

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

In the Matter of:

United States Steel Corporation
Clairton Plant
400 State Street
Clairton, PA 15025

Violation No. 250601

Violations of Article XXI ("Air
Pollution Control") at property:

United States Steel Corporation
Mon Valley Works
400 State Street
Clairton, PA 15025

ENFORCEMENT ORDER

NOW, this 5th day of June, 2025, the Allegheny County Health Department (hereinafter "ACHD") issues this Enforcement Order after it has found and determined the following:

I. AUTHORITY

1. The Director of the ACHD has been delegated authority pursuant to the federal Clean Air Act, 42 U.S.C. Sections 7401-7671q (hereinafter "CAA"), and the Pennsylvania Air Pollution Control Act, 35 P.S. Sections 4001-4014 (hereinafter "APCA"), and the ACHD is a local health agency organized under the Local Health Administration Law, 19 P.S. §§ 12001-12028, whose powers and duties include the enforcement of laws relating to public health within Allegheny County, including, but not limited to, the ACHD's Rules and Regulations, Article XXI, Air Pollution Control (Allegheny County Code of Ordinances Chapters 505, 507 and 535) (hereinafter "Article XXI").

II. BACKGROUND

2. United States Steel Corporation (hereinafter “U. S. Steel”) owns and operates a coke making facility in Clairton, Allegheny County, Pennsylvania (hereinafter “Clairton Coke Plant”).

3. The Clairton Coke Plant operates six coke batteries and produces approximately 8,600 tons of coke per day from the destructive distillation (carbonization) of approximately 11,700 tons of coal.

4. During the carbonization process, approximately 150 million cubic feet of coke oven gas are produced. The volatile constituents of coal contained in the coke oven gas are recovered in the by-products plant. In addition to the coke oven gas, daily production of these by-products includes approximately 95,500 gallons of crude tar and 35 tons of elemental sulfur.

5. Until March 31, 2023, the Clairton Coke Plant operated ten coke oven batteries (Batteries 1, 2, 3, 13, 14, 15, 19, 20, B, and C). On or about April 1, 2023, pursuant to Condition IV.35. of the renewed Title V Operating Permit & Federally Enforceable State Operating Permit #0052-OP22 (hereinafter “#0052-OP22”) for the Clairton Coke Plant, U. S. Steel permanently shut down Batteries 1, 2, and 3 at the Clairton Coke Plant.

6. On May 1, 2024, pursuant to the 2024 Consent Decree – Civil Action No.2:19-cv-00484, the Clairton Coke Plant permanently shut down Battery 15. On May 30, 2024, U.S. Steel applied for an amendment to the Clairton Coke Plant’s Title V Operating Permit & Federally Enforceable State Operating Permit #0052-OP22 (hereinafter “#0052-OP22”) to remove Battery 15 from #0052-OP22 as an emission source.

7. On October 10, 2024, ACHD issued the amended Title V Operating Permit & Federally Enforceable State Operating Permit #0052-OP22a (hereinafter “#0052-OP22a) to the Clairton Coke Plant, which still includes Battery 15.

Pushing Operations

8. Pushing is generally the operation by which coke that has completed the coking cycle is mechanically pushed from a coke oven into a traveling car (“hot car”) and transported to a quench station where the coke is cooled with water.

9. During normal operation of the coke oven batteries 13, 14, 15, 19 and 20 at the Clairton Coke Plant, a fume collection hood (“traveling hood”) is moved into place above the hot car outside the door of a coke oven at the completion of the coking cycle for that oven. B Battery is equipped with a shed enclosure that captures pushing emissions. The door on the side of the oven where the hot car is located (“coke side”) is then removed prior to pushing coke from the oven. Pushing emissions from the traveling hood or shed are vented to the battery’s baghouses.

10. Emissions occur during the pushing operation from activities such as the physical movement of the coke mass from the oven, dropping of coke into the hot car, or partial combustion of coke due to the high temperature of the coke contacting ambient air.

11. To significantly reduce emissions from the pushing operation, the traveling hood is connected to a fan which provides suction at the hood, pulling emissions from the pushing operation into the hood and through ductwork to the Pushing Emission Control (“PEC”) baghouse.

12. At the PEC baghouse, the gas stream carrying pushing emissions passes through multiple filter compartments or modules. Each module contains a series of fabric filters which together remove more than 99% of dust (filterable particulate emissions) from the gas stream before this stream is vented through a stack connected to that module.

