

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

July 11, 2023

**CERTIFIED MAIL –**

Mark Jeffrey  
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 – July 1, 2022 through September 30, 2022 (3<sup>rd</sup> Quarter)**

Dear Mr. Jeffrey:

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 third quarter of 2022, July 1, 2022 through September 30, 2022. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$301,725.00**. Pursuant to the SOA, Section V. ("Civil Penalty Payment"), Paragraph A, 90 percent of that amount, or **\$271,552.50**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$30,172.50**, 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.



**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

301 39<sup>TH</sup> STREET • CLACK HEALTH CENTER • BUILDING 7  
PITTSBURGH, PA 15201-1811  
PHONE (412) 578-8103 • FAX (412) 578-8144  
24-HR (412) 687-ACHD (2243)  
[WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT](http://WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT)



The demand for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from July 1, 2022 through September 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 July 1, 2022 through September 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](mailto: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", written in a cursive style.

Allason Holt  
Program Manager -- Compliance and Enforcement Program

cc: Matt DeLibero ([MDelibero@uss.com](mailto:MDelibero@uss.com))  
Mike Dzurinko ([MDzurinko@uss.com](mailto:MDzurinko@uss.com))  
Jonelle Scheetz ([JSScheetz@uss.com](mailto:JSScheetz@uss.com))

AQ Documents File

## Quarters Selected for Report

Q3 2022

**\$301,725**

Total Penalty

U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections  
 Stipulated Penalties **COA 190604**  
 (Q3 2022)

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
▲					
☐ <b>Q3 2022</b>					
Jul 2022	\$2,750	\$52,625	\$36,000	\$6,600	\$97,975
Aug 2022	\$3,500	\$86,500	\$17,000	\$3,200	\$110,200
Sep 2022	\$3,500	\$69,750	\$18,500	\$1,800	\$93,550
<b>Total</b>	<b>\$9,750</b>	<b>\$208,875</b>	<b>\$71,500</b>	<b>\$11,600</b>	<b>\$301,725</b>
<b>Total</b>	<b>\$9,750</b>	<b>\$208,875</b>	<b>\$71,500</b>	<b>\$11,600</b>	<b>\$301,725</b>

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

Quarter (Year)	ACHD Total Compliant	ACHD Total Inspections (w/o HO Doors)	ACHD % Compliance	Total M303 Compl Insps	Total M303 Inspections	Method 303 % Compliance	Total Compliant Insp (ACHD and M303)	Total Inspections (ACHD and M303)	Percent Compliance
Q2 2022	377	437	86.27%	3631	3640	99.75%	4008	4077	98.31%
Q3 2022	390	453	86.09%	3662	3667	99.86%	4052	4120	98.35%
<b>Total</b>	<b>767</b>	<b>890</b>	<b>86.18%</b>	<b>7293</b>	<b>7307</b>	<b>99.81%</b>	<b>8060</b>	<b>8197</b>	<b>98.33%</b>

### Quarterly Compliance



### Average Percent Compliance

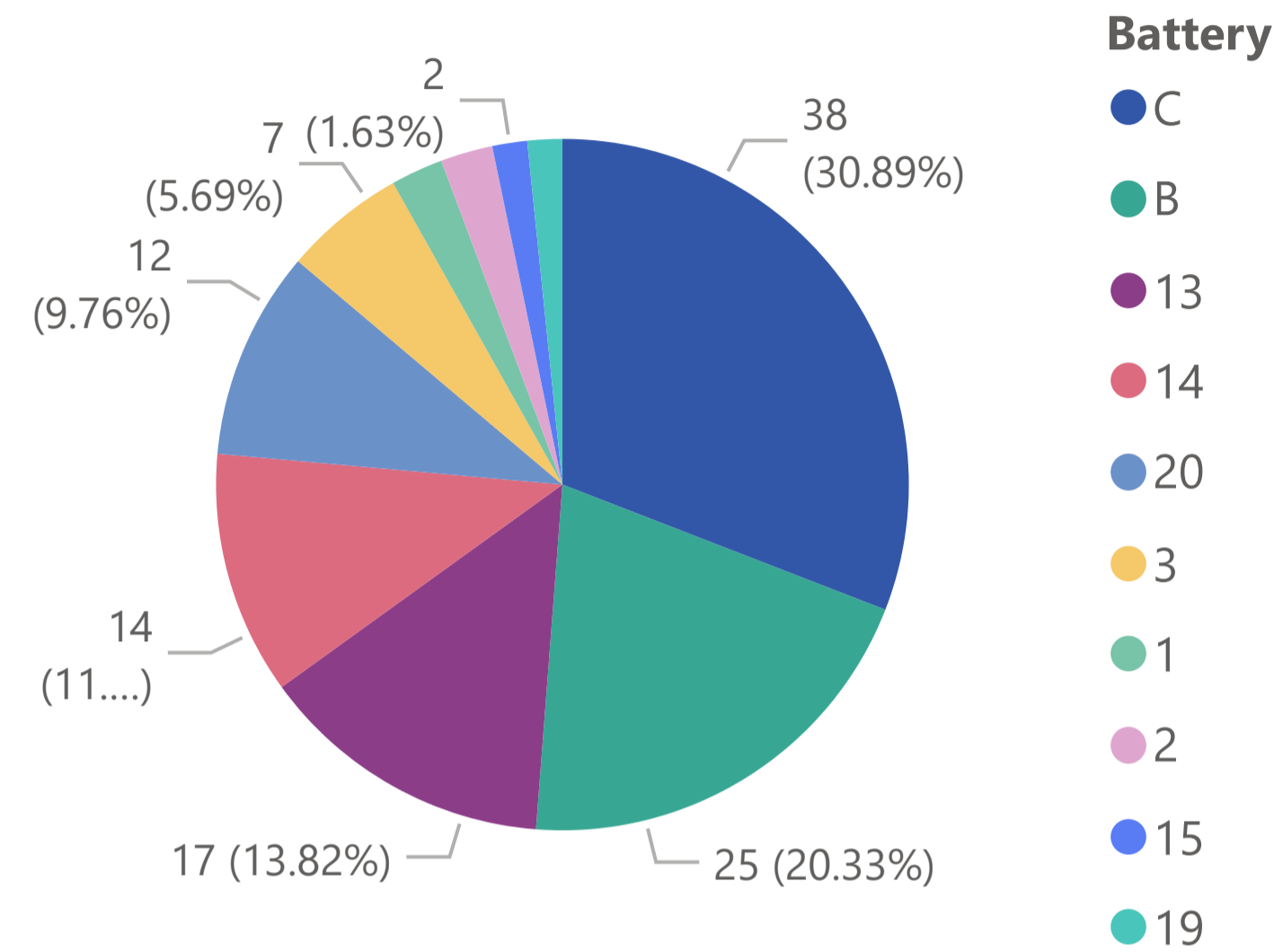
Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters
Q3 2022	98.308%	98.350%	98.329%
Q2 2022	97.449%	98.308%	97.878%
Q1 2022	97.794%	97.449%	97.621%
Q4 2021	97.864%	97.794%	97.829%
Q3 2021	98.336%	97.864%	98.100%
Q2 2021	98.525%	98.336%	98.430%
Q1 2021	99.074%	98.525%	98.799%
Q4 2020	99.128%	99.074%	99.101%
Q3 2020	98.725%	99.128%	98.927%
Q2 2020	98.177%	98.725%	98.451%

### Penalty Summary for ACHD Inspections

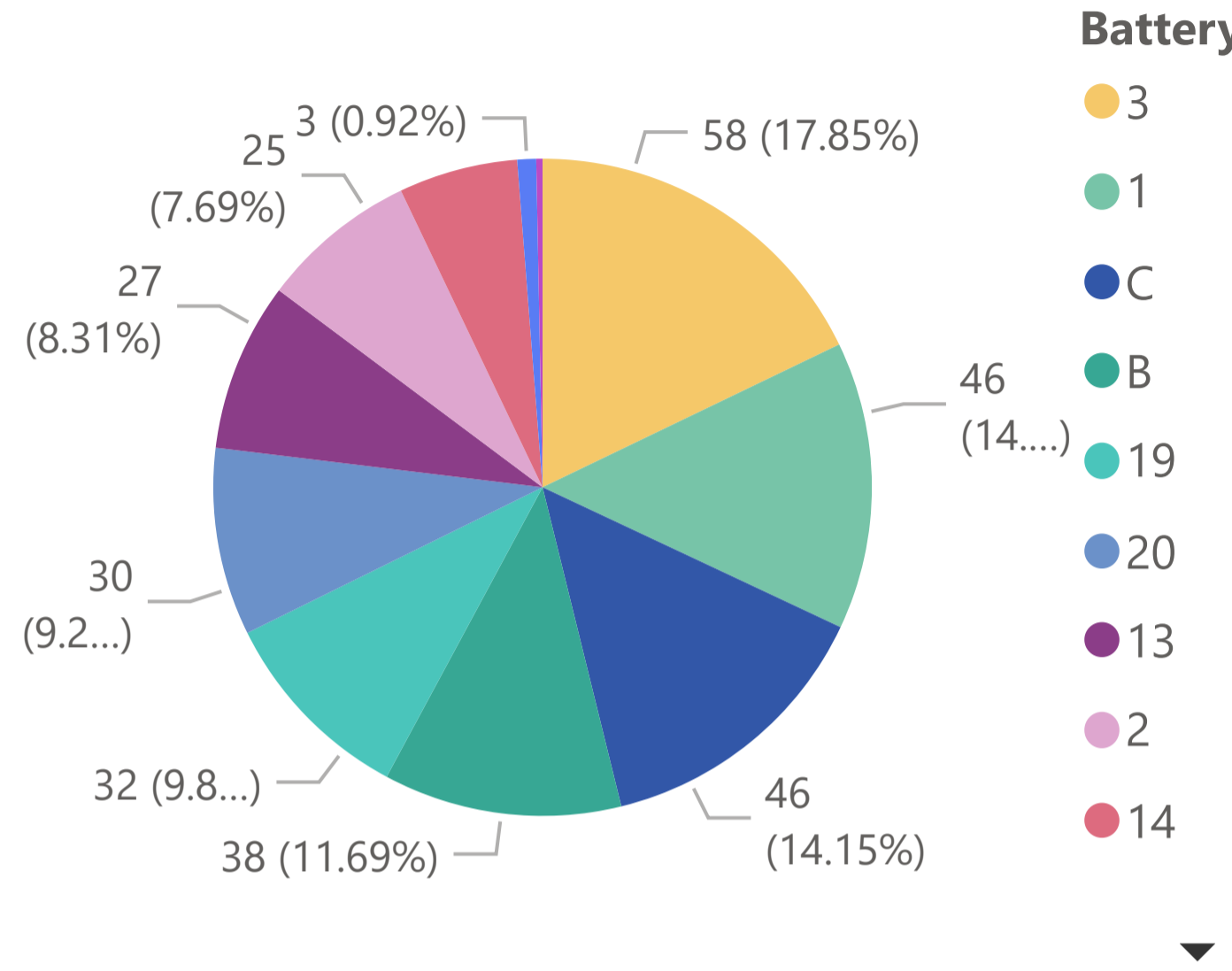
Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD HO Door Penalty	ACHD Total Penalties
<span>▲</span> <span>☐ Q3 2022</span>									
Jul 2022	\$9,250	\$2,500	\$8,750	\$1,500	\$2,500	\$0	\$0	\$28,125	\$52,625
Aug 2022	\$19,500	\$3,000	\$11,000	\$7,000	\$2,500	\$0	\$0	\$43,500	\$86,500
Sep 2022	\$9,000	\$6,500	\$13,500	\$3,000	\$2,500	\$1,500	\$1,500	\$32,250	\$69,750
<b>Total</b>	<b>\$37,750</b>	<b>\$12,000</b>	<b>\$33,250</b>	<b>\$11,500</b>	<b>\$7,500</b>	<b>\$1,500</b>	<b>\$1,500</b>	<b>\$103,875</b>	<b>\$208,875</b>
<b>Total</b>	<b>\$37,750</b>	<b>\$12,000</b>	<b>\$33,250</b>	<b>\$11,500</b>	<b>\$7,500</b>	<b>\$1,500</b>	<b>\$1,500</b>	<b>\$103,875</b>	<b>\$208,875</b>

