

COUNTY OF



ALLEGHENY

May 28, 2020

John R. Michaud
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 - October 1, 2019 through March 31, 2020 (4th and 1st Quarters)

Dear Mr. Michaud:

The 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, 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 fourth quarter of 2019 and first quarter of 2020, October 1, 2019, through March 31, 2020. The violations and associated penalties are set forth in the attachments.

The Department has calculated a potential penalty in the amount of **\$361,400.00**. Pursuant to SOA, V. Civil Penalty Payment, Paragraph A, 90 percent of that amount, or **\$325,260.00**, is to be paid to the Community Benefit Trust and 10 percent of the potential penalties, **\$36,140.00**, shall constitute a civil penalty and is to be paid to the Allegheny 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



DEBRA BOGEN, MD, DIRECTOR
ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
301 39TH 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



The demand for stipulated penalties in this letter pertains only to the violations listed in the attachments that transpired from October 1, 2019 through March 31, 2020. Also, this letter in no way precludes the Department from issuing demands for other stipulated penalties for other violations which may have occurred from October 1, 2019 through March 31, 2020.

If you have any questions concerning this demand for stipulated penalties, please contact Shannon Sandberg, ACHD Air Quality Enforcement Section Chief, at 412-578-7969 or by email at: Shannon.Sandberg@AlleghenyCounty.us. Thank you for your prompt attention to this matter.

Sincerely,



Shannon Sandberg
Air Quality Manager
Compliance and Enforcement Section
Air Quality Program

cc: Mark Jeffrey (MJeffrey@uss.com)
Mike Dzurinko (MDzurinko@uss.com)
Jonelle Scheetz (JSScheetz@uss.com)
Dean DeLuca, Air Quality Program Manager
AQ Documents File

Summary of Stipulated Penalty and Compliance Rate COA #190604

Quarterly Stipulated Penalty Summary										
Quarter	Total Charging Penalty	Total Door Leak Penalty	Total H.O. Door Penalty	Total Lid Leak Penalty	Total Offtake Penalty	Total Push Penalty	Total Travel Penalty	Total Soaking Penalty	Total COMs Penalty	Total Penalty Due
Q4 2019	\$12,750	\$7,250	\$14,125	\$10,250	\$12,000	\$25,500	\$19,500	\$42,750	\$14,200	\$158,325
Q1 2020	\$17,500	\$3,000	\$31,125	\$12,500	\$0	\$41,750	\$23,500	\$66,500	\$7,200	\$203,075
Total	\$30,250	\$10,250	\$45,250	\$22,750	\$12,000	\$67,250	\$43,000	\$109,250	\$21,400	\$361,400

Quarterly Coke Emission Compliance									
Quarter	M303 Total Compliant Inspections*	M303 Total Inspections	M303 Total % Compliance	ACHD_Total Compliant Inspections	ACHD_Total Inspections	ACHD_Total Percent Compliant	Total ACHD and M303 Inspections	Compliant Inspections	Quarters Average %Compliance
Q4 2019	3445	3461	99.54%	1143	1190	96.05%	4651	4588	98.65%
Q1 2020	3178	3186	99.75%	1363	1423	95.78%	4609	4541	98.52%
Total	6623	6647	99.64%	2506	2613	95.91%	9260	9129	98.59%

Quarter ▼

Multiple selections ▼



Summary of Charging Emissions (Q4 2019)

ACHD Documented Charge Violations					
Date	Battery	Charging Violation Severity	Charging Severity Value	Exceedance Days Penalty	ACHD Charging Penalty
10/31/2019	C	Major	1.59	0	\$2,500
11/1/2019	C	Major	2.49	0	\$2,500
11/25/2019	B	Major	2.54	0	\$2,500
Total				0	\$7,500

Method 303 Documented Charge Violations								
Date	Battery	Charge(1-4) Severity Value	Charge(2-5) Severity Value	Battery Charge Severity Value	Charge(2-5) Violation Severity	Charge(1-4) Violation Severity	Battery Charge Violation Severity	M303 Charging Penalty
10/29/2019	C			1.10			Low	\$1,000
11/13/2019	19	1.27	0.09	1.29		Moderate		\$1,500
12/20/2019	B			3.76			Major	\$2,750
Total								\$5,250

Total Penalty by Quarter				
Quarter	Total Charging Violations	M303 Charging Penalty	ACHD Charging Penalty	Total Charging Penalty
Q4 2019	6	\$5,250	\$7,500	\$12,750
Total	6	\$5,250	\$7,500	\$12,750



SUMMARY OF DOOR LEAK VIOLATIONS (Q4 2019)

Method 303 Violations							
Date	Battery	Doors %Leaking	Door Severity Value	Door Leaks Violation Severity	Door Leak Penalty	Exceedance Day Penalty	Total Door Leak Penalty
10/8/2019	C	4.76	1.59	Major	\$2,500	\$0	\$2,500
10/22/2019	C	3.13	1.04	Low	\$1,000	\$0	\$1,000
11/7/2019	C	3.57	1.19	Low	\$1,000	\$0	\$1,000
12/23/2019	B	10.00	2.00	Major	\$2,500	\$250	\$2,750
Total						\$250	\$7,250

Total Stipulated Penalties Door Leaks				
Quarter	Total Door Leak Violations	ACHD Door Leak Penalty	M303 Door Leak Penalty	Total Door Leak Penalty
Q4 2019	4	\$0	\$7,250	\$7,250
Total	4	\$0	\$7,250	\$7,250

