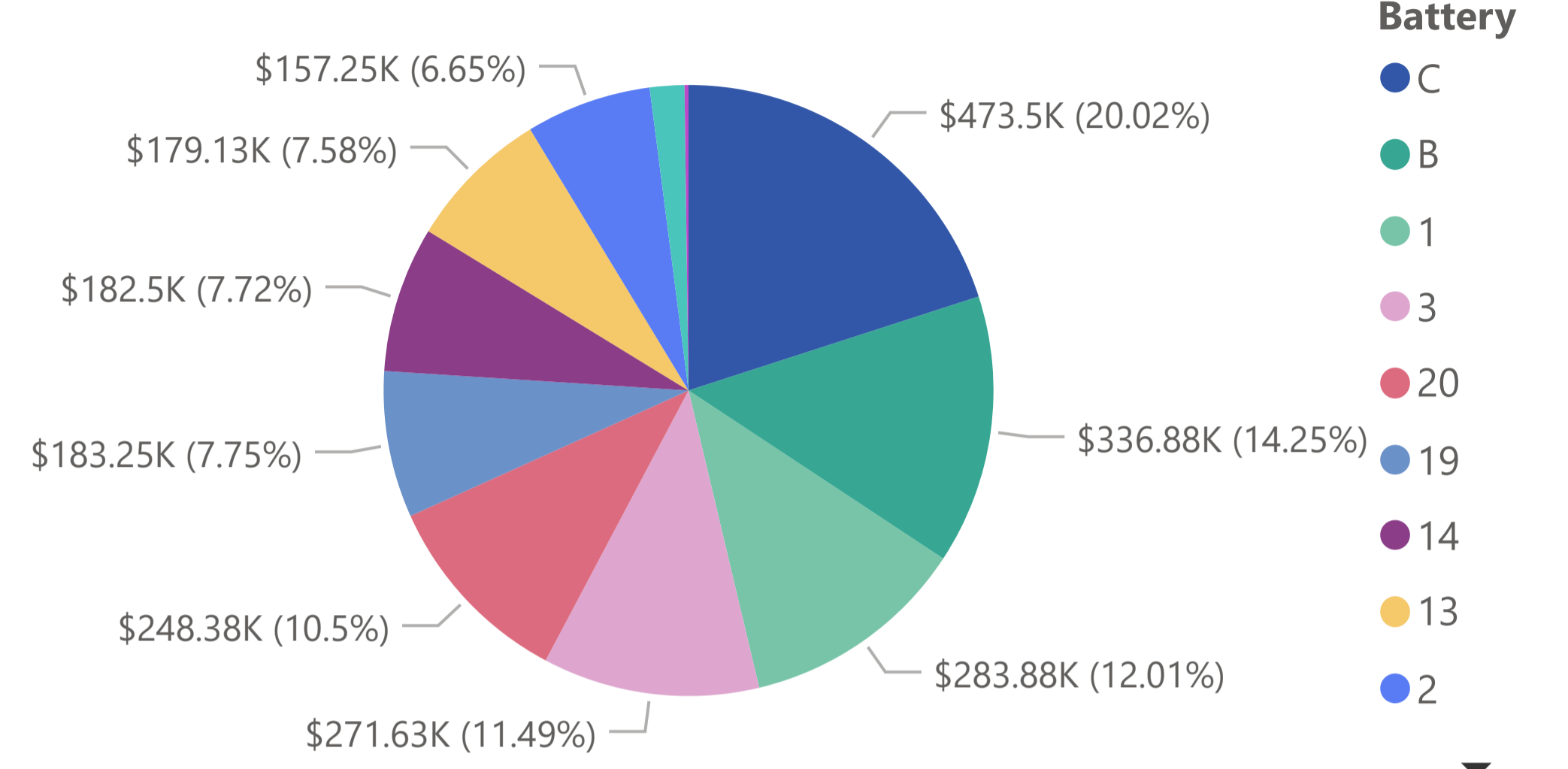
| Quarter (Year) | Battery 1 | Battery 2 | Battery 3 | Battery 13 | Battery 14 | Battery 15 | Battery 19 | Battery 20 | Battery B | Battery C | Total Non-Compliant Clock Hours | COMs Penalty |
|---|-----------|-----------|-----------|------------|------------|------------|------------|------------|-----------|-----------|---------------------------------|----------------|
| <input type="checkbox"/> Q2 2022 | 2 | 7 | 2 | 14 | 4 | 0 | 4 | 2 | 6 | 3 | 44 | \$8,800 |
