

ALLEGHENY

December 13, 2024

CERTIFIED MAIL -

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, 2023 through June 30, 2023 (2nd Quarter 2023)

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 2023, April 1, 2023 through June 30, 2023. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of \$170,950.00. A settlement agreement was reached between ACHD and United States Steel on September 22, 2023 regarding previous stipulated penalties. \$72,465.00 of the penalty is being offset by the terms of the September 22, 2023 Settlement Agreement. The final demand inclusive of the settlement offset for 2nd Quarter of 2023 is \$98,485.00



ALLEGHENY COUNTY HEALTH DEPARTMENT AIR QUALITY PROGRAM

836 FULTON STREET • PITTSBURGH, PA 15233
PHONE (412) 578-8103 • FAX (412) 578-8144
24-HR (412) 687-ACHD (2243)
WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT



The civil penalties for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from April 1, 2023 through June 30, 2023. 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, 2023 through June 30, 2023.

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,

Allason Holt

Program Manager - Compliance and Enforcement Program

cc: Matt DeLibero (<u>MDelibero@uss.com</u>)

Mark Jeffrey (MJeffrey@uss.com)

Mike Dzurinko (MDzurinko@uss.com)

USS_CLT_ENV@uss.com

AQ Documents File

Gary Fischman

Shertus

Quarters Selected for Report

Q2 2023

\$170,950
Total Penalty

U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections Stipulated Penalties **COA 190604**(Q2 2023)

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
□ Q2 2023					
Apr 2023	\$5,000	\$45,250	\$5,750	\$3,800	\$59,800
May 2023	\$5,000	\$12,375	\$12,750	\$5,200	\$35,325
Jun 2023	\$2,500	\$56,125	\$13,000	\$4,200	\$75,825
Total	\$12,500	\$113,750	\$31,500	\$13,200	\$170,950
Total	\$12,500	\$113,750	\$31,500	\$13,200	\$170,950

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 2023	32	39	82.05%	3498	3510	99.66%	3530	3549	99.46%
Q2 2023	132	162	81.48%	2269	2275	99.74%	2401	2437	98.52%
Total	164	201	81.59%	5767	5785	99.69%	5931	5986	99.08%

Quarterly Compliance



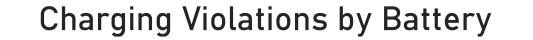
Average Percent Compliance

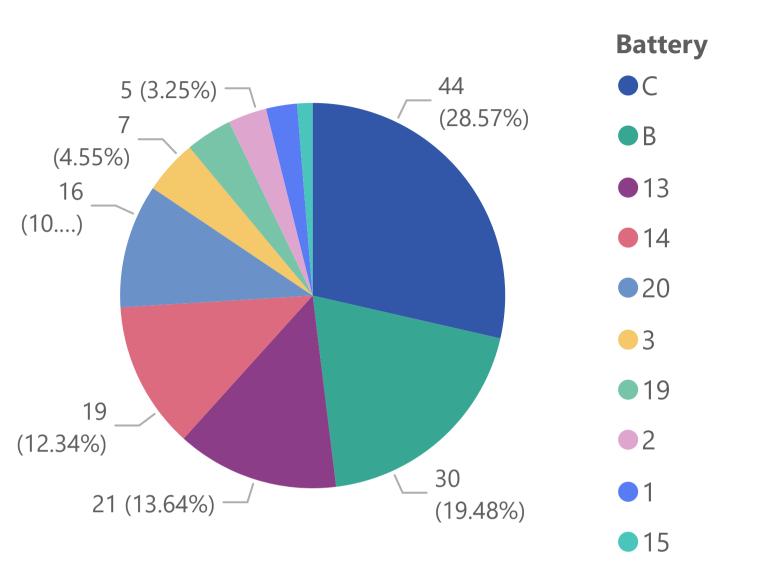
Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters		
02 2022	00.4650/	00.5220/	00 00 40/		
Q2 2023	99.465%	98.523%	98.994%		
Q1 2023	98.566%	99.465%	99.015%		
Q4 2022	98.350%	98.566%	98.458%		
Q3 2022	98.308%	98.350%	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	98.527%	98.336%	98.432%		
∩1 2∩21	QQ N71%	QQ 527%	02 201%		

Penalty Summary for ACHD Inspections

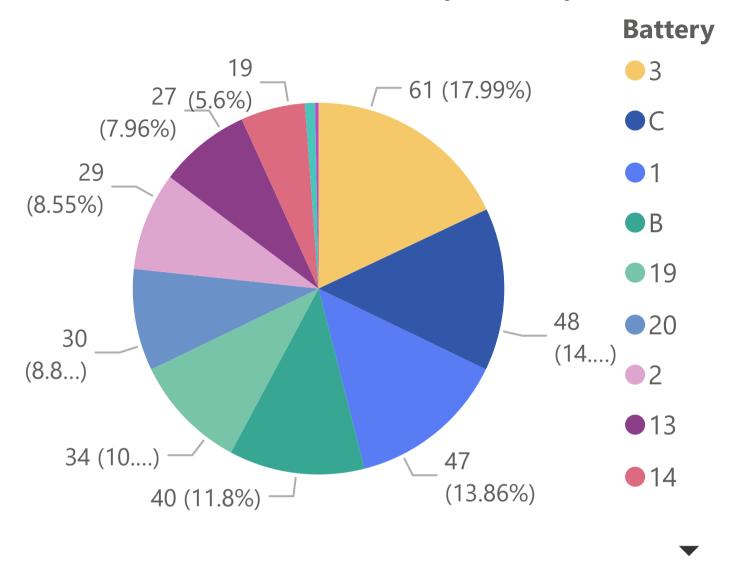
Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD HO Door Penalty	ACHD Total Penalties
□ Q2 2023									
Apr 2023	\$7,750	\$4,000			\$5,000	\$2,750	\$0	\$25,750	\$45,250
May 2023	\$5,250	\$0			\$0	\$0	\$1,000	\$6,125	\$12,375
Jun 2023	\$16,000	\$10,750			\$4,000	\$0	\$1,500	\$23,875	\$56,125
Total	\$29,000	\$14,750			\$9,000	\$2,750	\$2,500	\$55,750	\$113,750
Total	\$29,000	\$14,750			\$9,000	\$2,750	\$2,500	\$55,750	\$113,750

