

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](http://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,

A handwritten signature in black ink, appearing to read 'Allason Holt', with a stylized flourish at the end.

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

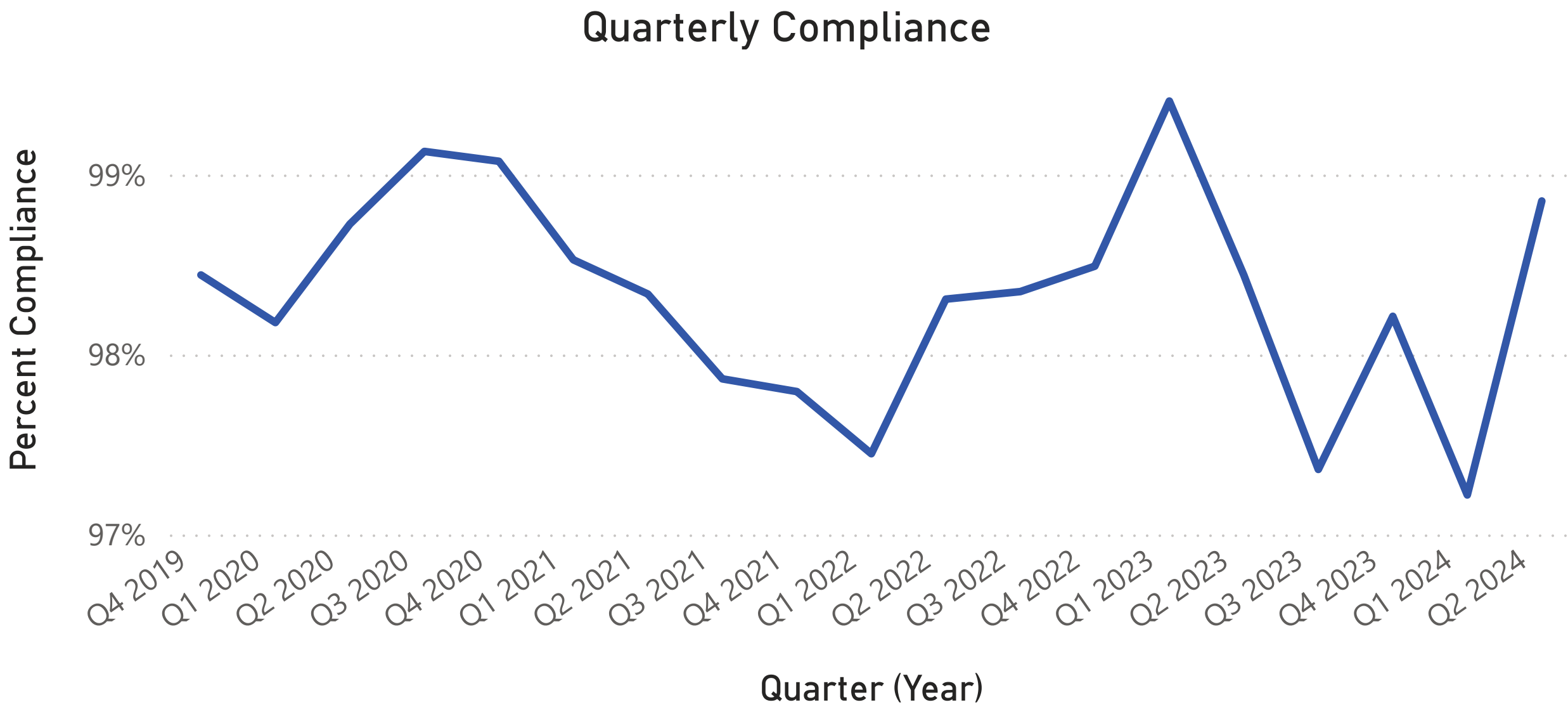
\$85,775

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 Insps	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%

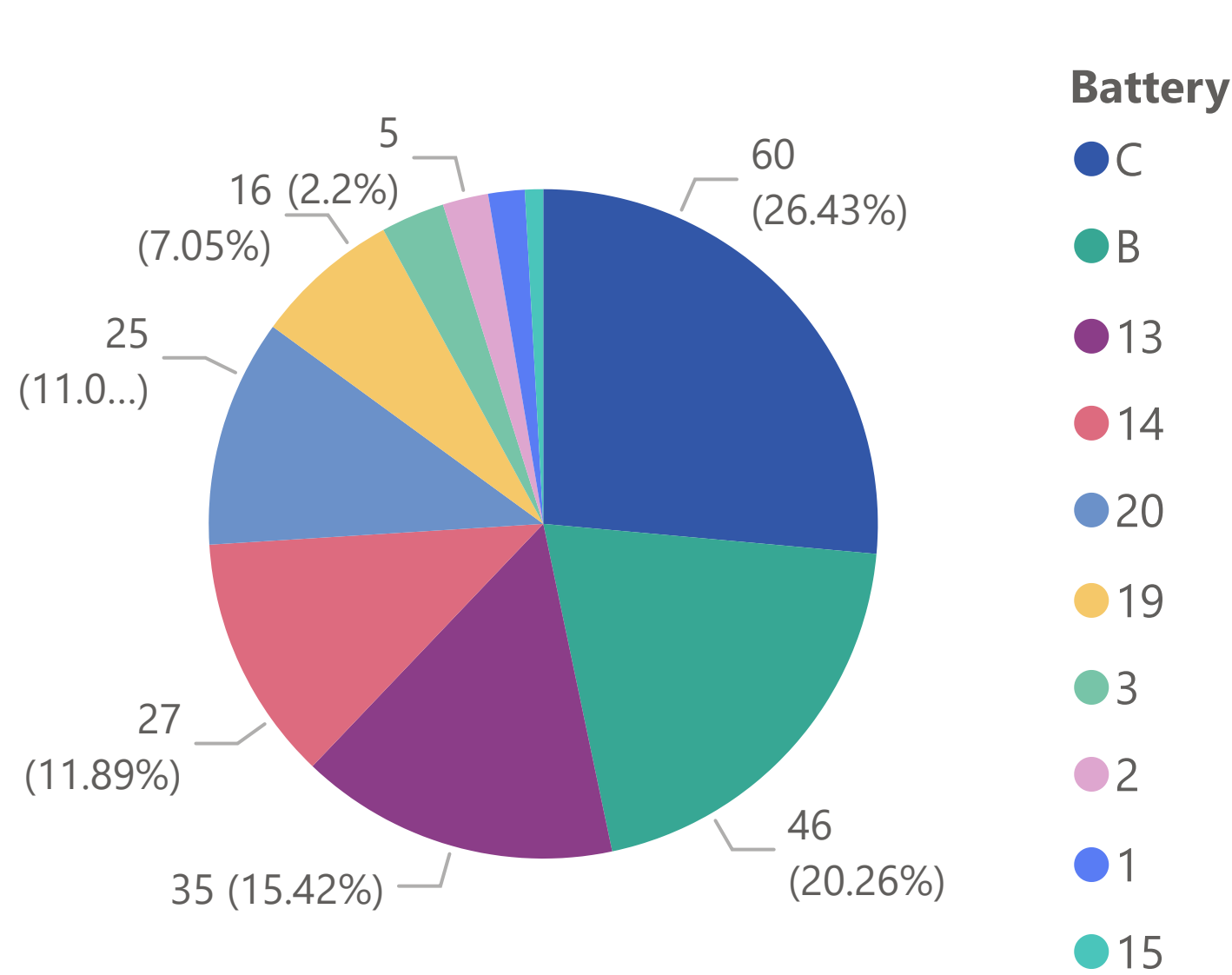


Average Percent Compliance			
Quarter (Year)	Quarterly Compliance (1 previous Q)	Quarterly Compliance (current Qs)	Compliance Average of Current and Previous Quarters
Q2 2024	97.219%	98.853%	98.036%
Q1 2024	98.212%	97.219%	97.716%
Q4 2023	97.361%	98.212%	97.787%
Q3 2023	98.441%	97.361%	97.901%
Q2 2023	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%	97.575%

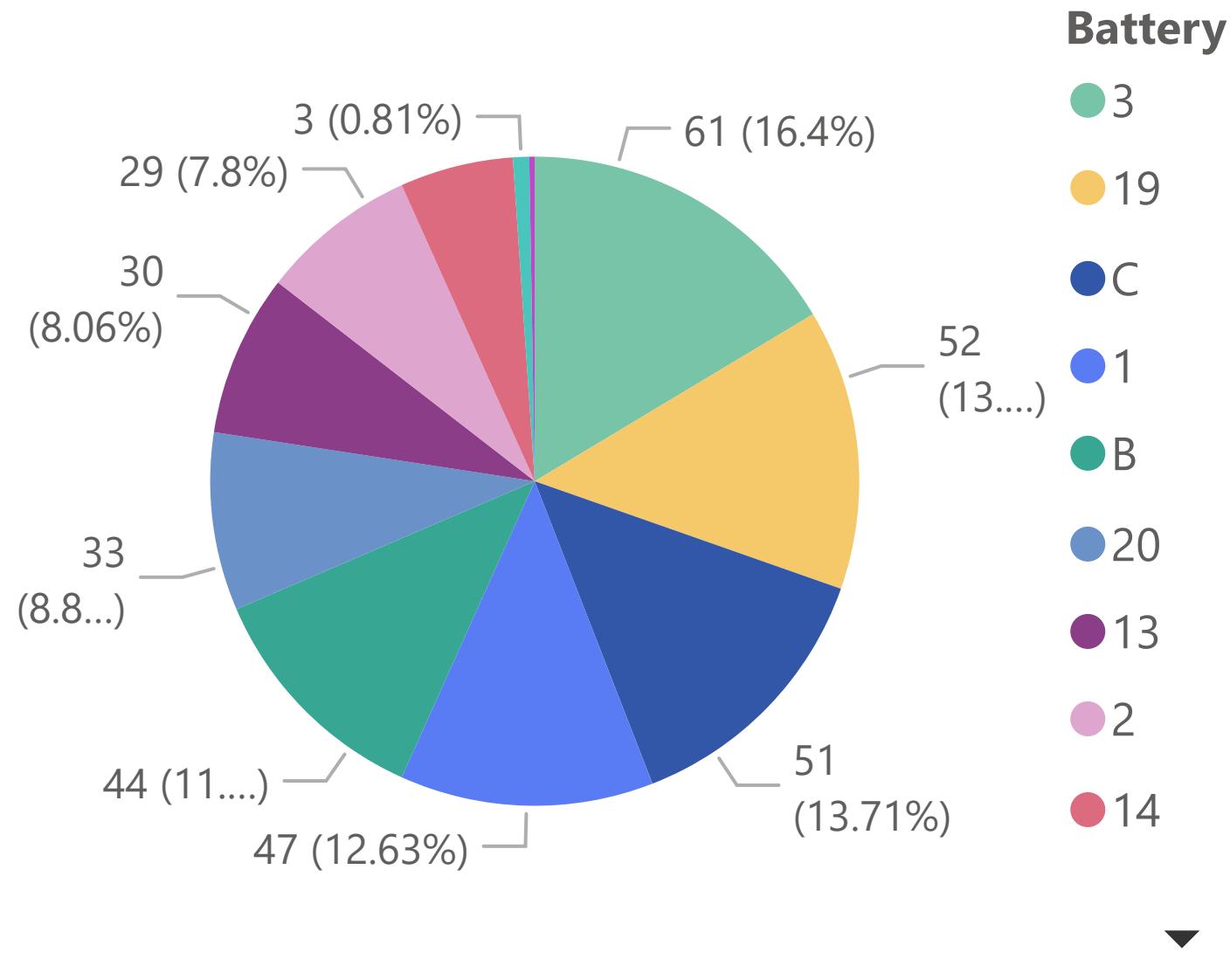
Penalty Summary for ACHD Inspections									
Quarter (Year)	ACHD Charging Penalty	ACHD Soaking Penalty	ACHD Push Penalty	ACHD Travel Penalty	ACHD Doors Penalty	ACHD Lid Penalty	ACHD Offtake Penalty	ACHD HO Door Penalty	ACHD Total Penalties
Q2 2024									
Apr 2024	\$0	\$0	\$5,000			\$0	\$0	\$0	\$5,000
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