Uncontrolled Pushing

13. The Clairton Coke Plant has experienced process and equipment failures, which resulted in the traveling hood not being properly positioned above the hot car, a loss of suction to the baghouse, baghouse outage or other issues causing emissions not to be captured during the push.

14. The pushing of coke from an oven without first capturing and ducting the emissions to a fully operational PEC baghouse is known as an “uncontrolled push.”

15. As identified in detail below, U.S. Steel elected to perform numerous uncontrolled pushes without capturing and ducting the emissions to a fully operational PEC baghouse, which resulted in increased filterable particulate emissions.

III. FINDINGS OF VIOLATIONS

16. On November 21, 2022, the ACHD issued a Title V Operating Permit & Federally Enforceable State Operating Permit #0052-OP22 to U.S. Steel for the Clairton Coke Plant

17. #0052-OP22, Condition V.D.1 (“Restrictions”), states:

- a. The permittee shall not operate, or allow to be operated, Battery 13 or Battery 14 or Battery 15 coke ovens unless there is installed on each battery a pushing emission control system baghouse which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT, . . .

* * * *

- c. The permittee shall not operate, or allow to be operated Battery 13 or Battery 14 or Battery 15, unless the Battery 13, 14 and 15 PEC System baghouse is properly installed, operated and maintained according to the following conditions::
 - 1) Emissions due to the pushing of Battery 13, 14 and 15 coke ovens shall be vented through the PEC System baghouse dust collector

18. #0052-OP22, Condition V.F.1 (“Restrictions”), states:

- a. The permittee shall not operate, or allow to be operated, Battery 19 or Battery 20 coke ovens unless there is installed on each battery a pushing emission control system baghouse which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT,

* * * *

- c. The permittee shall not operate, or allow to be operated Battery 19 or Battery 20 unless the Battery 19 and 20 PEC System baghouse is properly installed, operated and maintained according to the following conditions, at all times

- 1) Emissions due to the pushing of Battery 19 and 20 coke ovens shall be vented through the PEC System baghouse dust collector.

19. #0052-OP22, Condition V.H.1 (“Restrictions”), states:

- a. The permittee shall not operate, or allow to be operated, Battery B coke ovens unless there is installed on the battery a pushing emission control system baghouse which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT

- b. The permittee shall not operate, or allow to be operated Battery B, unless the PEC System baghouse is properly installed, operated and maintained according to the following conditions, at all times:

- 1) Emissions due to the pushing of Battery B coke ovens shall be vented through the PEC System baghouse dust collector.

20. #0052-OP22a, Condition V.F.1 (“Restrictions”), states:

- a. The permittee shall not operate, or allow to be operated, Battery B coke ovens unless there is installed on the battery a pushing emission control system baghouse which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT

- b. The permittee shall not operate, or allow to be operated Battery B, unless the PEC System baghouse is properly installed, operated and maintained according to the following conditions, at all times:

- 1) Emissions due to the pushing of Battery B coke ovens shall be vented through the PEC System baghouse dust collector.

21. The ACHD has reviewed data regarding uncontrolled pushes for Batteries B, 13, 14, 15, 19, and 20 provided by U.S. Steel in its monthly Process Information Reports dating from January 1, 2024, through December 31, 2024, as such reports are required under Conditions V.D.5.c, V.F.5.c, and V.H.5.c of #0052-OP22 and V.F.5.c of #0052-OP22a, as well as information provided in Breakdown Reports submitted pursuant to Article XXI, § 2108.01.c..

22. The ACHD has determined that, between January 1, 2024, and December 31, 2024, uncontrolled pushes occurred at the above-mentioned batteries as shown in the table below:

Year	Uncontrolled Pushes			
	Batteries 13, 14, and 15 #0052-OP22 Condition V.D.1.c	Batteries 19 and 20 #0052-OP22 Condition V.F.1.c	Battery B #0052-OP22 Condition V.H.1.b #0052-OP22a Condition V.F.1.b	Total
2024	62	81	24	167

23. Article XXI, § 2103.10.b.3 (“Prohibition of Operation in Violation of Conditions”), states: “It shall be a violation of this Article giving rise to the remedies provided by Section 2109.02 of this Article for any person to fail to comply with any terms or conditions set forth in any permit issued pursuant to this Subpart.”

