

COUNTY OF



ALLEGHENY

December 18, 2025

CERTIFIED MAIL – 9489 0090 0027 6045 2118 10

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,
2024 through June 30, 2024 (Second Quarter 2025)

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 2024, April 1, 2024 through June 30, 2024. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$85,775.00**. Pursuant to the SOA, Section V. ("Civil Penalty Payment"), Paragraph A, 90 percent of that amount, or **\$77,197.00**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$8,577.00**, 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 Program Manager, Compliance and Enforcement Program, Allegheny County Health Department, 836 Fulton Street, Pittsburgh, PA 15233.



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, 2024 through June 30, 2024. 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, 2024 through June 30, 2024.

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 (MDelibero@uss.com)
Mark Jeffrey (MJeffrey@uss.com)
Mike Dzurinko (MDzurinko@uss.com)
USS_CLT_ENV@uss.com
AQ Documents File
Gary Fischman

Quarters Selected for Report

Q2 2024

\$85,775

Total Penalty

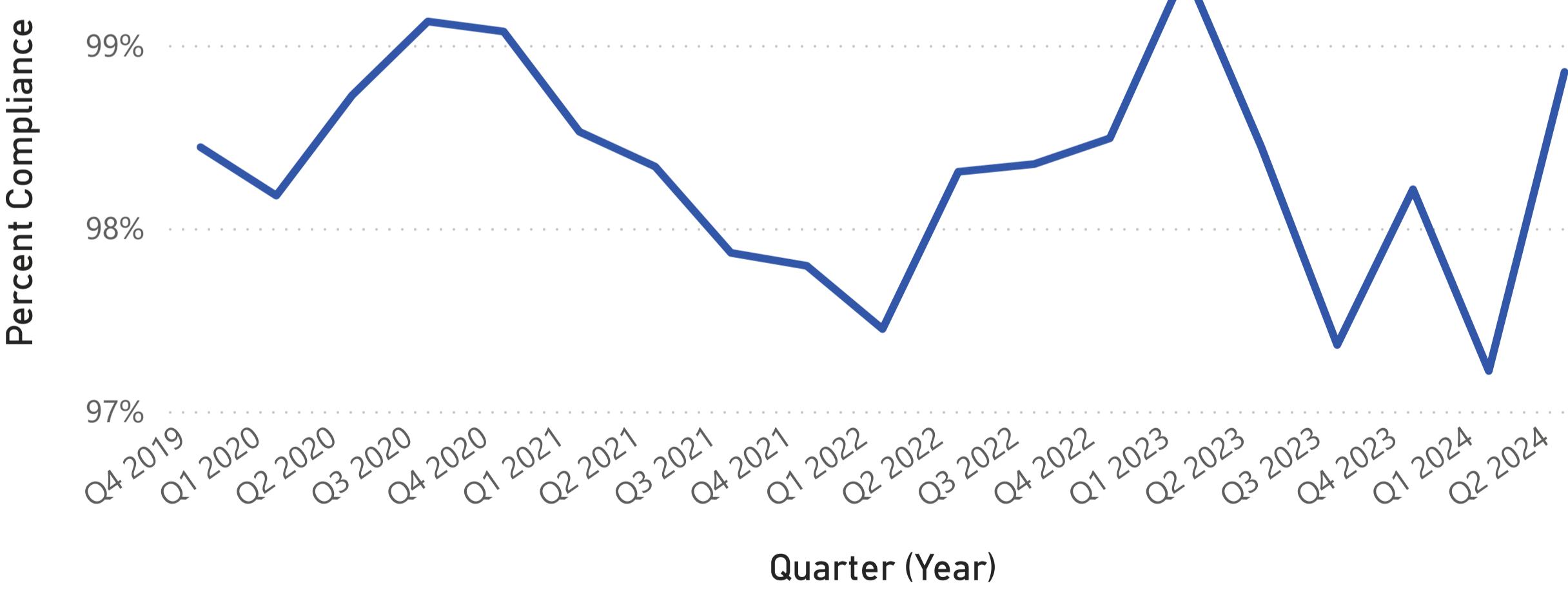
U.S. Steel, Third Party Method 303, and ACHD Coke Oven Inspections
 Stipulated Penalties **COA 190604**
 (Q2 2024)

Quarter (Year)	Penalty from Method 303 Inspections	Penalty from ACHD Inspections	Penalty from USS Inspections	COMs Penalty	Total Penalty
Q2 2024					
Apr 2024	\$0	\$5,000	\$4,500	\$800	\$10,300
May 2024	\$0	\$7,500	\$3,000	\$2,000	\$12,500
Jun 2024	\$0	\$54,375	\$3,000	\$5,600	\$62,975
Total	\$0	\$66,875	\$10,500	\$8,400	\$85,775
Total	\$0	\$66,875	\$10,500	\$8,400	\$85,775

Quarterly Compliance (ACHD and Method 303 Inspections)

Quarter (Year)	ACHD Total Compliant	ACHD Total Inspections (w/o HO Doors)	ACHD % Compliance	Total M303 Compl Insp	Total M303 Inspections	Method 303 % Compliance	Total Compliant Insp (ACHD and M303)	Total Inspections (ACHD and M303)	Percent Compliance
Q1 2024	341	411	82.97%	2421	2430	99.63%	2762	2841	97.22%
Q2 2024	138	166	83.13%	2275	2275	100.00%	2413	2441	98.85%
Total	479	577	83.02%	4696	4705	99.81%	5175	5282	97.97%

Quarterly Compliance



Average Percent Compliance

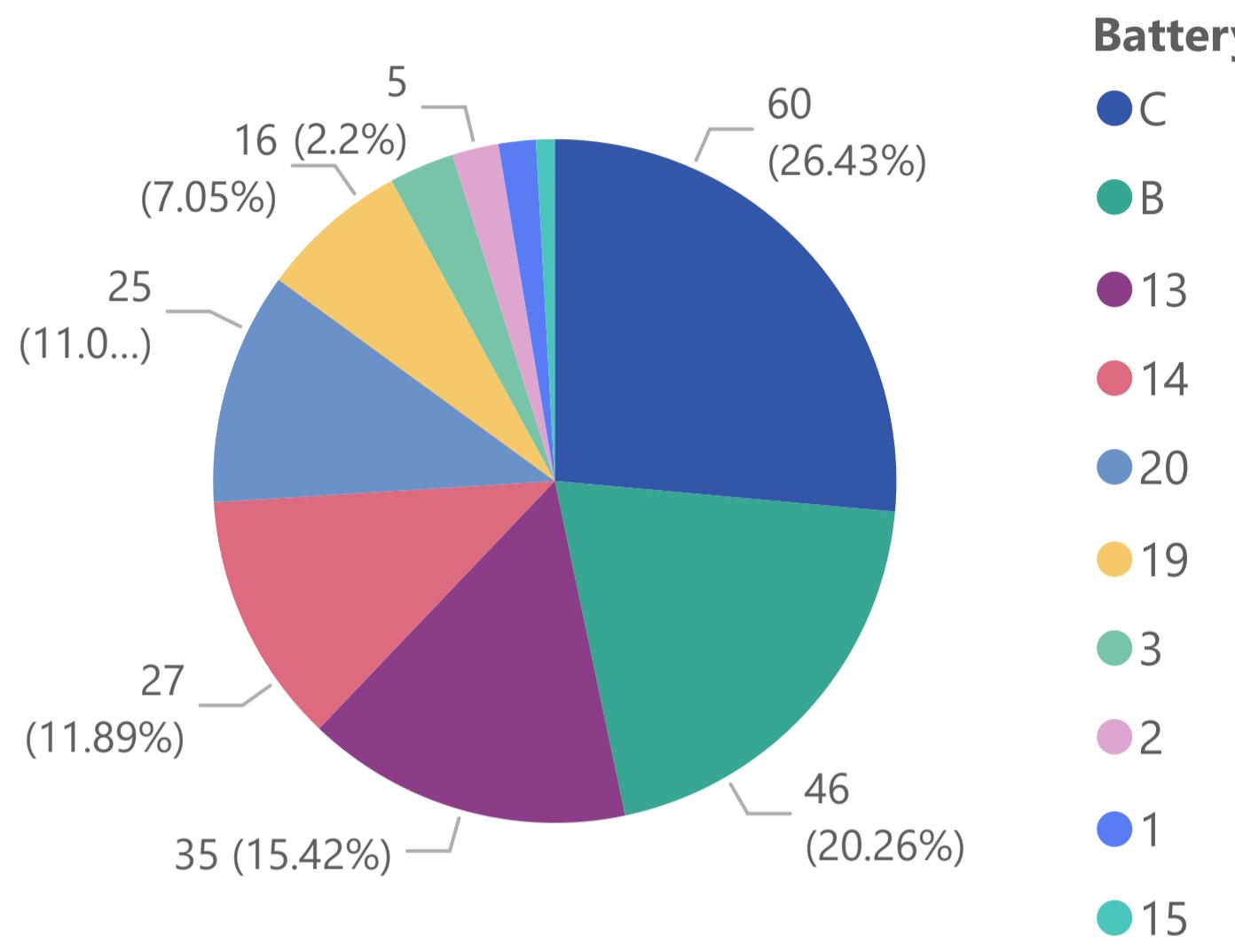
Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters
Q2 2024	97.219%	98.853%	98.036%
Q1 2024	98.212%	97.219%	97.716%
Q4 2023	97.361%	98.212%	97.787%
Q3 2023	98.441%	97.361%	97.901%
Q2 2023	99.408%	98.441%	98.925%
Q1 2023	98.491%	99.408%	98.949%
Q4 2022	98.350%	98.491%	98.420%
Q3 2022	98.308%	98.350%	98.329%
Q2 2022	97.449%	98.308%	97.878%
Q1 2022	97.701%	97.449%	97.621%