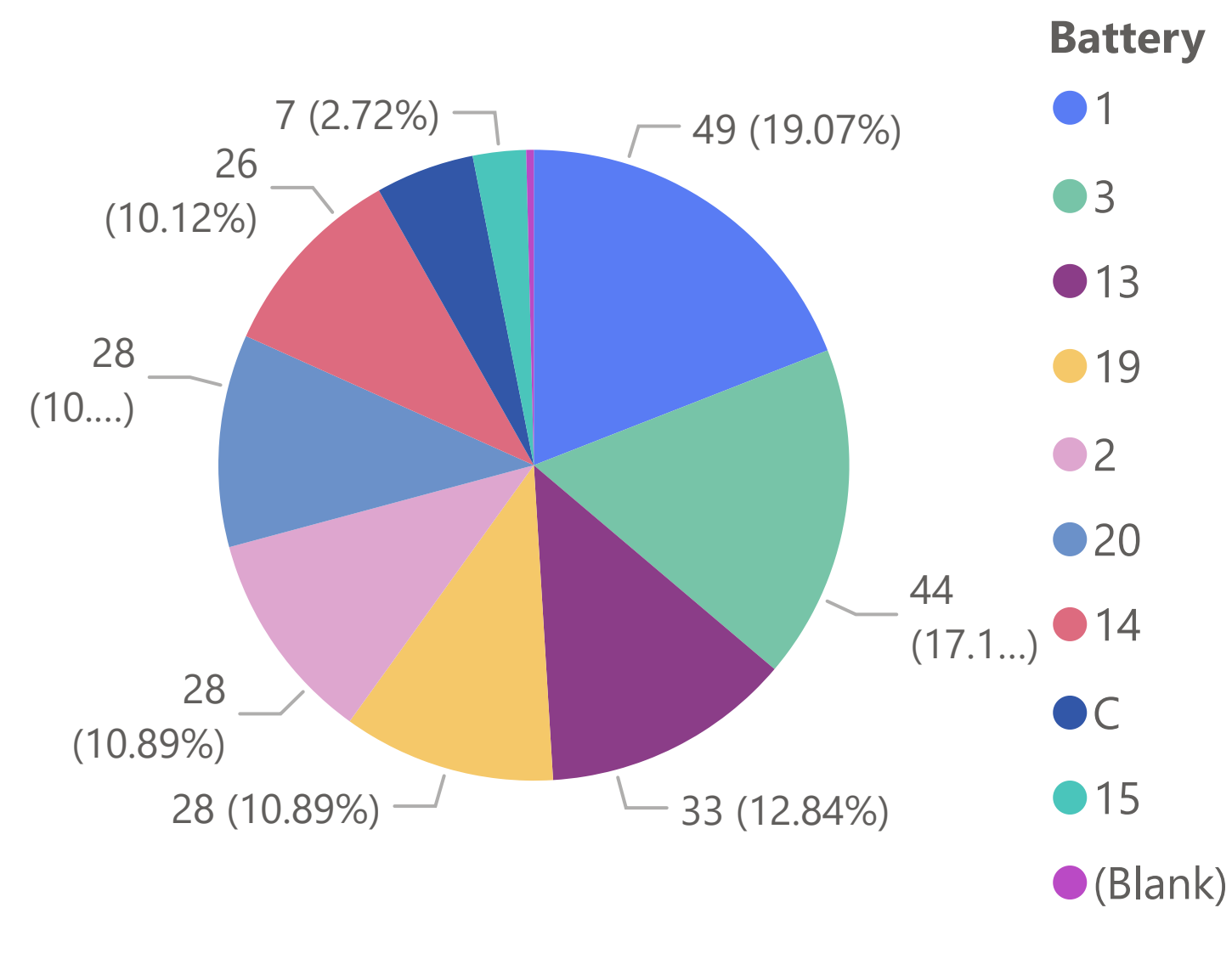
Charging Violations by Battery



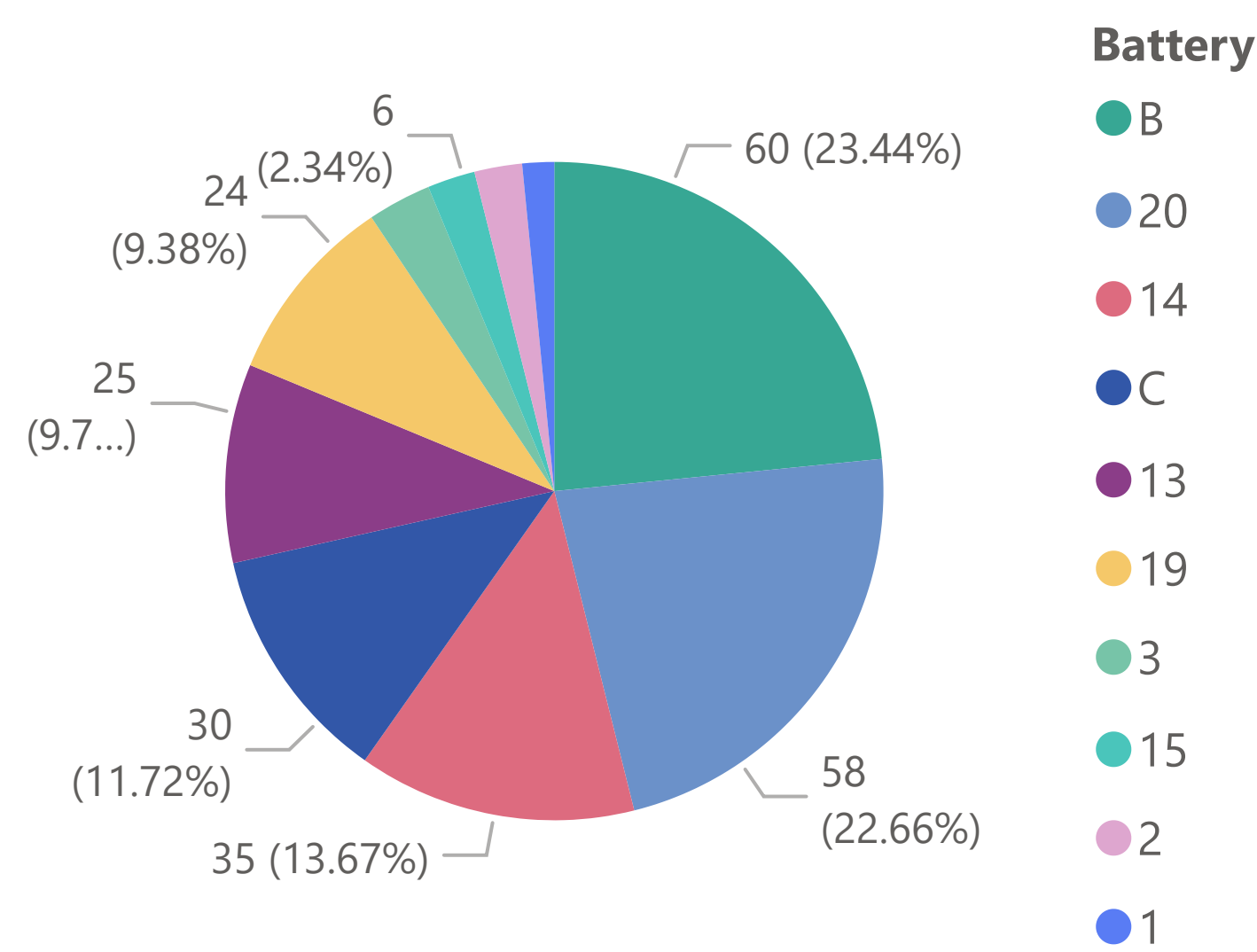
Push Violations by Battery



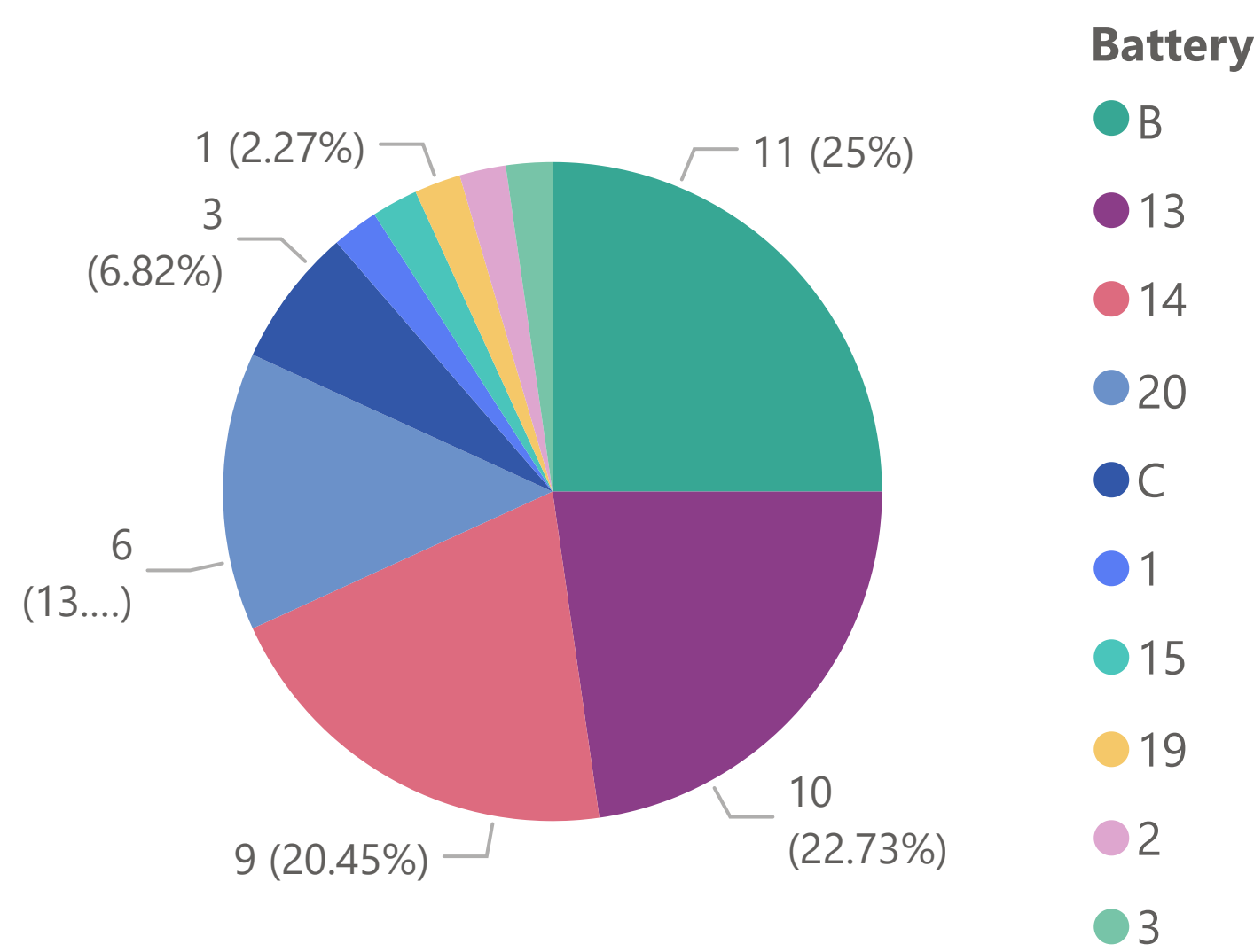