Non-Compliant Coke Oven Inspections Performed by ACHD

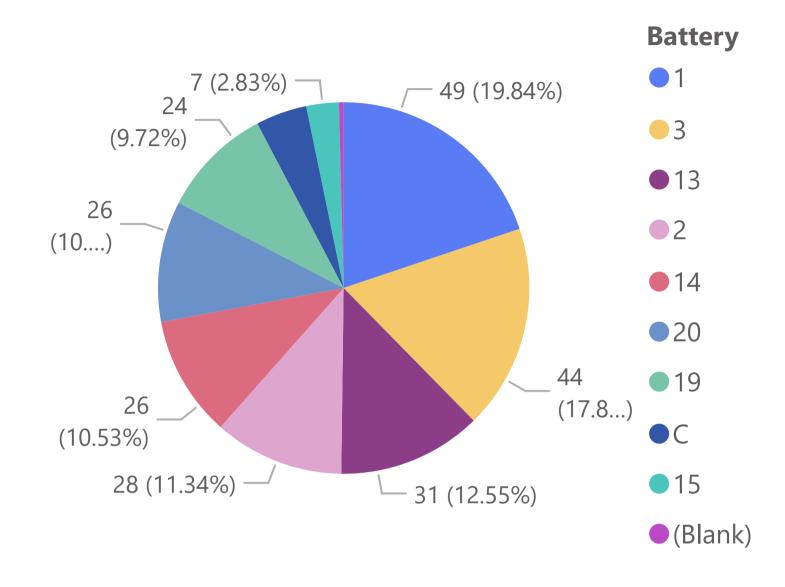




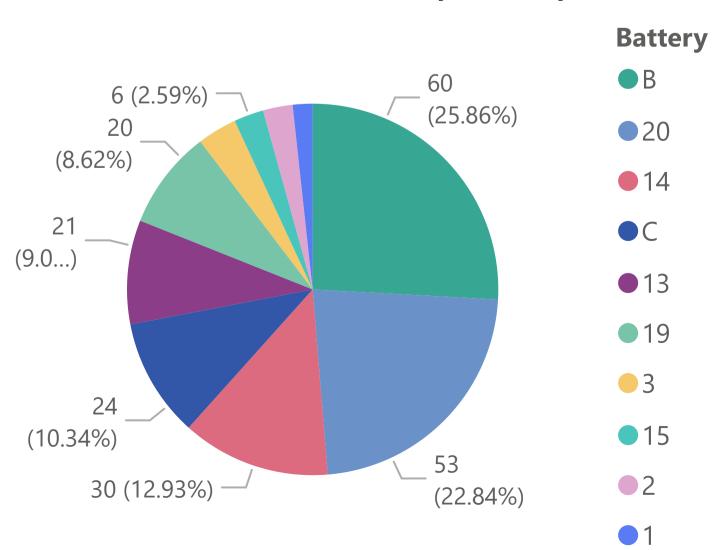
Push Violations by Battery



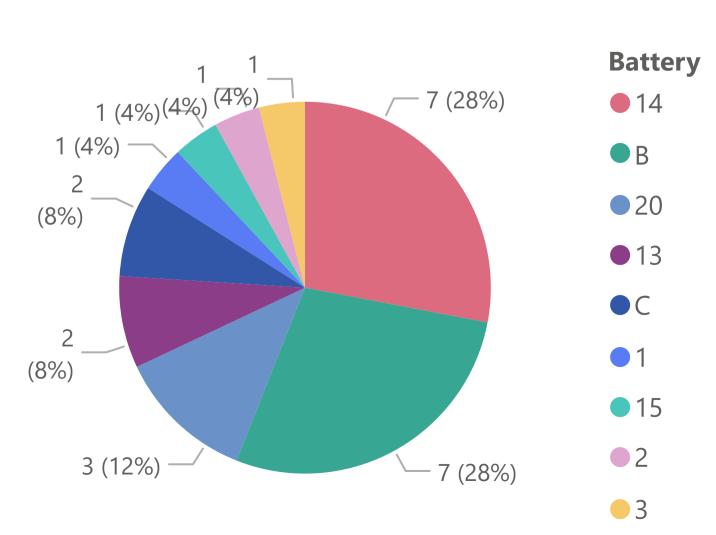
Travel Violations by Battery



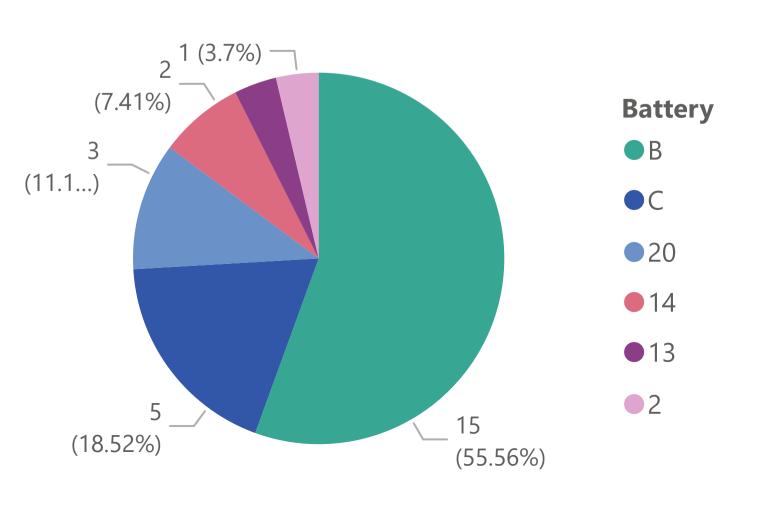
Soak Violations by Battery



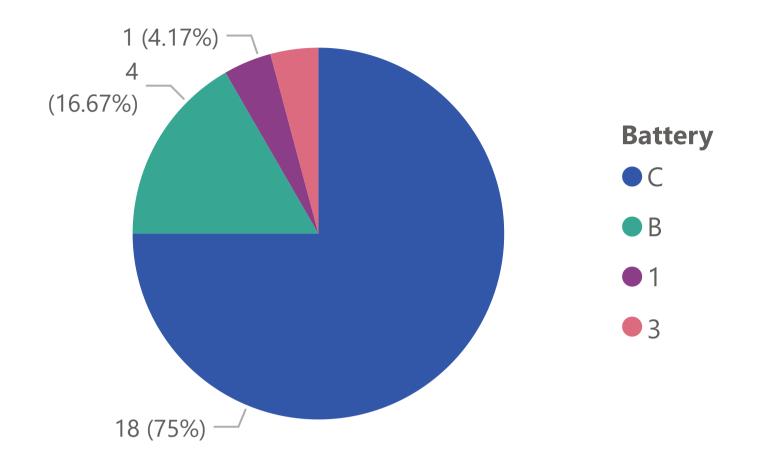
Topside (Offtakes) Violations by Battery