# Non-Compliant Coke Oven Inspections Performed by ACHD

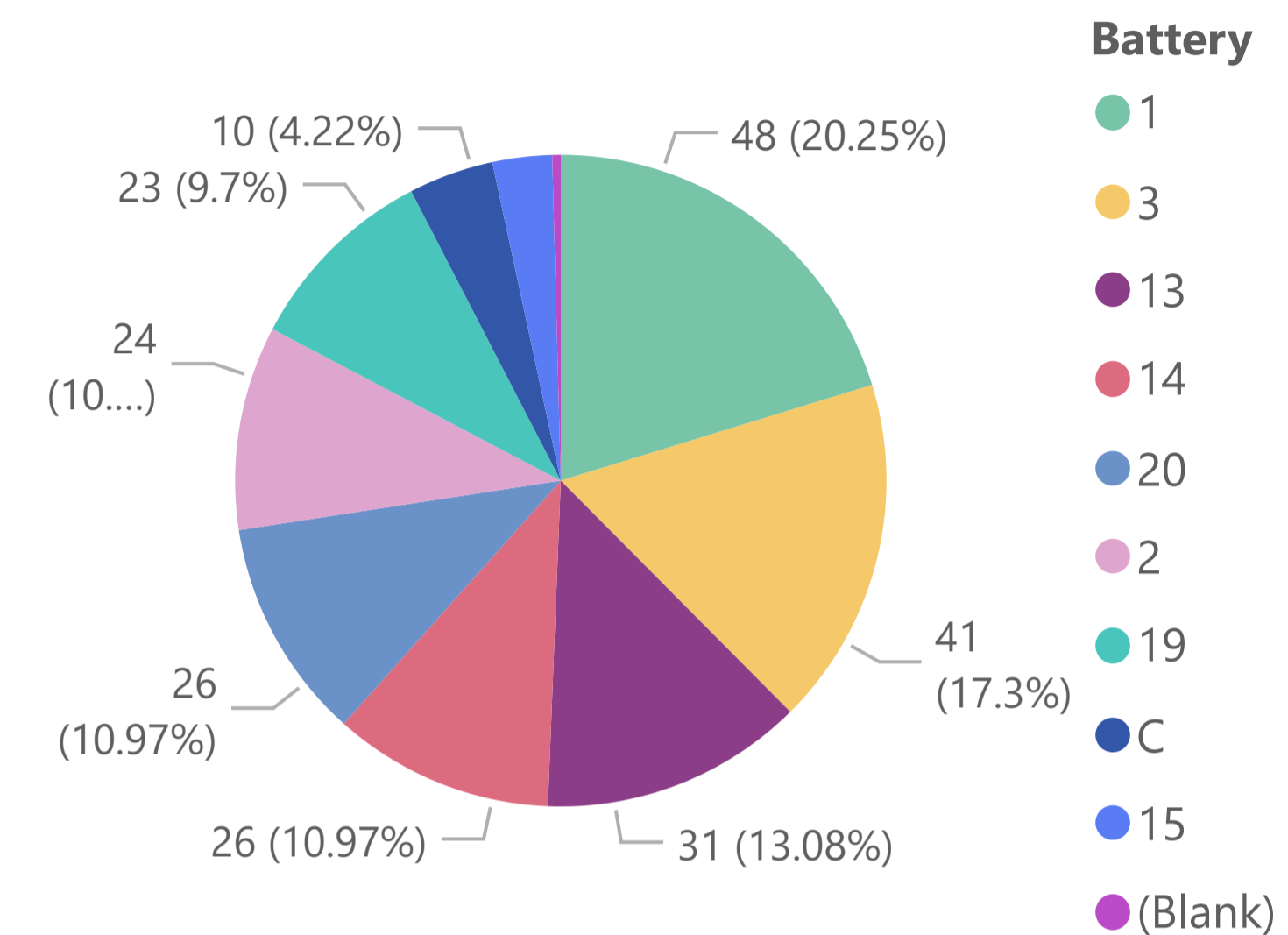
## Charging Violations by Battery



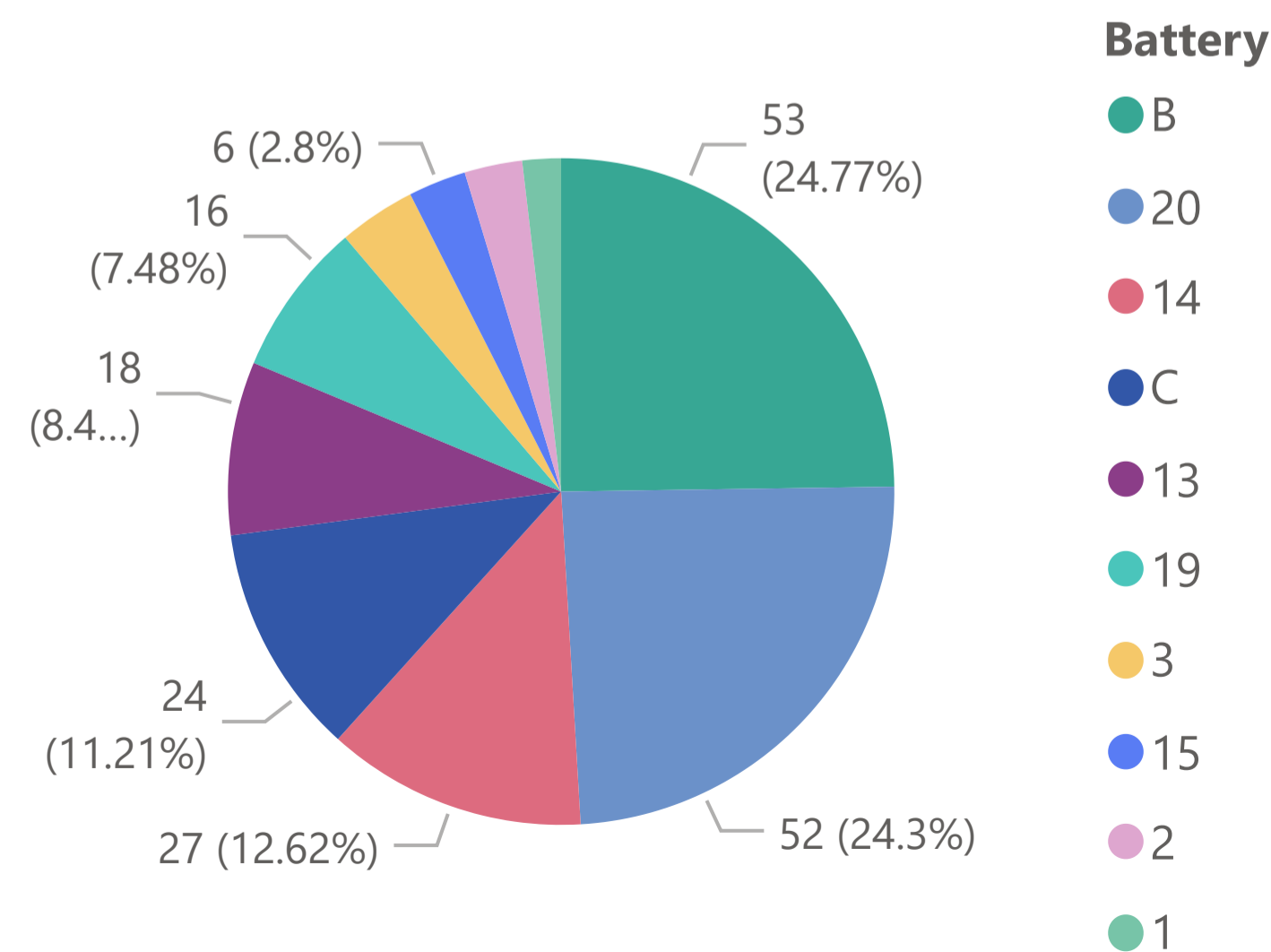
## Push Violations by Battery



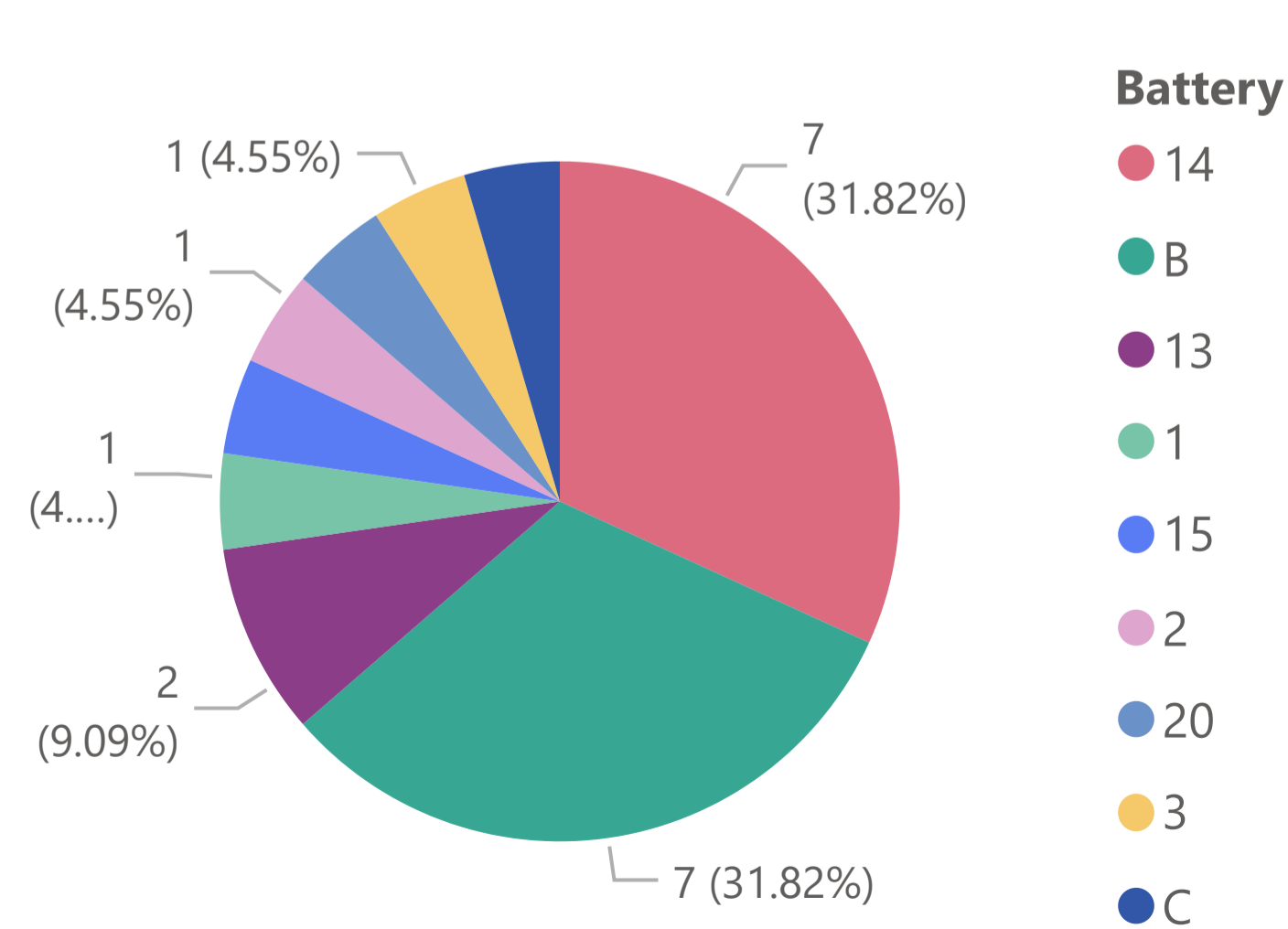
## Travel Violations by Battery



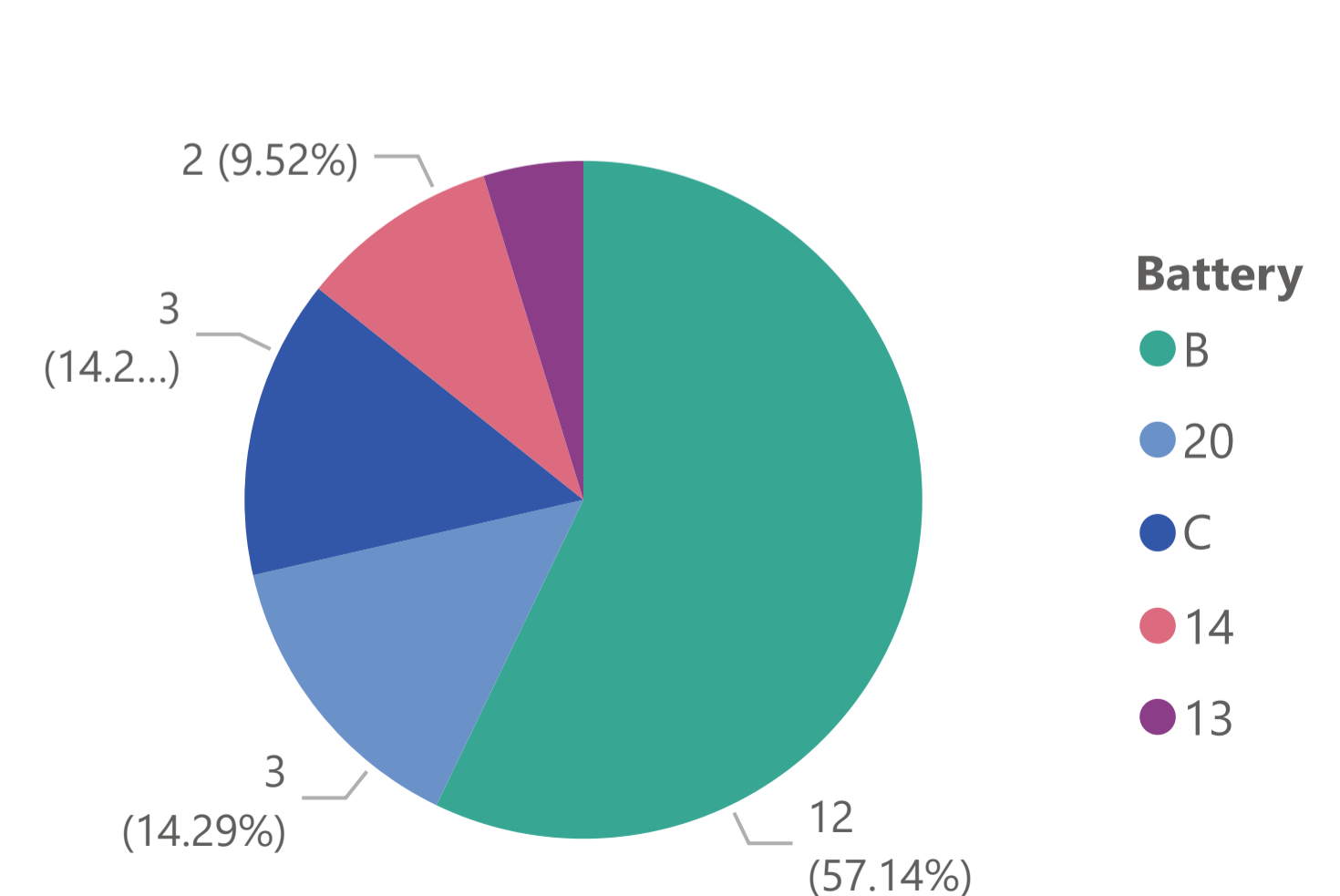
## Soak Violations by Battery



## 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
Q3 2022	7/1/2022	1	152	2.01	Major	2.50	\$2,500	\$250		\$2,750
Q3 2022	7/5/2022	B	102	1.84	Major	2.50	\$2,500			\$2,500
Q3 2022	7/11/2022	20	67	1.21	Moderate	1.50	\$1,500			\$1,500
Q3 2022	7/21/2022	14	80	1.44	Moderate	1.50	\$1,500			\$1,500
Q3 2022	7/27/2022	B	60	1.08	Low	1.00	\$1,000			\$1,000
Q3 2022	8/1/2022	B	150	2.70	Major	2.50	\$2,500			\$2,500
Q3 2022	8/8/2022	3	83	1.10	Low	1.00	\$1,000			\$1,000
Q3 2022	8/9/2022	2	129	1.71	Major	2.50	\$2,500			\$2,500
Q3 2022	8/15/2022	14	181	3.26	Major	2.50	\$2,500			\$2,500
Q3 2022	8/17/2022	C	254	4.58	Major	2.50	\$2,500			\$2,500
Q3 2022	8/22/2022	C	104	1.87	Major	2.50	\$2,500			\$2,500
Q3 2022	8/23/2022	13	72	1.30	Moderate	1.50	\$1,500			\$1,500
Q3 2022	8/24/2022	20	114	2.05	Major	2.50	\$2,500			\$2,500
Q3 2022	8/26/2022	B	66	1.19	Low	1.00	\$1,000			\$1,000
Q3 2022	8/29/2022	3	84	1.11	Low	1.00	\$1,000			\$1,000
Q3 2022	9/1/2022	13	75	1.35	Moderate	1.50	\$1,500			\$1,500
Q3 2022	9/8/2022	20	66	1.19	Low	1.00	\$1,000			\$1,000
Q3 2022	9/15/2022	3	107	1.42	Moderate	1.50	\$1,500			\$1,500
Q3 2022	9/19/2022	14	63	1.14	Low	1.00	\$1,000			\$1,000
Q3 2022	9/21/2022	B	74	1.33	Moderate	1.50	\$1,500			\$1,500
Q3 2022	9/27/2022	C	112	2.02	Major	2.50	\$2,500			\$2,500
<b>Total</b>								<b>\$250</b>		<b>\$37,750</b>



### 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
Q3 2022	7/27/2022	B3	B	P	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/27/2022	B5	B	P	low	1.00	\$1,000			\$1,000
Q3 2022	8/1/2022	B11	B	P	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/10/2022	A1	14	C	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/8/2022	C21	20	C	major	2.50	\$2,500			\$2,500
Q3 2022	9/8/2022	C23	20	P	major	2.50	\$2,500			\$2,500
Q3 2022	9/13/2022	C79	C	P	moderate	1.50	\$1,500			\$1,500
<b>Total</b>										<b>\$12,000</b>

## 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
Q3 2022	7/1/2022	1	B25	55	moderate	1.50	\$1,500	\$250		\$1,750
Q3 2022	7/12/2022	C	C49	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/12/2022	C	C51	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/12/2022	C	C53	55	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/13/2022	3	B28	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/21/2022	14	B3	60	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/1/2022	B	B13	75	major	2.50	\$2,500			\$2,500
Q3 2022	8/2/2022	19	B18	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/3/2022	20	B27	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/9/2022	2	B26	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/9/2022	2	B24	50	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/22/2022	C	C43	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/24/2022	20	A5	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/7/2022	B	A16	35	low	1.00	\$1,000			\$1,000