Travel Violations by Battery



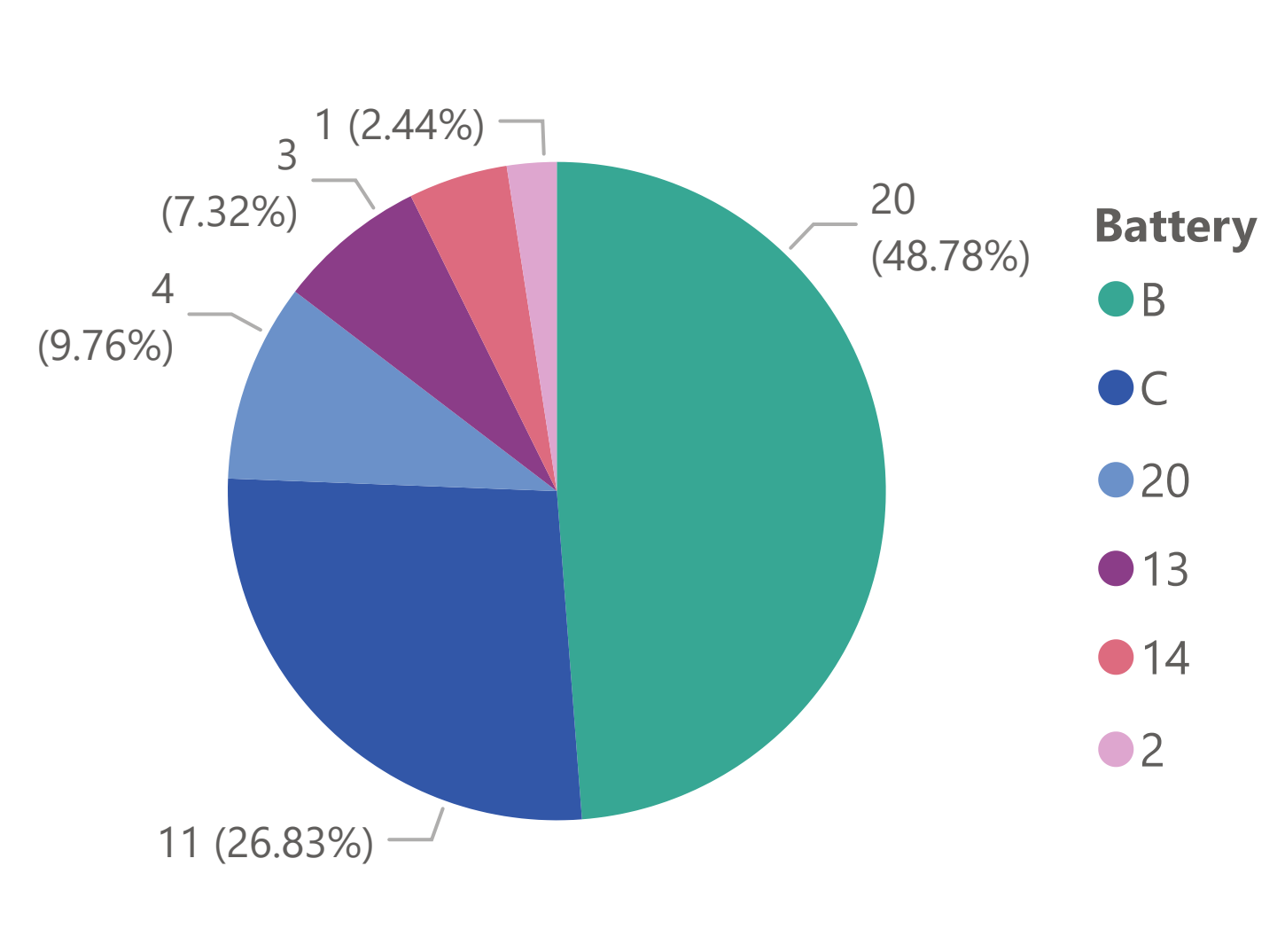
Soak Violations by Battery



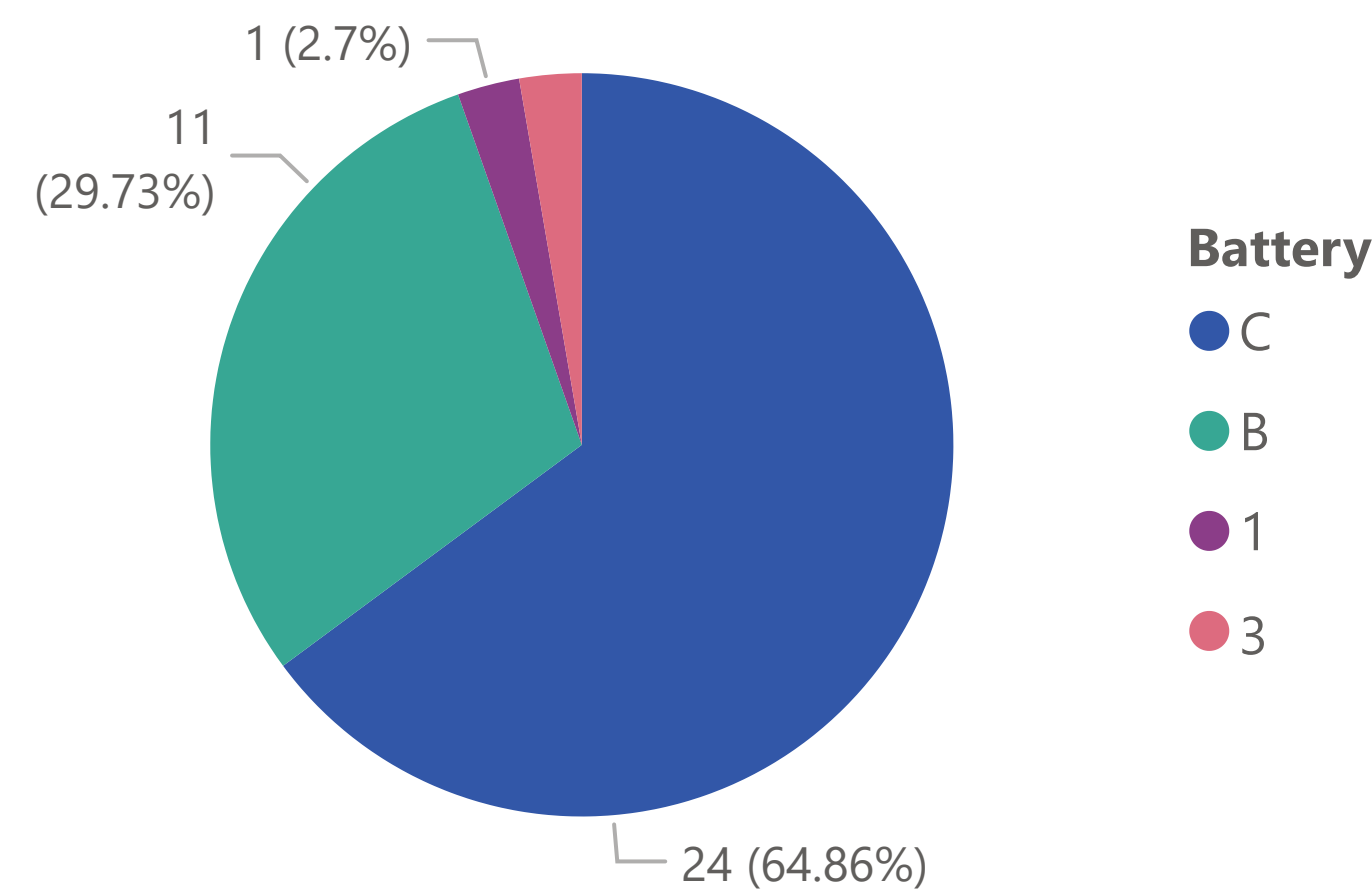
Topside (Offtakes) Violations by Battery