Penalty Summary for ACHD Inspections

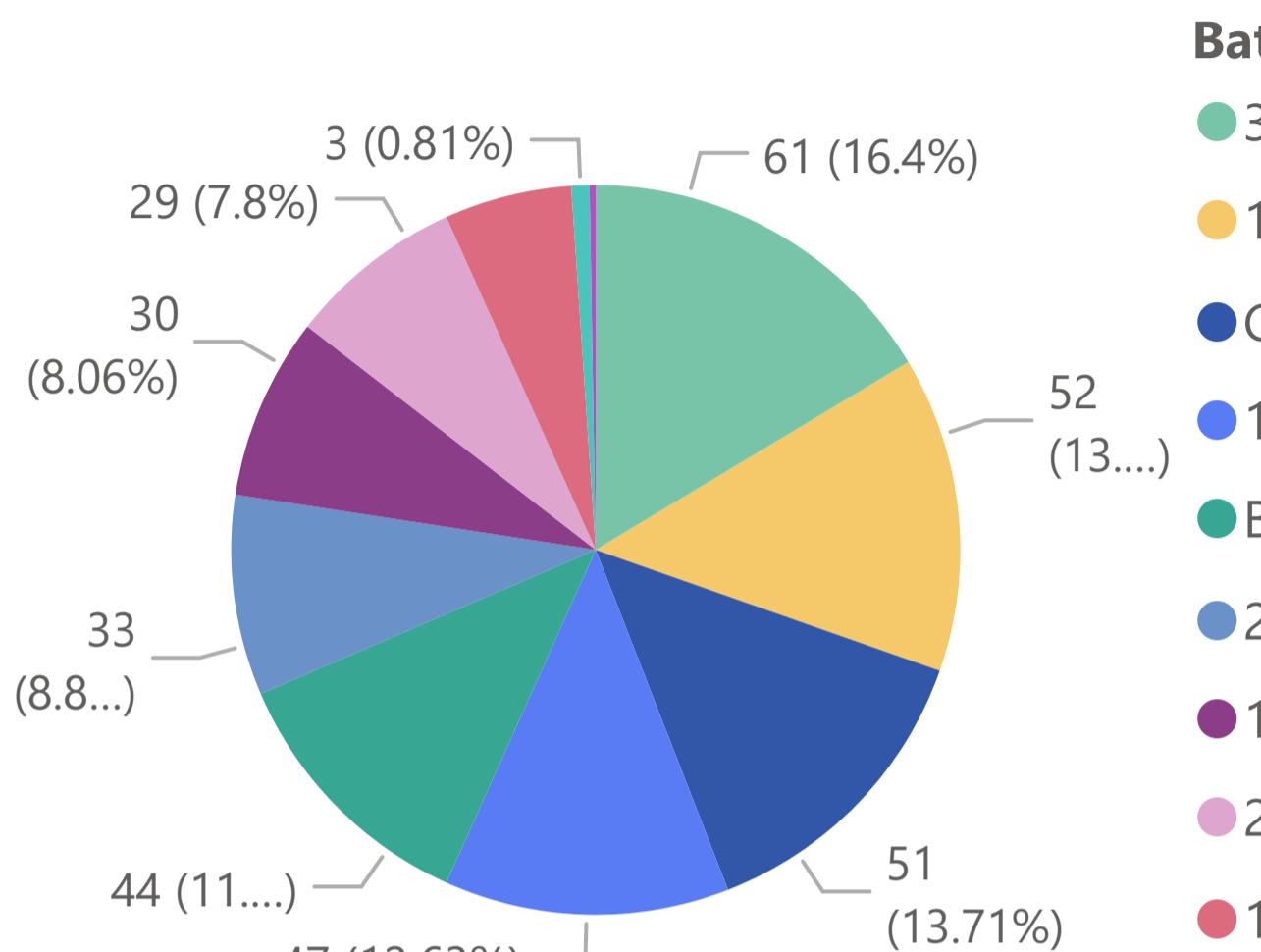
Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD HO Door Penalty	ACHD Total Penalties
Q2 2024									
Apr 2024	\$0	\$0	\$5,000		\$0	\$0	\$0		\$5,000
May 2024	\$2,500	\$0	\$5,000			\$0	\$0		\$7,500
Jun 2024	\$17,250	\$0	\$10,000	\$5,500	\$2,500	\$3,750	\$6,000	\$9,375	\$54,375
Total	\$19,750	\$0	\$20,000	\$5,500	\$2,500	\$3,750	\$6,000	\$9,375	\$66,875
Total	\$19,750	\$0	\$20,000	\$5,500	\$2,500	\$3,750	\$6,000	\$9,375	\$66,875