Q3 2022	9/14/2022	1	A26	90	major	2.50	\$2,500			\$2,500
Q3 2022	9/14/2022	2	A9	40	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/19/2022	14	A2	40	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/21/2022	B	B35	55	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/21/2022	B	A4	75	major	2.50	\$2,500			\$2,500
Q3 2022	9/22/2022	19	C17	55	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/23/2022	14	A11	60	moderate	1.50	\$1,500			\$1,500
<b>Total</b>								<b>\$250</b>		<b>\$33,250</b>

### Non-Compliant ACHD Travel Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Travel max opacity	ACHD Travel Severity of Violation	Travel Penalty Multiplier	Travel Penalty	H2S Penalty	SO2 Penalty	Total Travel Penalty
Q3 2022	7/21/2022	14	B3	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/2/2022	19	B18	35	low	1.00	\$1,000			\$1,000
Q3 2022	8/3/2022	20	B27	55	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/9/2022	2	B26	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/9/2022	2	B24	50	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/24/2022	20	A5	45	moderate	1.50	\$1,500			\$1,500
Q3 2022	9/1/2022	13	B5	25	low	1.00	\$1,000			\$1,000
Q3 2022	9/14/2022	1	A26	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/19/2022	14	A2	30	low	1.00	\$1,000			\$1,000
<b>Total</b>										<b>\$11,500</b>

### 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
Q3 2022	7/12/2022	C	7.74%	2.58	Major	2.50	\$2,500			\$2,500
Q3 2022	8/22/2022	C	5.30%	1.77	Major	2.50	\$2,500			\$2,500
Q3 2022	9/27/2022	C	8.78%	2.93	Major	2.50	\$2,500			\$2,500
<b>Total</b>										<b>\$7,500</b>

### 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
Q3 2022	9/13/2022	C	0.73	1.22	Moderate		1.50				\$1,500
<b>Total</b>											<b>\$1,500</b>

### 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
Q3 2022	9/7/2022	B	5.56	1.39	Moderate	1.50	\$1,500			\$1,500
<b>Total</b>										<b>\$1,500</b>

### 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
Q3 2022	7/6/2022	3	B28	60	Moderate	1.50	\$1,125			\$1,125
Q3 2022	7/12/2022	C	C26	35	Low	1.00	\$750			\$750
Q3 2022	7/12/2022	C	C27	35	Low	1.00	\$750			\$750
Q3 2022	7/12/2022	C	C23	40	Low	1.00	\$750			\$750
Q3 2022	7/12/2022	C	C24	40	Low	1.00	\$750			\$750
Q3 2022	7/12/2022	C	C23	50	Moderate	1.50	\$1,125			\$1,125
Q3 2022	7/12/2022	C	C28	55	Major	2.50	\$1,875			\$1,875
Q3 2022	7/12/2022	C	C30	55	Major	2.50	\$1,875			\$1,875
Q3 2022	7/12/2022	C	C5	55	Major	2.50	\$1,875			\$1,875
Q3 2022	7/12/2022	C	C19	60	Major	2.50	\$1,875			\$1,875
Q3 2022	7/12/2022	C	C29	75	Major	2.50	\$1,875			\$1,875
Q3 2022	7/12/2022	C	C78	100	Major	2.50	\$1,875			\$1,875
Q3 2022	7/13/2022	3	B19	45	Low	1.00	\$750			\$750
Q3 2022	7/13/2022	3	B24	50	Low	1.00	\$750			\$750
Q3 2022	7/20/2022	1	B1	55	Moderate	1.50	\$1,125	\$250		\$1,375
Q3 2022	7/20/2022	2	A26	80	Major	2.50	\$1,875	\$250		\$2,125
Q3 2022	7/20/2022	2	A24	85	Major	2.50	\$1,875	\$250		\$2,125
Q3 2022	7/26/2022	1	B6	45	Low	1.00	\$750			\$750
Q3 2022	7/26/2022	1	B22	50	Low	1.00	\$750			\$750
Q3 2022	7/26/2022	1	B1	60	Moderate	1.50	\$1,125			\$1,125
Q3 2022	7/26/2022	1	B7	75	Major	2.50	\$1,875			\$1,875
<b>Total</b>							<b>\$27,375</b>			<b>\$28,125</b>