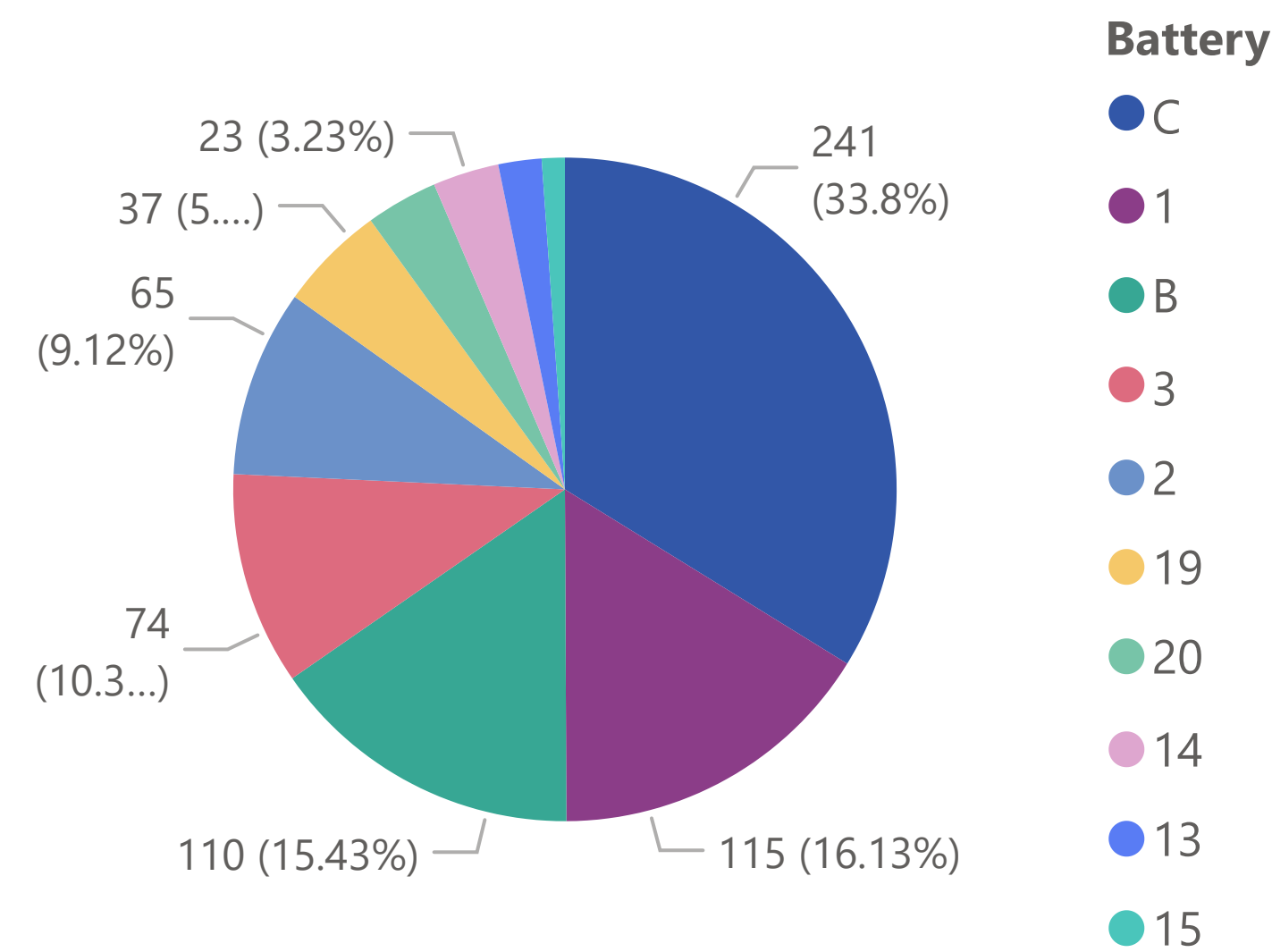
Topside (Lids) Violation by Battery



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 Multiplier	Soaking Penalty	H2S Penalty	SO2 Penalty	ACHD Soaking Penalty
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## 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 2024	4/2/2024	19	A11	70	major	2.50	\$2,500			\$2,500
Q2 2024	4/2/2024	19	A5	80	major	2.50	\$2,500			\$2,500
Q2 2024	5/30/2024	19	A23	75	major	2.50	\$2,500			\$2,500
Q2 2024	5/30/2024	19	A25	80	major	2.50	\$2,500			\$2,500
Q2 2024	6/3/2024	19	A4	65	major	2.50	\$2,500			\$2,500
Q2 2024	6/3/2024	19	C29	75	major	2.50	\$2,500			\$2,500
Q2 2024	6/3/2024	19	A2	85	major	2.50	\$2,500			\$2,500
Q2 2024	6/3/2024	19	C27	90	major	2.50	\$2,500			\$2,500
Total										\$20,000

## 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 2024	6/3/2024	19	C29	55	moderate	1.50	\$1,500			\$1,500
Q2 2024	6/5/2024	13	B19	75	major	2.50	\$2,500			\$2,500
Q2 2024	6/14/2024	19	C11	40	moderate	1.50	\$1,500			\$1,500
Total										\$5,500

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 2024	6/6/2024	B	11.67%	2.33	Major	2.50	\$2,500			\$2,500
Total							\$2,500			

Non-Compliant ACHD Topside (Lid) Inspections and Penalties												
Quarter (Year)	Date	Battery	Percent Leaking Lids	Severity Value	Severity of Violation	Topsides (Lid)	Penalty Multiplier	Topside(Lids)	H2S Penalty	SO2 Penalty	ACHD Lid Penalty	
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	

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 2024	6/10/2024	14	5.17	1.29	Moderate	1.50	\$1,500			\$1,500
Q2 2024	6/11/2024	13	4.31	1.08	Low	1.00	\$1,000			\$1,000
Q2 2024	6/12/2024	20	4.76	1.19	Low	1.00	\$1,000			\$1,000
Q2 2024	6/19/2024	20	4.76	1.19	Low	1.00	\$1,000			\$1,000
Q2 2024	6/28/2024	B	5.56	1.39	Moderate	1.50	\$1,500			\$1,500
Total										\$6,000

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
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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

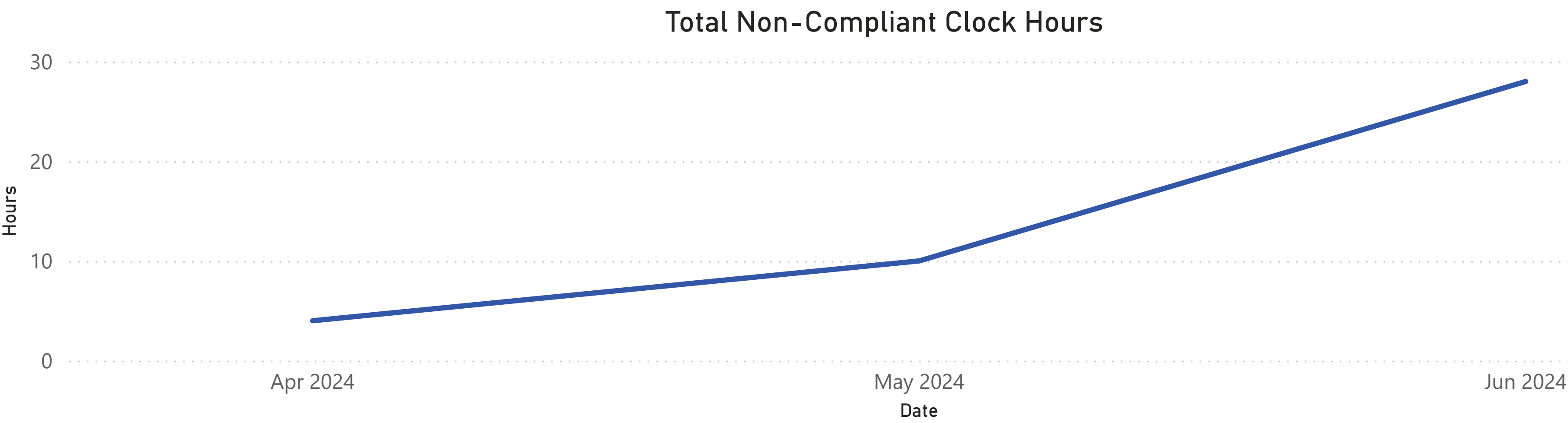
USS Non-Compliant Pushing Inspections and Penalties

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

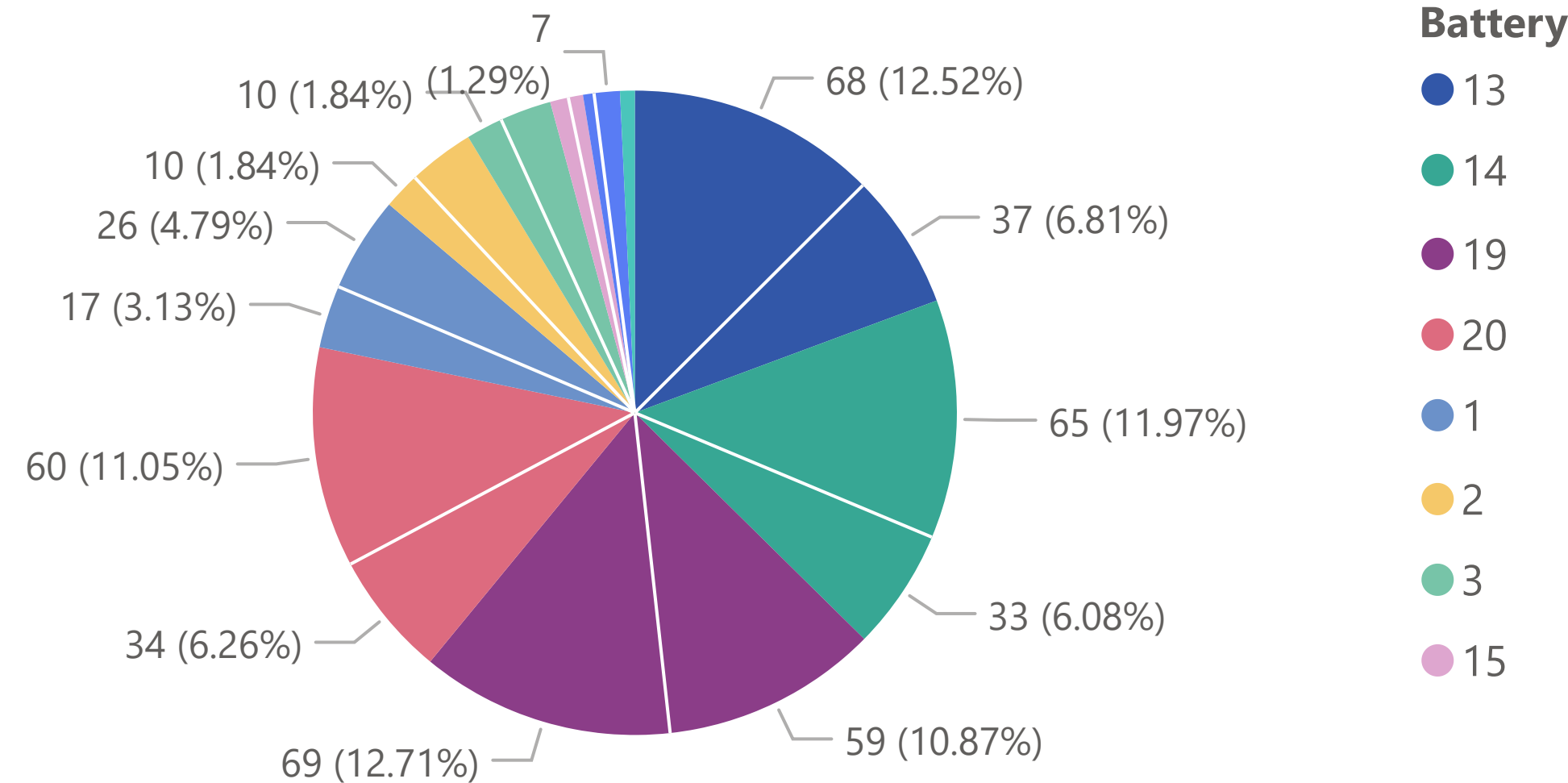
USS Non-Compliant Travel Inspections and Penalties										
Quarter (Year)	Date	Battery	Oven	Opacity	Travel Severity of Violation	Travel Penalty Multiplier	USS Travel Penalty	H2S Exceedance Penalty (travel)	SO2 Exceedance Penalty (travel)	USS Total Travel Penalty
Q2 2024	4/4/2024	13	B24	40	moderate	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