Non-Compliant Coke Oven Inspections Performed by ACHD

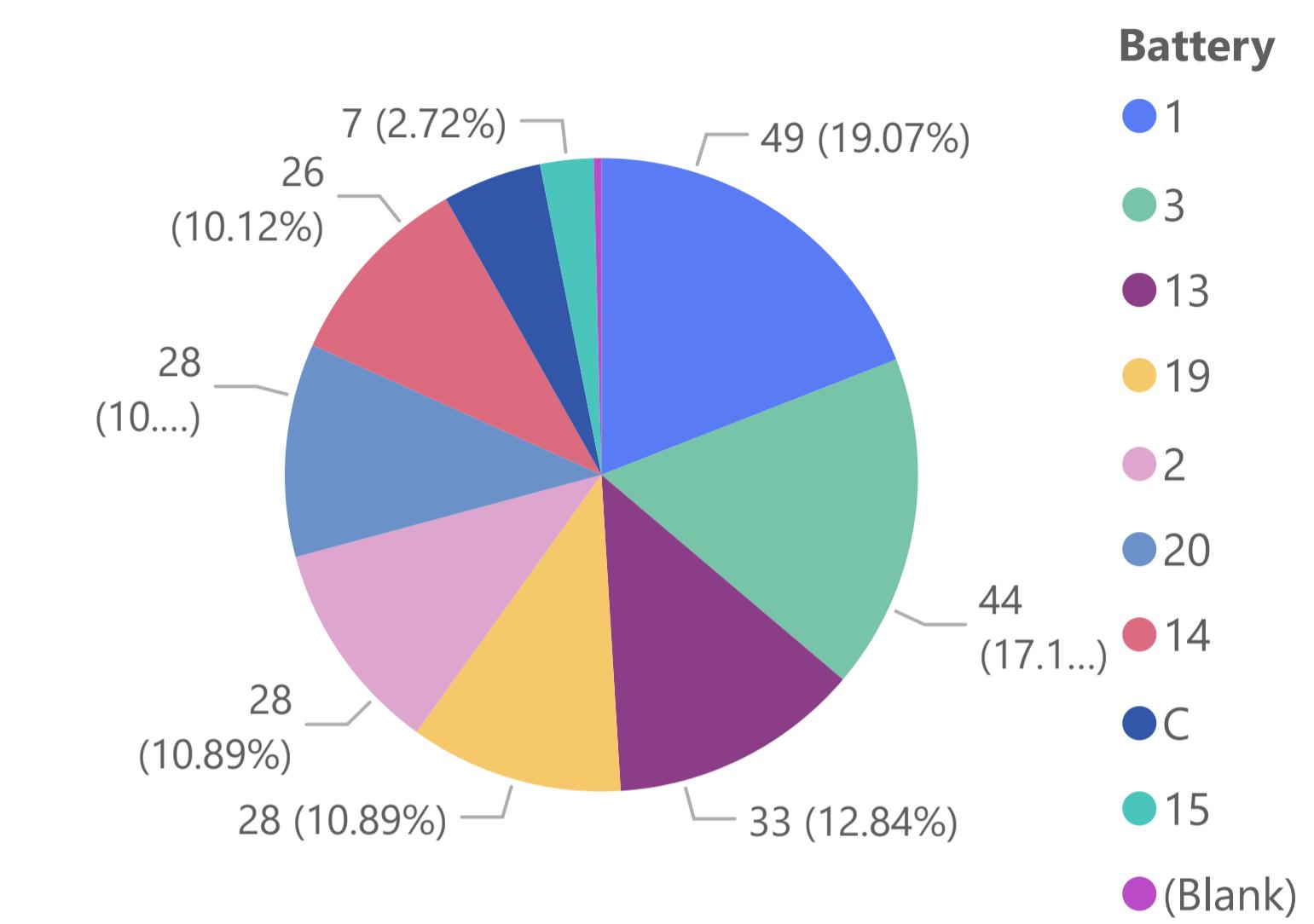
Charging Violations by Battery



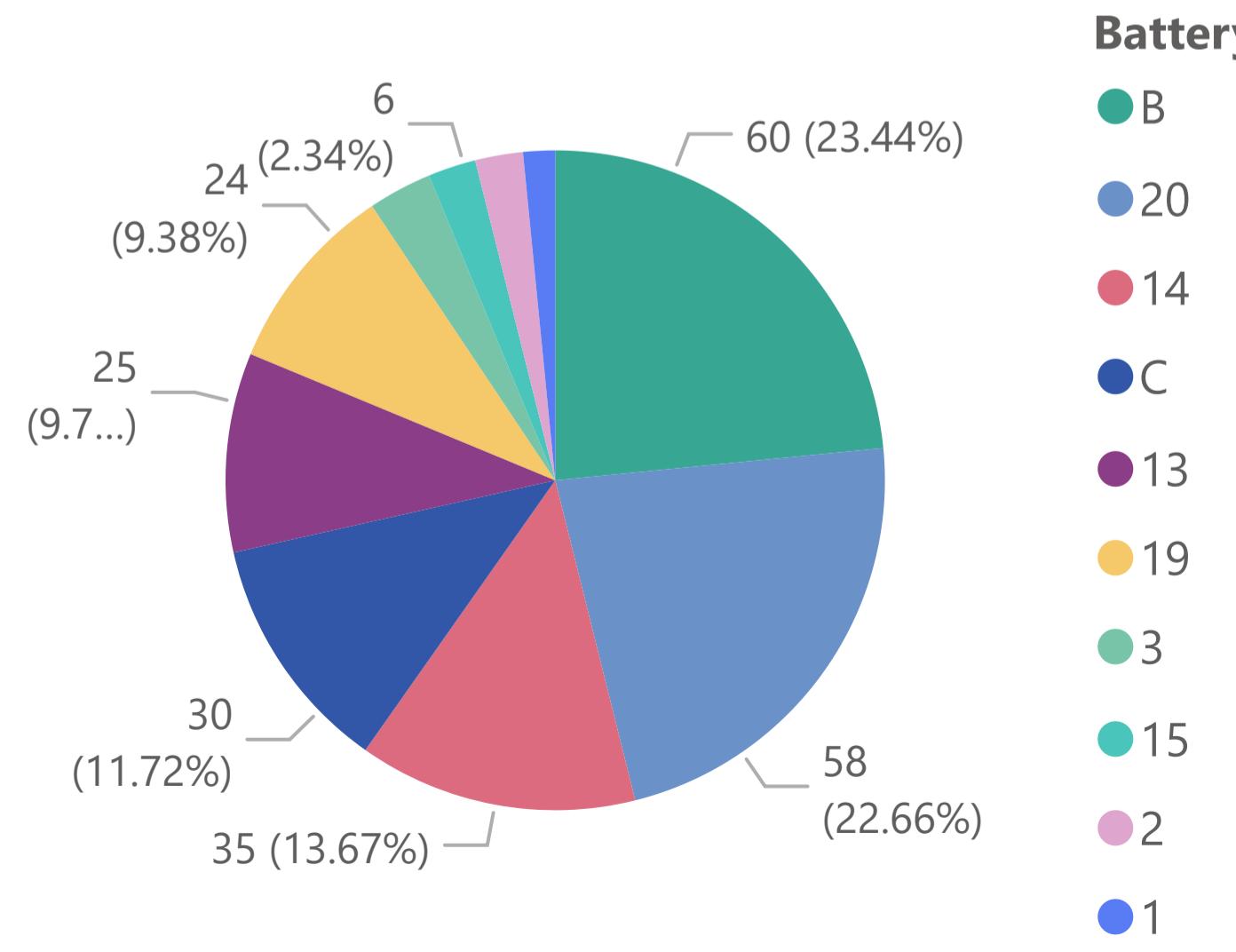
Push Violations by Battery



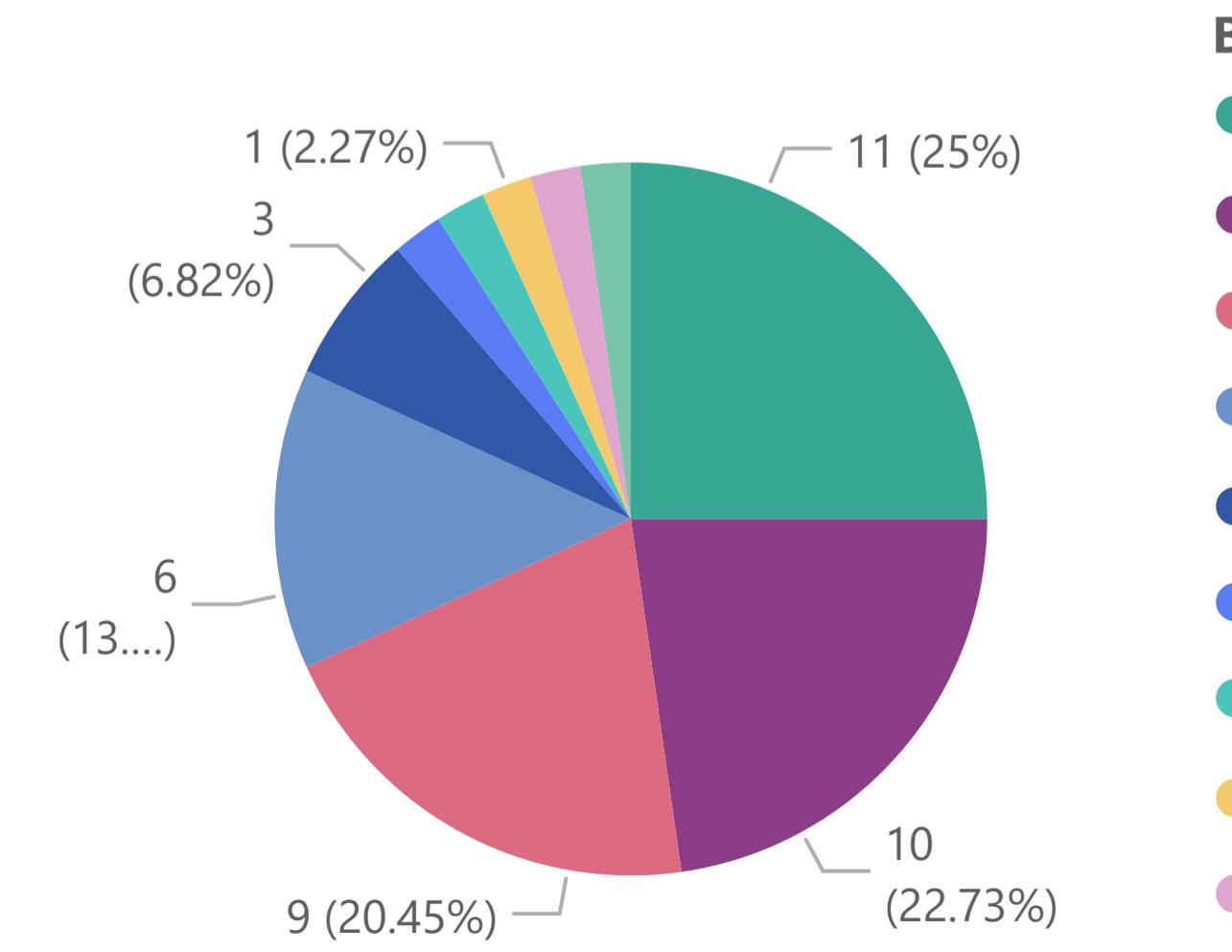
Travel Violations by Battery



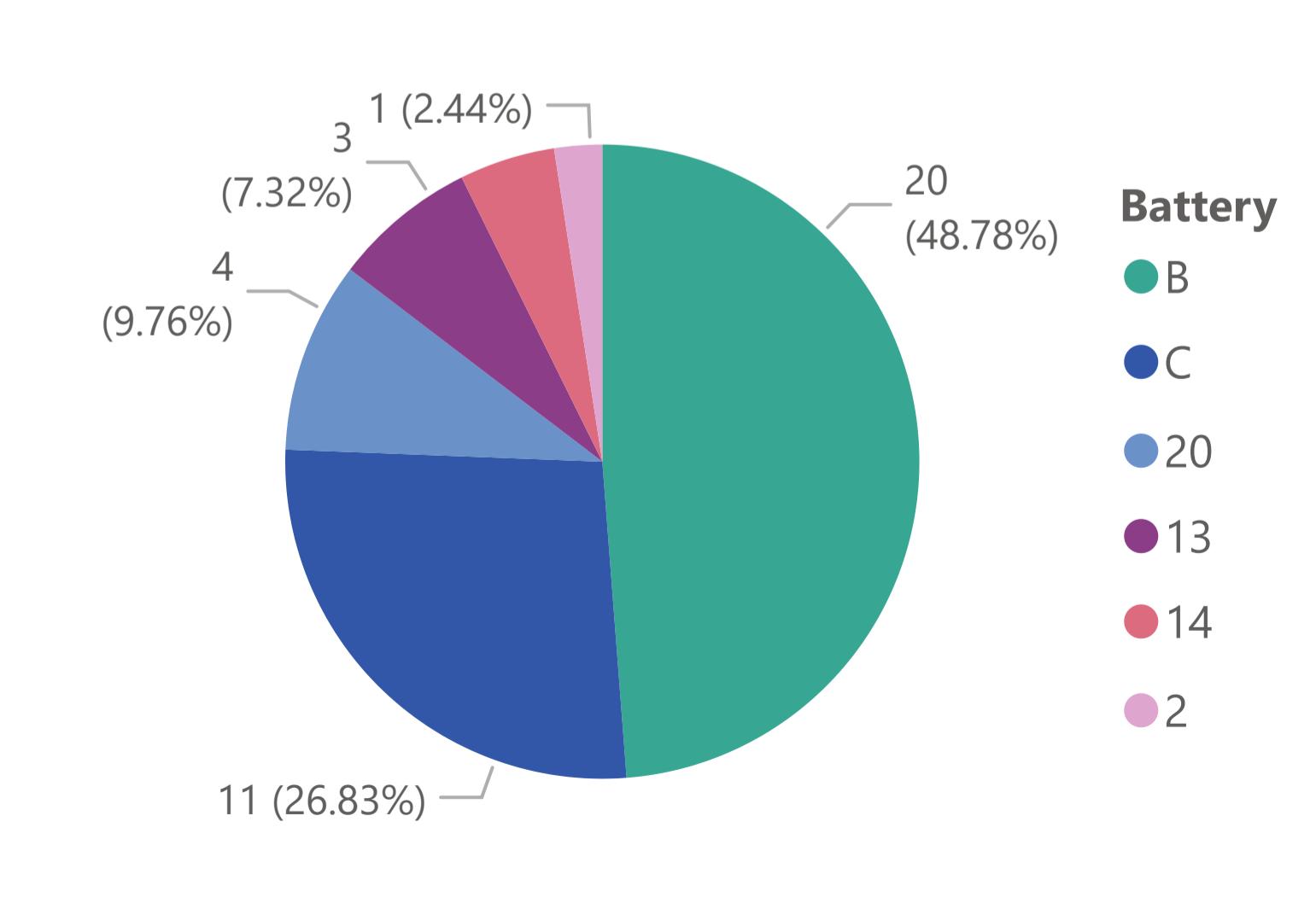
Soak Violations by Battery



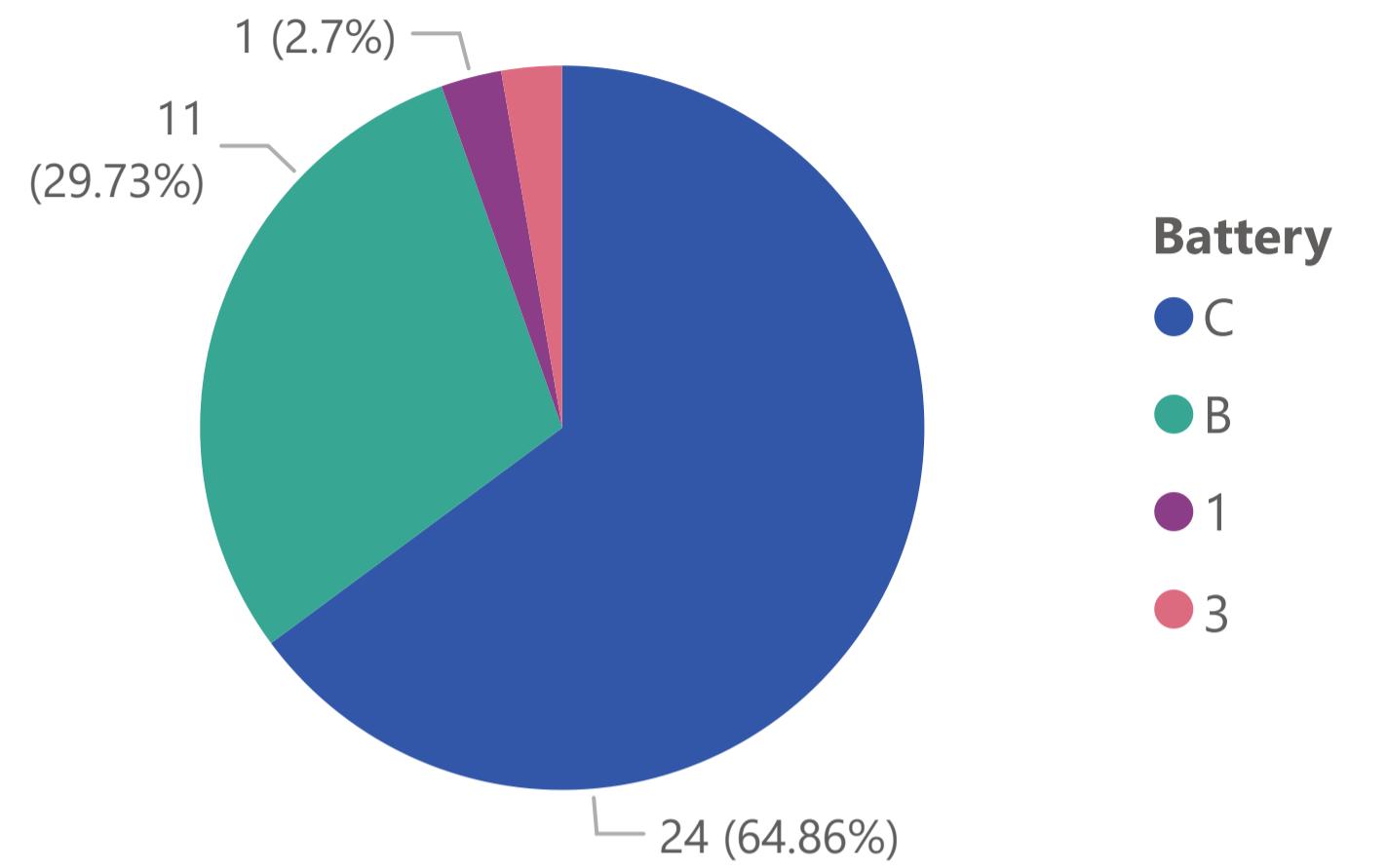
Topside (Offtakes) Violations by Battery



