

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

In the Matter of:

United States Steel Corporation
Mon Valley Works
Edgar Thomson Plant
13th Street and Braddock Avenue
Braddock, PA 15104

Violation No. 200601

Violations of Article XXI, § 2104.01
("Visible Emissions") at property:

13th Street and Braddock Avenue
Braddock, PA 15104

ENFORCEMENT ORDER

NOW, this 1st day of June 2020, the Allegheny County Health Department (hereinafter "ACHD") issues this Enforcement Order after it has found and determined the following:

FINDINGS

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").

1. On October 24, 2019 at approximately 12:39 PM, visible emissions at the United States Steel Corporation's Edgar Thomson facility were observed by a Method 9 certified observer (contractor to ACHD) who was located near Route 837 at the time of the observation. The observer

documented sixteen (16) readings equal to or exceeding 20% and two (2) readings exceeding 60% opacity. A true and correct copy of the October 24, 2019 Observation Form is included herein at Exhibit A.

2. On October 24, 2019, ACHD was notified by the ACHD contractor that a noncompliance condition existed at the United States Steel Edgar Thomson Works. ACHD then contacted a USS representative and stated that a noncompliance condition was observed at the south end of their property. ACHD stated that the emissions were observed originating from a process (sub car and/or a vacuum truck) at 12:39 PM.

3. Photos provided by the Method 9 inspector show a large plume of emissions that appear to originate from a work area near the south end of the facility. In the photos, a vacuum truck can be seen operating in the same work area as the sub car which was located on rail road tracks. Additionally, the photo shows several individuals in the vicinity of the incident who may have also witnessed the incident. True and correct copies of photos of the Sub Ladle Car on October 24, 2019 are included herein at Exhibit A.

4. On April 23, 2020, an ACHD observer noted a noncompliance condition at the south end of the United States Steel Edgar Thomson property. The observer was located on the bike trail between the Monongahela River and Kennywood. The ACHD observer noted the emissions originated from a red vac truck performing work on railroad tracks on the United States Steel Property. The brown emissions were vented directly vertical and observed from 9:21 am through 9:28 am with the greatest opacity observed to be 90%. A true and correct copy of the April 23, 2020 Observation Form is included herein as Exhibit B.

5. Based on observations made by the Method 9 certified inspectors, ACHD has determined United States Steel Corporation is in violation of Article XXI, § 2104.01.a and which reads as follows:

§ 2104.01.a VISIBLE EMISSIONS

a. General

No person shall operate, or allow to be operated, any source except those specifically excluded by Subsection b below in such a manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

1. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60-minute period; or,
2. Equal or exceed an opacity of 60% at any time.

ORDER

NOW THEREFORE, pursuant to the authority granted to the ACHD by Article XXI, § 2109.03.a.1, and the Local Health Administration Law, 19 P.S. § 12010, it is hereby **ORDERED** that:

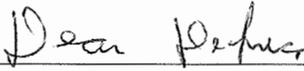
6. Within thirty (30) days of receipt of this Order, United States Steel shall submit to ACHD all documents and communication related to the events that lead to the emissions observed on October 24, 2019 and April 23, 2020.

7. 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.

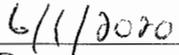
8. Pursuant to Article XI (“Hearings and Appeals”) of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order you have thirty (30) days in which to file an appeal from the receipt of this Order. Such a Notice of Appeal shall be filed in the 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.

9. Please be aware that if you wish to appeal this Order and the ACHD has imposed a civil penalty, you are required within 30 days of receipt of this Order to either forward the penalty amount to the ACHD for placement in an escrow account or post an appeal bond to the ACHD in the amount of the penalty. Please review the specific requirements for prepaying the penalty or posting the appeal bond found in Article XXI, §§ 2109.06.a.2-3. A copy of Article XXI and Article XI may be found at <http://www.achd.net/regs.html>.

DONE and **ENTERED** this 1st day of June 2020, in Allegheny County, Pennsylvania.