### 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
Q3 2022	8/9/2022	1	B12	50	Low	1.00	\$750			\$750
Q3 2022	8/9/2022	1	B6	70	Major	2.50	\$1,875			\$1,875
Q3 2022	8/9/2022	1	B10	80	Major	2.50	\$1,875			\$1,875
Q3 2022	8/9/2022	1	B4	85	Major	2.50	\$1,875			\$1,875
Q3 2022	8/9/2022	1	B14	100	Major	2.50	\$1,875			\$1,875
Q3 2022	8/11/2022	2	B20	45	Low	1.00	\$750			\$750
Q3 2022	8/11/2022	2	B22	75	Major	2.50	\$1,875			\$1,875
Q3 2022	8/22/2022	C	C27	35	Low	1.00	\$750			\$750
Q3 2022	8/22/2022	C	C30	35	Low	1.00	\$750			\$750
Q3 2022	8/22/2022	C	C31	35	Low	1.00	\$750			\$750
Q3 2022	8/22/2022	C	C19	60	Major	2.50	\$1,875			\$1,875
Q3 2022	8/22/2022	C	C28	75	Major	2.50	\$1,875			\$1,875
Q3 2022	8/22/2022	C	C29	75	Major	2.50	\$1,875			\$1,875
Q3 2022	8/22/2022	C	C30	80	Major	2.50	\$1,875			\$1,875
Q3 2022	8/29/2022	3	B16	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/29/2022	3	A21	60	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/29/2022	3	A28	65	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/29/2022	3	A29	65	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/29/2022	3	B10	75	Major	2.50	\$1,875			\$1,875
Q3 2022	8/29/2022	3	B22	100	Major	2.50	\$1,875			\$1,875
Q3 2022	8/31/2022	2	B11	45	Low	1.00	\$750			\$750
Q3 2022	8/31/2022	1	A19	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/31/2022	2	A4	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/31/2022	2	B22	60	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/31/2022	2	B4	65	Moderate	1.50	\$1,125			\$1,125
Q3 2022	8/31/2022	2	B11	75	Major	2.50	\$1,875			\$1,875
Q3 2022	8/31/2022	1	A1	85	Major	2.50	\$1,875			\$1,875
Q3 2022	8/31/2022	2	B4	90	Major	2.50	\$1,875			\$1,875
Q3 2022	8/31/2022	1	A17	100	Major	2.50	\$1,875			\$1,875
Q3 2022	8/31/2022	2	A2	100	Major	2.50	\$1,875			\$1,875
<b>Total</b>							<b>\$43,500</b>			<b>\$43,500</b>



### 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
Q3 2022	9/12/2022	1	A29	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/12/2022	1	B5	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/14/2022	2	A30	55	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/21/2022	B	B23	75	Major	2.50	\$1,875			\$1,875
Q3 2022	9/21/2022	B	A11	85	Major	2.50	\$1,875			\$1,875
Q3 2022	9/21/2022	B	B1	90	Major	2.50	\$1,875			\$1,875
Q3 2022	9/22/2022	14	B7	100	Major	2.50	\$1,875			\$1,875
Q3 2022	9/26/2022	1	A17	65	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/26/2022	1	A21	75	Major	2.50	\$1,875			\$1,875
Q3 2022	9/26/2022	1	A19	100	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C5	35	Low	1.00	\$750			\$750
Q3 2022	9/27/2022	C	C7	35	Low	1.00	\$750			\$750
Q3 2022	9/27/2022	C	C3	40	Low	1.00	\$750			\$750
Q3 2022	9/27/2022	C	C44	40	Low	1.00	\$750			\$750
Q3 2022	9/27/2022	C	C72	45	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/27/2022	C	C84	50	Moderate	1.50	\$1,125			\$1,125
Q3 2022	9/27/2022	C	C6	70	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C69	75	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C58	80	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C66	80	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C60	90	Major	2.50	\$1,875			\$1,875
Q3 2022	9/27/2022	C	C72	90	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
<b>Q3 2022</b>	<b>1</b>			<b>4</b>	<b>5</b>
Jul 2022	0			1	1
Aug 2022	0			2	2
Sep 2022	1			1	2
<b>Total</b>	<b>1</b>			<b>4</b>	<b>5</b>

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

Q3 2022	3662	3667	99.86%	\$9,750
<b>Total</b>	<b>3662</b>	<b>3667</b>	<b>99.86%</b>	<b>\$9,750</b>

### 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
Q3 2022	7/1/2022	14						Major	\$2,500	\$250		\$2,750
Q3 2022	8/5/2022	19						Low	\$1,000			\$1,000
Q3 2022	8/20/2022	B						Major	\$2,500			\$2,500
Q3 2022	9/1/2022	14						Low	\$1,000			\$1,000
Q3 2022	9/13/2022	B			Major				\$2,500			\$2,500
<b>Total</b>										<b>\$250</b>		<b>\$9,750</b>

### 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
Q3 2022	29	\$35,250	34	\$36,250	\$71,500
<b>Total</b>	<b>29</b>	<b>\$35,250</b>	<b>34</b>	<b>\$36,250</b>	<b>\$71,500</b>

### 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
Q3 2022	7/3/2022	3	A2	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/3/2022	3	A4	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/11/2022	19	A14	60	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/11/2022	2	B17	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/11/2022	3	A21	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/12/2022	14	A21	30	low	1.00	\$1,000			\$1,000
Q3 2022	7/19/2022	20	B9	30	low	1.00	\$1,000			\$1,000
Q3 2022	7/21/2022	14	B10	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	14	A5	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	C	C15	40	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/22/2022	C	C17	35	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	C	C19	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/31/2022	1	A24	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/31/2022	20	A4	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/1/2022	20	A28	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/7/2022	19	C7	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/10/2022	19	C21	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/14/2022	1	A11	60	moderate	1.50	\$1,500			\$1,500
Q3 2022	8/16/2022	1	A23	65	major	2.50	\$2,500			\$2,500
<b>Total</b>							<b>\$22,000</b>			<b>\$22,000</b>

### 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
Q3 2022	9/15/2022	1	A20	70	major	2.50	\$2,500			\$2,500
Q3 2022	9/18/2022	14	A29	30	low	1.00	\$1,000	250		\$1,250
Q3 2022	9/19/2022	19	B10	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/20/2022	20	C25	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/21/2022	19	C1	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/22/2022	19	C7	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/22/2022	20	B11	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/25/2022	19	C21	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/28/2022	1	A11	85	major	2.50	\$2,500			\$2,500
Q3 2022	9/28/2022	20	B26	30	low	1.00	\$1,000			\$1,000
<b>Total</b>							<b>\$13,000</b>			<b>\$13,250</b>

### 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
Q3 2022	7/3/2022	3	A2	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/3/2022	3	A4	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/11/2022	19	A14	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/11/2022	2	B17	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/11/2022	3	A21	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/12/2022	14	A21	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/14/2022	13	A14	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/19/2022	20	B9	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	14	A23	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	14	A5	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	19	B7	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	20	A22	15	low	1.00	\$1,000			\$1,000
Q3 2022	7/22/2022	C	C15	55	moderate	1.50	\$1,500			\$1,500
Q3 2022	7/22/2022	C	C17	65	major	2.50	\$2,500			\$2,500
Q3 2022	7/22/2022	C	C19	35	low	1.00	\$1,000			\$1,000
Q3 2022	7/27/2022	14	B4	20	low	1.00	\$1,000			\$1,000
Q3 2022	7/27/2022	19	B15	25	low	1.00	\$1,000			\$1,000
Q3 2022	7/31/2022	1	A24	30	low	1.00	\$1,000			\$1,000
Q3 2022	7/31/2022	20	A4	15	low	1.00	\$1,000			\$1,000
<b>Total</b>						<b>21.00</b>				<b>\$21,000</b>

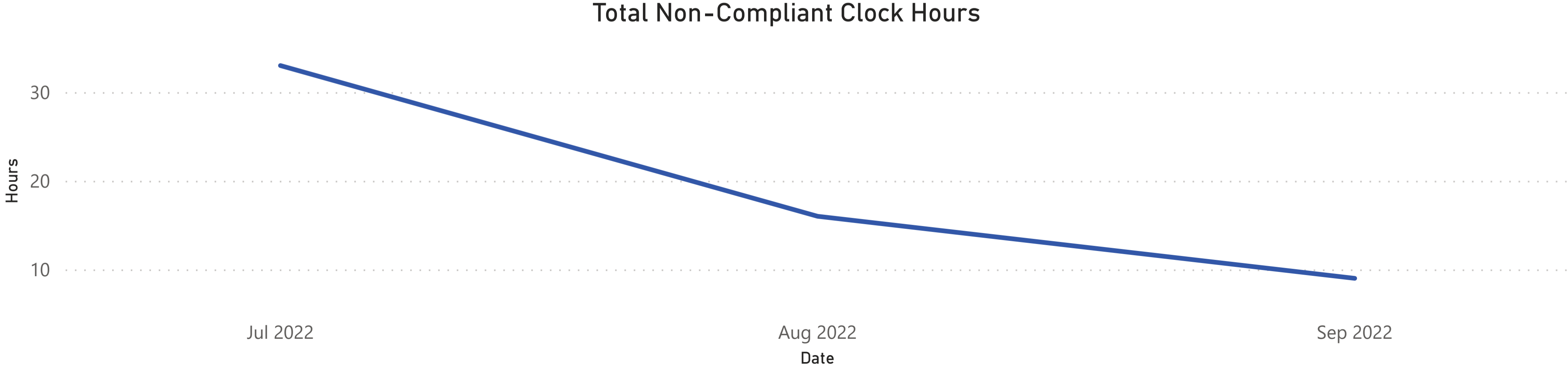
### USS Non-Compliant Travel Inspections and Penalties

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
Q3 2022	8/1/2022	20	A28	15	low	1.00	\$1,000			\$1,000
Q3 2022	8/7/2022	19	C7	20	low	1.00	\$1,000			\$1,000
Q3 2022	8/8/2022	13	A20	20	low	1.00	\$1,000			\$1,000
Q3 2022	8/9/2022	14	A19	20	low	1.00	\$1,000			\$1,000
Q3 2022	8/10/2022	19	C21	20	low	1.00	\$1,000			\$1,000
Q3 2022	8/11/2022	14	B4	25	low	1.00	\$1,000			\$1,000
Q3 2022	8/14/2022	1	A11	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/30/2022	14	A1	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/30/2022	14	A19	30	low	1.00	\$1,000			\$1,000
Q3 2022	8/31/2022	14	A17	30	low	1.00	\$1,000			\$1,000
Q3 2022	9/18/2022	14	A29	25	low	1.00	\$1,000	\$250		\$1,250
Q3 2022	9/21/2022	19	C1	20	low	1.00	\$1,000			\$1,000
Q3 2022	9/22/2022	19	C7	20	low	1.00	\$1,000			\$1,000
Q3 2022	9/25/2022	19	C21	20	low	1.00	\$1,000			\$1,000
Q3 2022	9/28/2022	20	B26	15	low	1.00	\$1,000			\$1,000
<b>Total</b>						<b>15.00</b>				<b>\$15,250</b>