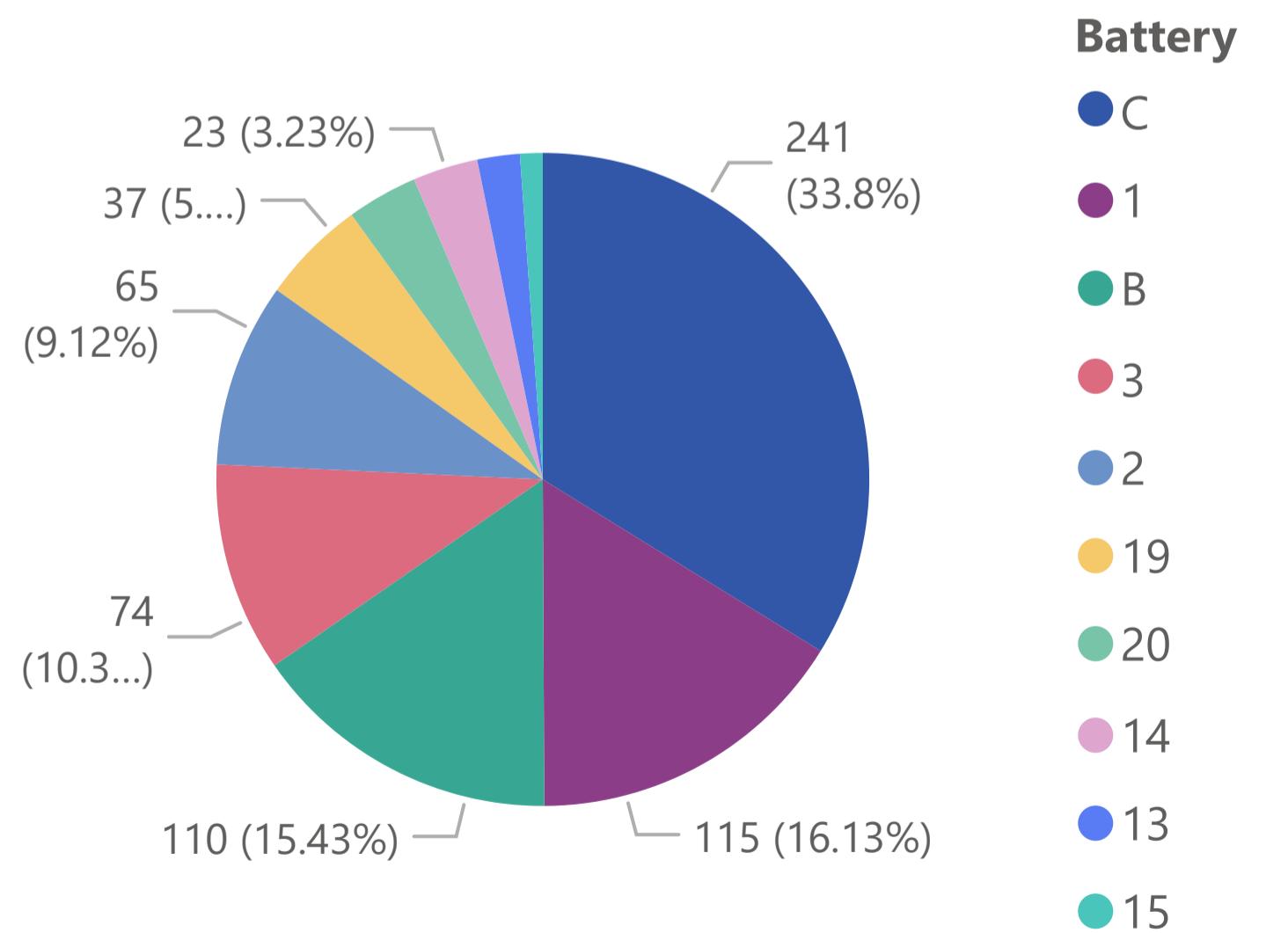
Topside (Lids) Violation by Battery



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 2024	5/28/2024	20	86	1.55	Major	2.50	\$2,500			\$2,500
Q2 2024	6/3/2024	19	103	1.36	Moderate	1.50	\$1,500			\$1,500
Q2 2024	6/5/2024	13	121	2.18	Major	2.50	\$2,500			\$2,500
Q2 2024	6/11/2024	13	124	2.23	Major	2.50	\$2,500			\$2,500
Q2 2024	6/13/2024	13	186	3.35	Major	2.50	\$2,500	\$250		\$2,750
Q2 2024	6/18/2024	B	80	1.44	Moderate	1.50	\$1,500			\$1,500
Q2 2024	6/24/2024	C	85	1.53	Major	2.50	\$2,500			\$2,500
Q2 2024	6/25/2024	13	82	1.48	Moderate	1.50	\$1,500			\$1,500
Q2 2024	6/28/2024	B	250	4.50	Major	2.50	\$2,500			\$2,500
Total							\$250			\$19,750

Non-Compliant ACHD Soaking Inspections and Penalties

Quarter (Year)	Date	Oven	Battery	pusher / coke (if viol.)	Severity of Violation	Soaking Penalty	Soaking Multiplier	Penalty	H2S Penalty	SO2 Penalty	ACHD Soaking Penalty
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ACHD Non-Compliant Push Inspections and Penalties

Non-Compliant ACHD Travel Inspections and Penalties

Non-Compliant ACHD Doors Inspections and Penalties

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
Q2 2024	6/13/2024	C	2.22	3.70	Major	2.50	\$250		\$2,750
Q2 2024	6/19/2024	20	1.19	1.19	Low	1.00			\$1,000
Total							\$250		\$3,750

Non-Compliant ACHD Topside (Offtake) Inspections and Penalties

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 2024	6/6/2024	B	A15	45	Low	1.00	\$750			\$750
Q2 2024	6/6/2024	B	A8	45	Low	1.00	\$750			\$750
Q2 2024	6/6/2024	B	A11	60	Moderate	1.50	\$1,125			\$1,125
Q2 2024	6/6/2024	B	A1	75	Major	2.50	\$1,875			\$1,875
Q2 2024	6/6/2024	B	B6	80	Major	2.50	\$1,875			\$1,875
Q2 2024	6/6/2024	B	A3	95	Major	2.50	\$1,875			\$1,875
Q2 2024	6/18/2024	B	A4	60	Moderate	1.50	\$1,125			\$1,125
Total							\$9,375			\$9,375

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

Q2 2024	0				0
Apr 2024	0				0
May 2024	0				0
Jun 2024	0				0
Total	0				0

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

Q2 2024	2275	2275	100.00%	\$0
Total	2275	2275	100.00%	\$0

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
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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 2024	5	\$5,000	5	\$5,500	\$10,500
Total	5	\$5,000	5	\$5,500	\$10,500

USS Non-Compliant Pushing Inspections and Penalties

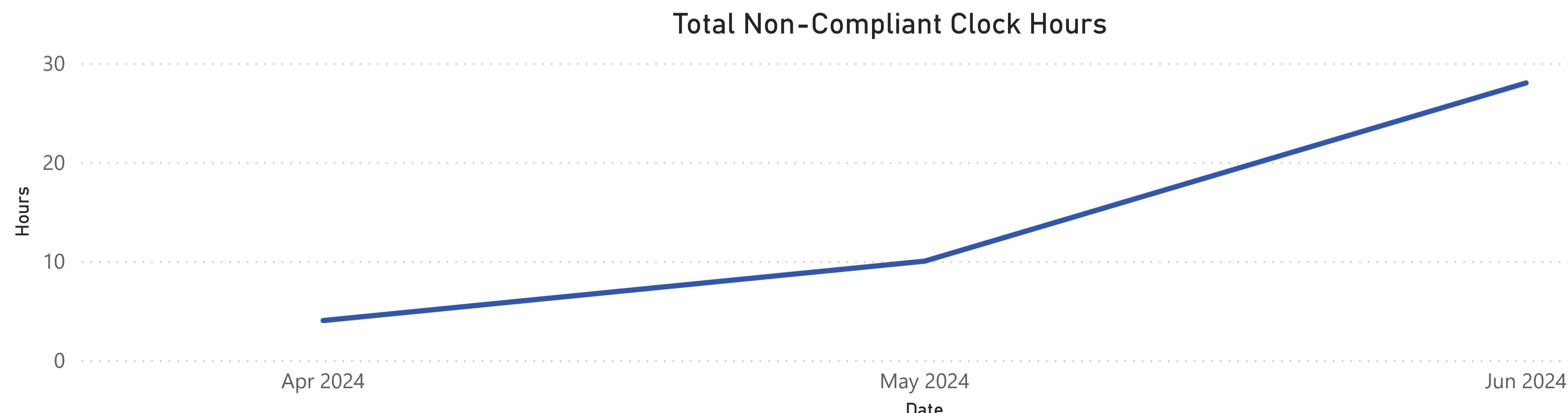
Quarter (Year)	Date	Battery	Oven	Opacity	Push Severity of Violation	Push Penalty Multiplier	USS Push Penalty	H2S Exceedance Penalty (push)	SO2 Exceedance Penalty (Push)	USS Total Push Penalty
Q2 2024	4/15/2024	13	A29	30	low	1.00	\$1,000			\$1,000
Q2 2024	4/18/2024	19	C11	30	low	1.00	\$1,000			\$1,000
Q2 2024	5/13/2024	20	A24	20	low	1.00	\$1,000			\$1,000
Q2 2024	5/14/2024	14	B5	20	low	1.00	\$1,000			\$1,000
Q2 2024	6/30/2024	14	B22	30	low	1.00	\$1,000			\$1,000
Total							\$5,000			\$5,000