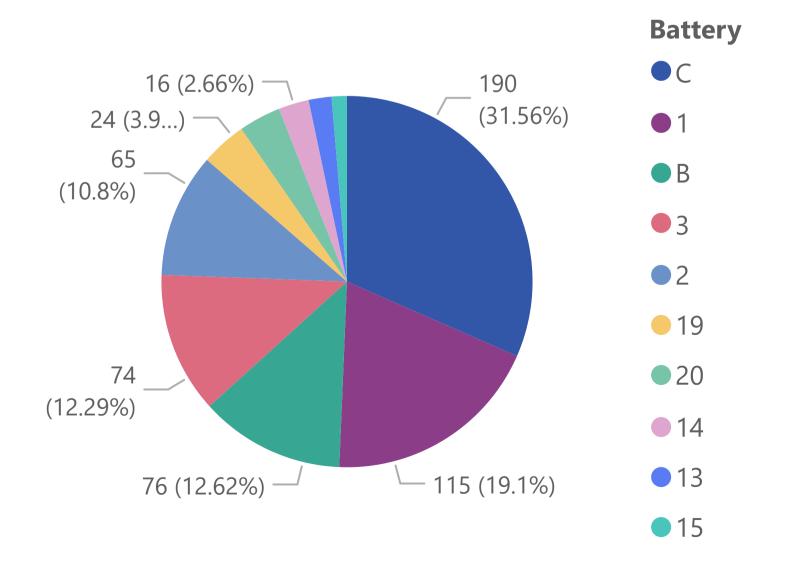
Topside (Lids) Violation by Battery



Percent Leaking Doors Violation by Battery



ACHD TTL H.O. Door Viols 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 2023	4/12/2023	14	92	1.66	Major	2.50	\$2,500			\$2,500
Q2 2023	4/13/2023	В	124	2.23	Major	2.50	\$2,500	\$250		\$2,750
Q2 2023	4/18/2023	С	548	9.87	Major	2.50	\$2,500			\$2,500
Q2 2023	5/2/2023	14	80	1.44	Moderate	1.50	\$1,500			\$1,500
Q2 2023	5/22/2023	В	120	2.16	Major	2.50	\$2,500	\$250		\$2,750
Q2 2023	5/25/2023	19	76	1.01	Low	1.00	\$1,000			\$1,000
Q2 2023	6/1/2023	20	80	1.44	Moderate	1.50	\$1,500			\$1,500
Q2 2023	6/6/2023	19	77	1.02	Low	1.00	\$1,000	\$250		\$1,250
Q2 2023	6/8/2023	13	76	1.37	Moderate	1.50	\$1,500			\$1,500
Q2 2023	6/14/2023	С	140	2.52	Major	2.50	\$2,500			\$2,500
Q2 2023	6/15/2023	13	82	1.48	Moderate	1.50	\$1,500	\$250		\$1,750
Q2 2023	6/20/2023	19	104	1.38	Moderate	1.50	\$1,500			\$1,500
Q2 2023	6/22/2023	С	92	1.66	Major	2.50	\$2,500			\$2,500
Q2 2023	6/27/2023	13	123	2.22	Major	2.50	\$2,500			\$2,500
Q2 2023	6/28/2023	14	58	1.05	Low	1.00	\$1,000			\$1,000
Total								\$1,000		\$29,000

Total \$1,000 \$29,000

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 2023	4/17/2023	A26	19	С	moderate	1.50	\$1,500			\$1,500
Q2 2023	4/17/2023	B21	13	С	major	2.50	\$2,500			\$2,500
Q2 2023	6/6/2023	A18	19	Р	moderate	1.50	\$1,500	\$250		\$1,750
Q2 2023	6/8/2023	B17	13	Р	moderate	1.50	\$1,500			\$1,500
Q2 2023	6/20/2023	A9	19	С	major	2.50	\$2,500			\$2,500
Q2 2023	6/27/2023	B1	13	Р	major	2.50	\$2,500			\$2,500
Q2 2023	6/28/2023	A22	14	С	major	2.50	\$2,500			\$2,500
Total								\$250		\$14.750

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

Non-Compliant ACHD Travel Inspections and Penalties

Quarter (Year) Date Battery Oven Travel max opacity ACHD Travel Severity of Travel Penalty Multiplier Travel Penalty H2S Penalty SO2 Penalty Total Travel Penalty Violation

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 Penal	ty ACHD Doors Penalty
Q2 2023	4/18/2023	С	5.33%	1.78	Major	2.50	\$2,500		\$2,500
Q2 2023	4/27/2023	В	11.19%	2.24	Major	2.50	\$2,500		\$2,500
Q2 2023	6/14/2023	С	6.49%	2.16	Major	2.50	\$2,500		\$2,500
Q2 2023	6/19/2023	В	6.56%	1.31	Moderate	1.50	\$1,500		\$1,500
Total									\$9,000

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 Pena	ilty
Q2 2023	4/13/2023	В	1.06	1.06	Low	1.00	\$250	\$1,2	250
Q2 2023	4/18/2023	С	0.73	1.22	Moderate	1.50		\$1,5	500
Total							\$250	\$2,7	'50

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 2023	5/25/2023	20	4.22	1.05	Low	1.00	\$1,000			\$1,000
Q2 2023	6/22/2023	С	3.61	1.20	Moderate	1.50	\$1,500			\$1,500

Total \$2,500

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 2023	4/5/2023	20	C4	75	Major	2.50	\$1,875			\$1,875
Q2 2023	4/13/2023	В	B32	45	Low	1.00	\$750	\$250		\$1,000
Q2 2023	4/18/2023	C	C76	35	Low	1.00	\$750			\$750
Q2 2023	4/18/2023	C	C76	40	Low	1.00	\$750			\$750
Q2 2023	4/18/2023	C	C30	45	Moderate	1.50	\$1,125			\$1,125
Q2 2023	4/18/2023	C	C81	50	Moderate	1.50	\$1,125			\$1,125
Q2 2023	4/18/2023	C	C76	70	Major	2.50	\$1,875			\$1,875
Q2 2023	4/18/2023	C	C34	90	Major	2.50	\$1,875			\$1,875
Q2 2023	4/18/2023	C	C35	90	Major	2.50	\$1,875			\$1,875
Q2 2023	4/18/2023	C	C36	100	Major	2.50	\$1,875			\$1,875
Q2 2023	4/27/2023	В	A32	45	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	A34	45	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	A12	50	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	A33	50	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	B1	50	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	B12	50	Low	1.00	\$750			\$750
Q2 2023	4/27/2023	В	A35	55	Moderate	1.50	\$1,125			\$1,125
Q2 2023	4/27/2023	В	A36	60	Moderate	1.50	\$1,125			\$1,125
Q2 2023	4/27/2023	В	A38	60	Moderate	1.50	\$1,125			\$1,125
Q2 2023	4/27/2023	В	A20	70	Major	2.50	\$1,875			\$1,875
Q2 2023	4/27/2023	В	A4	75	Major	2.50	\$1,875			\$1,875
Q2 2023	5/1/2023	20	B28	55	Moderate	1.50	\$1,125			\$1,125
Q2 2023	5/22/2023	В	B36	50	Low	1.00	\$750	\$250		\$1,000
Q2 2023	5/22/2023	В	B14	75	Major	2.50	\$1,875	\$250		\$2,125
Q2 2023	5/24/2023	С	C12	55	Major	2.50	\$1,875			\$1,875
Total							\$31,125			\$31,875