Year v
 2019 v

Quarter v
 Q4 2019 v

Month v
 All v



Summary of High Opacity Door Emission Violations (Q4 2019)

Year ▼

2019 ▼

Quarter ▼

Q4 2019 ▼

Month ▼

All ▼

Date	Battery	OVEN	Reading Time	Average of OPACITY	Severity Value	Severity of Violation	Exceedance Day Penalty	Total H.O. Door Penalty
10/10/2019	3	A5	12:00:00 PM	45.00	1.00	Low	\$0	\$750
10/10/2019	3	B22	11:53:00 AM	45.00	1.00	Low	\$0	\$750
10/11/2019	2	A29	7:25:00 AM	60.00	1.33	Moderate	\$0	\$1,125
10/11/2019	2	B1	7:26:00 AM	70.00	1.56	Major	\$0	\$1,875
10/11/2019	2	B11	7:27:00 AM	80.00	1.78	Major	\$0	\$1,875
10/11/2019	2	B5	7:26:00 AM	60.00	1.33	Moderate	\$0	\$1,125
10/11/2019	2	B7	7:27:00 AM	45.00	1.00	Low	\$0	\$750
10/23/2019	20	C27	9:48:00 AM	45.00	1.00	Low	\$0	\$750
10/31/2019	C	C64	10:11:00 AM	90.00	2.57	Major	\$0	\$1,875
11/15/2019	20	C26	10:58:00 AM	45.00	1.00	Low	\$250	\$1,000
11/21/2019	14	B24	9:00:00 AM	50.00	1.11	Low	\$0	\$750
12/3/2019	3	B29	10:41:00 AM	45.00	1.00	Low	\$0	\$750
12/16/2019	1	C2	11:47:00 AM	50.00	1.11	Low	\$0	\$750
Total				56.15			\$250	\$14,125



Summary of Topside (Offtake Leaks) (Q4 2019)

Method 303 Documented Offtake Leak Violations							
Date	Battery	Average of Offtakes %Leaking	Offtake Leak Severity Value	Offtake Leaks Violation Severity	Topside(offtakes) Penalty	Exceedance Day Penalty	Total Topside(offtakes) Penalty
10/17/2019	1	5.21	1.04	Low	\$1,000	\$0	\$1,000
10/19/2019	15	6.78	1.69	Major	\$2,500	\$0	\$2,500
10/22/2019	15	6.67	1.67	Major	\$2,500	\$0	\$2,500
11/12/2019	15	4.17	1.04	Low	\$1,000	\$0	\$1,000
11/20/2019	13	5.17	1.29	Moderate	\$1,500	\$0	\$1,500
12/12/2019	15	4.39	1.10	Low	\$1,000	\$0	\$1,000
Total		5.40			\$9,500	\$0	\$9,500

ACHD Documented Offtake Leak Violations						
Date	Battery	% Operating Offtakes Leaking	Offtake Severity Value	Offtake Severity of Violation	Exceedance Penalty	Offtakes Penalty
10/1/2019	14	8.04	2.01	Major	\$0	\$2,500
Total		8.04			\$0	\$2,500

Total Offtake Leak Violations				
Quarter	Total Offtake Violations	M303 Offtake Leak Total Penalty	ACHD Topside(offtakes) Penalty	Total Offtake Penalty
Q4 2019	7	\$9,500	\$2,500	\$12,000
Total	7	\$9,500	\$2,500	\$12,000

Year
 Month
 Quarter



Summary of Topside (Lid Leaks) Violations (Q4 2019)

Method 303 Topside (Lids) Inspections							ACHD Topside (Lids) Inspections							
Date	Battery	Average of Lids %Leaking	Lid Leak Severity Value	Lid Leaks Violation Severity	Exceedance Day Penalty	Total Topside(Lids) Penalty	Date	Battery	% Leaking Lids	Severity Value	Severity of Violation	Lids Penalty	Exceedance Penalty	ACHD Topside(Lid) Penalty
10/10/2019	B	4.1667%	4.16	Major	\$0	\$2,500	10/21/2019	B	3.04%	3.04	Major	2,500.00	0	\$2,500
10/23/2019	C	1.7284%	2.88	Major	\$0	\$2,500	Total					2,500.00	0	\$2,500
10/25/2019	C	0.9756%	1.63	Major	\$250	\$2,750								
Total		2.2902%			\$250	\$7,750								

Total Lid Leak Violations				
Quarter	Total Lid Leak Violations	M303 Lid Leak Total Penalty	ACHD Topside(Lid) Penalty	Total Lid Leak Penalty
Q4 2019	4	\$7,750	\$2,500	\$10,250
Total	4	\$7,750	\$2,500	\$10,250

Summary of Pushing Violations (4Q 2019)