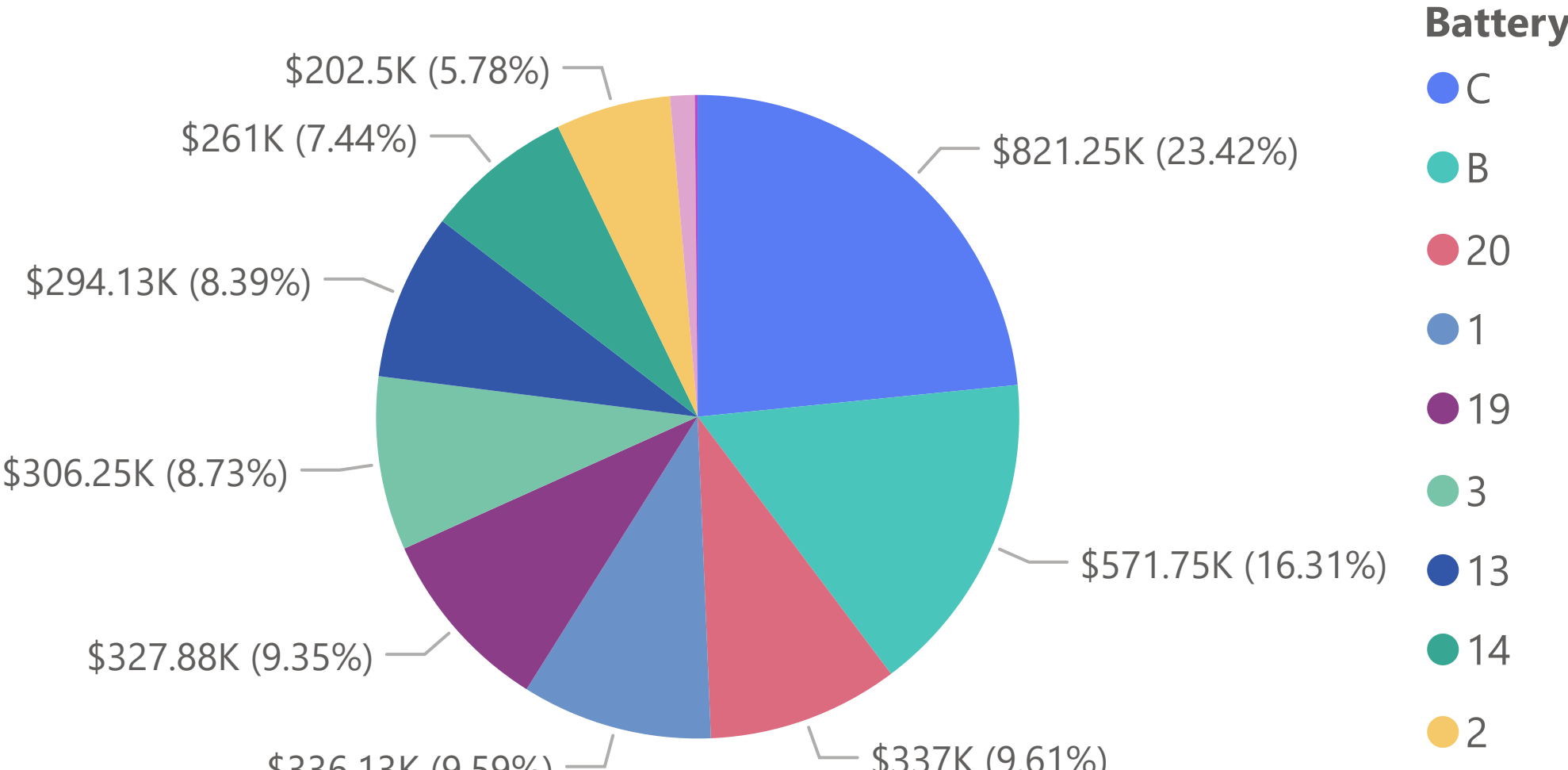
Quarter (Year)	Battery 13	Battery 14	Battery 15	Battery 19	Battery 20	Battery B	Battery C	Total Non-Compliant Clock Hours	COMs Penalty
⊞ Q2 2024	1	10	0	0	6	23	2	42	\$8,400
Total	1	10	0	0	6	23	2	42	\$8,400



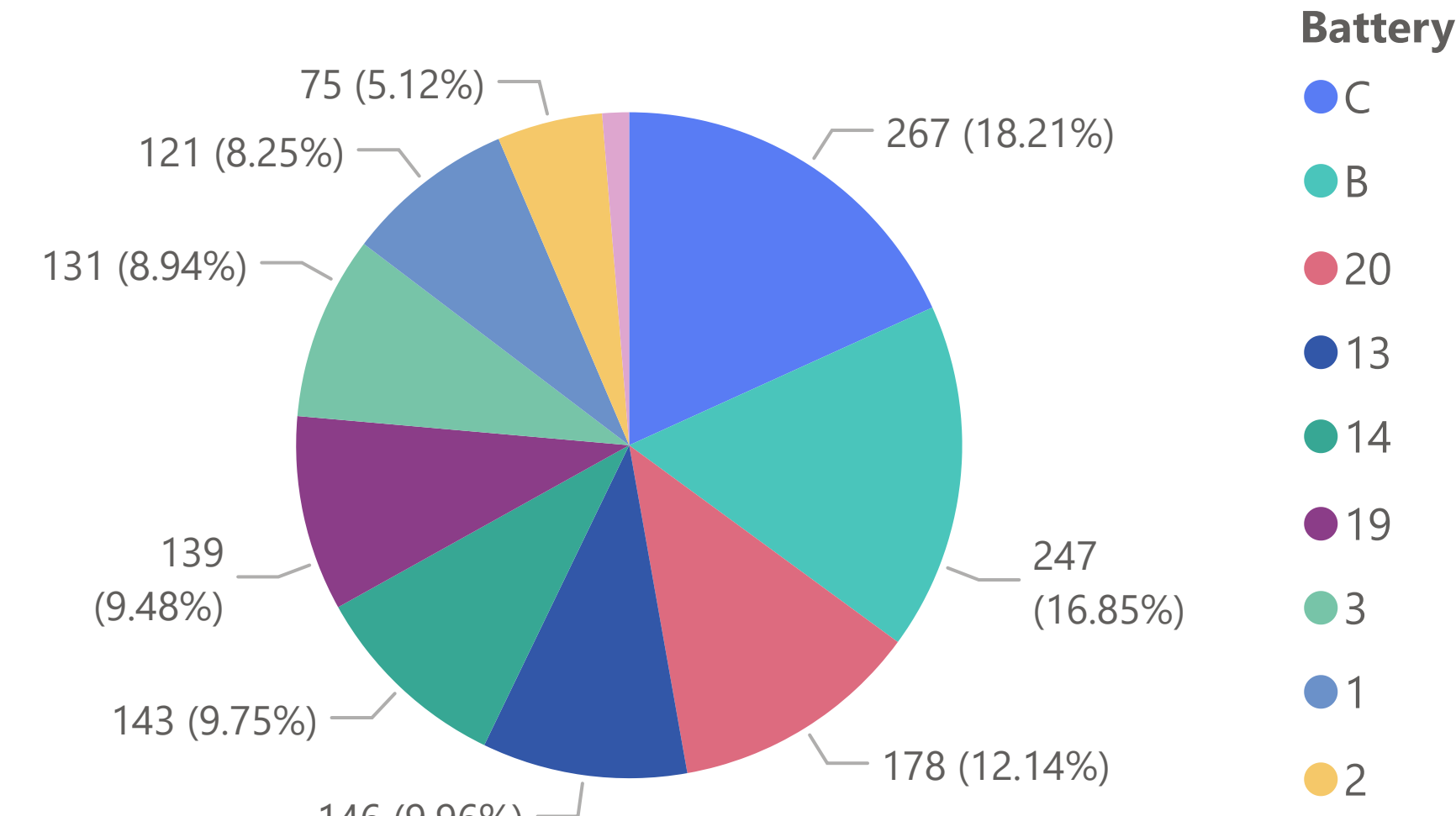
Non-Compliant Inspections: USS Push and Travel Inspections