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 2023	6/1/2023	20	B2	50	Low	1.00	\$750			\$750
Q2 2023	6/1/2023	20	B25	55	Moderate	1.50	\$1,125			\$1,125
Q2 2023	6/6/2023	19	C3	50	Low	1.00	\$750	\$250		\$1,000
Q2 2023	6/14/2023	C	C58	35	Low	1.00	\$750			\$750
Q2 2023	6/14/2023	C	C42	40	Low	1.00	\$750			\$750
Q2 2023	6/14/2023	С	C64	40	Low	1.00	\$750			\$750
Q2 2023	6/14/2023	C	C44	45	Moderate	1.50	\$1,125			\$1,125
Q2 2023	6/14/2023	C	C40	55	Major	2.50	\$1,875			\$1,875
Q2 2023	6/14/2023	C	C18	70	Major	2.50	\$1,875			\$1,875
Q2 2023	6/14/2023	C	C55	85	Major	2.50	\$1,875			\$1,875
Q2 2023	6/14/2023	C	C57	85	Major	2.50	\$1,875			\$1,875
Q2 2023	6/14/2023	C	C68	100	Major	2.50	\$1,875			\$1,875
Q2 2023	6/19/2023	В	B12	50	Low	1.00	\$750			\$750
Q2 2023	6/19/2023	В	A 5	70	Major	2.50	\$1,875			\$1,875
Q2 2023	6/19/2023	В	A18	75	Major	2.50	\$1,875			\$1,875
Q2 2023	6/19/2023	В	A 3	75	Major	2.50	\$1,875			\$1,875
Q2 2023	6/19/2023	В	B32	80	Major	2.50	\$1,875			\$1,875
Total							\$23,625			\$23,875

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
□ Q2 2023	0	1		5	6
Apr 2023	0	1		1	2
May 2023	0			2	2
Jun 2023	0			2	2
Total	0	1		5	6

Quarter (Year)Total M303 Compl InspsTotal M303 InspectionsMethod 303 % ComplianceMethod 303 Total PenaltyQ2 20232269227599.74%\$12,500

2275

2269

Total

\$12,500

99.74%

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 2023	4/17/2023	19						Major	\$2,500			\$2,500
Q2 2023	4/26/2023	В				Major			\$2,500			\$2,500
Q2 2023	5/8/2023	20						Major	\$2,500			\$2,500
Q2 2023	5/29/2023	20						Major	\$2,500			\$2,500
Q2 2023	6/9/2023	20						Moderate	\$1,500			\$1,500
Q2 2023	6/14/2023	20						Low	\$1,000			\$1,000

Total \$12,500

Summary of Penalties from USS Inspections

Total	14	\$14,750	16	\$16,750	\$31,500
Q2 2023	14	\$14,750	16	\$16,750	\$31,500
Quarter (Year)	Total USS Push Violations	Total USS Push Penalty	Total USS Travel Violations	Total USS Travel Penalty	USS Total Penalty

USS Non-Compliant Pushing Inspections and Penalties

Quarter (Year)	Date	Battery	Oven	Opacity	Push Severity of Violation	Push Penalty Multiplier	USS Push Pena	ty H2S Exceedance Penalty (push)		SO2 Exceedance Penalty (Push)	USS Total Push Penalty
_											
Q2 2023	4/16/2023	19	C25	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	4/19/2023	14	A26	30	low	1.00	\$1,0	00	250		\$1,250
Q2 2023	5/10/2023	13	B8	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	5/10/2023	20	C17	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	5/16/2023	20	B24	25	low	1.00	\$1,0	00	250		\$1,250
Q2 2023	5/16/2023	20	B28	30	low	1.00	\$1,0	00	250		\$1,250
Q2 2023	5/21/2023	14	A25	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/12/2023	14	B22	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/18/2023	20	C8	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/20/2023	19	A3	20	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/22/2023	13	B08	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/25/2023	14	A28	20	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/25/2023	19	C01	30	low	1.00	\$1,0	00			\$1,000
Q2 2023	6/25/2023	20	A28	30	low	1.00	\$1,0	00			\$1,000
Total							\$14,0	00			\$14,750

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
	_				Violation			renalty (travel)	renalty (travel)	
Q2 2023	4/13/2023	13	A13	20	low	1.00	\$1,000	\$250		\$1,250
Q2 2023	4/16/2023	19	C25	25	low	1.00	\$1,000			\$1,000
Q2 2023	4/19/2023	14	A26	20	low	1.00	\$1,000	\$250		\$1,250
Q2 2023	5/8/2023	19	B23	15	low	1.00	\$1,000			\$1,000
Q2 2023	5/10/2023	13	B8	25	low	1.00	\$1,000			\$1,000
Q2 2023	5/16/2023	20	B28	15	low	1.00	\$1,000	\$250		\$1,250
Q2 2023	5/17/2023	19	A22	15	low	1.00	\$1,000			\$1,000
Q2 2023	5/18/2023	14	A15	30	low	1.00	\$1,000			\$1,000
Q2 2023	5/21/2023	14	A25	25	low	1.00	\$1,000			\$1,000
Q2 2023	5/29/2023	19	B12	30	low	1.00	\$1,000			\$1,000
Q2 2023	6/12/2023	14	B22	25	low	1.00	\$1,000			\$1,000
Q2 2023	6/18/2023	20	C8	25	low	1.00	\$1,000			\$1,000
Q2 2023	6/20/2023	19	A3	15	low	1.00	\$1,000			\$1,000
Q2 2023	6/22/2023	13	B08	20	low	1.00	\$1,000			\$1,000
Q2 2023	6/25/2023	14	B05	25	low	1.00	\$1,000			\$1,000
Q2 2023	6/25/2023	19	C07	15	low	1.00	\$1,000			\$1,000
Total						16.00				\$16,750

Continuous Opacity Monitor Non-Compliant Clock Hours

Quarter (Year)	,	Battery 2	Battery 3	-	•	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
⊞ Q2 2023	1	0	0	17	9	0	4	1	16	18	66	\$13,200
Total	1	0	0	17	9	0	4	1	16	18	66	\$13,200