Date	BATTERY	OVEN	Average of Push Max Opacity	Average of USS Opacity	Push Severity of Violation	Exceedance Day Penalty	Total Push Penalty
10/1/2019	14	B1	30.00	30.00	Low	\$0	\$1,000
10/3/2019	19	B22		40.00	Moderate	\$0	\$1,500
10/8/2019	C	C76	45.00		Moderate	\$0	\$1,500
10/10/2019	3	B14	30.00		Low	\$0	\$1,000
10/10/2019	3	B16	30.00		Low	\$0	\$1,000
10/10/2019	3	B20	30.00		Low	\$0	\$1,000
10/15/2019	2	B21		30.00	Low	\$0	\$1,000
10/22/2019	1	A2	20.00		Low	\$0	\$1,000
10/22/2019	1	A4	25.00		Low	\$0	\$1,000
10/28/2019	1	B29	20.00		Low	\$0	\$1,000
11/13/2019	20	A21	25.00		Low	\$0	\$1,000
11/18/2019	1	C1	50.00		Moderate	\$0	\$1,500
11/19/2019	1	B26	50.00		Moderate	\$0	\$1,500
11/21/2019	14	A28	30.00		Low	\$0	\$1,000
11/27/2019	1	B18	30.00		Low	\$0	\$1,000
12/2/2019	3	A1	30.00		Low	\$0	\$1,000
12/2/2019	3	A3	30.00		Low	\$0	\$1,000
12/3/2019	2	A20		20.00	Low	\$0	\$1,000
12/4/2019	13	B13	20.00		Low	\$0	\$1,000
12/4/2019	13	B17	30.00		Low	\$0	\$1,000
12/6/2019	20	B20	40.00		Moderate	\$0	\$1,500
12/9/2019	13	A27		30.00	Low	\$0	\$1,000
12/10/2019	2	A18	30.00		Low	\$0	\$1,000
Total			31.32	30.00		\$0	\$25,500

Month
 Year
 Quarter



Summary of Travel Emission Violations (Q4 2019)

Date	Battery	OVEN	Average of TRAVEL MAX OPACITY	Average of USS Opacity	Travel Severity of Violation	Exceedance Day Penalty	Total Travel Penalty
10/1/2019	14	B1	4.00	25.00	Low	0	\$1,000
10/10/2019	3	B14	35.00		Low	0	\$1,000
10/10/2019	3	B16	35.00		Low	0	\$1,000
10/10/2019	3	B18	35.00		Low	0	\$1,000
10/10/2019	3	B20	35.00		Moderate	0	\$1,500
10/11/2019	14	A5	17.50		Low	0	\$1,000
10/11/2019	14	A7	17.50		Moderate	0	\$1,500
10/15/2019	2	B21		25.00	Low	0	\$1,000
10/23/2019	15	B17	10.00		Low	0	\$1,000
10/28/2019	1	B29	10.00		Low	0	\$1,000
11/5/2019	19	A4		60.00	Moderate	0	\$1,500
11/13/2019	20	A21	12.50		Low	0	\$1,000
11/18/2019	1	C1	45.00		Moderate	0	\$1,500
11/19/2019	1	B26	8.33		Low	0	\$1,000
11/20/2019	2	A14	6.67		Low	0	\$1,000
11/21/2019	14	A28	25.00		Moderate	0	\$1,500
11/25/2019	13	B12	8.75		Low	0	\$1,000
Total			3.90	31.25		0	\$19,500

Year ▼
 Quarter ▼
 Month ▼
2019 ▼
Q4 2019 ▼
All ▼



Summary of Soaking Emissions Violation (4Q 2019)

Year
 Month
 Quarter

Quarter	ACHD Soaking Violations	ACHD Soaking Penalty
Q4 2019	26	\$42,750
Total	26	\$42,750

Quarter	ACHD Soaking Inspections	ACHD Soaking Compliant	ACHD Soaking Violations	ACHD Soaking Inspection Interruptions	ACHD Soaking % Compliant
Q4 2019	294	268	26	84	91.16%
Total	294	268	26	84	91.16%

Date	Battery	OVEN	READ TIME	Push or Coke	Severity of Violation	Average of Max Non-Flame Opacity	ACHD Soaking Penalty
10/1/2019	14	B11	924	P	Moderate	50.00	\$1,500
10/1/2019	14	B13	943	P	Major	100.00	\$2,500
10/1/2019	14	B9	923	P	Major	100.00	\$2,500
10/17/2019	20	C23	911	C	Moderate	60.00	\$1,500
10/21/2019	B	A20	809	C	Major	100.00	\$2,500
10/23/2019	20	B27	857	C	Moderate	60.00	\$1,500
10/24/2019	13	B23	907	P	Moderate	50.00	\$1,750
10/28/2019	1	A20	757	P	Moderate	40.00	\$1,500
10/31/2019	2	A25	1116	P	Low	35.00	\$1,000
10/31/2019	C	C62	910	P	Low	30.00	\$1,000
10/31/2019	C	C64	929	P	Moderate	50.00	\$1,500
10/31/2019	C	C66	948	P	Moderate	40.00	\$1,500
11/4/2019	20	A20	934	C	Moderate	40.00	\$1,500
11/6/2019	B	A13	732	C	Major	70.00	\$2,500
11/7/2019	B	B36	942	P	Low	35.00	\$1,000
11/8/2019	15	A4	804	P	Low	25.00	\$1,000
11/12/2019	15	B10	853	C	Moderate	40.00	\$1,500
11/12/2019	15	B6	760	P	Moderate	40.00	\$1,500
11/14/2019	13	B24	1026	C	Low	35.00	\$1,000
11/14/2019	C	C66	931	P	Moderate	60.00	\$1,500
11/21/2019	14	A26	818	P	Major	100.00	\$2,500
11/21/2019	14	A28	942	C	Major	70.00	\$2,500
11/21/2019	14	A28	942	P	Low	30.00	\$1,000
11/21/2019	14	A30	1052	C	Low	30.00	\$1,000
12/4/2019	13	B11	749	P	Moderate	50.00	\$1,500
12/4/2019	13	B9	749	P	Major	100.00	\$2,500
Total						55.38	\$42,750