24. Each uncontrolled push is a separate violation of the applicable permit condition stated above for the battery where the push occurs and of Article XXI.

25. The ACHD finds that U.S. Steel’s repeated failure to use its pollution control device constitutes 167 violations of Article XXI, § 2103.10.b.3, for failing to comply with the conditions set forth in #0052-OP22 and #0052-OP22a.

IV. ORDER

NOW THEREFORE, pursuant to the authority granted to the ACHD by Article XXI §§ 2109.02 and 2109.06 and the Local Health Administration Law, 19 P.S. § 12010, it is hereby ORDERED that:

26. Nothing in this Order shall prohibit the ACHD from taking further enforcement action for uncontrolled pushes not specifically identified in this Order.

27. Please be advised that failure to comply with this Order within the times specified herein is a violation of Article XXI giving rise to the remedies provided by Article XXI § 2109.02 including civil penalties of up to \$25,000 per violation per day.

28. For the violations set forth in the preceding paragraphs, U.S. Steel is hereby assessed a civil penalty of **NINE HUNDRED AND EIGHTEEN THOUSAND, FIVE HUNDRED DOLLARS** (\$918,500.00). The civil penalty is as follows:

A. Gravity Based Component

Violation	Gravity Based Penalty	Violations	Total Gravity Penalty
Uncontrolled Pushing: OP #0052, Conditions V.B.1.c, V.D.1.c, and V.F.1.c (Article XXI, § 2105.03)	\$2,500.00	167	\$417,500.00
Uncontrolled Pushing: OP #0052, Conditions V.H.1.c (Article XXI, § 2105.03)			
GRAVITY COMPONENT SUBTOTAL			\$417,500.00

B. Adjustment Factors

Compliance History: 8 Enforcement Actions in last 2 years	\$417,500.00
Title V Source: Title V	\$ 83,500.00
TOTAL CIVIL PENALTY	\$ 918,500.00

29. U.S. Steel shall pay the civil penalty amount within thirty (30) days of receipt of this Order. Payment shall be made by corporate or certified check, or the like, made payable to the “Allegheny County Clean Air Fund”, and sent to Air Quality Program Manager, Allegheny County Health Department, 836 Fulton Street, Pittsburgh, PA 15233.

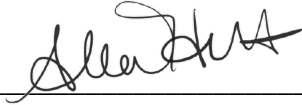
30. The ACHD has determined the above civil penalty to be in accordance with Article XXI § 2109.06.b., reflecting relevant factors including, but not limited to: the nature, severity and frequency of the alleged violations; the maximum amount of civil and criminal penalties authorized by law; the willfulness of such violations; the impact of such violations on the public and the environment; the actions taken by U.S. Steel to minimize such violations and to prevent future violations; and U.S. Steel’s compliance history.

31. Pursuant to Article XI § 1104.A (“Hearings and Appeals”), and Article XXI § 2109.06.a.5, of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order, a Notice of Appeal shall be filed no later than thirty (30) days after receipt of written notice or issuance of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219. This Order is enforceable upon issuance and any appeal of this Order shall not act as a stay unless the Director of the ACHD so orders. In the absence of a timely appeal, the terms of this Order shall become final.

32. Pursuant to XXI § 2109.06.a.2-3, please be aware that if you wish to appeal this Order, you are required within 30 days of receipt of this Order to forward the civil penalty amount of the ACHD for placement in an escrow account, post an appeal bond to the ACHD in the amount of the penalty, or claim an inability to pay. Failure to forward the money or the appeal bond at the time of the appeal shall result in a waiver of all legal rights to contest the violation or the amount

of the civil penalty, unless you allege financial inability to prepay the penalty or to post the appeal bond. If you allege financial inability to pay, then you have the burden to prove it. Please review the specific requirements for prepaying the penalty, posting the appeal bond, or claiming an inability to pay found in Article XXI § 2109.06.a.2-3. A copy of Article XXI and Article XI may be found at <https://www.alleghenycounty.us/Health-Department/Health-Department-Regulations.aspx>.

DONE and **ENTERED** this 5th day of June, 2025, in Allegheny County, Pennsylvania.



Allason Holt
Air Quality Program Manager
Compliance and Enforcement

6/5/2025

Date