| Apr 2022 | 0 | 3 | 1 | 2 | 3 | 0 | 0 | 0 | 1 | 1 | 11 | \$2,200 |
| May 2022 | 0 | 1 | 1 | 9 | 0 | 0 | 2 | 2 | 1 | 2 | 18 | \$3,600 |
| Jun 2022 | 2 | 3 | 0 | 3 | 1 | 0 | 2 | 0 | 4 | 0 | 15 | \$3,000 |
| Total | 2 | 7 | 2 | 14 | 4 | 0 | 4 | 2 | 6 | 3 | 44 | \$8,800 |



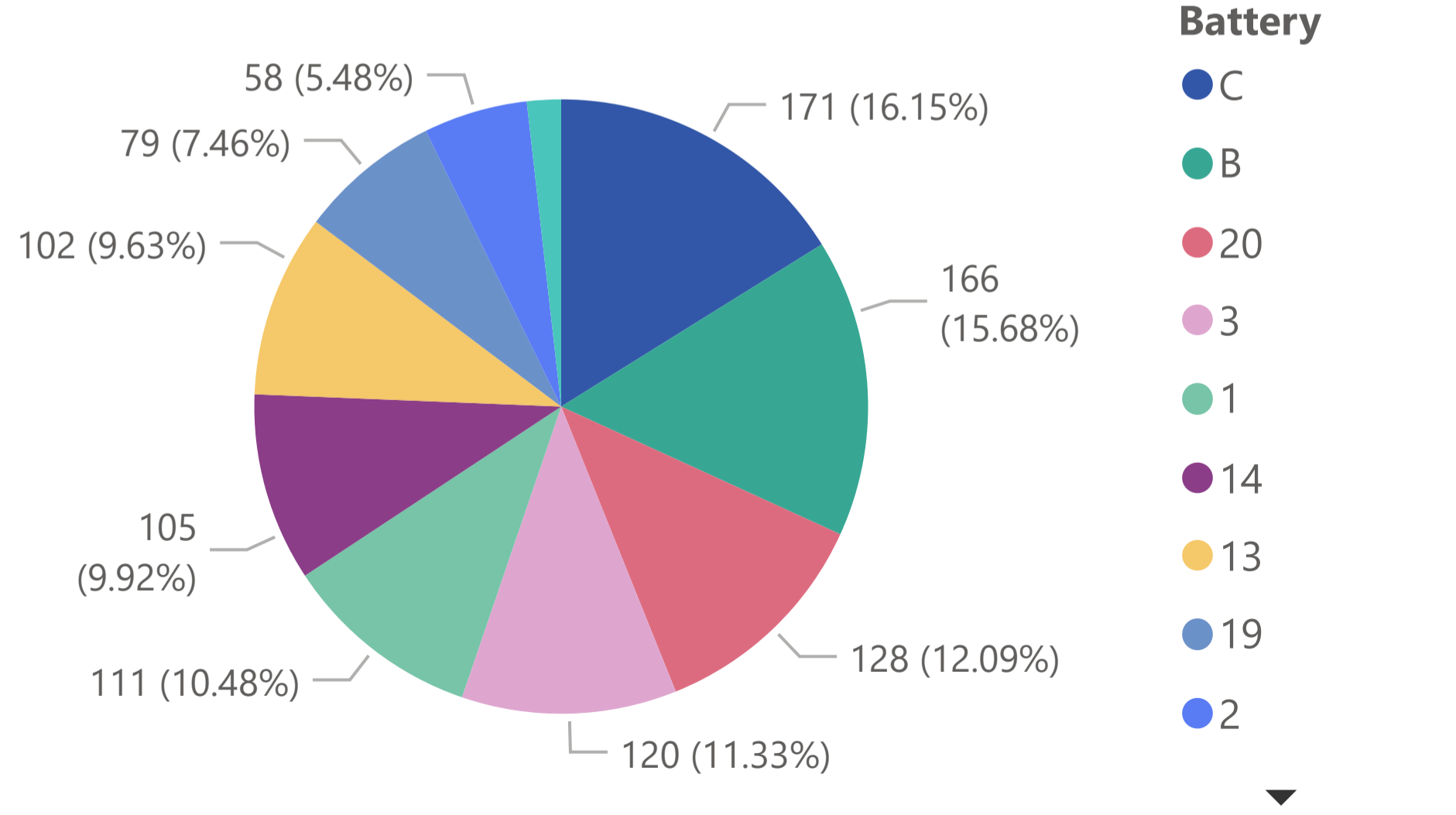
Non-Compliant Inspections: USS Push and Travel Inspections



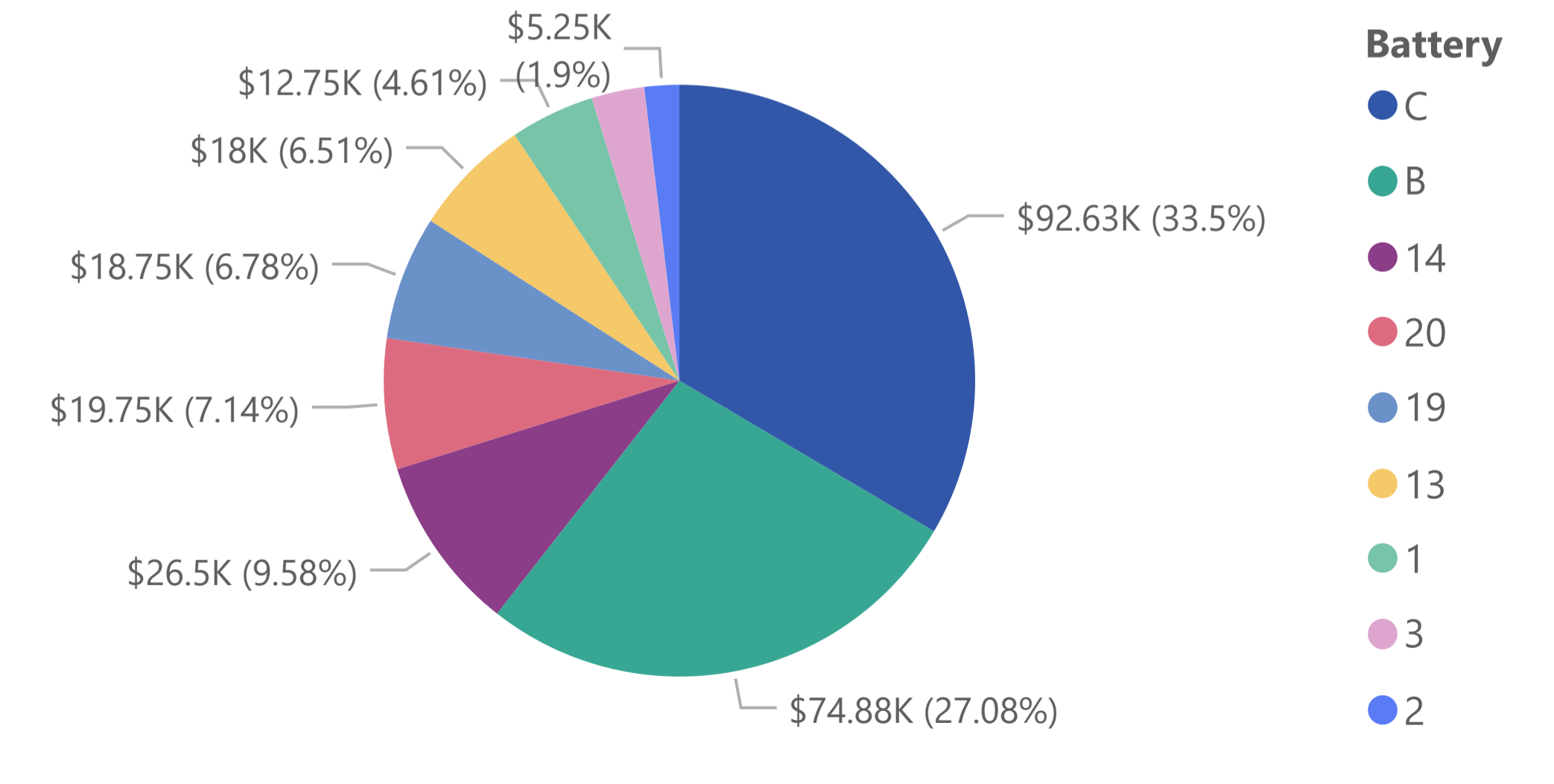