SUMMARY OF COMs EXCEEDANCES Q4 2019

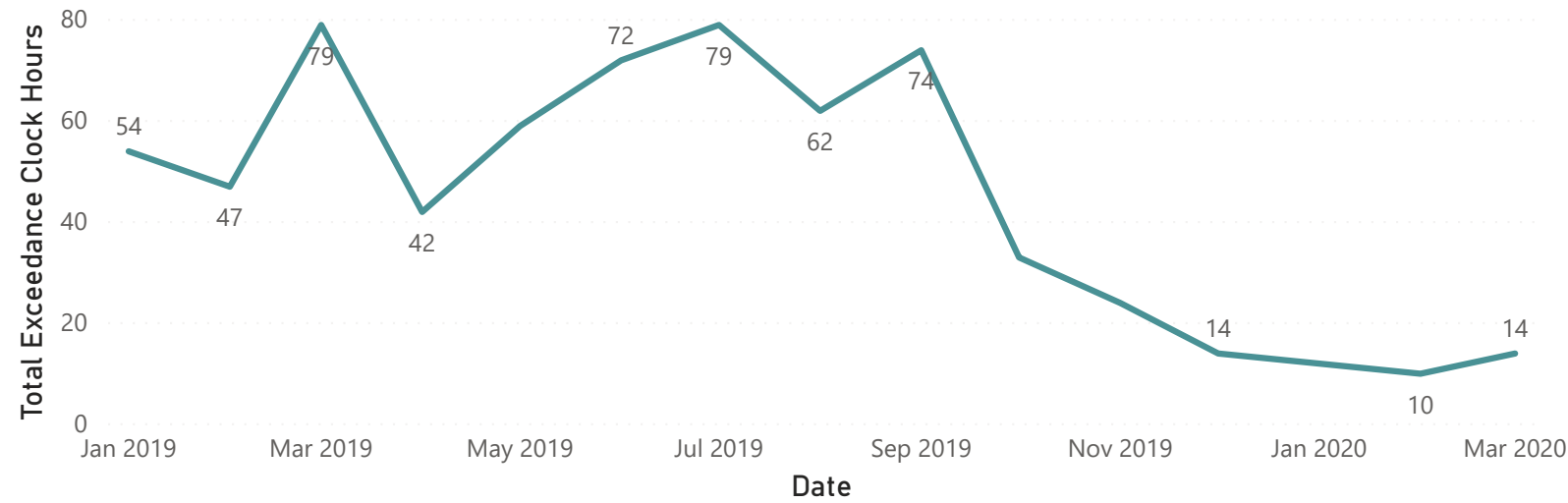
COMs Exceedance Clock Hours

Battery	Oct 2019	Nov 2019	Dec 2019	Total
1	1	2	0	3
13	1	1	0	2
14	4	0	3	7
15	13	3	2	18
19	3	8	1	12
2	2	3	1	6
20	2	1	2	5
3	2	3	3	8
B	4	3	0	7
C	1	0	2	3
Total	33	24	14	71

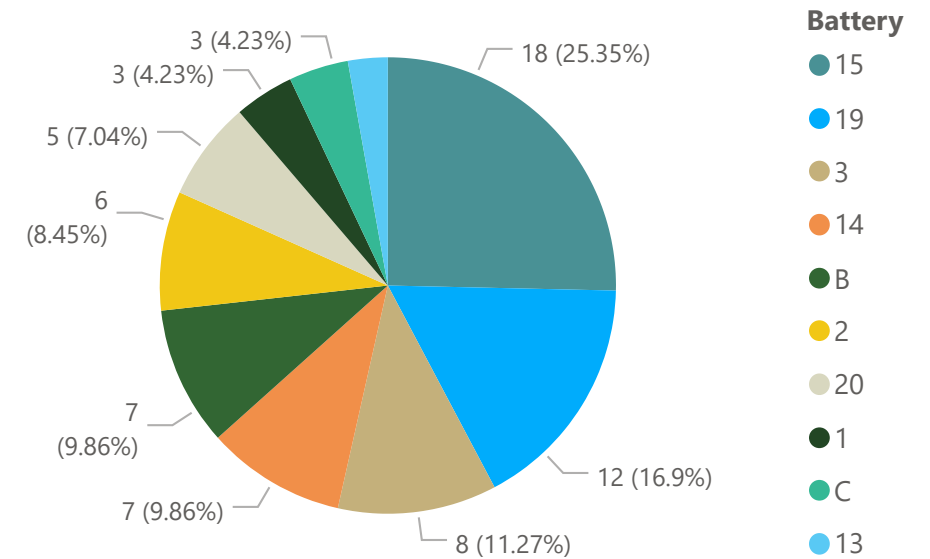
COMs Exceedance Penalties

Quarter	1	13	14	15	19	2	20	3	B	C	Total
Q4 2019	\$600	\$400	\$1,400	\$3,600	\$2,400	\$1,200	\$1,000	\$1,600	\$1,400	\$600	\$14,200
Total	\$600	\$400	\$1,400	\$3,600	\$2,400	\$1,200	\$1,000	\$1,600	\$1,400	\$600	\$14,200

Total Exceedance Clock Hours by Date



Total Exceedance Clock Hours by Battery



Year

Battery



Summary of Charging Emissions (Q1 2020)