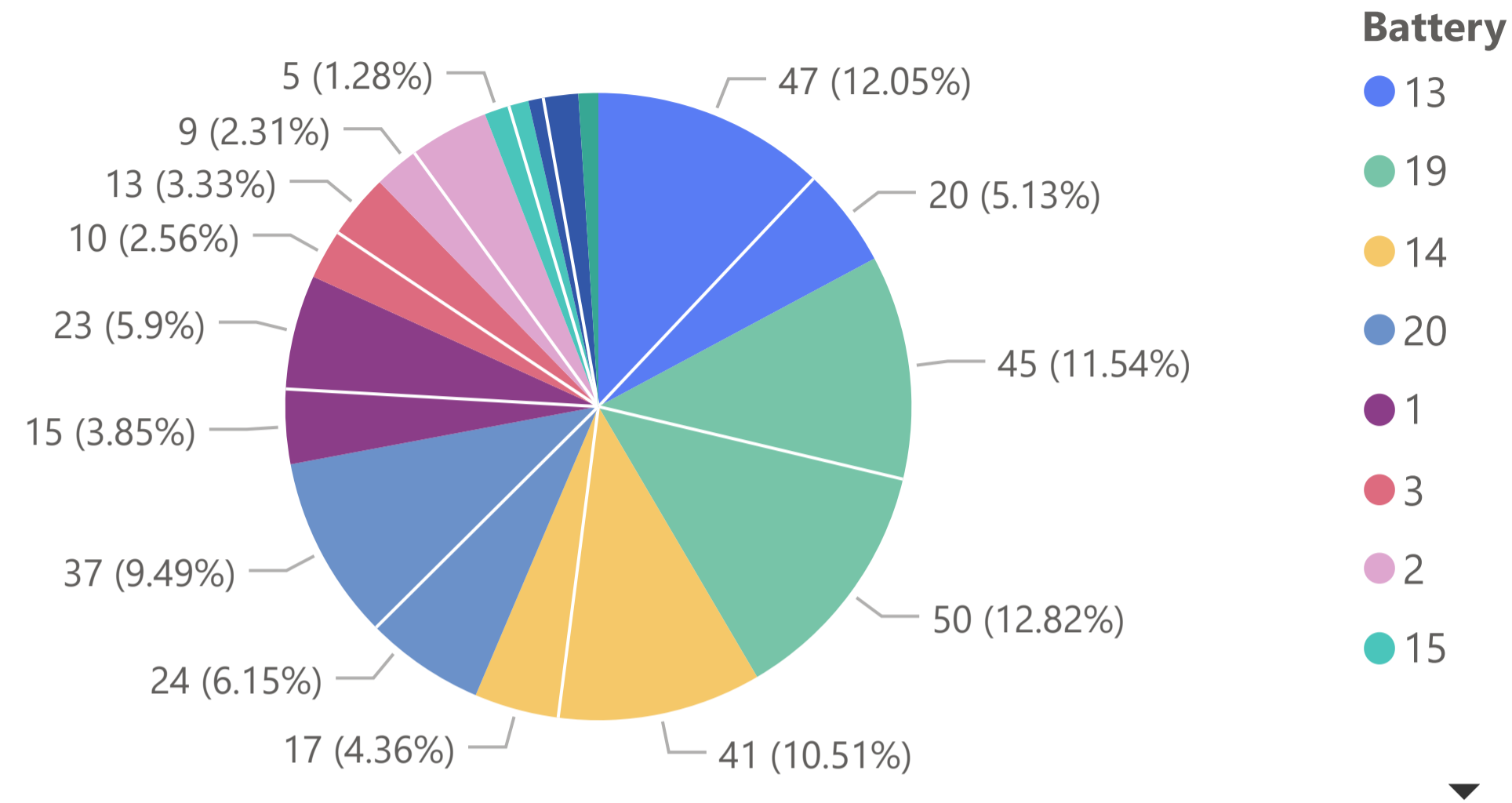


# Continuous Opacity Monitor Non-Compliant Clock Hours

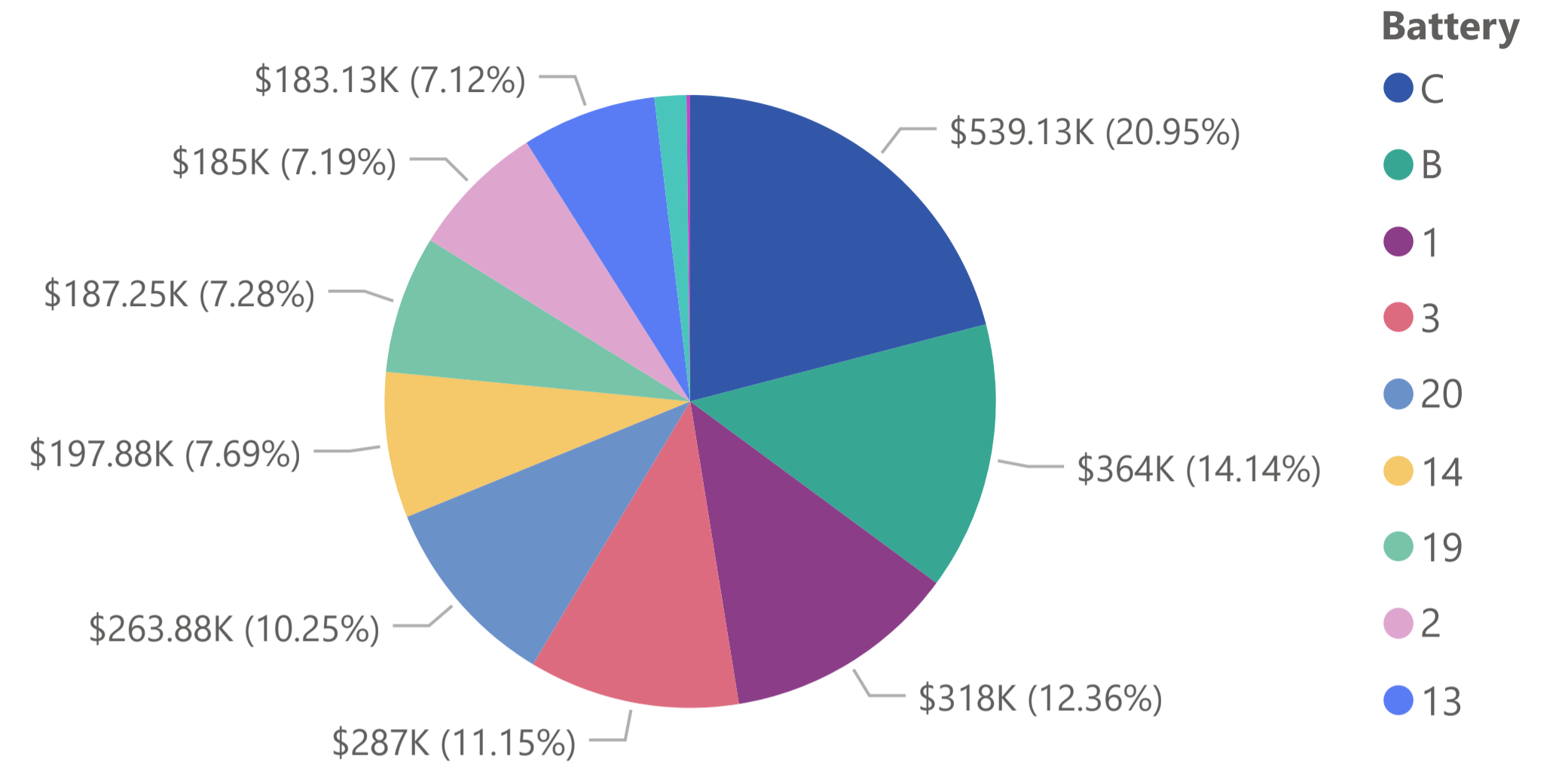
Quarter (Year)	Battery 1	Battery 2	Battery 3	Battery 13	Battery 14	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
<input type="checkbox"/> <b>Q3 2022</b>	<b>7</b>	<b>4</b>	<b>6</b>	<b>21</b>	<b>7</b>	<b>0</b>	<b>6</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>58</b>	<b>\$11,600</b>
Jul 2022	6	2	3	10	4	0	5	1	0	2	33	\$6,600
Aug 2022	1	2	1	9	1	0	0	1	1	0	16	\$3,200
Sep 2022	0	0	2	2	2	0	1	0	2	0	9	\$1,800
<b>Total</b>	<b>7</b>	<b>4</b>	<b>6</b>	<b>21</b>	<b>7</b>	<b>0</b>	<b>6</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>58</b>	<b>\$11,600</b>



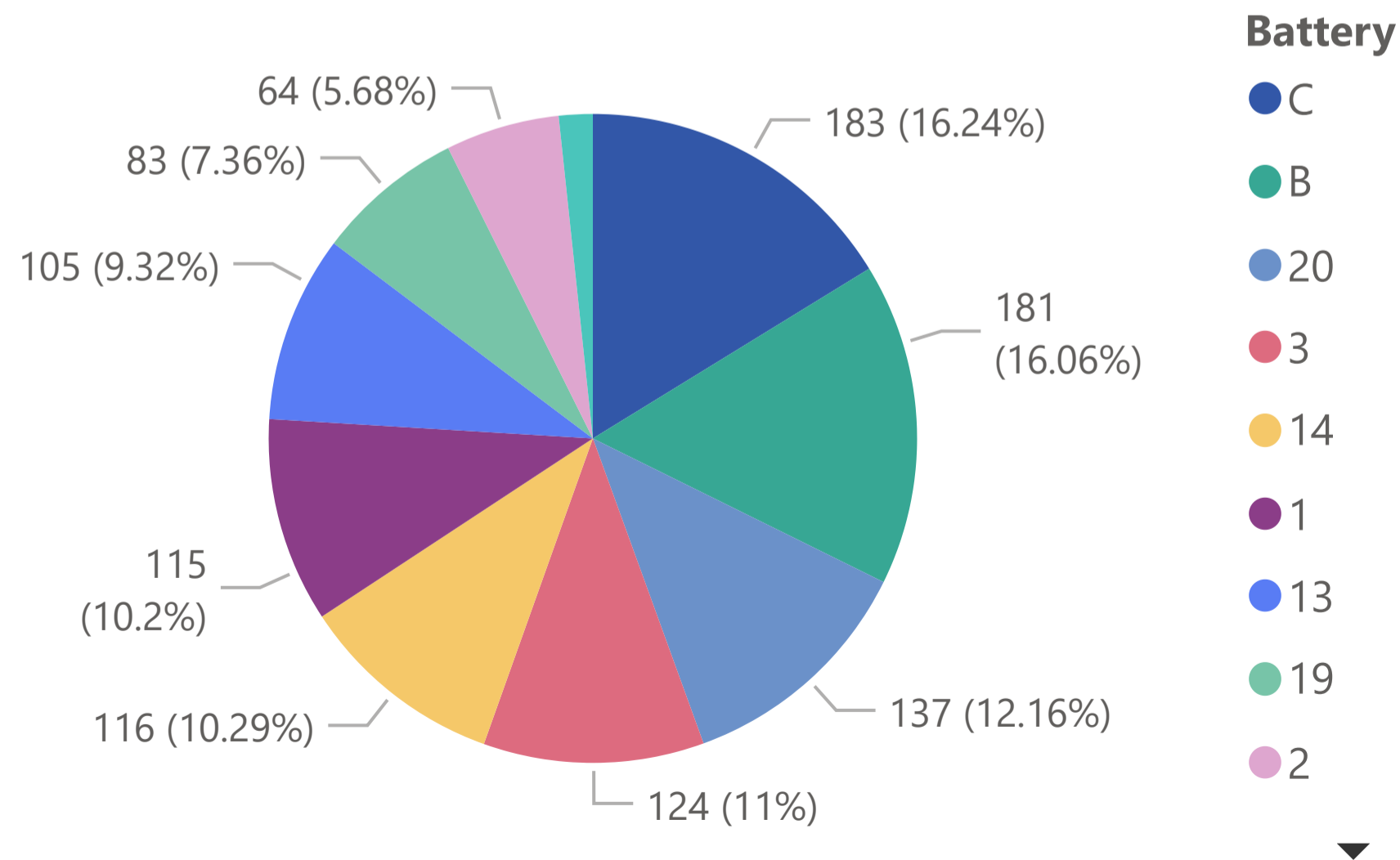
Non-Compliant Inspections: USS Push and Travel Inspections