ACHD Total Penalties



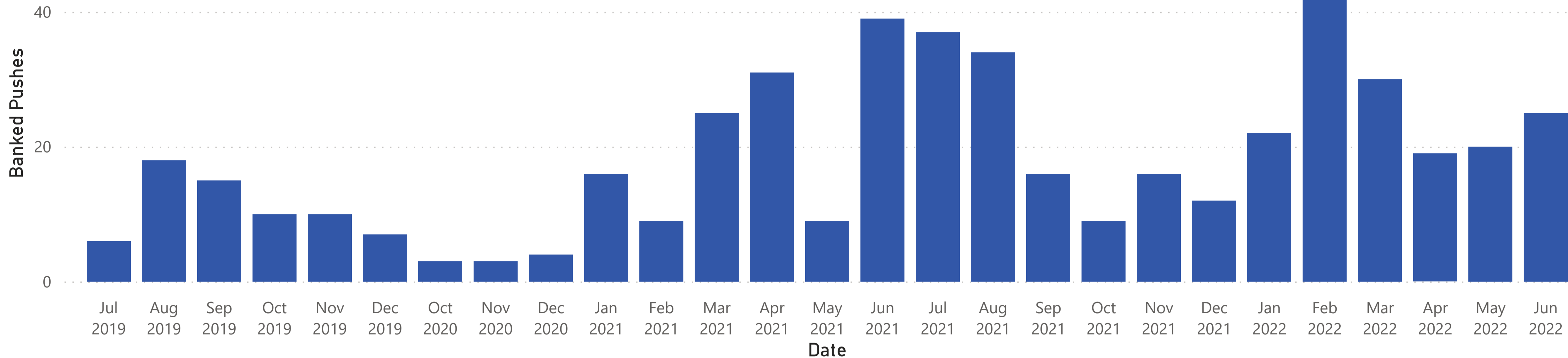
Total Non-Compliant Inspections



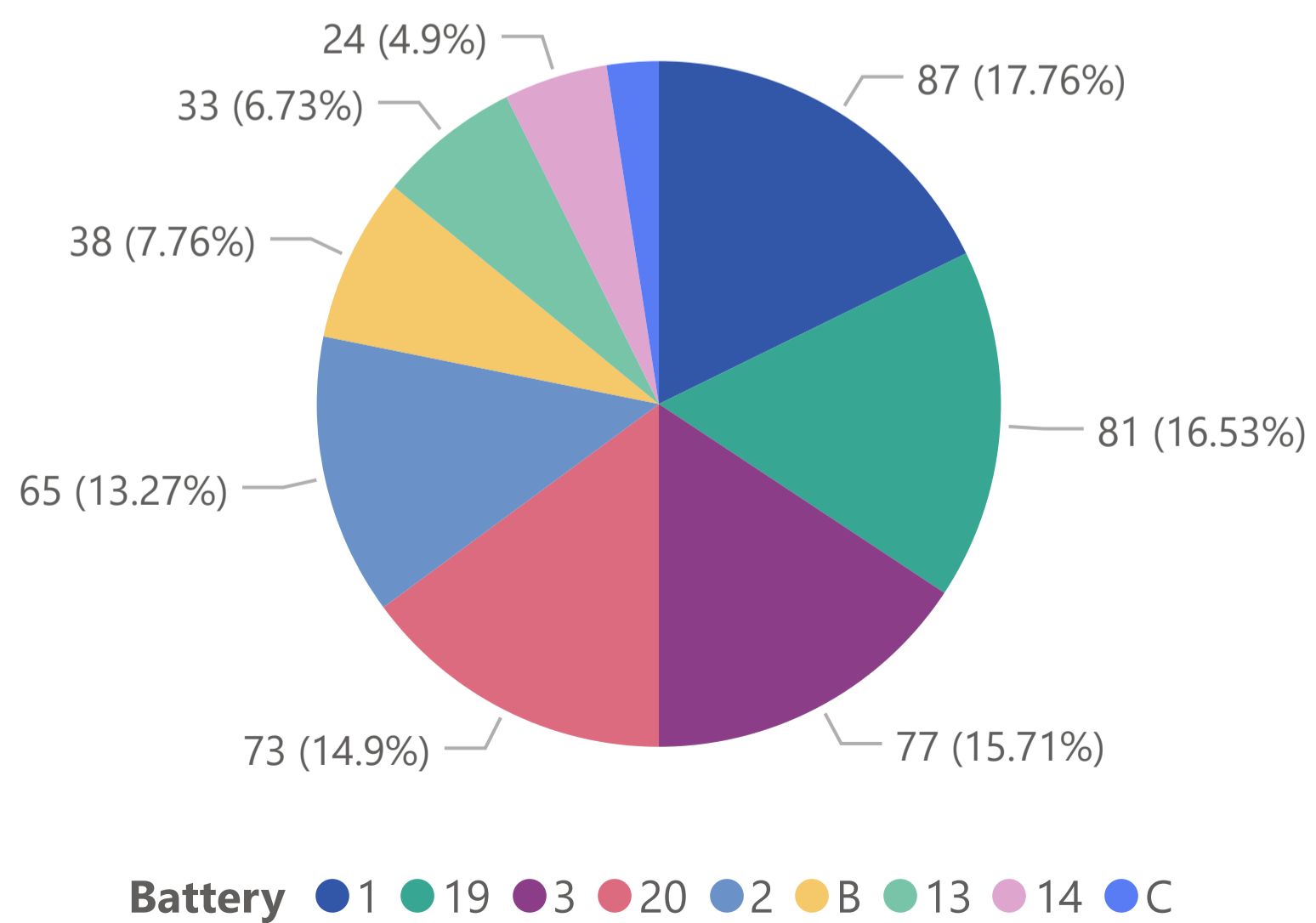
Method 303 Total Penalty



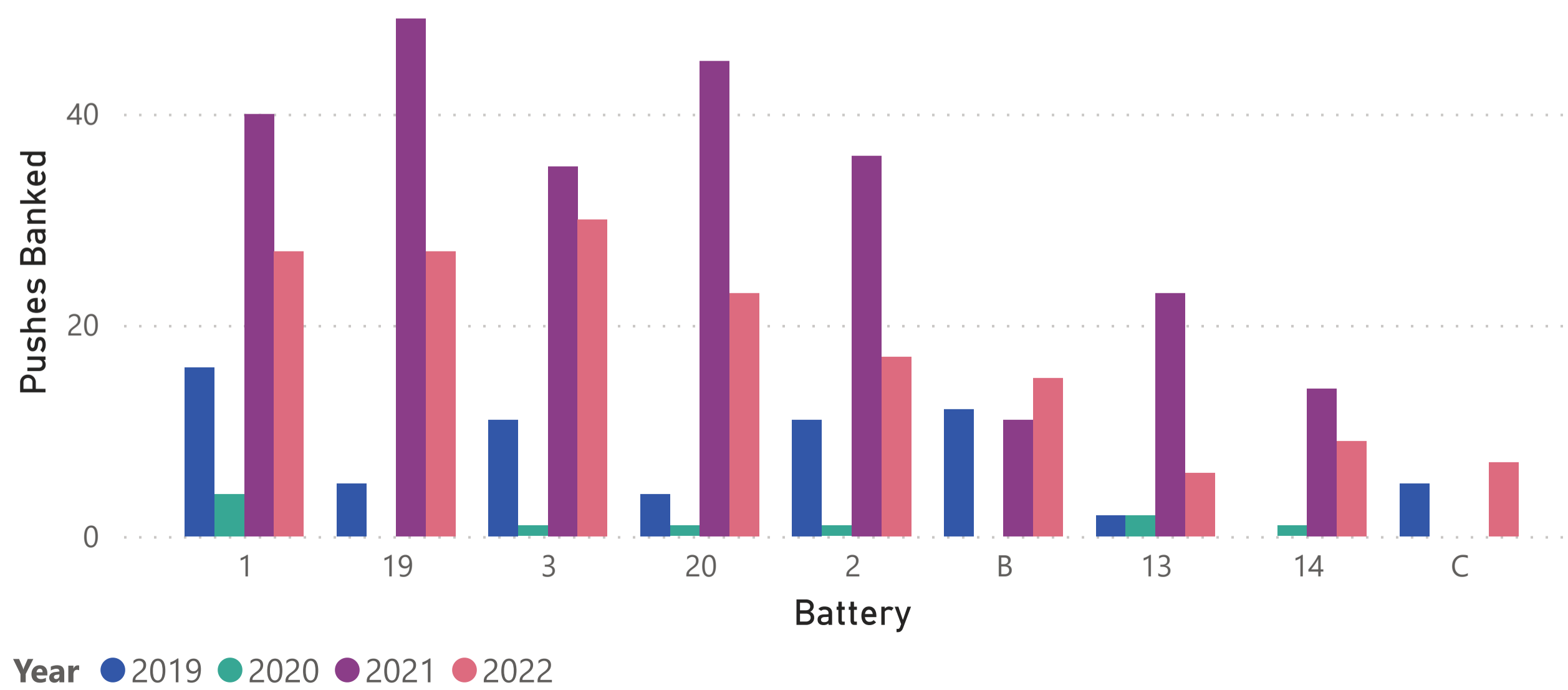
Total Instances of Banked Pushes



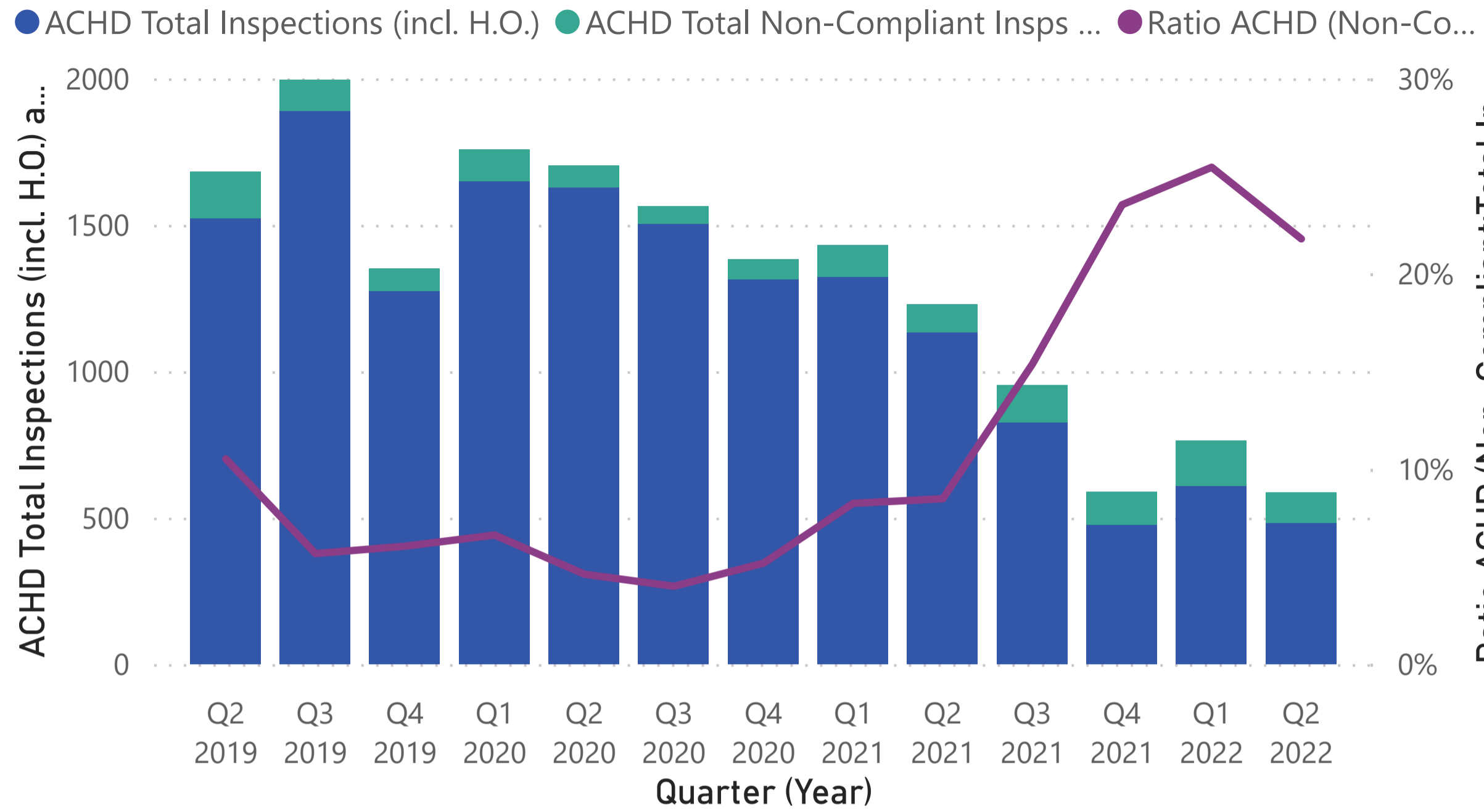
Pushes Banked by Battery



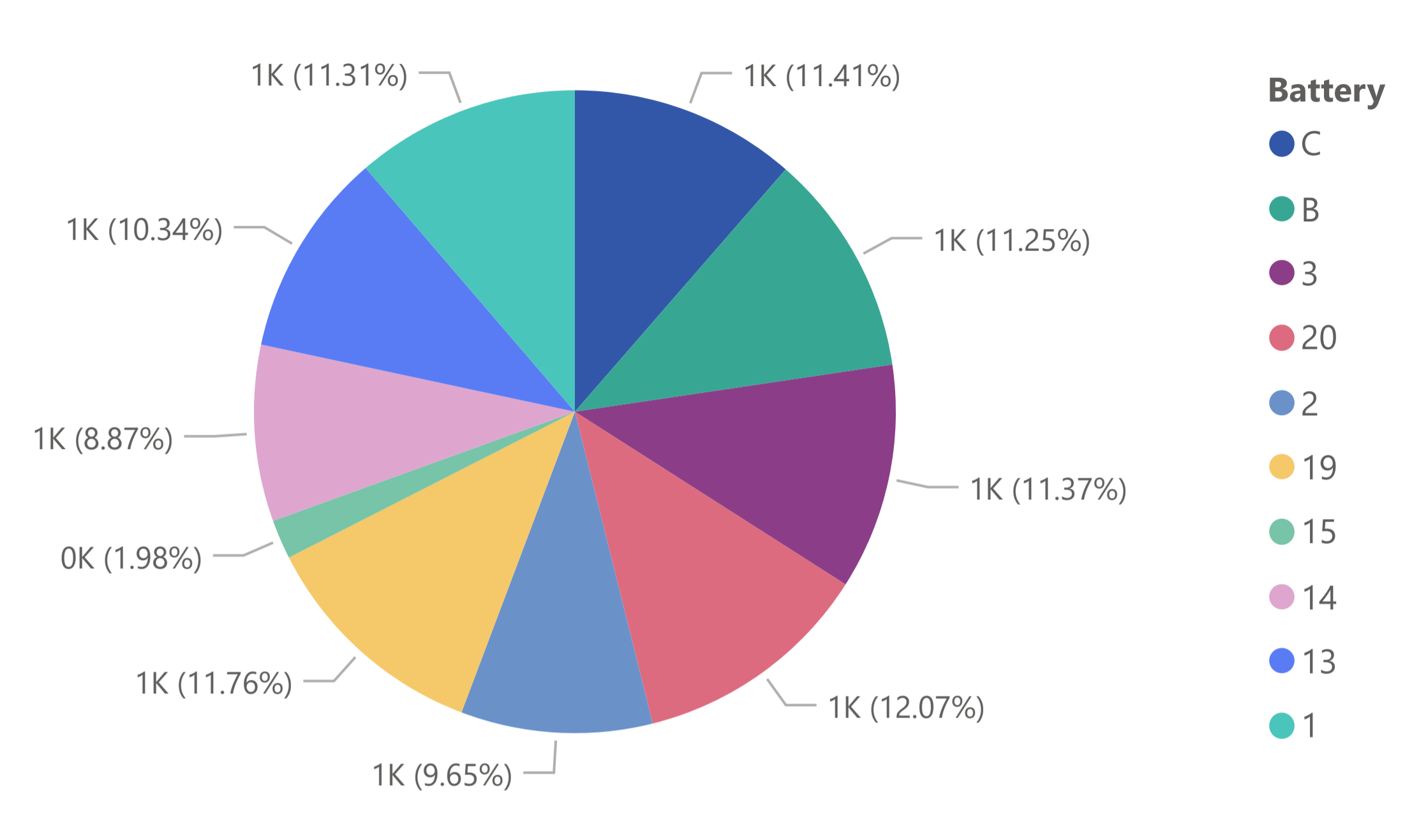
Pushes Banked by Battery and Year



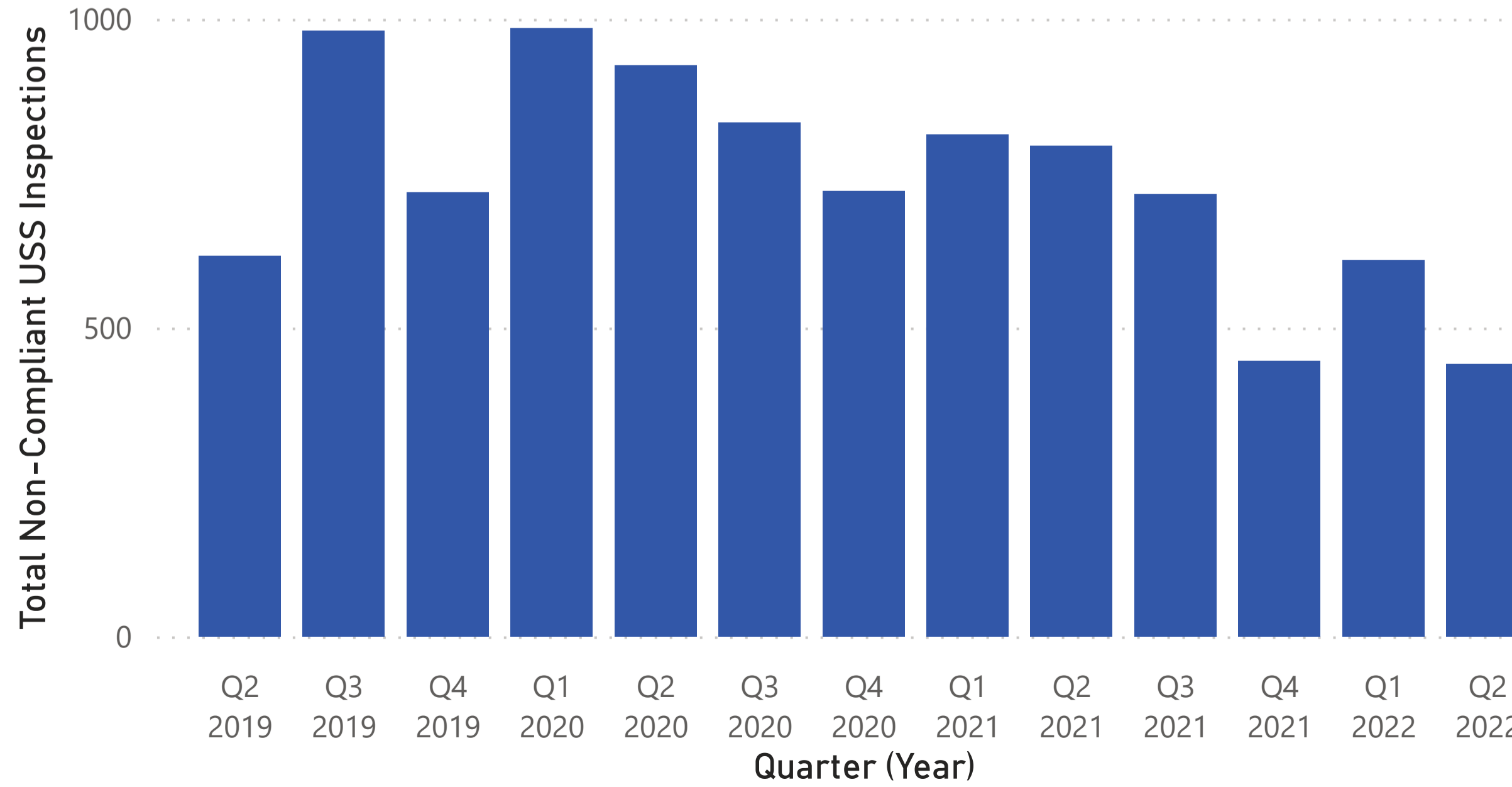
ACHD Total Inspections (SOA #190604)