USS Non-Compliant Travel Inspections and Penalties

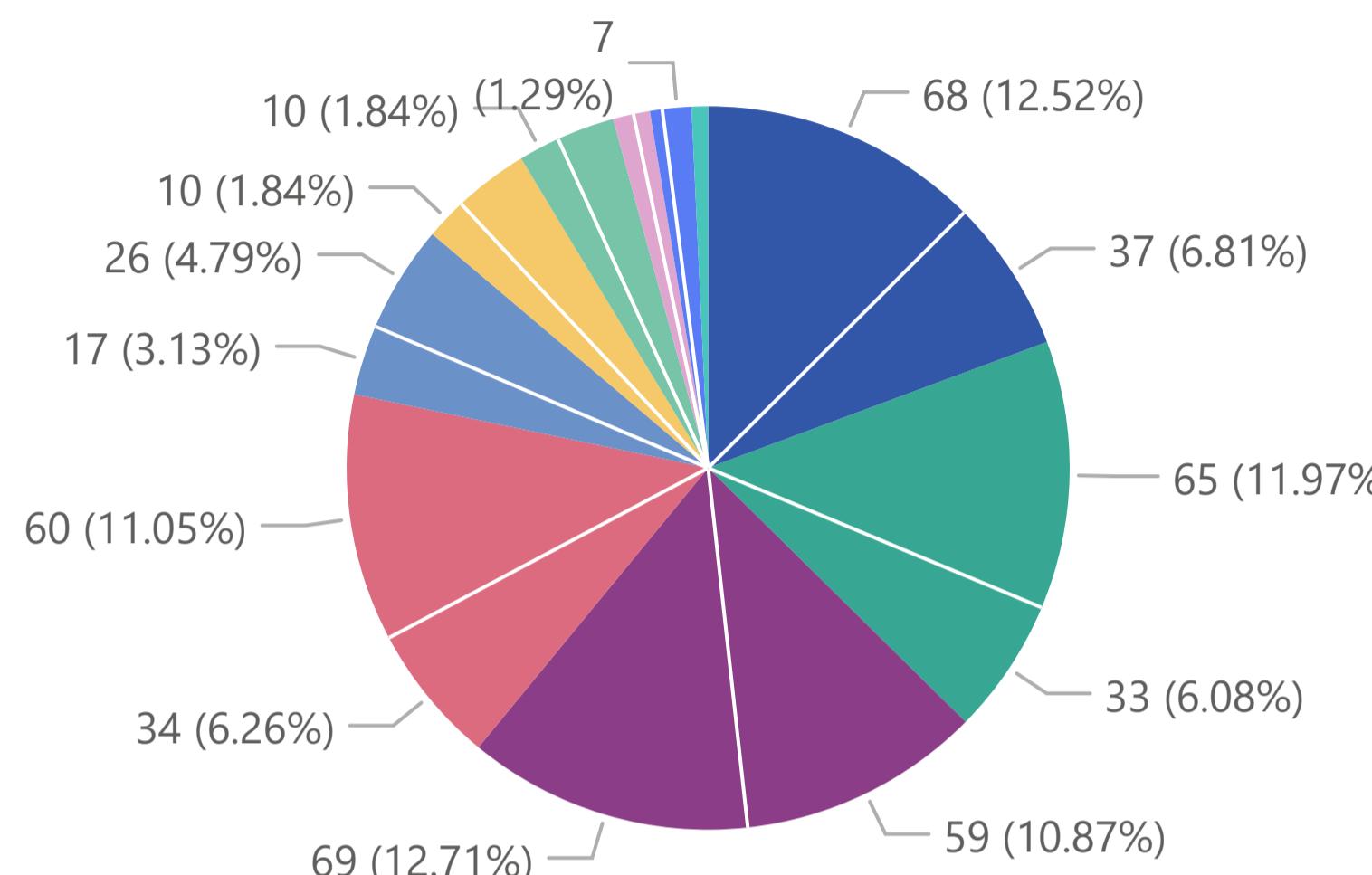
Quarter (Year)	Date	Battery	Oven	Opacity	Travel Severity of Violation	Travel Penalty Multiplier	USS Travel Penalty	H2S Exceedance Penalty (travel)	SO2 Exceedance Penalty (travel)	USS Total Travel Penalty
Q2 2024	4/4/2024	13	B24	40	moderate	1.50	\$1,500			\$1,500
Q2 2024	4/15/2024	13	A29	30	low	1.00	\$1,000			\$1,000
Q2 2024	5/14/2024	14	B5	15	low	1.00	\$1,000			\$1,000
Q2 2024	6/9/2024	13	A22	15	low	1.00	\$1,000			\$1,000
Q2 2024	6/30/2024	14	B22	20	low	1.00	\$1,000			\$1,000
Total						5.50				\$5,500

Continuous Opacity Monitor Non-Compliant Clock Hours

Quarter (Year)	Battery 13	Battery 14	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
Q2 2024	1	10	0	0	6	23	2	42	\$8,400
Total	1	10	0	0	6	23	2	42	\$8,400



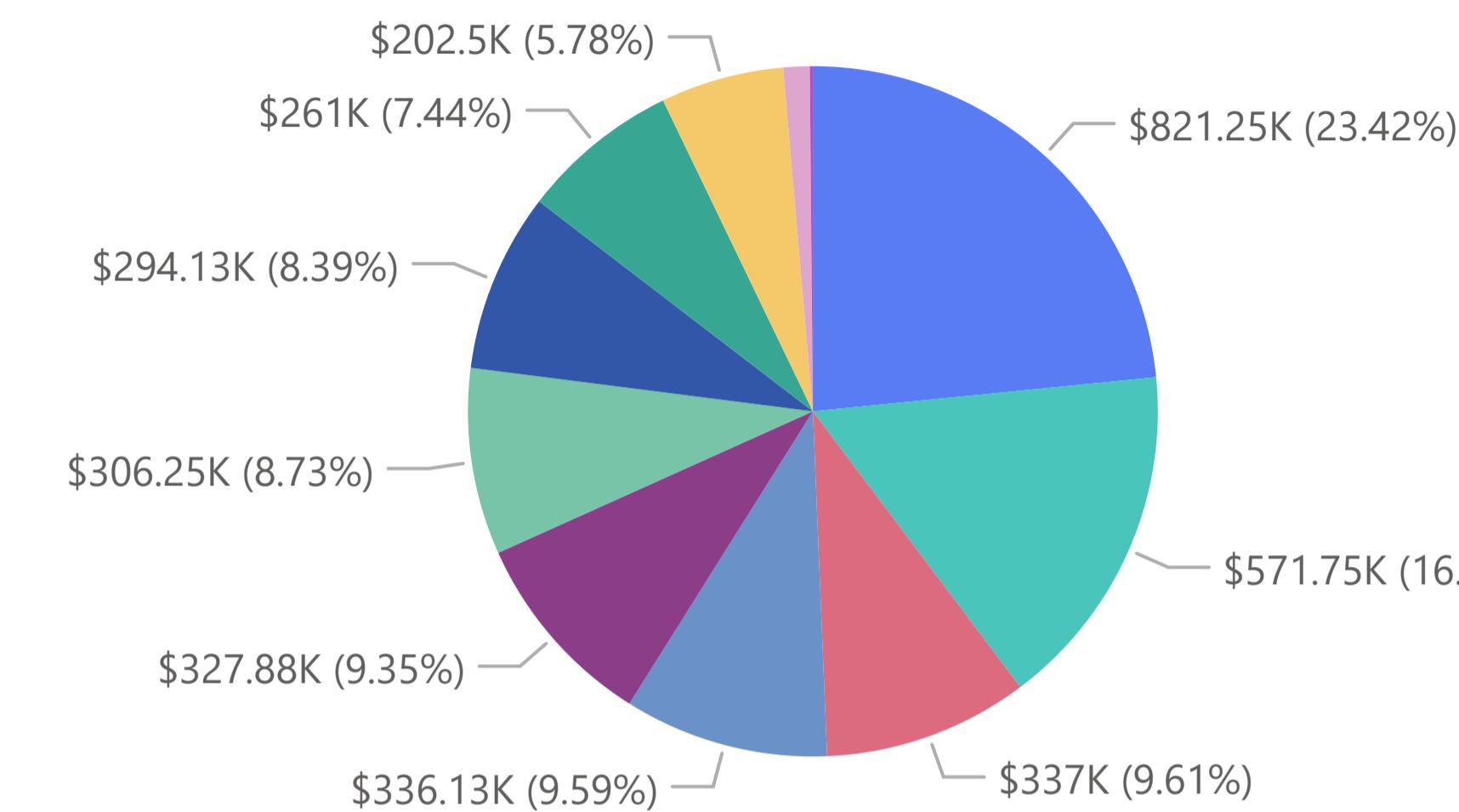
Non-Compliant Inspections: USS Push and Travel Inspections