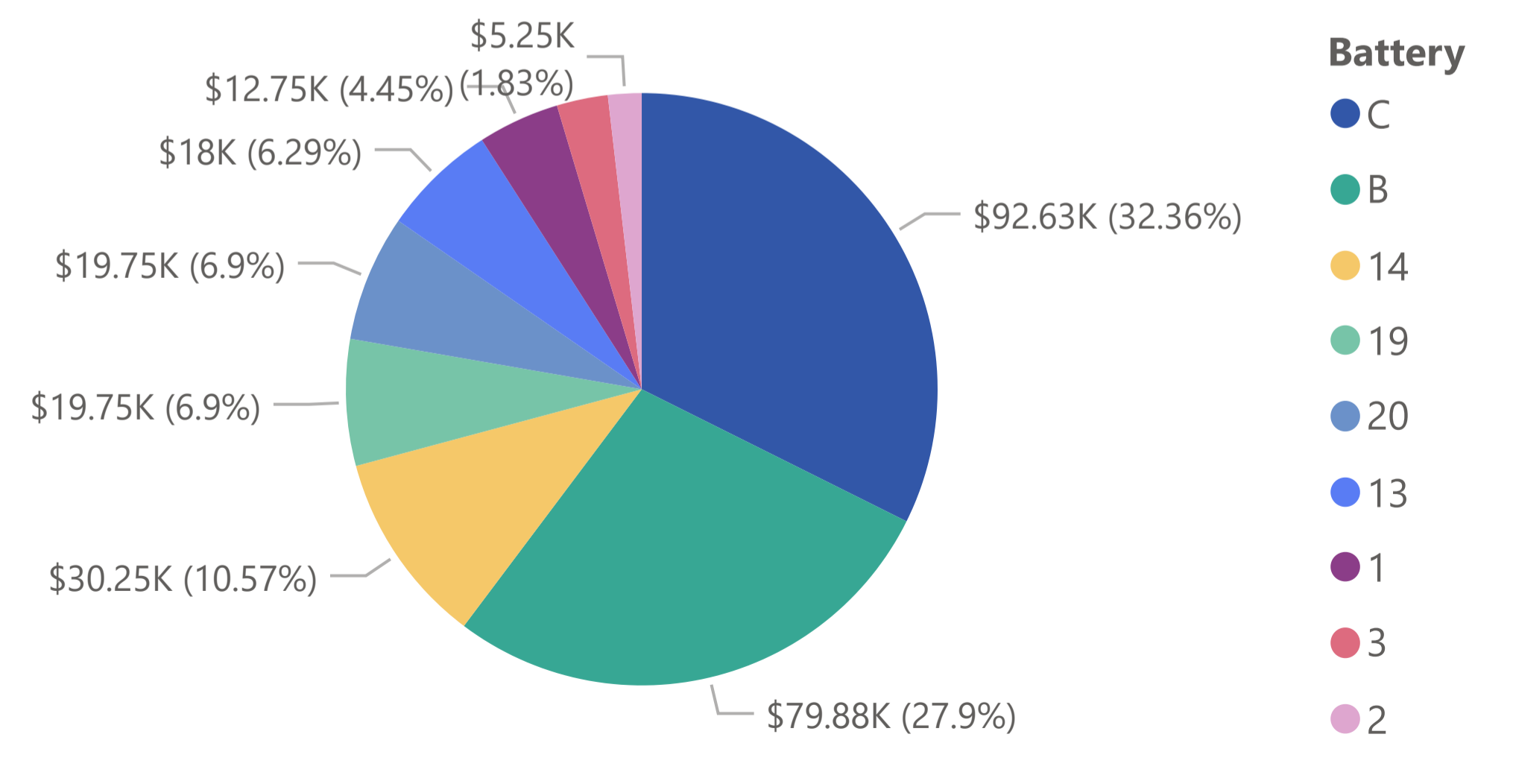
ACHD Total Penalties



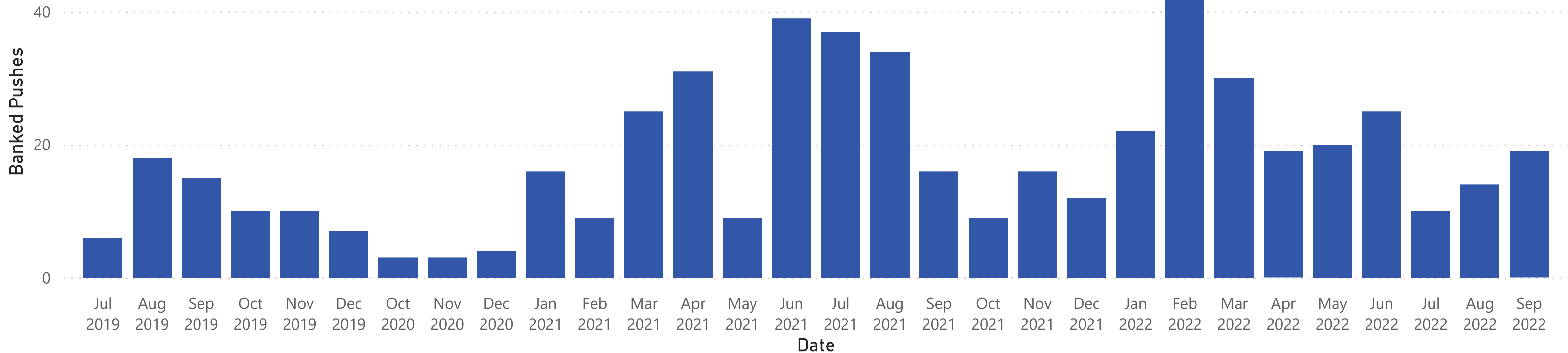
Total Non-Compliant Inspections



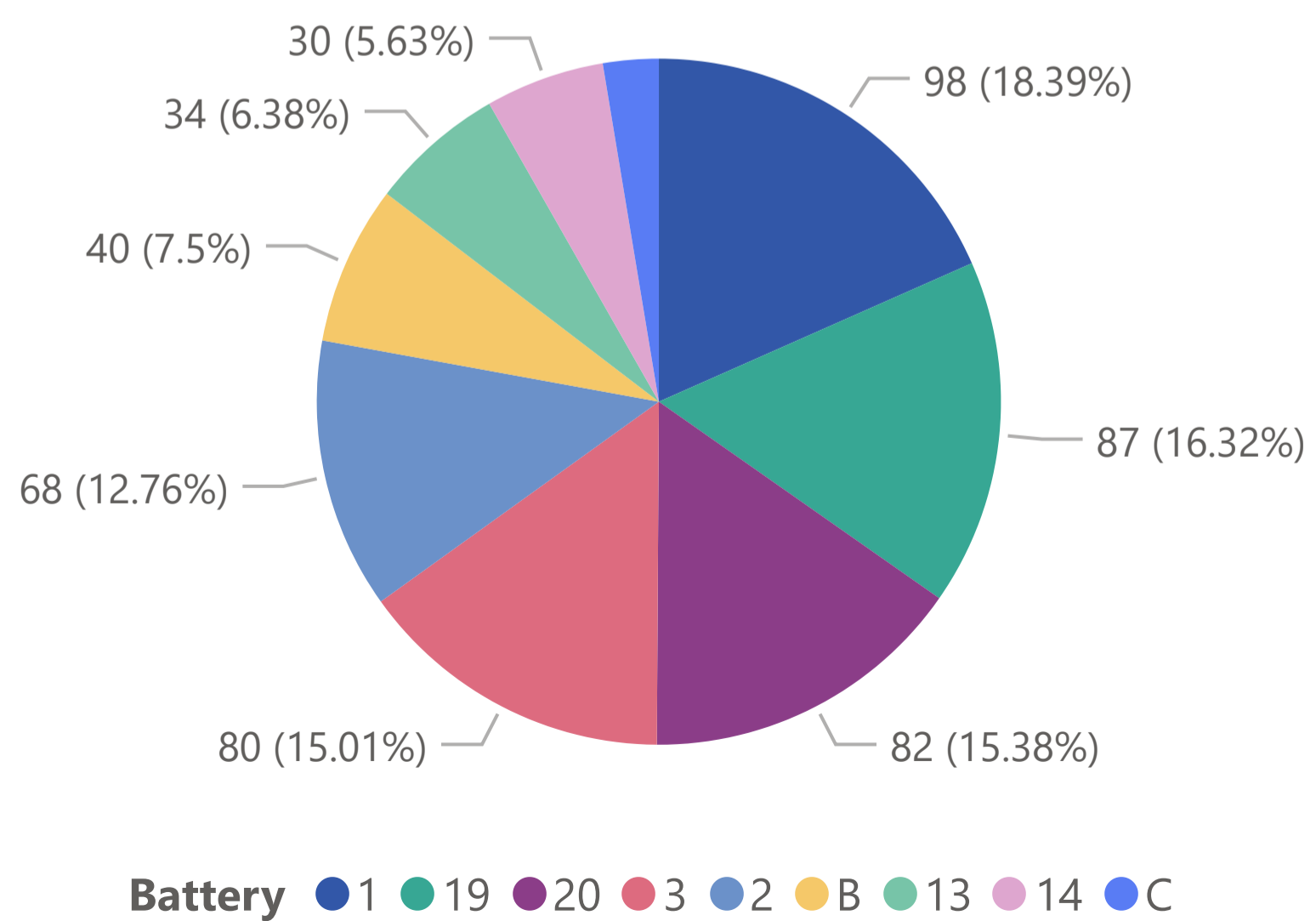
Method 303 Total Penalty



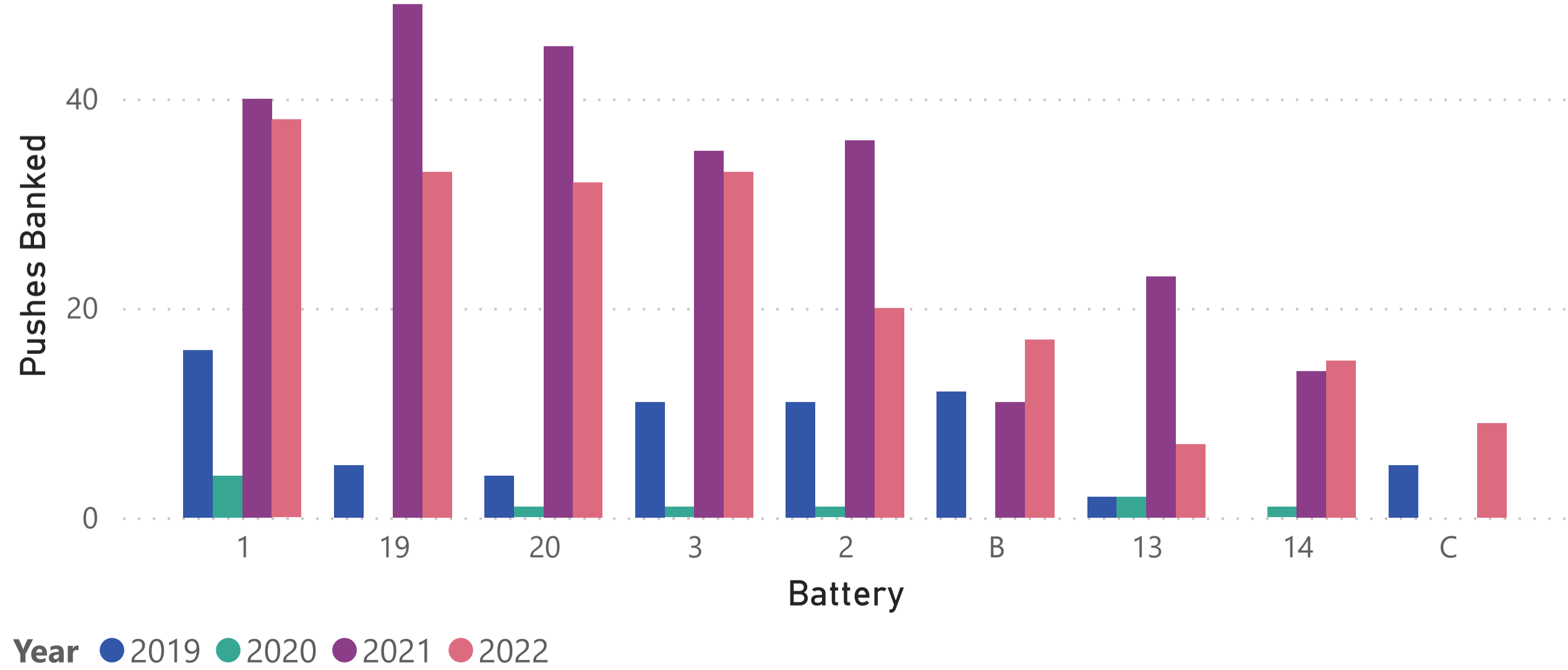