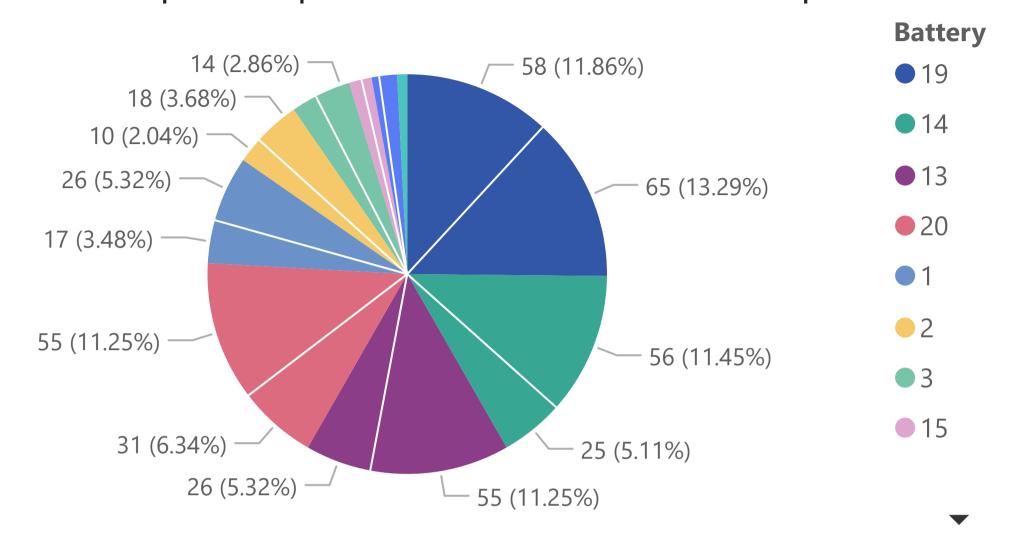




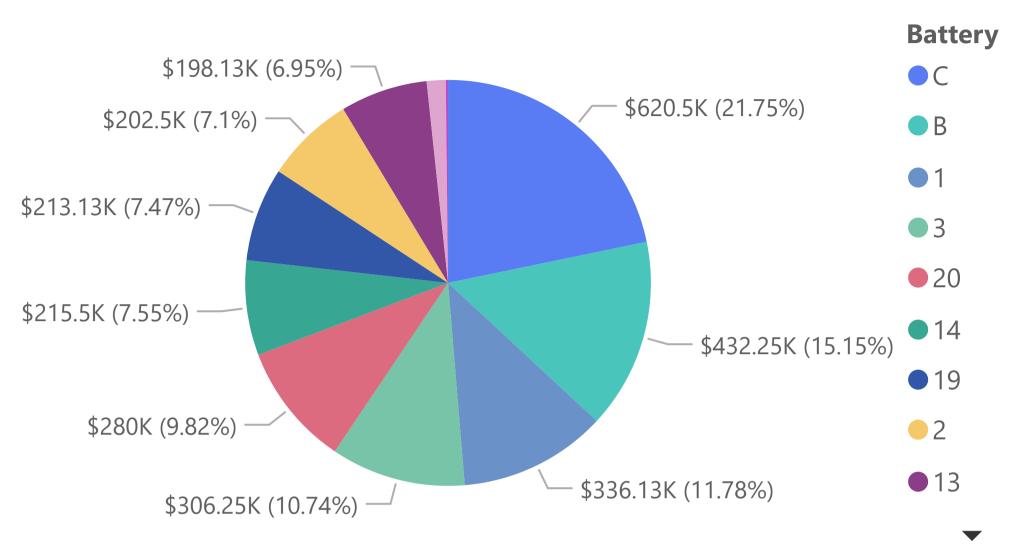
Jun 2023

or 2023 May 2023 Date

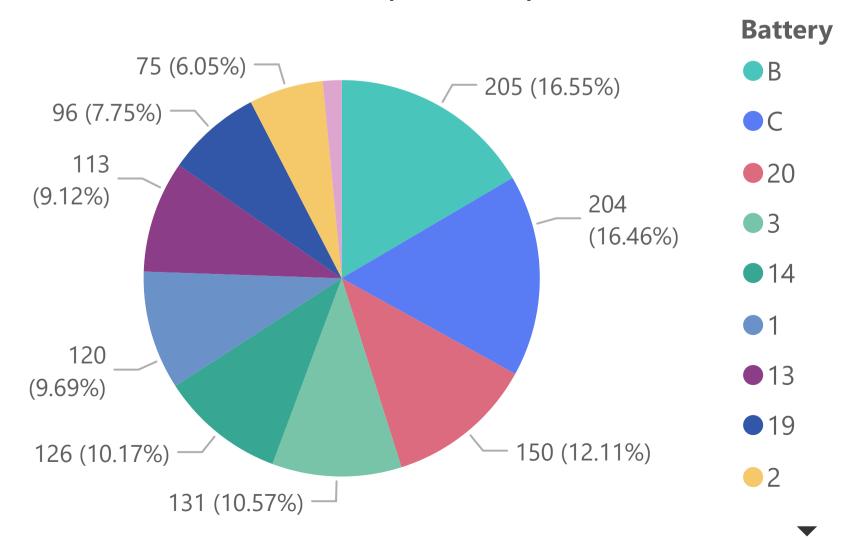
Non-Compliant Inspections: USS Push and Travel Inspections