ACHD Documented Charge Violations					Method 303 Documented Charge Violations								
Date	Battery	Charging Violation Severity	Charging Severity Value	ACHD Charging Penalty	Date	Battery	Charge(1-4) Severity Value	Charge(2-5) Severity Value	Battery Charge Severity Value	Charge(2-5) Violation Severity	Charge(1-4) Violation Severity	Battery Charge Violation Severity	M303 Charging Penalty
1/2/2020	20	Moderate	1.24	\$1,500									
1/6/2020	C	Major	3.01	\$2,500									
1/28/2020	C	Moderate	1.30	\$1,500									
2/12/2020	C	Major	2.50	\$2,500									
2/18/2020	13	Low	1.05	\$1,000									
3/4/2020	19	Low	1.13	\$1,000									
3/5/2020	20	Moderate	1.44	\$1,500	3/5/2020	B			2.76			Major	\$2,500
3/11/2020	C	Major	2.40	\$2,500	Total				2.76				\$2,500
3/31/2020	C	Low	1.12	\$1,000									
Total				\$15,000									

Total Penalty by Quarter				
Quarter	Total Charging Violations	M303 Charging Penalty	ACHD Charging Penalty	Total Charging Penalty
Q1 2020	10	\$2,500	\$15,000	\$17,500
Total	10	\$2,500	\$15,000	\$17,500

Year v
 Quarter v
 Month v
Multipl... v
Q1 2020 v
All v



SUMMARY OF DOOR LEAK VIOLATIONS (Q1 2020)

Method 303 Violations							
Date	Battery	Doors %Leaking	Door Severity Value	Door Leaks Violation Severity	Door Leak Penalty	Exceedance Day Penalty	Total Door Leak Penalty
▲							
1/20/2020	C	4.17	1.39	Moderate	\$1,500	\$0	\$1,500
2/14/2020	C	4.17	1.39	Moderate	\$1,500	\$0	\$1,500
Total						\$0	\$3,000

Total Stipulated Penalties Door Leaks			
Quarter	Total Door Leak Violations	ACHD Door Leak Penalty	Total Door Leak Penalty
Q1 2020	2	\$0	\$3,000
Total	2	\$0	\$3,000

Year ▼
 2020 ▼

Quarter ▼
 Q1 2020 ▼

Month ▼
 All ▼



Summary of High Opacity Door Emission Violations (Q1 2020)

Year

2020

Quarter

Q1 2020

Month

All

Date	Battery	OVEN	Reading Time	Average of OPACITY	Severity Value	Severity of Violation	Exceedance Day Penalty	Total H.O. Door Penalty
1/7/2020	19	C23	8:58:00 AM	85.00	1.89	Major	\$0	\$1,875
1/8/2020	2	B13	7:43:00 AM	100.00	2.22	Major	\$0	\$1,875
1/8/2020	2	B28	7:45:00 AM	80.00	1.78	Major	\$0	\$1,875
1/16/2020	3	A18	10:42:00 AM	50.00	1.11	Low	\$0	\$750
1/17/2020	1	A13	11:06:00 AM	90.00	2.00	Major	\$0	\$1,875
1/17/2020	1	C2	11:03:00 AM	50.00	1.11	Low	\$0	\$750
1/17/2020	1	C2	11:00:00 AM	80.00	1.78	Major	\$0	\$1,875
1/17/2020	C	C32	10:53:00 AM	40.00	1.14	Low	\$0	\$750
1/27/2020	1	A28	11:22:00 AM	60.00	1.33	Moderate	\$0	\$1,125
1/27/2020	1	B1	11:21:00 AM	50.00	1.11	Low	\$0	\$750
1/30/2020	3	A8	12:39:00 PM	100.00	2.22	Major	\$0	\$1,875
2/20/2020	B	A11	7:36:00 AM	60.00	1.33	Moderate	\$0	\$1,125
2/20/2020	B	B32	7:39:00 AM	45.00	1.00	Low	\$0	\$750
2/24/2020	C	C46	9:55:00 AM	55.00	1.57	Major	\$250	\$2,125
2/24/2020	C	C73	10:01:00 AM	65.00	1.86	Major	\$250	\$2,125
2/28/2020	3	A10	9:35:00 AM	60.00	1.33	Moderate	\$0	\$1,125
2/28/2020	3	A8	9:34:00 AM	75.00	1.67	Major	\$0	\$1,875
2/28/2020	3	C1	7:04:00 PM	50.00	1.11	Low	\$0	\$750
3/2/2020	B	B32	7:22:00 AM	45.00	1.00	Low	\$250	\$1,000
3/17/2020	1	B1	11:17:00 AM	45.00	1.00	Low	\$0	\$750
3/19/2020	3	B17	7:40:00 AM	55.00	1.22	Moderate	\$0	\$1,125
3/31/2020	C	C19	10:01:00 AM	75.00	2.14	Major	\$0	\$1,875
3/31/2020	C	C41	9:57:00 AM	45.00	1.29	Moderate	\$0	\$1,125
Total				63.48			\$750	\$31,125



Summary of Topside (Offtake Leaks) (Q1 2020)

ACHD Documented Offtake Leak Violations

Date	Battery	% Operating Offtakes Leaking	Offtake Severity Value	Offtake Severity of Violation	Exceedance Penalty	Offtakes Penalty
▲						

Method 303 Documented Offtake Leak Violations

Date	Battery	Average of Offtakes %Leaking	Offtake Leak Severity Value	Offtake Leaks Violation Severity	Topside(offtakes) Penalty	Exceedance Day Penalty	Total Topside(offtakes) Penalty

Total Offtake Leak Violations

Quarter	Total Offtake Violations	M303 Offtake Leak Total Penalty	ACHD Topside(offtakes) Penalty	Total Offtake Penalty
Q1 2020		\$0		\$0
Total		\$0		\$0