### Total Instances of Banked Pushes



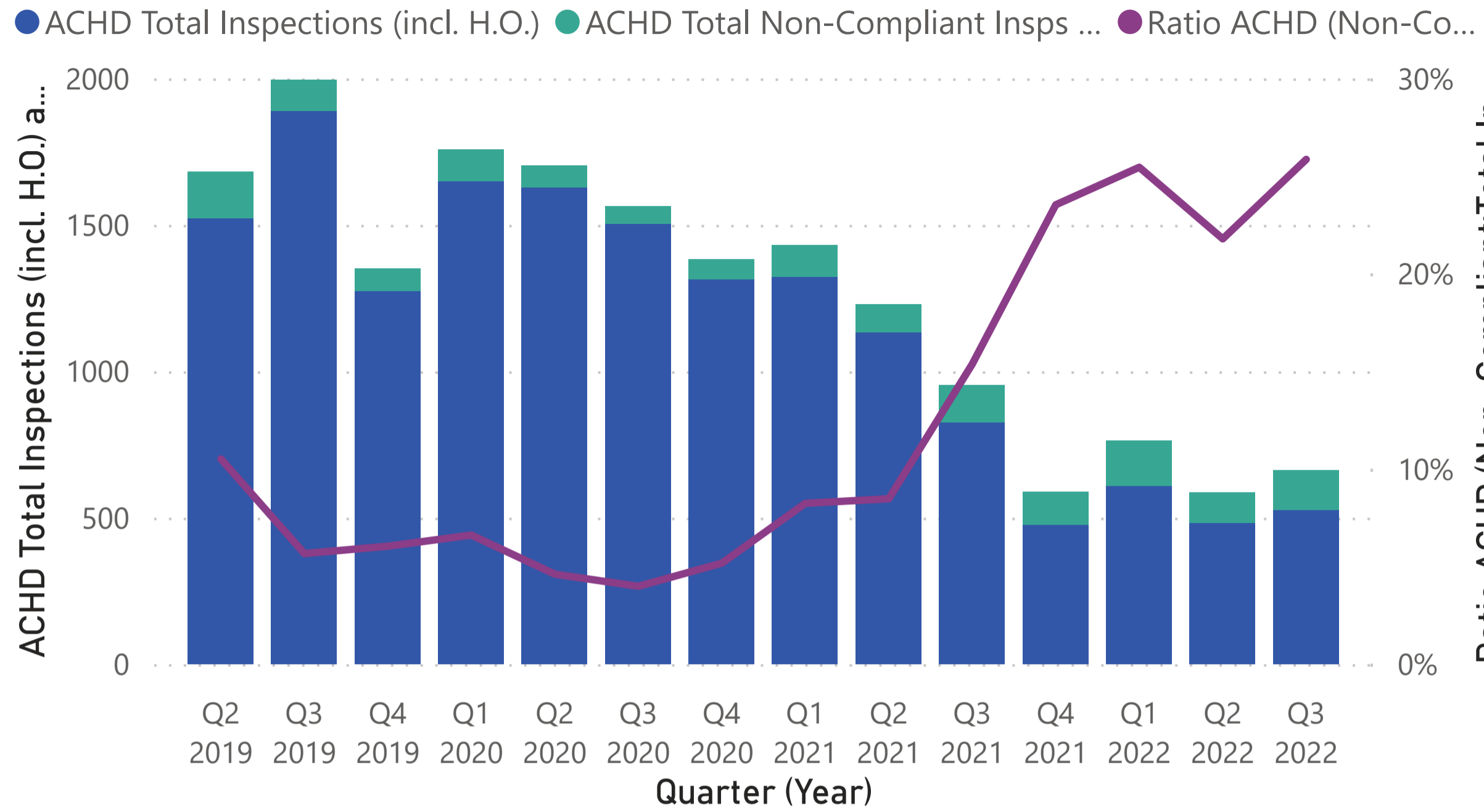
### Pushes Banked by Battery



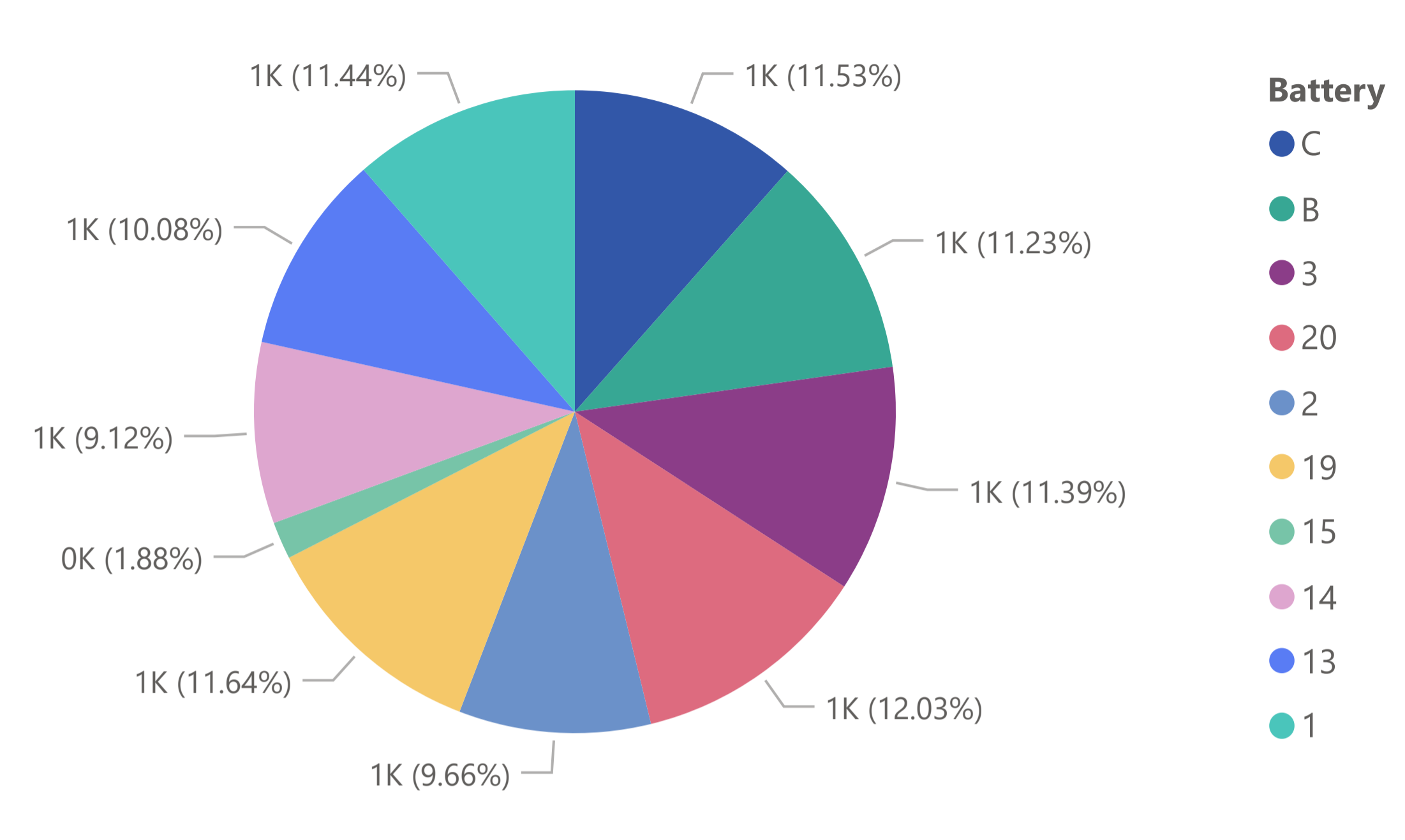
### Pushes Banked by Battery and Year



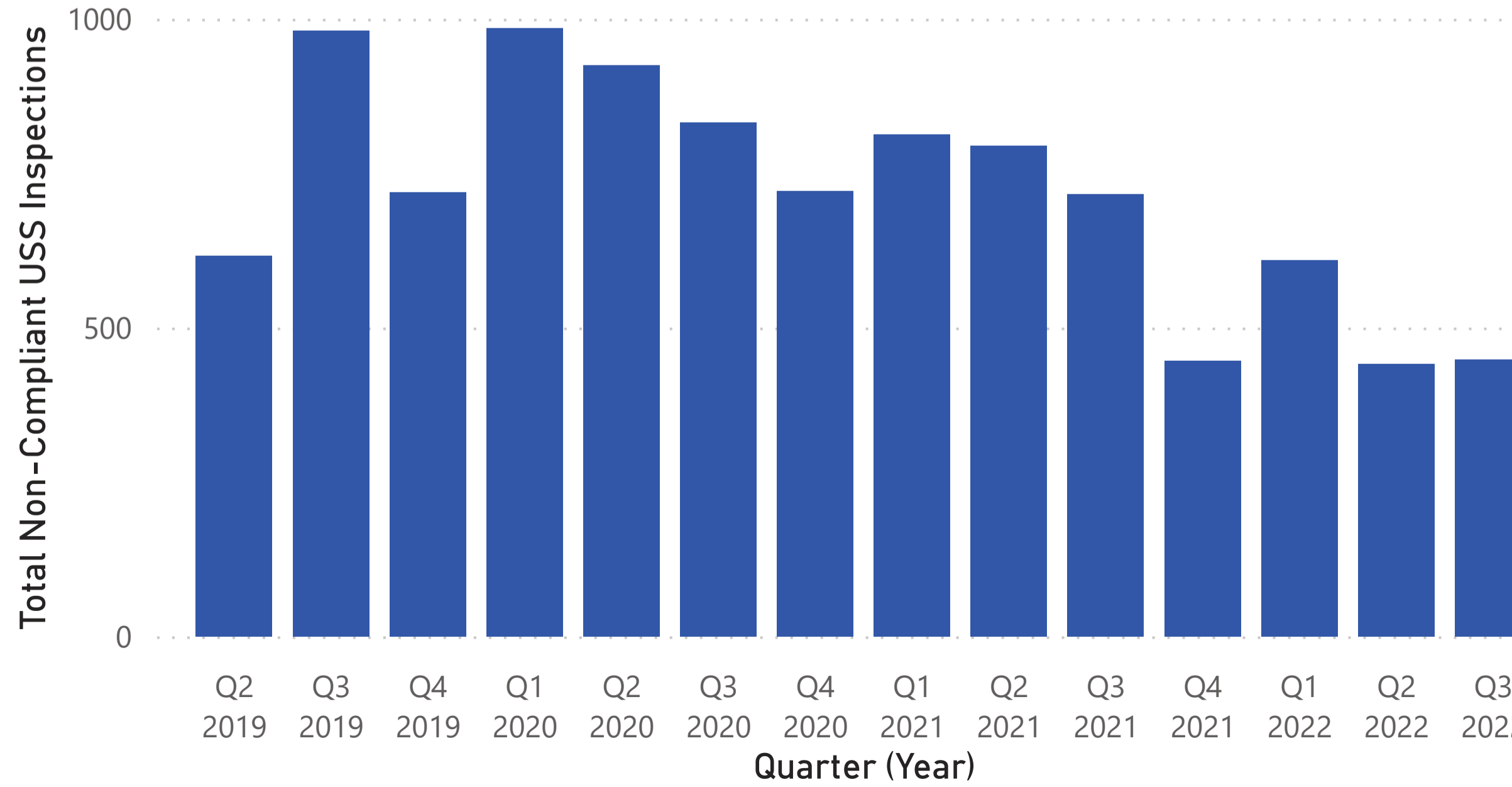
### ACHD Total Inspections (SOA #190604)