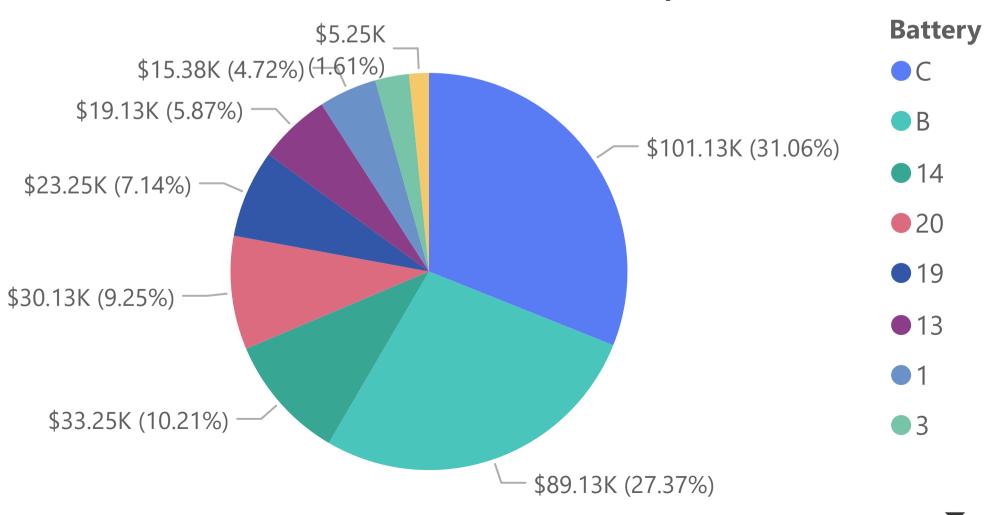
ACHD Total Penalties



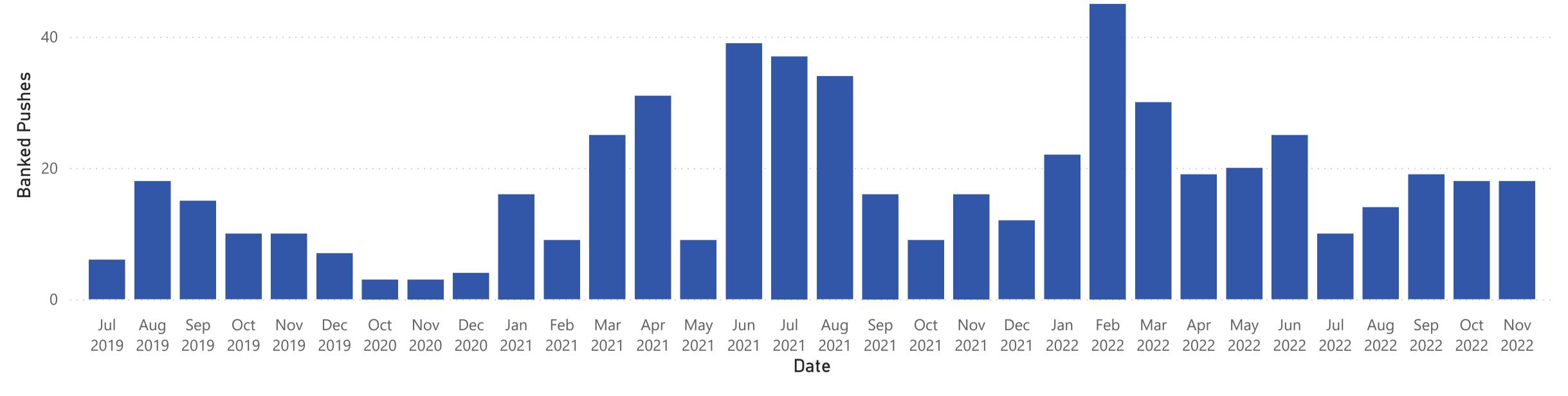
Total Non-Compliant Inspections



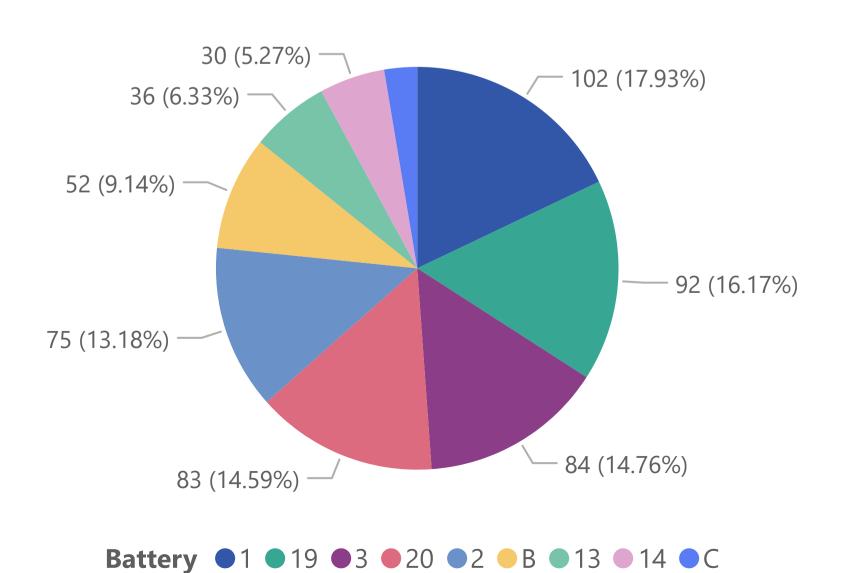
Method 303 Total Penalty



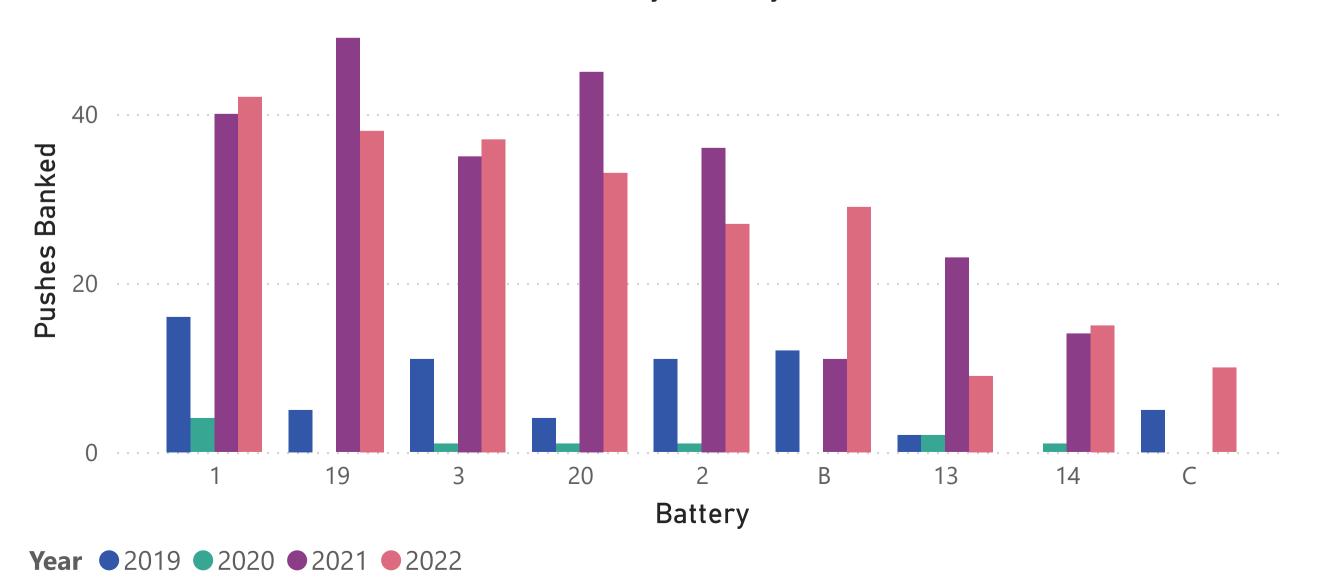