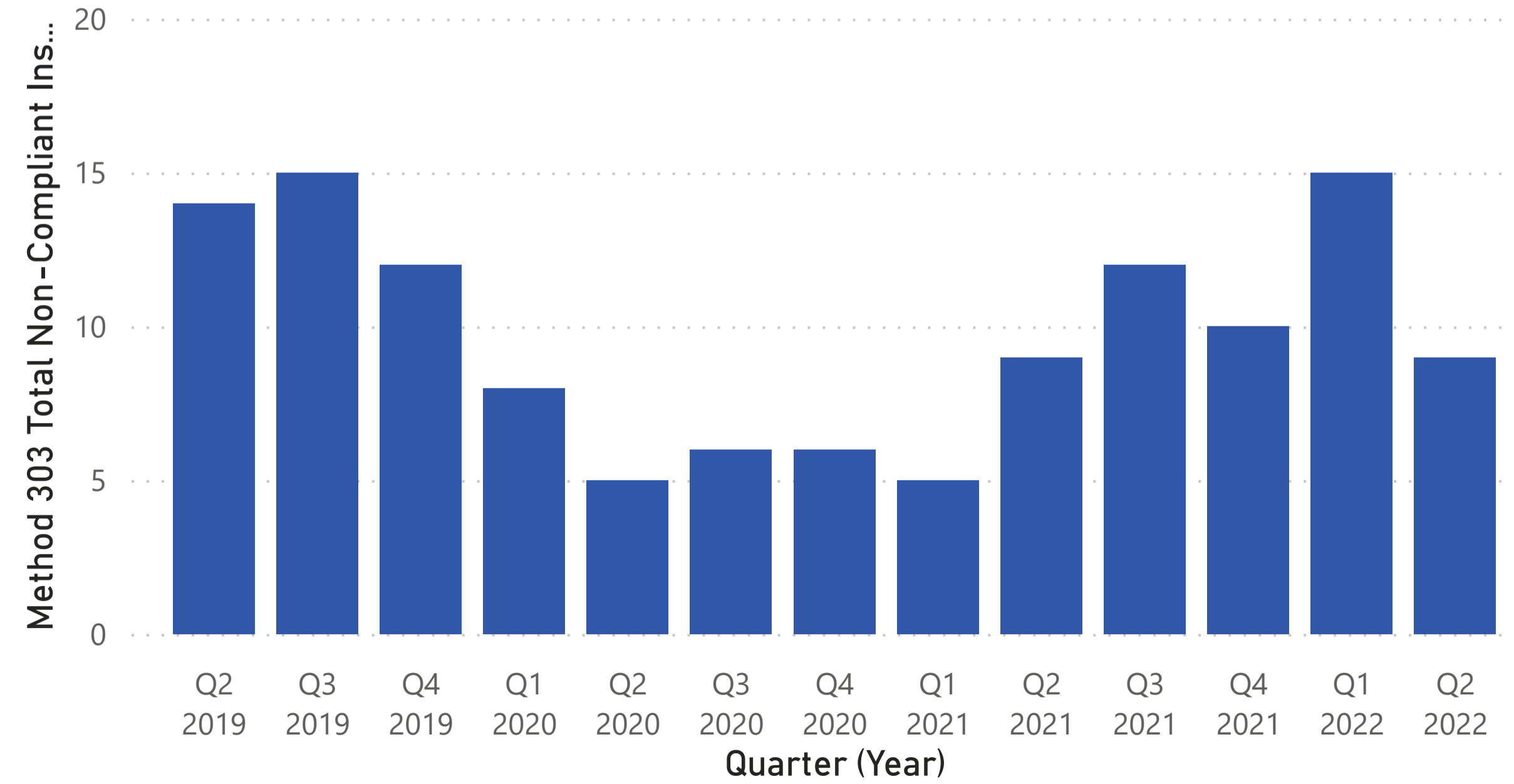
Non-Compliant Inspections (ACHD, M303, USS)



Non-Compliant Inspections Performed by U.S. Steel

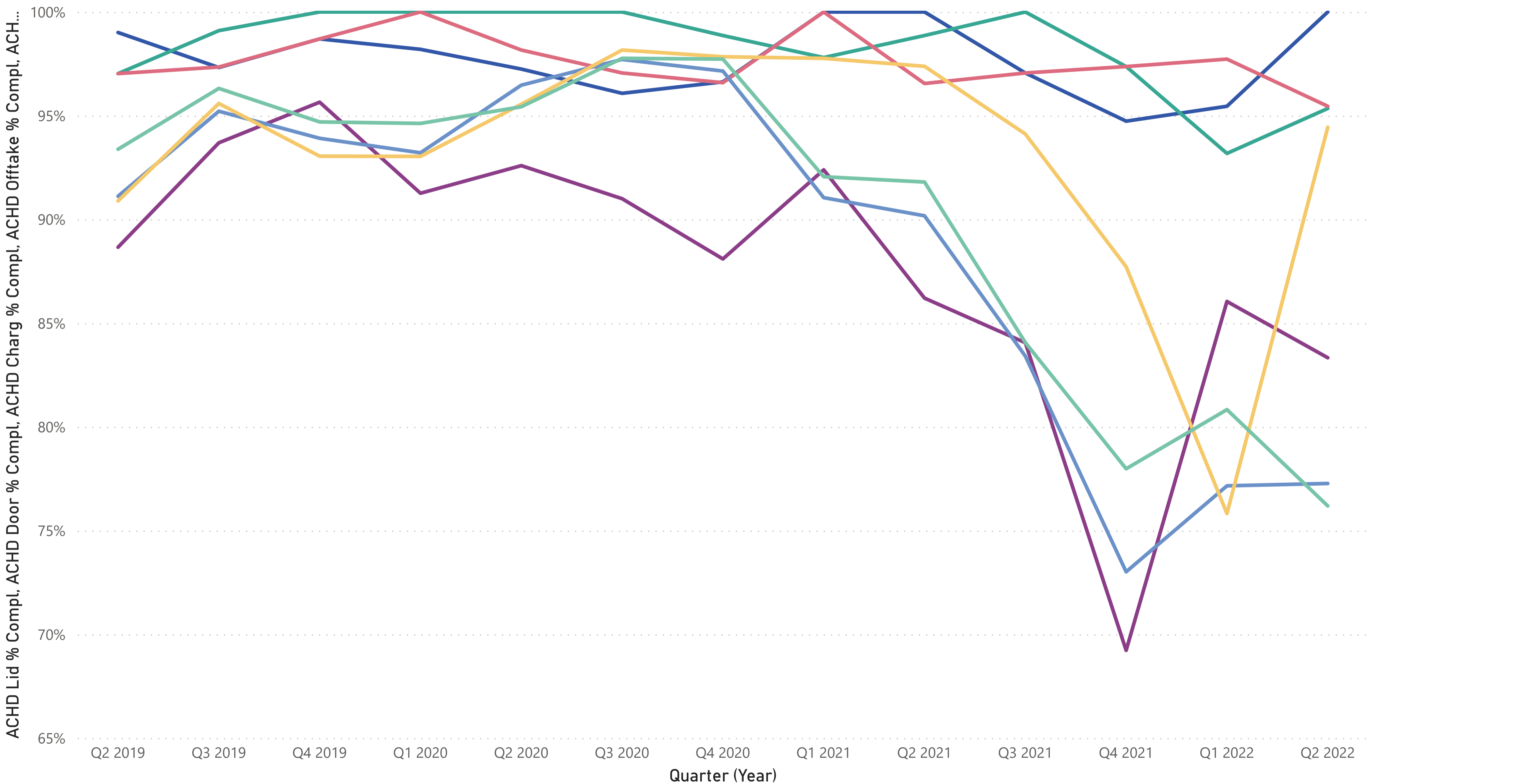


Method 303 Total Non-Compliant Inspections by Quarter (Year)



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 |
|----------------|--------------------|-------------------|------------------------|-------------------------|---------------------|---------------------------|-----------------------------|