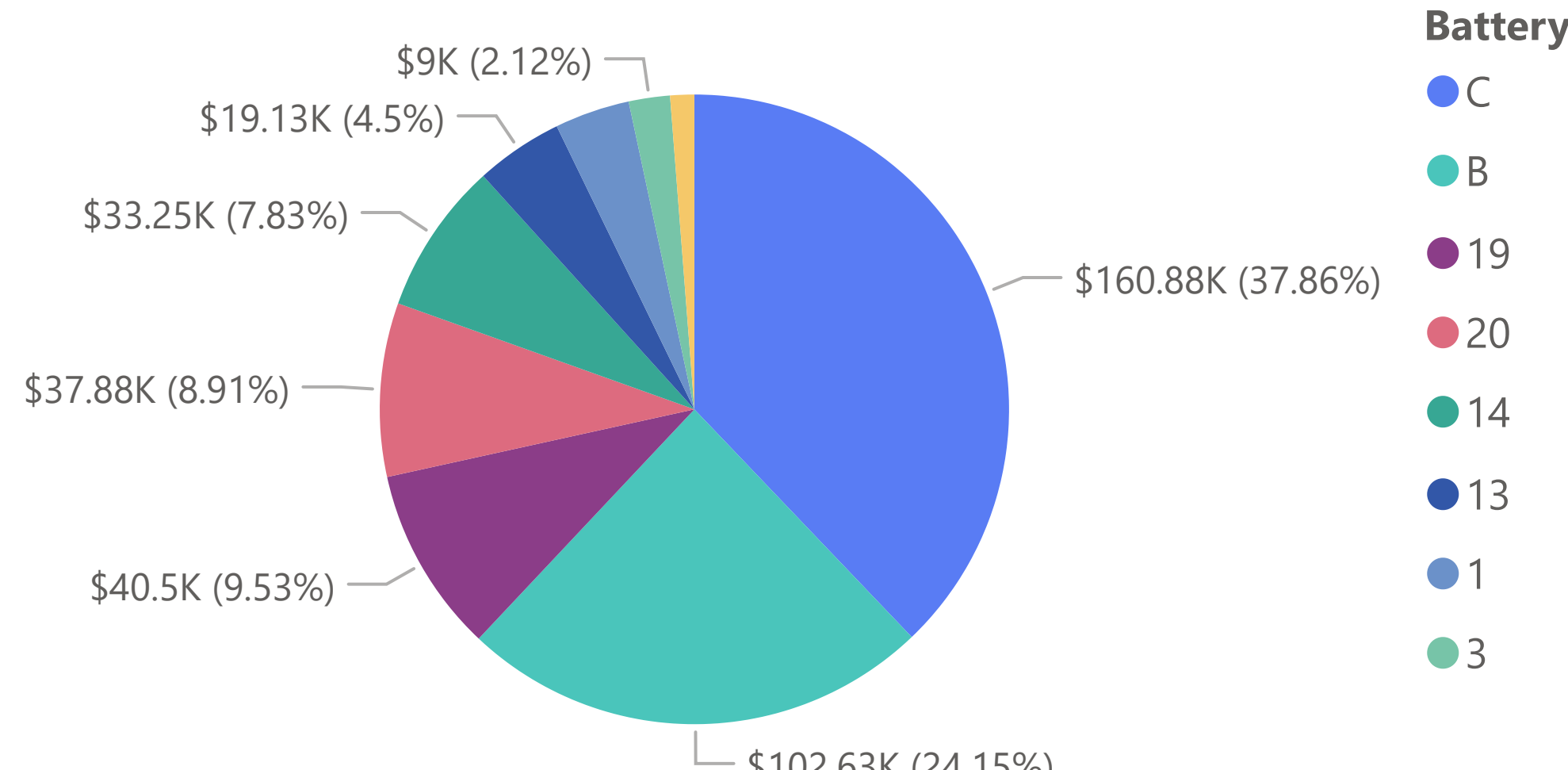
ACHD Total Penalties



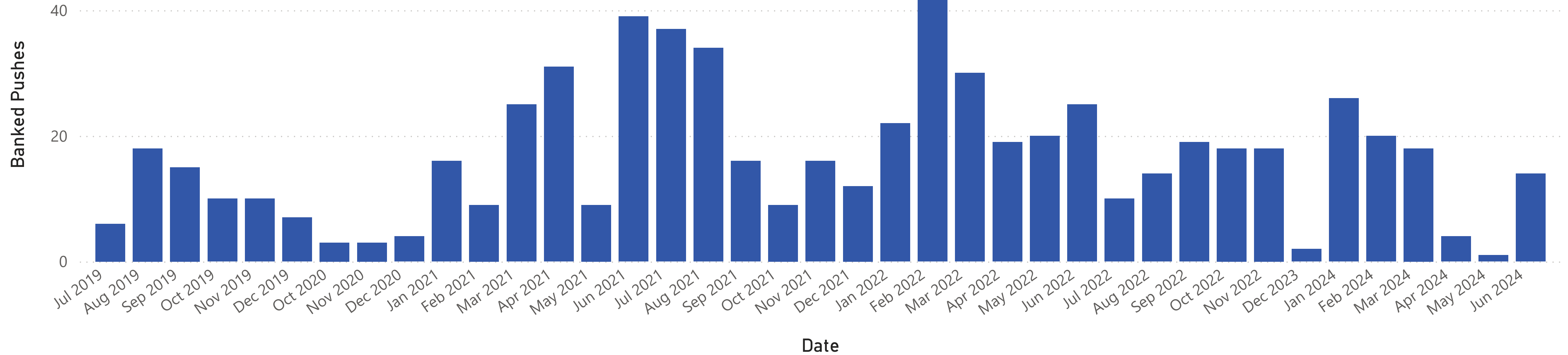
Total Non-Compliant Inspections



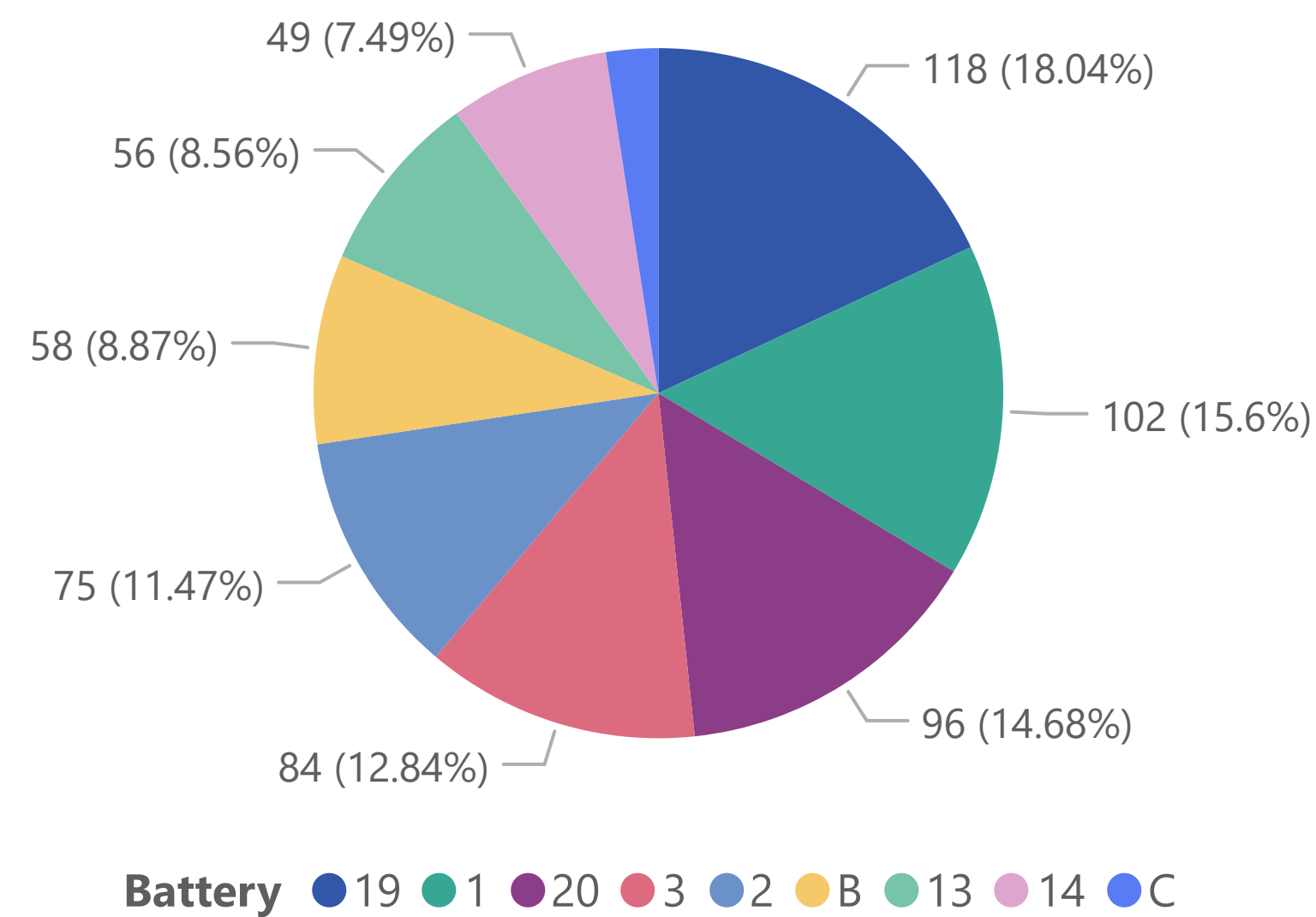
Method 303 Total Penalty



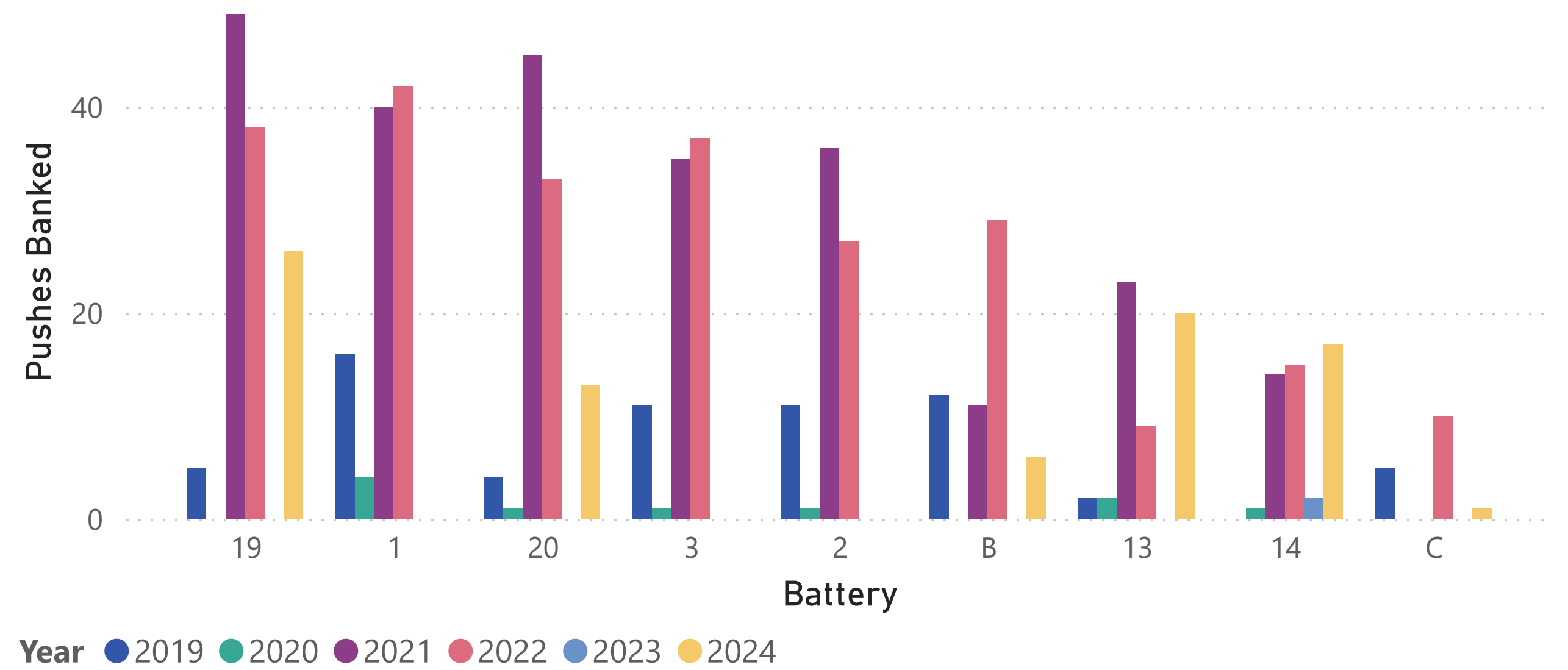