Total Instances of Banked Pushes



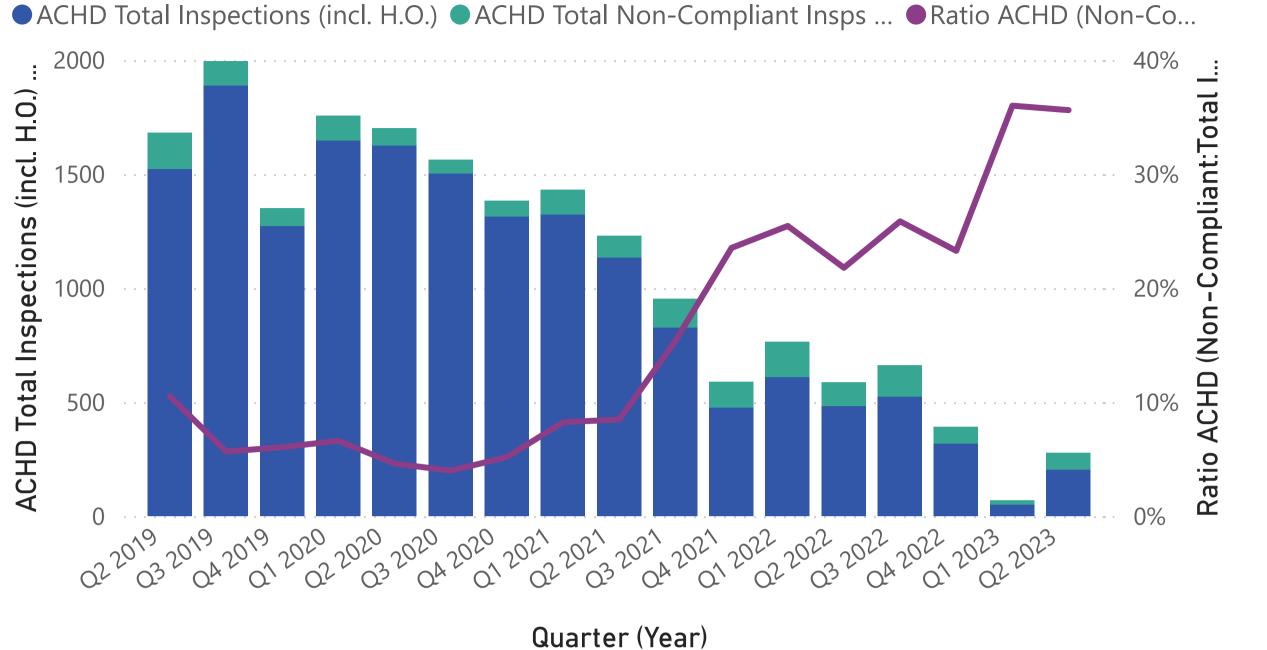
Pushes Banked by Battery



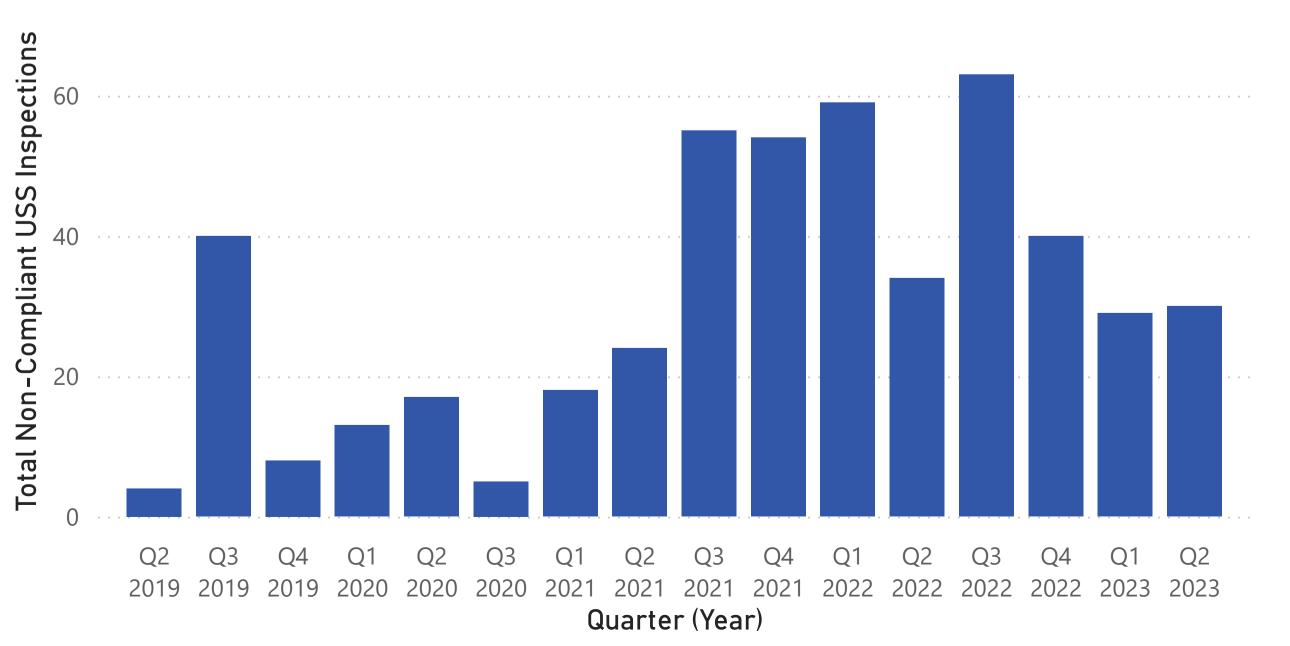
Pushes Banked by Battery and Year



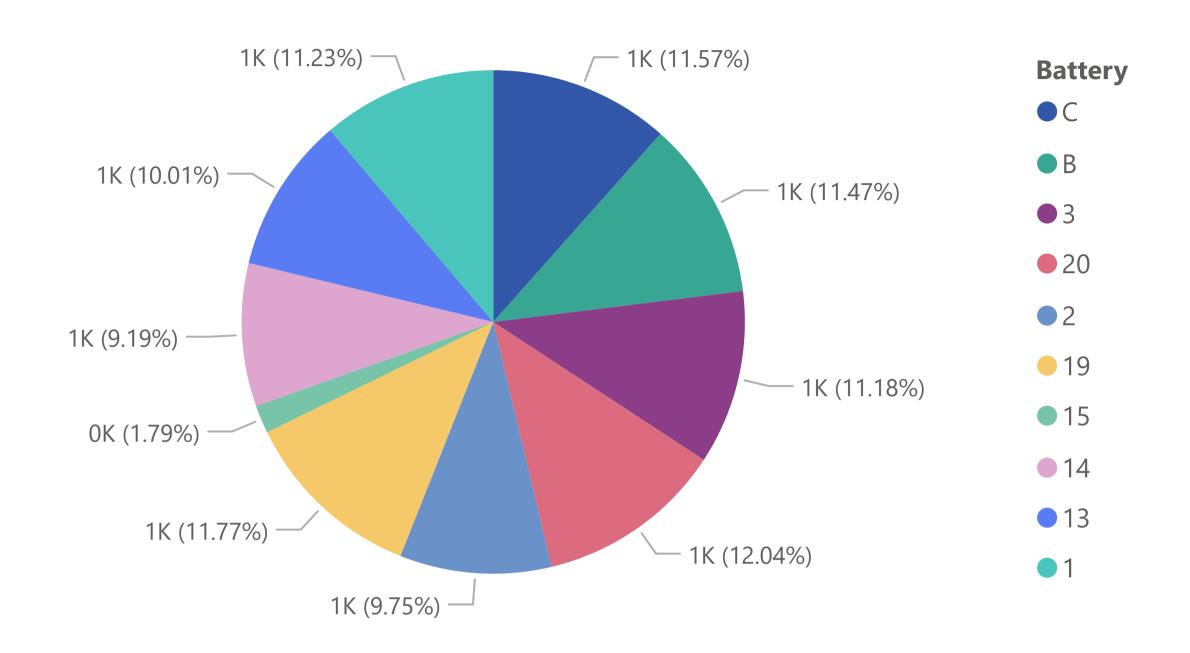
ACHD Total Inspections (SOA #190604)