| Q2 2022 | | \$250 | \$2,250 | \$250 | | | |
| 6/30/2022 | | | \$500 | \$250 | | | |
| 6/29/2022 | | | \$250 | | | | |
| 6/28/2022 | | \$250 | \$1,000 | | | | |
| 5/20/2022 | | | \$500 | | | | |
| Q1 2022 | | | | \$750 | \$250 | \$250 | |
| 3/14/2022 | | | | | | \$250 | |
| 2/22/2022 | | | | \$250 | \$250 | | |
| 1/19/2022 | | | | \$500 | | | |
| Q4 2021 | \$250 | | \$2,000 | \$2,250 | \$750 | \$250 | \$250 |
| 12/16/2021 | | | | | \$250 | | |
| 12/13/2021 | | | \$1,000 | \$250 | | | |
| 11/24/2021 | | | \$500 | \$250 | | | \$250 |
| 11/18/2021 | | | \$250 | \$250 | | | |
| 11/17/2021 | \$250 | | | | \$250 | | |
| 11/9/2021 | | | | \$250 | | | |
| 11/8/2021 | | | \$250 | \$750 | | | |
| 11/5/2021 | | | | \$250 | | | |
| 10/19/2021 | | | | | | \$250 | |
| 10/13/2021 | | | | \$250 | \$250 | | |
| Q3 2021 | \$250 | | \$1,000 | \$750 | \$750 | | |
| 8/24/2021 | | | \$250 | \$500 | | | |