Battery

- 13
- 14
- 19
- 20
- 1
- 2
- 3
- 15

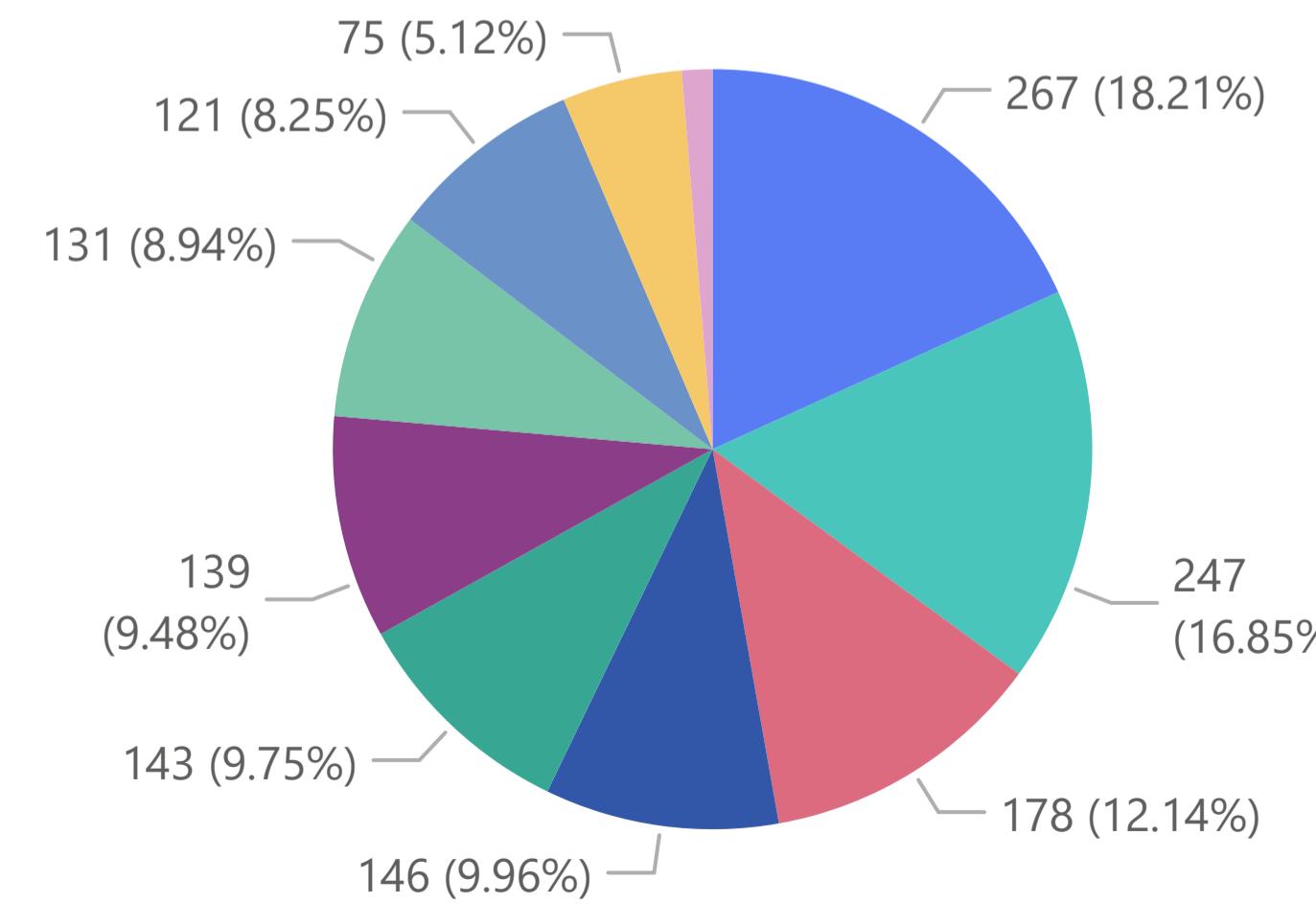
ACHD Total Penalties



Battery

- C
- B
- 20
- 1
- 19
- 3
- 13
- 14
- 2

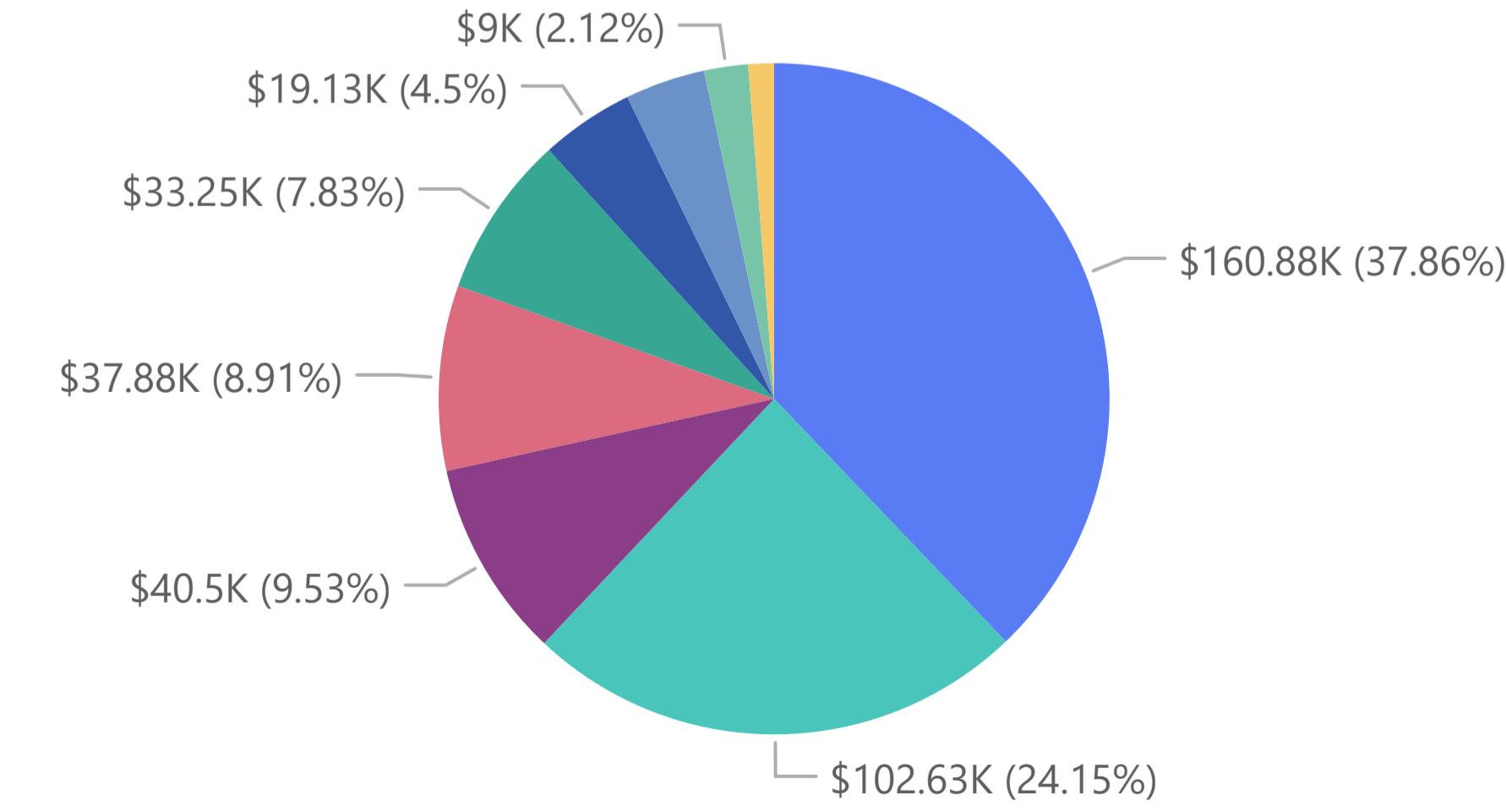
Total Non-Compliant Inspections



Battery

- C
- B
- 20
- 13
- 14
- 19
- 3
- 1
- 2

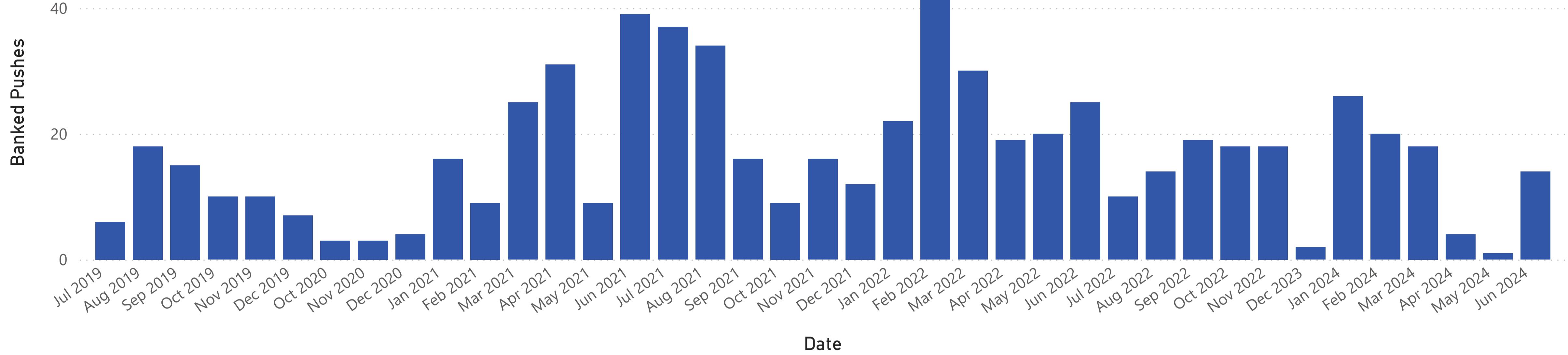
Method 303 Total Penalty