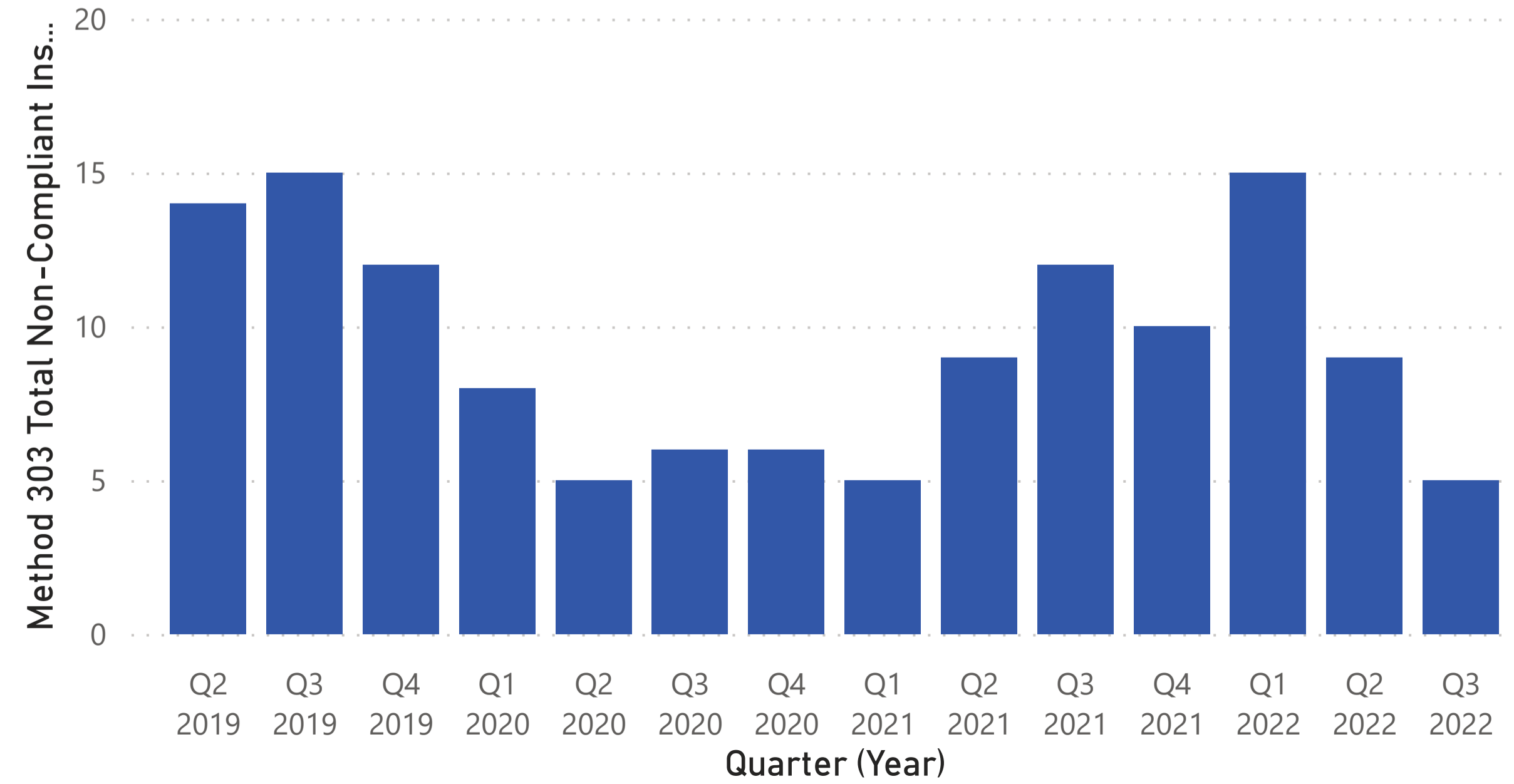
### Non-Compliant Inspections (ACHD, M303, USS)



### Non-Compliant Inspections Performed by U.S. Steel

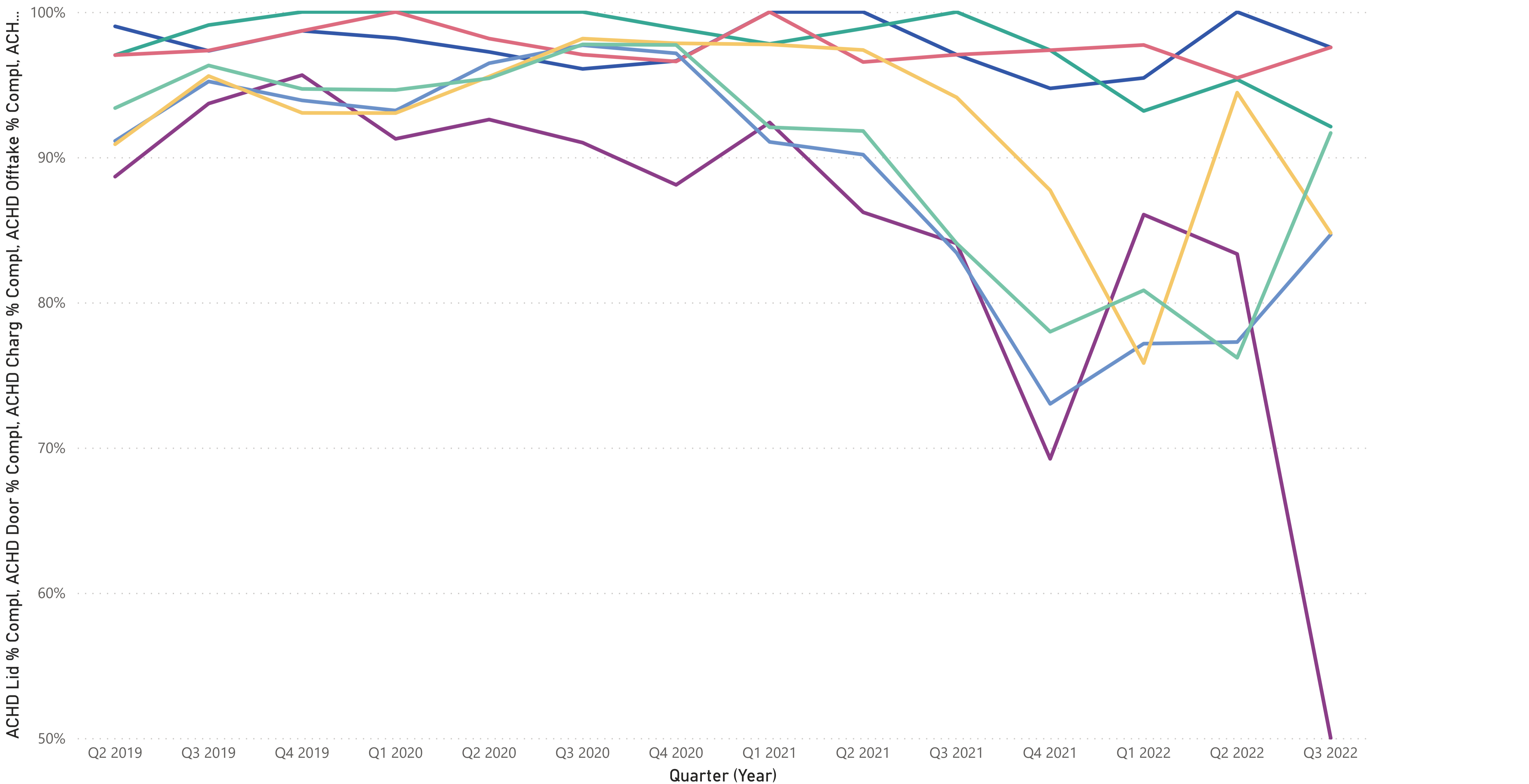


### Method 303 Total Non-Compliant Inspections by Quarter (Year)



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"/> <b>Q3 2022</b>	<b>\$250</b>		<b>\$750</b>	<b>\$250</b>			
7/20/2022			\$750				
7/1/2022	\$250			\$250			
<input type="checkbox"/> <b>Q2 2022</b>		<b>\$250</b>	<b>\$2,250</b>	<b>\$250</b>			
6/30/2022			\$500	\$250			
6/29/2022			\$250				
6/28/2022		\$250	\$1,000				
5/20/2022			\$500				
<input type="checkbox"/> <b>Q1 2022</b>				<b>\$750</b>	<b>\$250</b>	<b>\$250</b>	
3/14/2022						\$250	
2/22/2022				\$250	\$250		
1/19/2022				\$500			
<input type="checkbox"/> <b>Q4 2021</b>	<b>\$250</b>		<b>\$2,000</b>	<b>\$2,250</b>	<b>\$750</b>	<b>\$250</b>	<b>\$250</b>
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		
<input type="checkbox"/> <b>Q3 2021</b>	<b>\$250</b>		<b>\$1,000</b>	<b>\$750</b>	<b>\$750</b>		
8/24/2021			\$250	\$500			
7/28/2021			\$250	\$250	\$250		
7/27/2021					\$500		
7/7/2021	\$250		\$500				
<input type="checkbox"/> <b>Q2 2021</b>	<b>\$500</b>		<b>\$250</b>	<b>\$1,750</b>			<b>\$250</b>
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			
<input type="checkbox"/> <b>Q1 2021</b>	<b>\$250</b>	<b>\$250</b>	<b>\$5,250</b>	<b>\$500</b>			
3/10/2021	\$250	\$250	\$3,750				
3/9/2021			\$500	\$250			
3/8/2021			\$500	\$250			
3/3/2021			\$500				
<input type="checkbox"/> <b>Q4 2020</b>	<b>\$750</b>	<b>\$250</b>	<b>\$3,000</b>	<b>\$500</b>	<b>\$500</b>	<b>\$750</b>	<b>\$250</b>
<b>Total</b>	<b>\$3,250</b>	<b>\$750</b>	<b>\$16,750</b>	<b>\$9,500</b>	<b>\$4,000</b>	<b>\$1,500</b>	<b>\$1,000</b>