| 7/28/2021 | | | \$250 | \$250 | \$250 | | |
| 7/27/2021 | | | | | \$500 | | |
| 7/7/2021 | \$250 | | \$500 | | | | |
| Q2 2021 | \$500 | | \$250 | \$1,750 | | | \$250 |
| 6/28/2021 | \$250 | | | \$250 | | | |
| 6/21/2021 | | | | \$250 | | | |
| 5/21/2021 | | | | | | | \$250 |
| 5/19/2021 | | | \$250 | | | | |
| 4/28/2021 | | | | \$250 | | | |
| 4/6/2021 | \$250 | | | \$750 | | | |
| 4/5/2021 | | | | \$250 | | | |
| Q1 2021 | \$250 | \$250 | \$5,250 | \$500 | | | |
| 3/10/2021 | \$250 | \$250 | \$3,750 | | | | |
| 3/9/2021 | | | \$500 | \$250 | | | |
| 3/8/2021 | | | \$500 | \$250 | | | |
| 3/3/2021 | | | \$500 | | | | |
| Q4 2020 | \$750 | \$250 | \$3,000 | \$500 | \$500 | \$750 | \$250 |
| 11/10/2020 | \$250 | | | \$250 | | | |
| 11/9/2020 | | | \$750 | | | \$250 | |
| 11/4/2020 | \$250 | \$250 | \$2,000 | | \$250 | \$250 | \$250 |
| Total | \$3,000 | \$750 | \$16,000 | \$9,250 | \$4,000 | \$1,500 | \$1,000 |