Year
 Month
 Quarter



Summary of Topside (Lid Leaks) Violations (Q1 2020)

Method 303 Topside (Lids) Inspections

Date	Battery	Average of Lids %Leaking	Lid Leak Severity Value	Lid Leaks Violation Severity	Exceedance Day Penalty	Total Topside(Lids) Penalty
1/29/2020	B	1.3699%	1.37	Moderate	\$0	\$1,500
2/6/2020	14	1.6949%	1.69	Major	\$0	\$2,500
2/21/2020	C	1.7284%	2.88	Major	\$0	\$2,500
3/19/2020	B	1.7606%	1.76	Major	\$0	\$2,500
3/26/2020	14	1.2931%	1.29	Moderate	\$0	\$1,500
Total		1.5694%			\$0	\$10,500

ACHD Topside (Lids) Inspections

Date	Battery	% Leaking Lids	Severity Value	Severity of Violation	Lids Penalty	Exceedance Penalty	ACHD Topside(Lid) Penalty
1/21/2020	B	1.03%	1.03	Low	1,000.00	0	\$1,000
3/23/2020	B	1.03%	1.03	Low	1,000.00	0	\$1,000
Total					2,000.00	0	\$2,000

Total Lid Leak Violations

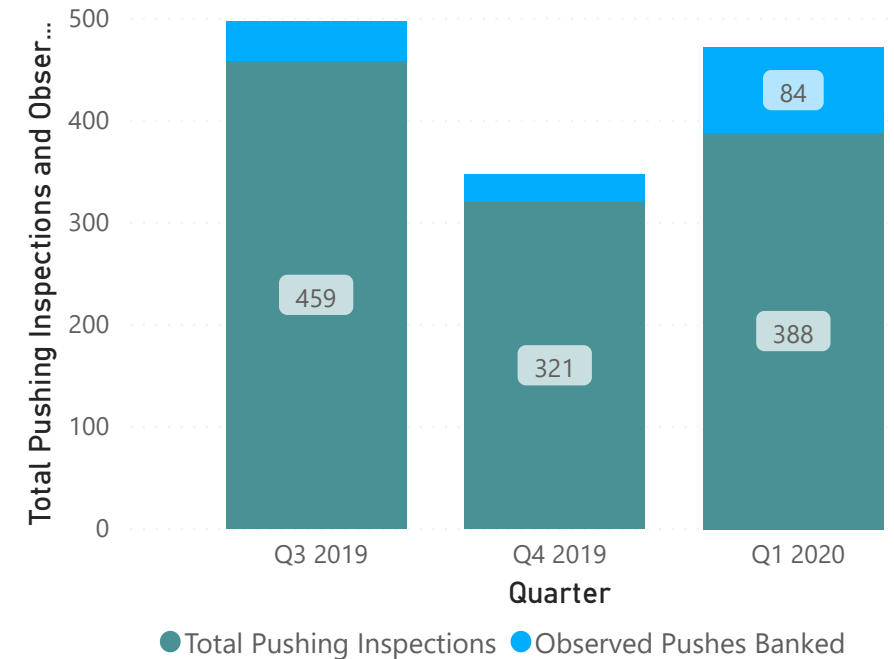
Quarter	Total Lid Leak Violations	M303 Lid Leak Total Penalty	ACHD Topside(Lid) Penalty	Total Lid Leak Penalty
Q1 2020	7	\$10,500	\$2,000	\$12,500
Total	7	\$10,500	\$2,000	\$12,500

Summary of Pushing Violations (1Q 2020)



Date	BATTERY	OVEN	Average of Push Max Opacity	Average of USS Opacity	Push Severity of Violation	Exceedance Day Penalty	Total Push Penalty
1/2/2020	3	B11	100.00		Major	\$0	\$2,500
1/2/2020	20	B18	35.00		Low	\$0	\$1,000
1/2/2020	3	B9	70.00		Major	\$0	\$2,500
1/6/2020	19	A18	40.00		Moderate	\$0	\$1,500
1/7/2020	2	B17	30.00		Low	\$0	\$1,000
1/7/2020	2	B21	30.00		Low	\$0	\$1,000
1/8/2020	2	B8	100.00		Major	\$0	\$2,500
1/13/2020	B	A2	80.00		Major	\$0	\$2,500
1/13/2020	B	B37	80.00		Major	\$0	\$2,500
1/17/2020	1	A3	60.00		Moderate	\$0	\$1,500
1/17/2020	C	C22	30.00		Low	\$0	\$1,000
1/29/2020	13	A11	40.00		Moderate	\$0	\$1,500
1/30/2020	3	B28	55.00		Moderate	\$0	\$1,500
1/30/2020	3	C1	30.00		Low	\$0	\$1,000
2/3/2020	B	A2	65.00	65.00	Major	\$500	\$2,750
2/12/2020	C	C40	45.00		Moderate	\$0	\$1,500
2/12/2020	C	C42	55.00		Moderate	\$0	\$1,500
2/18/2020	13	A30	40.00		Moderate	\$0	\$1,500
2/20/2020	B	B11	65.00	65.00	Major	\$0	\$2,500
2/26/2020	2	A20	60.00		Moderate	\$0	\$1,500
2/26/2020	2	A30	45.00		Moderate	\$0	\$1,500
2/28/2020	3	A1	55.00		Moderate	\$0	\$1,500
3/3/2020	14	B30	35.00		Low	\$0	\$1,000
3/23/2020	B	B14	30.00		Low	\$0	\$1,000
3/23/2020	B	B16	25.00		Low	\$0	\$1,000
3/26/2020	3	B13	35.00		Low	\$0	\$1,000
Total			51.35	65.00		\$500	\$41,750

Total Pushing Inspections and Observed Pushes Banked by ...