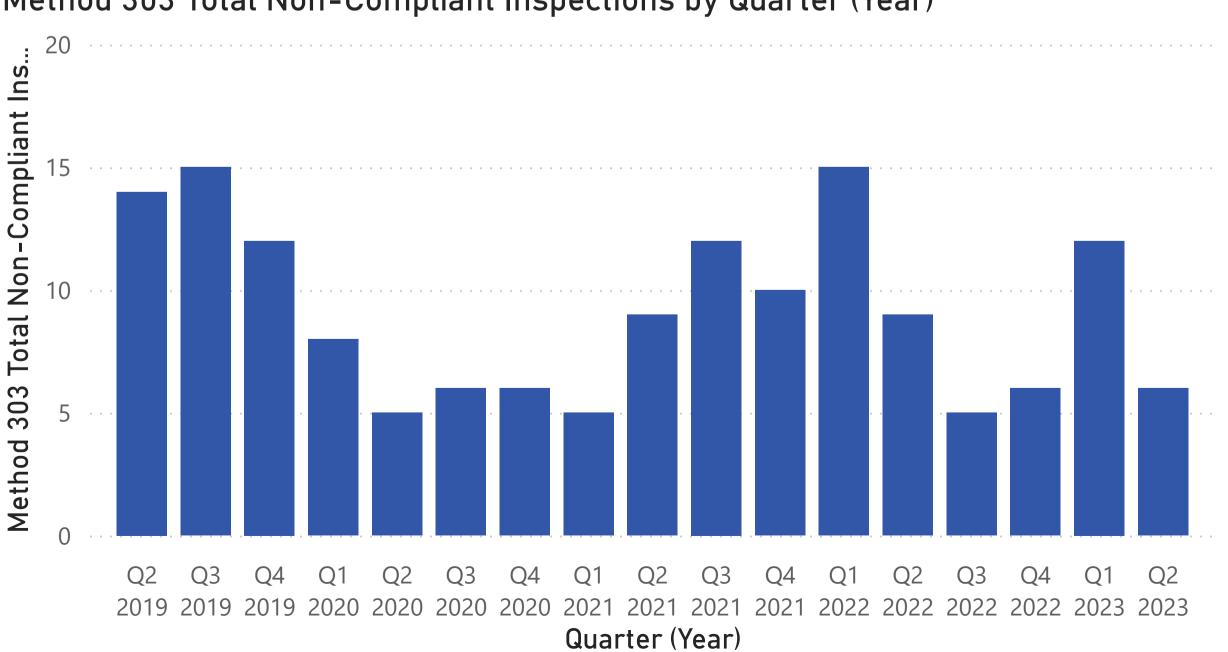
Non-Compliant Inspections Performed by U.S. Steel



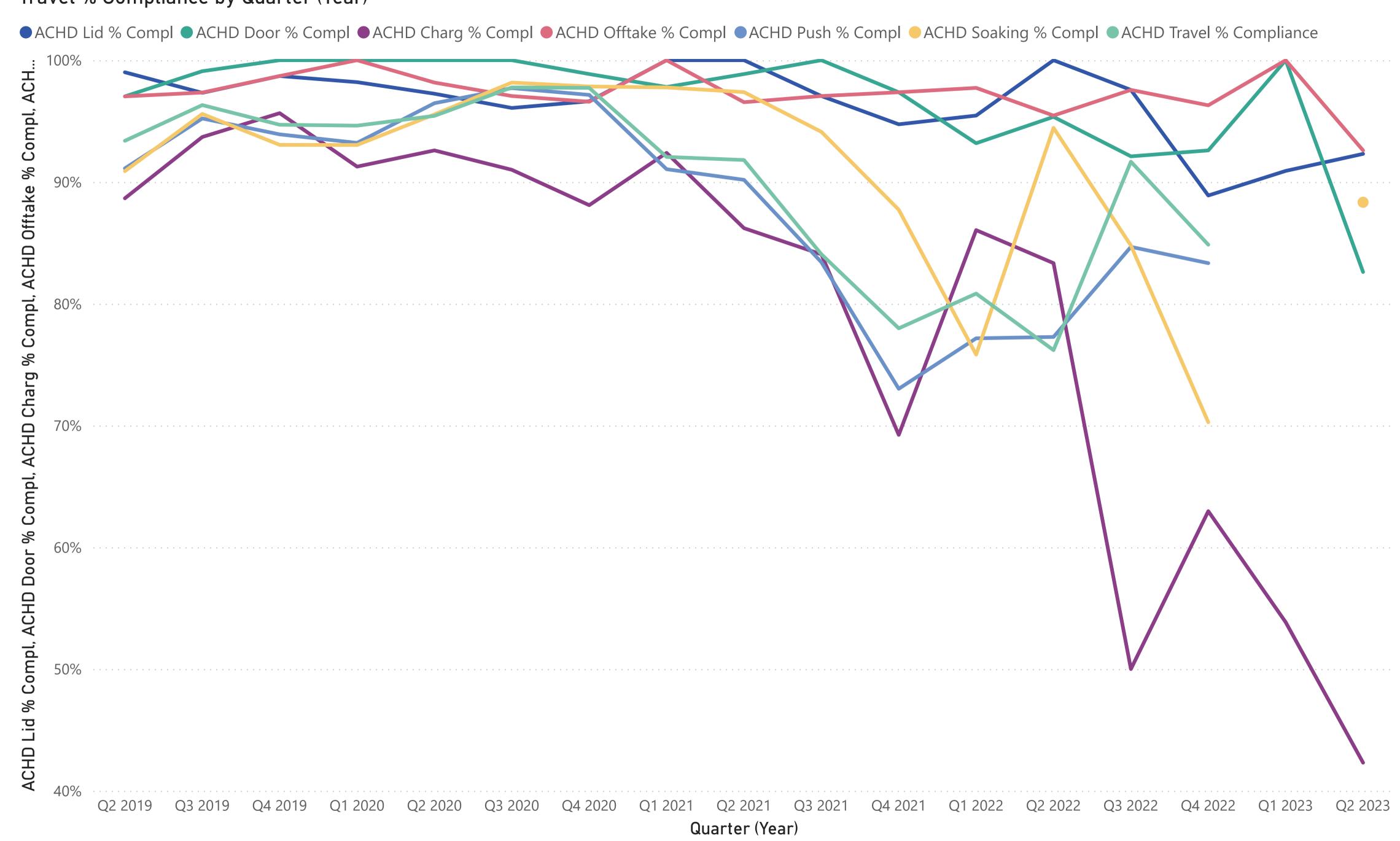
Non-Compliant Inspections (ACHD, M303, USS)



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)



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 2023	\$1,000		\$1,000		\$250	\$250	
6/15/2023	\$250						
6/6/2023	\$250		\$250		\$250		
5/22/2023	\$250		\$500				
4/13/2023	\$250		\$250			\$250	
□ Q1 2023	\$500		\$2,750			\$250	
3/22/2023			\$750				
3/21/2023			\$2,000			\$250	
3/16/2023	\$500						
□ Q4 2022	\$750	\$250	\$2,000	\$250	\$1,250	\$750	
10/21/2022						\$250	
10/13/2022			\$250				
10/12/2022	\$500						
10/11/2022	\$250	\$250	\$1,750	\$250		\$250	
10/6/2022					\$750	\$250	
10/5/2022					\$500		
□ Q3 2022	\$250		\$750	\$250			
7/20/2022			\$750				
7/1/2022	\$250			\$250			
□ 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		
Total	\$5,500	\$1,000	\$22,500	\$9,750	\$5,500	\$2,750	\$1,000