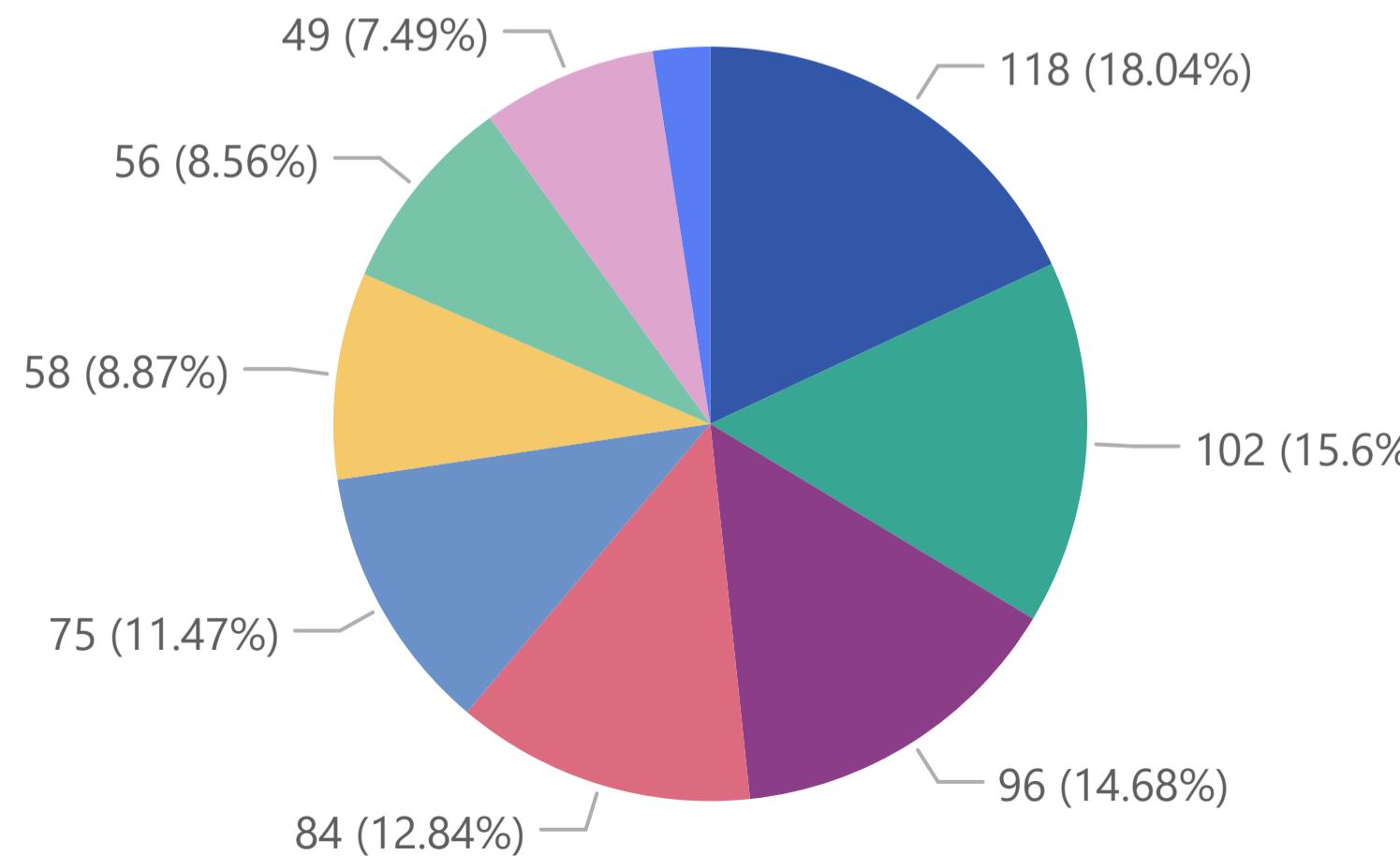
Battery

- C
- B
- 19
- 20
- 14
- 13
- 1
- 3

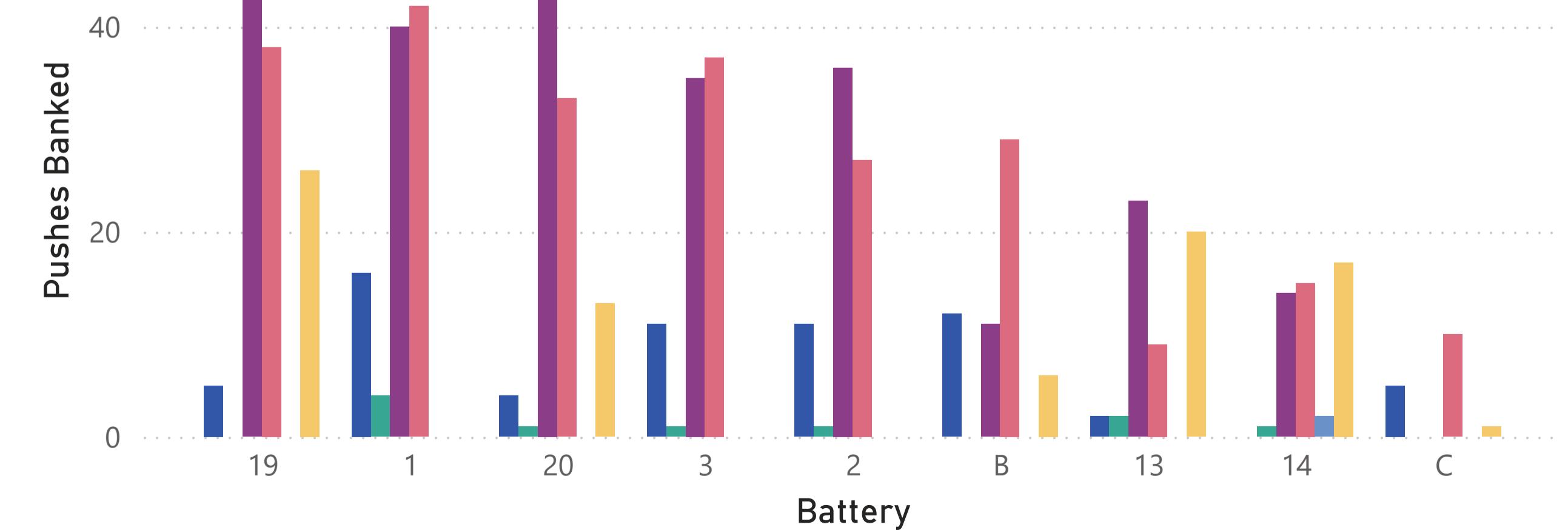
Total Instances of Banked Pushes



Pushes Banked by Battery



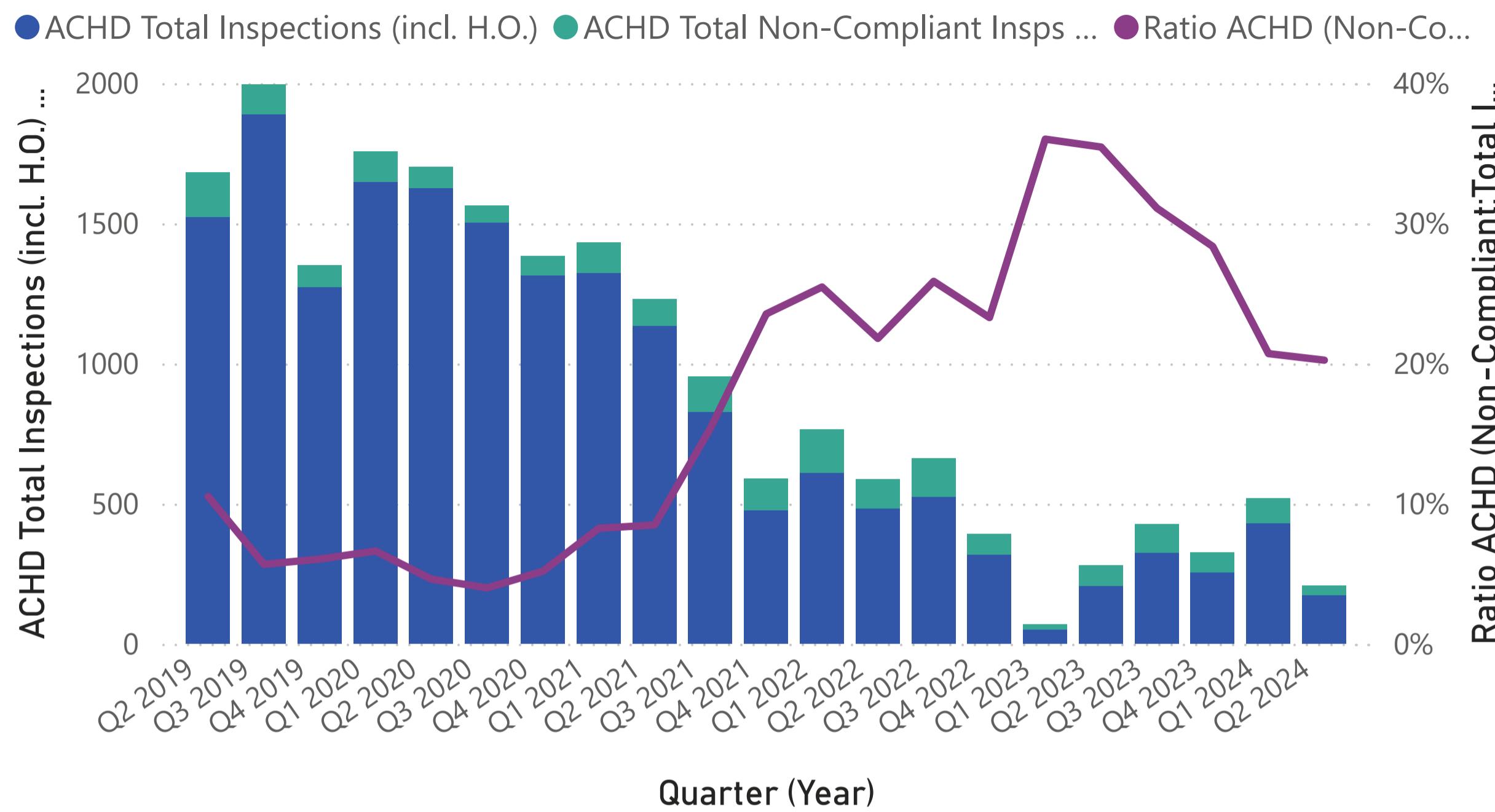
Pushes Banked by Battery and Year



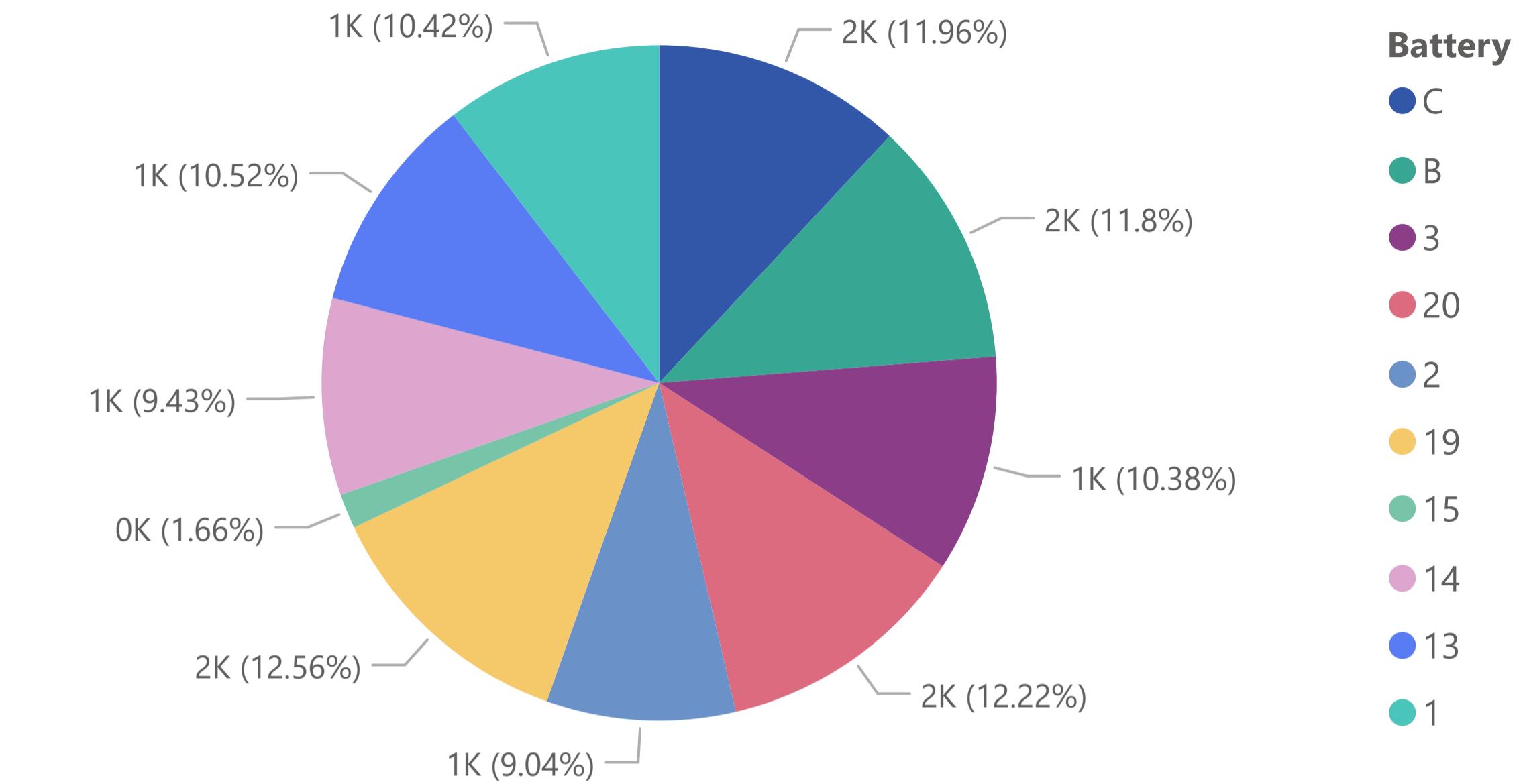
Battery ● 19 ● 1 ● 20 ● 3 ● 2 ● B ● 13 ● 14 ● C