### Total Instances of Banked Pushes



### Pushes Banked by Battery

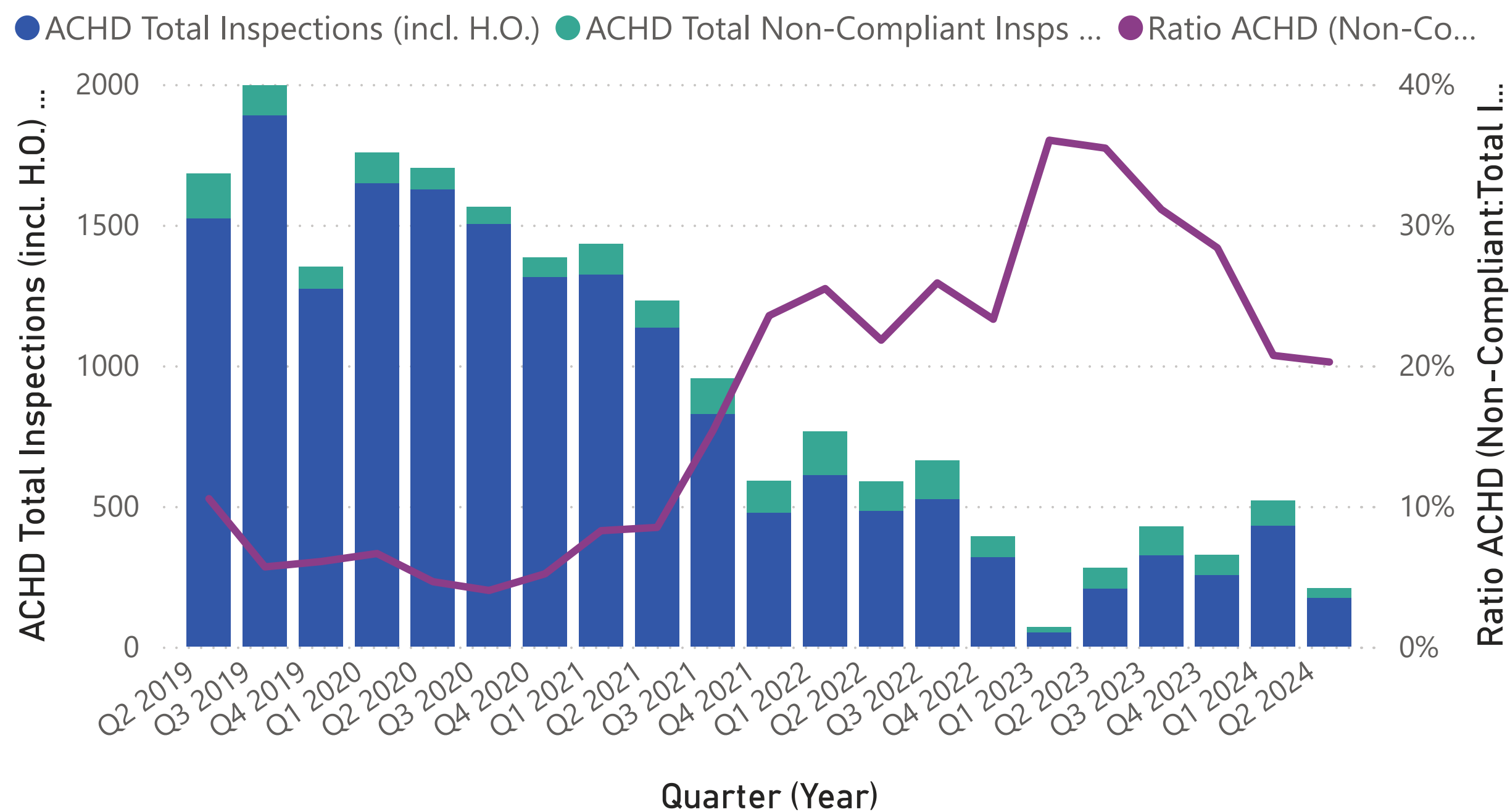


### Pushes Banked by Battery and Year

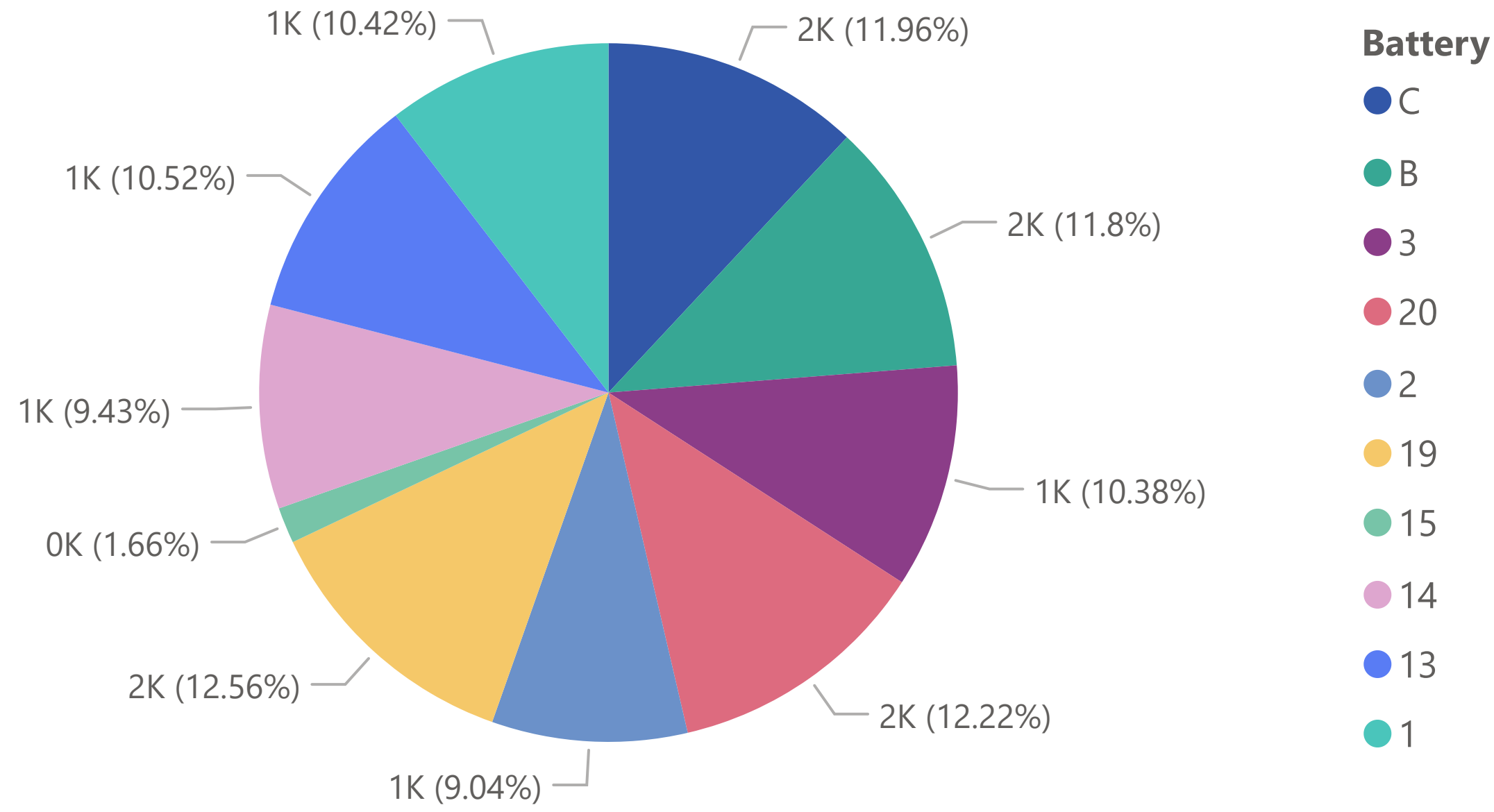




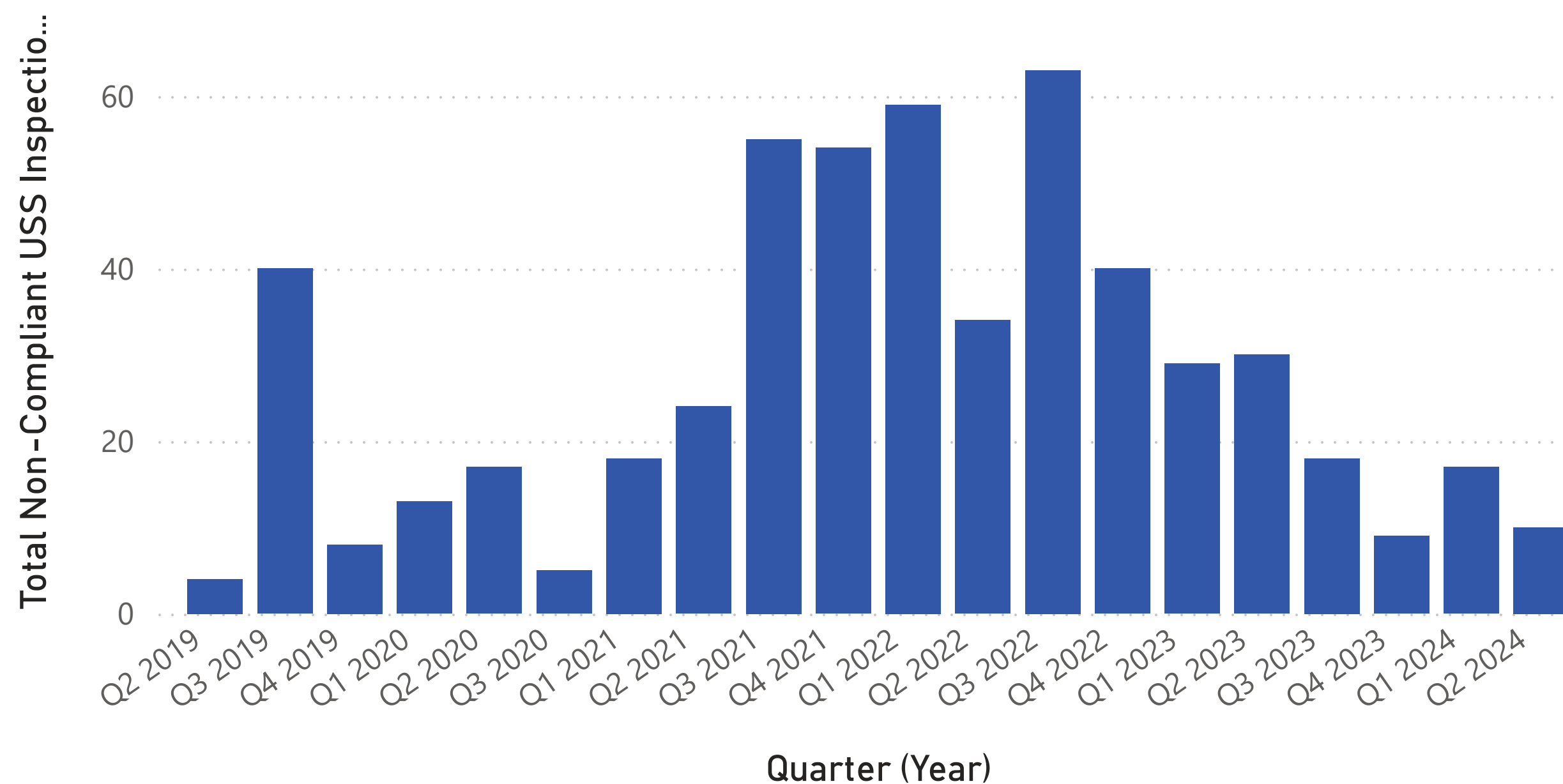
ACHD Total Inspections (SOA #190604)