Summary of Travel Emission Violations (Q1 2020)

Date	Battery	OVEN	Average of TRAVEL MAX OPACITY	Average of USS Opacity	Travel Severity of Violation	Exceedance Day Penalty	Total Travel Penalty
1/2/2020	20	B18	16.67		Moderate	0	\$1,500
1/2/2020	3	B9	12.50		Low	0	\$1,000
1/6/2020	19	A18	13.33		Low	0	\$1,000
1/8/2020	2	B17	35.00		Low	0	\$1,000
1/8/2020	2	B8	35.00		Moderate	0	\$1,500
1/14/2020	14	A13	25.00		Low	0	\$1,000
1/17/2020	1	A3	25.00		Low	0	\$1,000
1/29/2020	13	A11	15.00		Low	0	\$1,000
1/30/2020	3	B28	22.50		Low	0	\$1,000
1/30/2020	3	C1	22.50		Low	0	\$1,000
2/2/2020	13	A30		30.00	Low	0	\$1,000
2/5/2020	20	C27	15.00		Low	0	\$1,000
2/11/2020	19	B10	20.00		Low	0	\$1,000
2/26/2020	2	A20	40.00		Moderate	0	\$1,500
2/26/2020	2	A30	40.00		Low	0	\$1,000
2/28/2020	13	A13	13.75		Low	0	\$1,000
2/28/2020	13	A31	13.75		Low	0	\$1,000
2/28/2020	3	A1	30.00		Moderate	0	\$1,500
3/22/2020	13	A12		40.00	Moderate	0	\$1,500
3/26/2020	3	B13	20.00		Low	0	\$1,000
3/31/2020	13	A16		30.00	Low	0	\$1,000
Total			3.72	46.00		0	\$23,500

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 Q1 2020 v

Month v
 All v



Summary of Soaking Emissions Violation (Q1 2020)

(1/2)

First Quarter 2020 Soaking Violations

Date	Battery	OVEN	READ TIME	Push or Coke	max flame opacity	Max Non-Flame Opacity	Severity of Violation	Exceedance Penalty	ACHD Soaking Penalty
1/2/2020	20	B20	913	P		35	Low	\$0	\$1,000
1/2/2020	20	B20	913	C		40	Moderate	\$0	\$1,500
1/2/2020	20	B18	914	P		75	Major	\$0	\$2,500
1/2/2020	20	B22	929	P		100	Major	\$0	\$2,500
1/2/2020	3	B11	852	C	25		Low	\$0	\$1,000
1/13/2020	B	A8	936	C		90	Major	\$0	\$2,500
1/13/2020	B	A8	936	P		90	Major	\$0	\$2,500
1/13/2020	B	A6	917	C		100	Major	\$0	\$2,500
1/23/2020	14	A6	853	P		50	Moderate	\$0	\$1,500
1/28/2020	C	C28	910	P		50	Moderate	\$0	\$1,500
1/28/2020	C	C30	924	P		60	Moderate	\$0	\$1,500
1/29/2020	13	A5	758	C		50	Moderate	\$0	\$1,500
1/30/2020	13	A27	815	C	100		Low	\$0	\$1,000
1/30/2020	14	A14	1042	P	50		Low	\$0	\$1,000
2/3/2020	B	B35	906	P		25	Low	\$250	\$1,250
2/3/2020	B	A2	937	P		60	Moderate	\$250	\$1,750
2/5/2020	20	A12	943	P		35	Low	\$0	\$1,000
2/6/2020	B	B5	922	C		95	Major	\$0	\$2,500
2/12/2020	C	C42	1034	P		65	Major	\$0	\$2,500
Total								\$500	\$33,000



Summary of Soaking Emissions Violation (Q1 2020)

(2/2)

ACHD Documented Soaking Violations, Cont'd.								
Date	Battery	OVEN	READ TIME	Push or Coke	max flame opacity	Max Non-Flame Opacity	Exceedance Penalty	ACHD Soaking Penalty
2/20/2020	B	B11	819	C		30	\$0	\$1,000
2/20/2020	B	B11	820	P		100	\$0	\$2,500
2/20/2020	B	B13	823	P		100	\$0	\$2,500
2/20/2020	B	B13	845	C		30	\$0	\$1,000
2/20/2020	B	B15	825	P		70	\$0	\$2,500
2/25/2020	3	A5	812	C		100	\$0	\$2,500
2/27/2020	20	A22	929	C		80	\$0	\$2,500
2/28/2020	13	A13	758	C		50	\$0	\$1,500
2/28/2020	3	A7*	953	C		40	\$0	\$1,500
3/2/2020	B	A19	1104	C		75	\$250	\$2,750
3/2/2020	B	A9	931	P		60	\$250	\$1,750
3/5/2020	13	A5	855	P		50	\$0	\$1,500
3/5/2020	20	A16	1058	C		70	\$0	\$2,500
3/10/2020	19	B18	927	P		40	\$0	\$1,500
3/11/2020	C	C63	741	P		60	\$0	\$1,500
3/11/2020	C	C65	829	P		30	\$0	\$1,000
3/11/2020	C	C67	841	P		30	\$0	\$1,000
3/19/2020	3	B23	912	C		70	\$0	\$2,500
Total							\$500	\$33,500