Year ● 2019 ● 2020 ● 2021 ● 2022 ● 2023 ● 2024

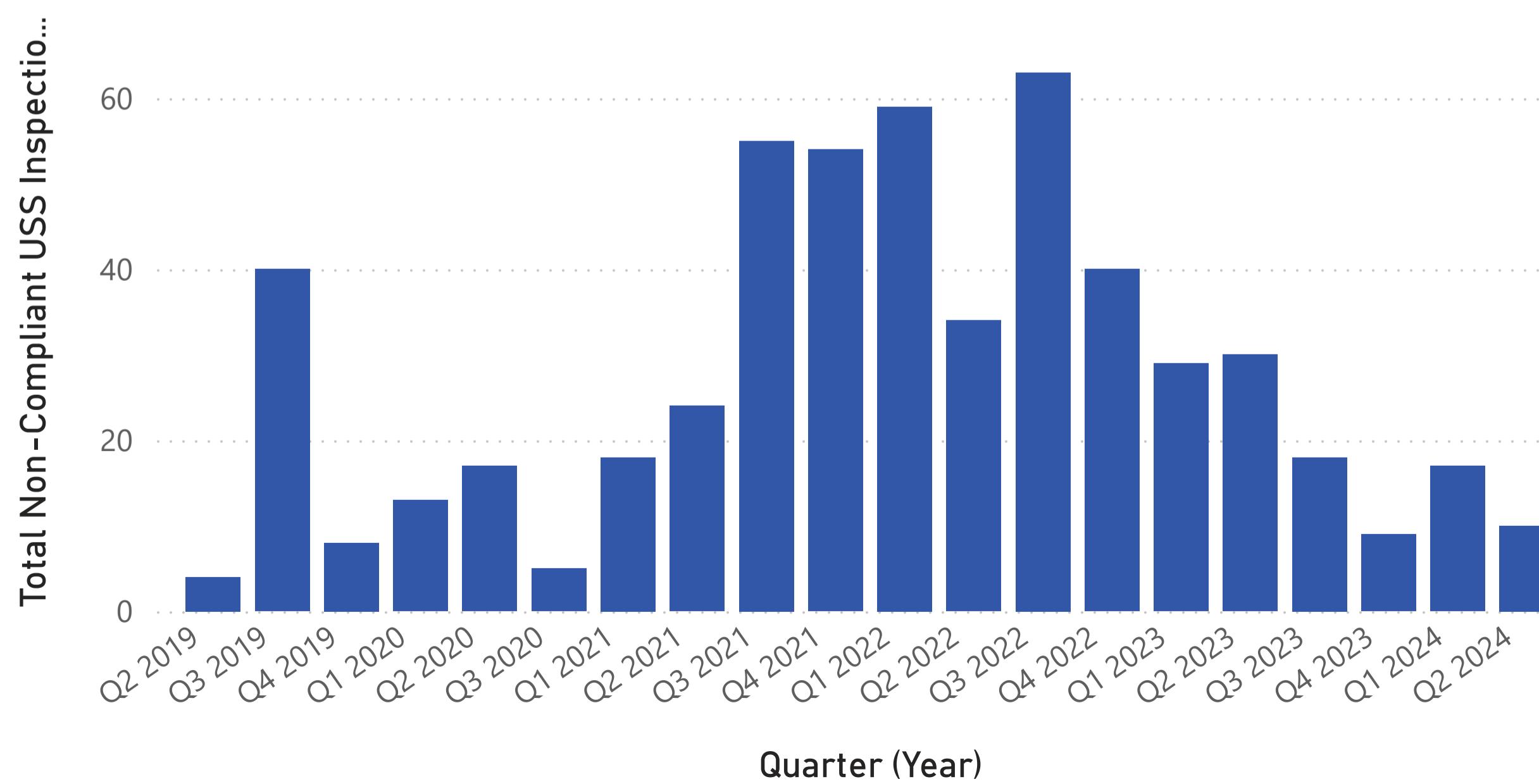
ACHD Total Inspections (SOA #190604)



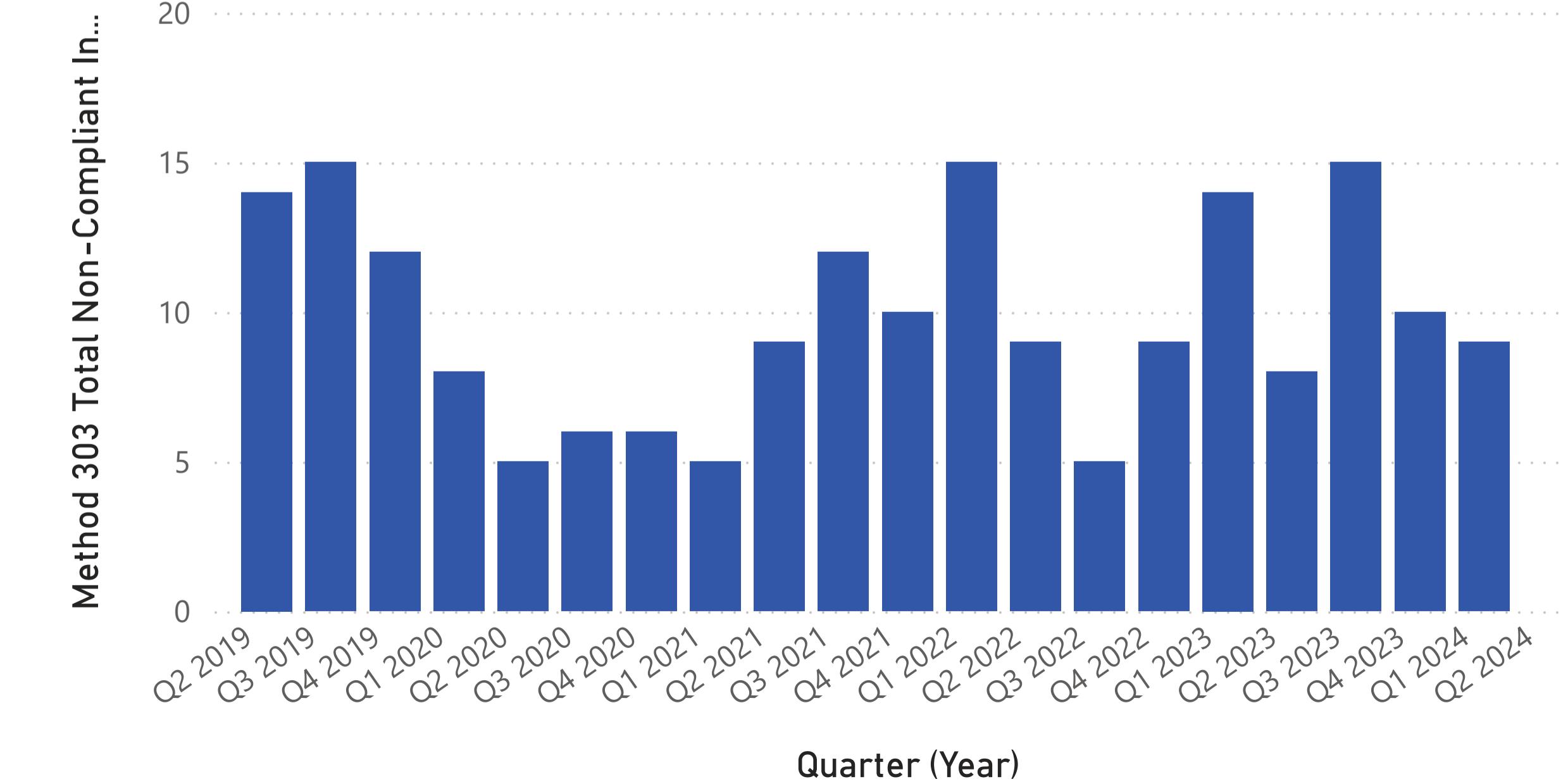
Non-Compliant Inspections (ACHD, M303, USS)



Non-Compliant Inspections Performed by U.S. Steel

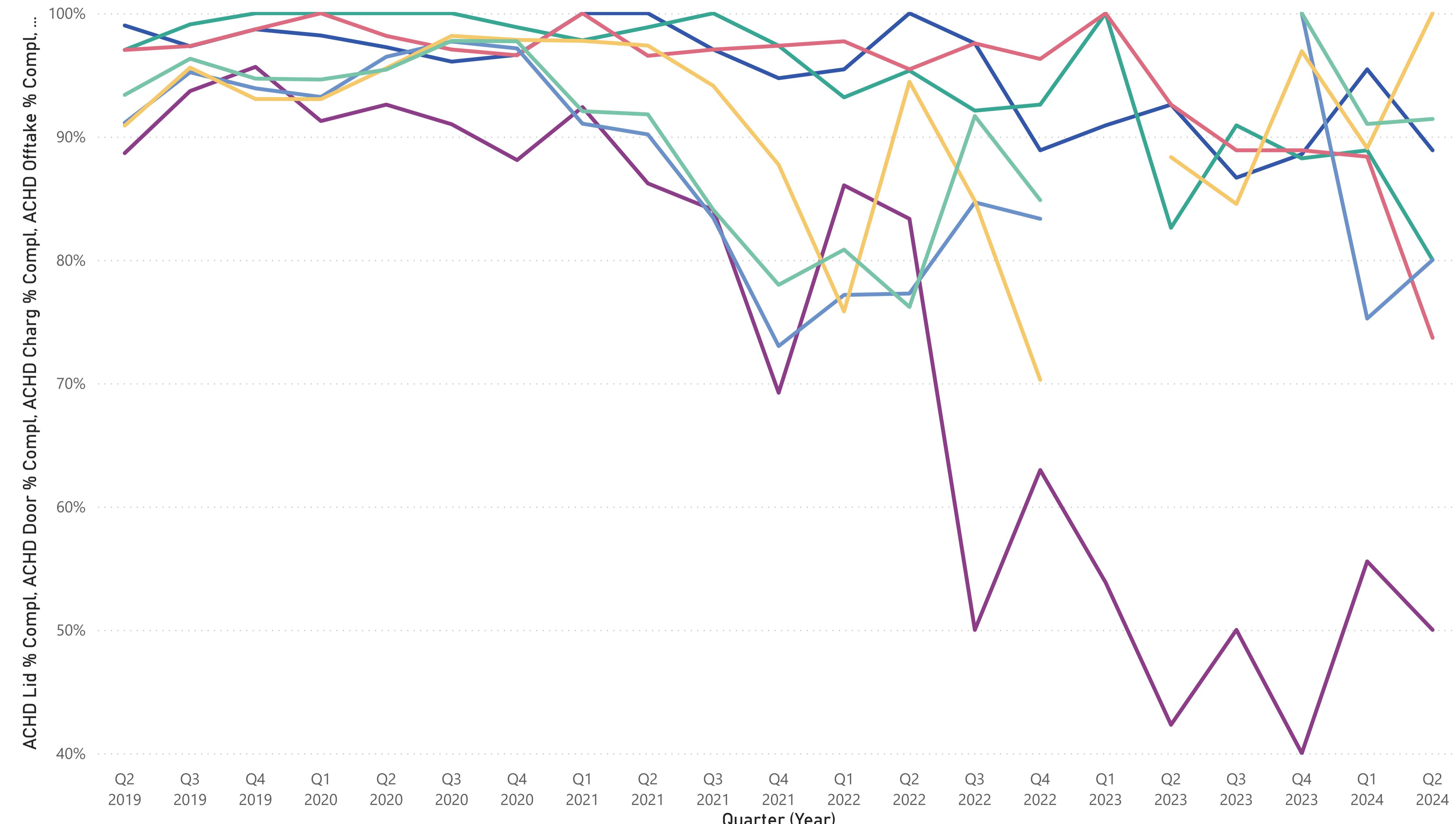


Method 303 Total Non-Compliant Inspections by Quarter (Year)



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 2024	\$250				\$250		
6/13/2024	\$250				\$250		
Q1 2024	\$750	\$500	\$1,250			\$500	
3/14/2024	\$250		\$500				
3/13/2024							\$250
2/26/2024	\$250			\$250			
2/9/2024			\$250				
1/25/2024	\$250						
1/24/2024				\$250			\$250
1/23/2024			\$250	\$250			
Q4 2023	\$1,750	\$750	\$4,500			\$500	\$250
11/16/2023	\$250	\$250	\$1,500			\$250	
11/15/2023	\$250	\$250	\$1,500				
11/14/2023	\$250						
11/3/2023	\$250						\$250
10/25/2023	\$250						
10/24/2023	\$250						
10/11/2023	\$250	\$250	\$1,500			\$250	
Q3 2023	\$500		\$500		\$750		\$250
9/6/2023					\$250		
9/5/2023	\$250		\$250				
7/11/2023	\$250		\$250		\$500		\$250
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			
Total	\$8,750	\$1,750	\$28,000	\$11,000	\$6,250	\$3,500	\$2,000