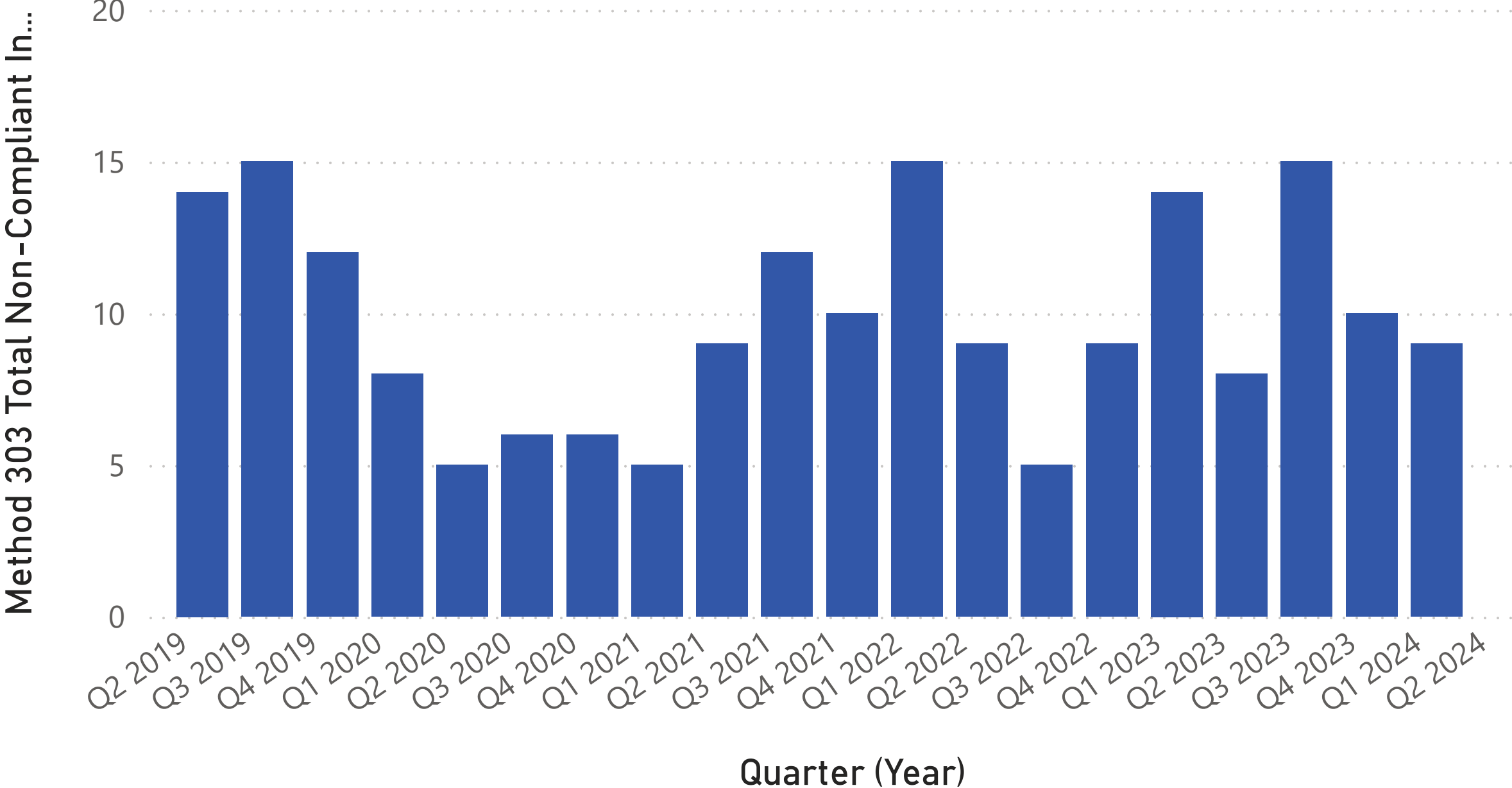
Non-Compliant Inspections (ACHD, M303, USS)



Non-Compliant Inspections Performed by U.S. Steel

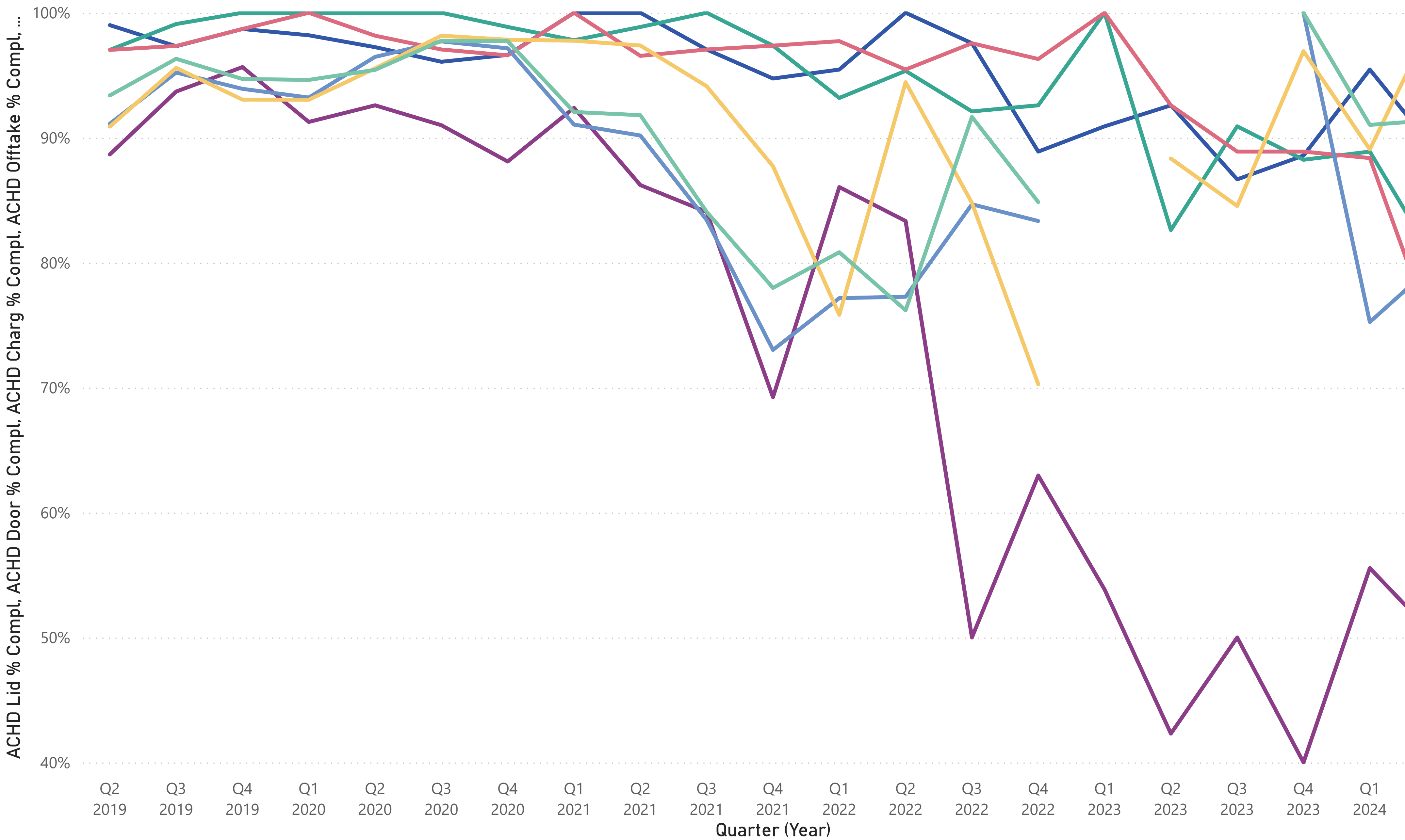


Method 303 Total Non-Compliant Inspections by Quarter (Year)



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"/> Q2 2024	\$250					\$250	
6/13/2024	\$250					\$250	
<input type="checkbox"/> 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			
<input type="checkbox"/> 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	
<input type="checkbox"/> Q3 2023	\$500		\$500		\$750		\$250
9/6/2023				\$250			
9/5/2023	\$250		\$250				
7/11/2023	\$250		\$250		\$500		\$250
<input type="checkbox"/> 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	
<input type="checkbox"/> Q1 2023	\$500		\$2,750			\$250	
3/22/2023			\$750				
3/21/2023			\$2,000			\$250	
3/16/2023	\$500						
<input type="checkbox"/> 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		
<input type="checkbox"/> Q3 2022	\$250		\$750	\$250			
7/20/2022			\$750				
7/1/2022	\$250			\$250			
<input type="checkbox"/> Q2 2022		\$250	\$2,250	\$250			
Total	\$8,750	\$1,750	\$28,000	\$11,000	\$6,250	\$3,500	\$2,000