Quarter	ACHD Soaking Violations	ACHD Soaking Penalty
Q1 2020	37	\$66,500
Total	37	\$66,500

Year
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SUMMARY OF COMs EXCEEDANCES Q1 2020

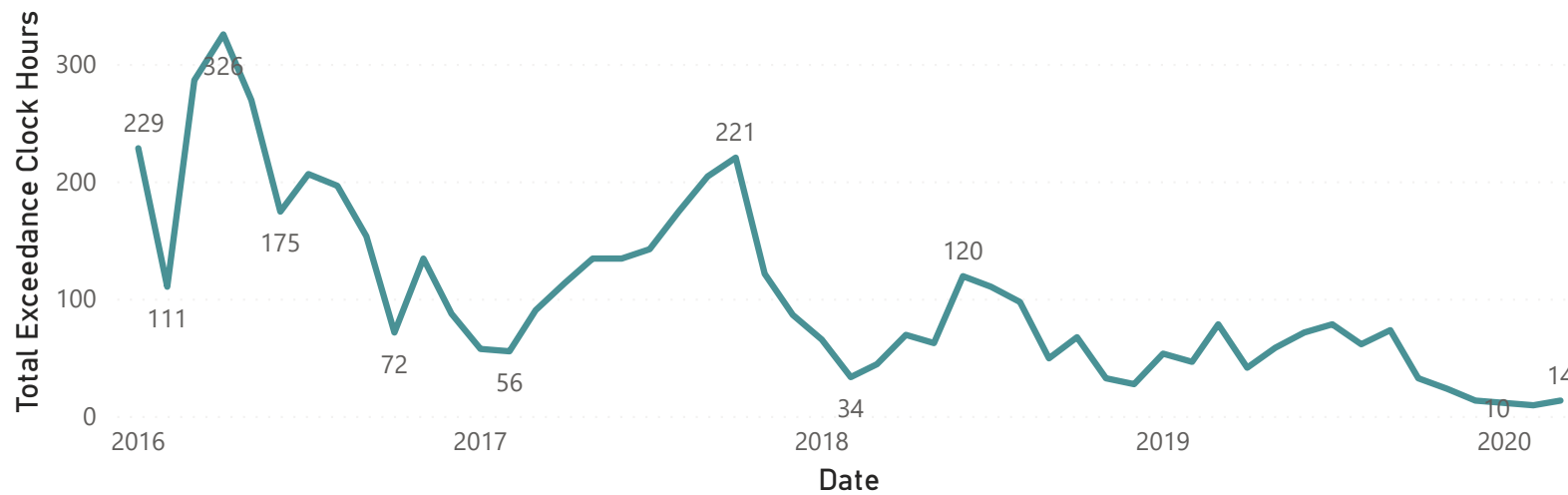
COMs Exceedance Clock Hours

Battery	Jan 2020	Feb 2020	Mar 2020	Total
1	0	0	0	0
13	2	0	0	2
14	1	4	3	8
15	0	0	0	0
19	4	1	1	6
2	1	0	1	2
20	0	2	1	3
3	1	1	4	6
B	3	0	4	7
C	0	2	0	2
Total	12	10	14	36

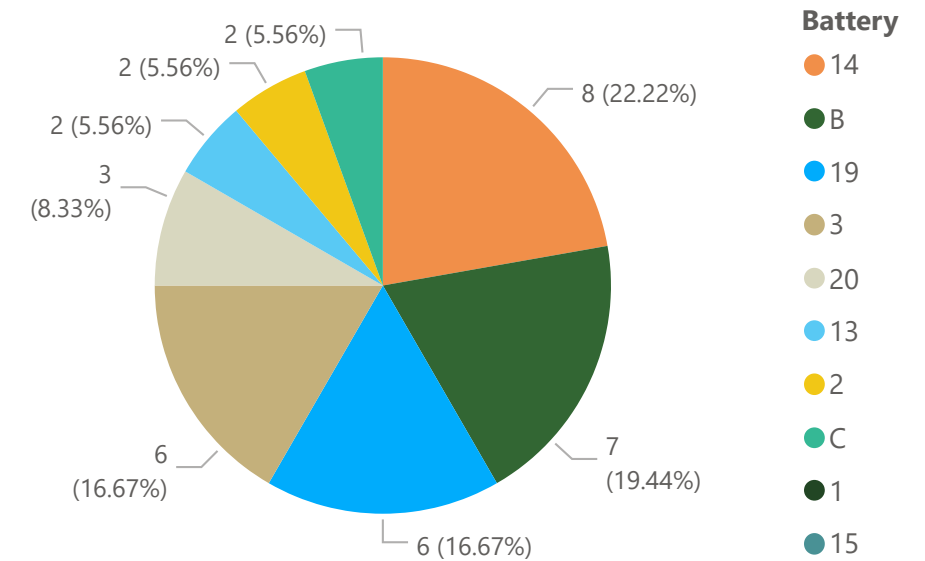
COMs Exceedance Penalties

Quarter	1	13	14	15	19	2	20	3	B	C	Total
Q1 2020	\$0	\$400	\$1,600	\$0	\$1,200	\$400	\$600	\$1,200	\$1,400	\$400	\$7,200
Total	\$0	\$400	\$1,600	\$0	\$1,200	\$400	\$600	\$1,200	\$1,400	\$400	\$7,200

Total Exceedance Clock Hours by Date



Total Exceedance Clock Hours by Battery



Year
 Battery