Dean DeLuca
Air Quality Program Manager

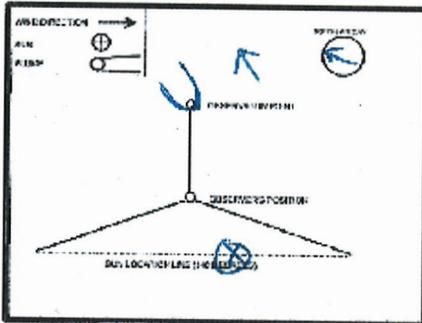


Date

DAILY VISIBLE EMISSIONS OBSERVATION FORM

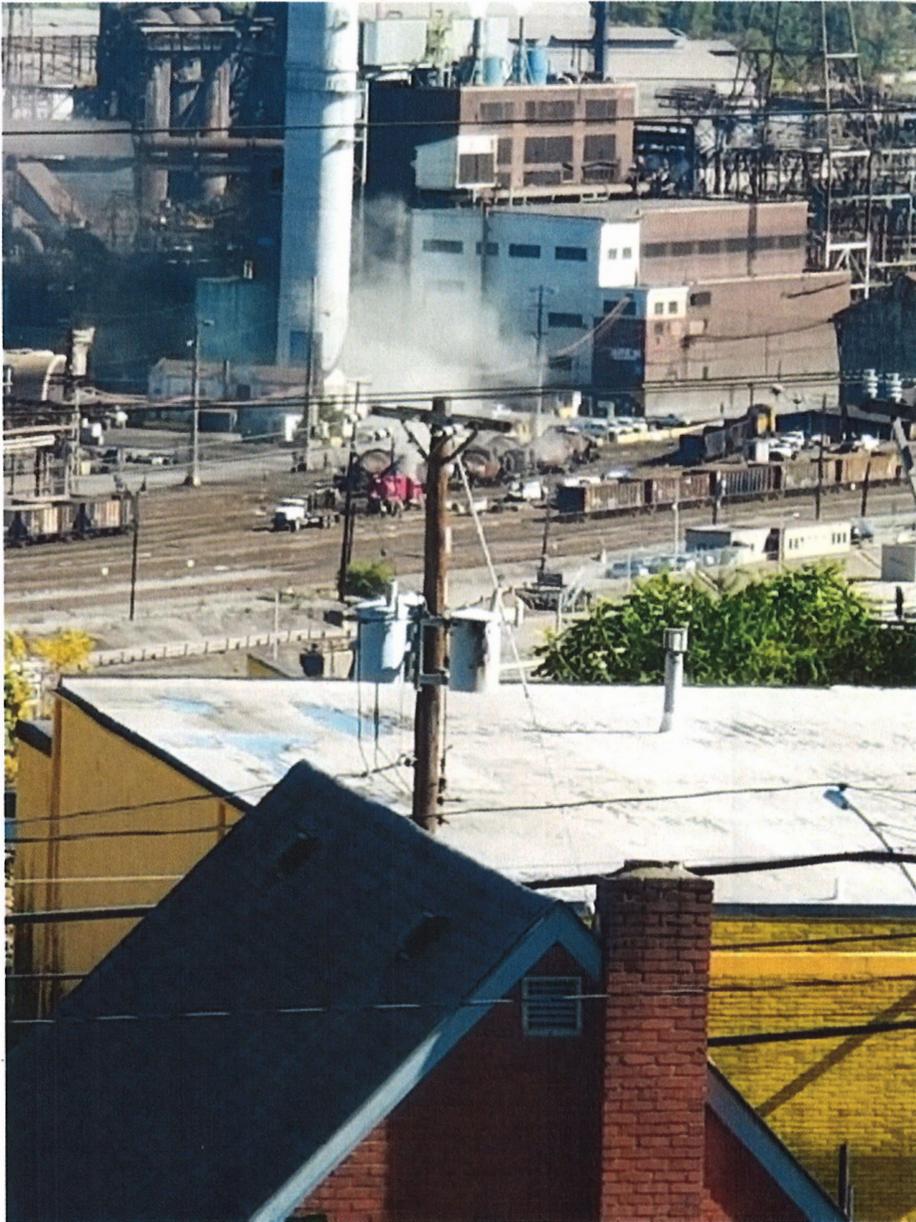
DATE: 19.06.10
 PROJECT: ACHO
 SOURCE: Sub Ladle Cars
 USS ET Works
 PRODUCT: PD
 ID: 15104
 SUB LADLE CARS
 WIND DIRECTION: 100° - 120°
 WIND SPEED: 10 - 15
 WIND GUST: 20
 WIND VELOCITY: 75mi
 WIND VELOCITY: 75mi
 PLUME FROM GROUND LEVEL
 PLUME FROM GROUND LEVEL
 TAN
 TAN
 BUILDINGS: Buildings
 CLEAR: Clear
 WIND DIRECTION: 100° - 120°
 WIND SPEED: 10 - 15
 WIND GUST: 20
 WIND VELOCITY: 75mi
 WIND VELOCITY: 75mi

	START TIME 12:35				STOP TIME 13:35			
	0	15	30	45	0	15	30	45
0	0	10	10	10	30	0	0	0
1	10	15	15	15	31	0	0	0
2	10	10	10	10	32	0	0	0
3	10	10	10	10	33	0	0	0
4	15	15	25	50	34	0	0	0
5	40	50	30	30	35	0	0	0
6	50	50	70	50	36	0	0	0
7	40	30	20	30	37	0	0	0
8	25	20	15	10	38	0	0	0
9	10	10	10	5	39	0	0	0
10	5	5	5	5	40	0	0	0
11	5	5	0	0	41	0	0	0
12	0	0	0	0	42	0	0	0
13	0	0	0	0	43	0	0	0
14	0	0	0	0	44	0	0	0
15	0	0	0	0	45	0	0	0
16	0	0	0	0	46	0	0	0
17	0	0	0	0	47	0	0	0
18	0	0	0	0	48	0	0	0
19	0	0	0	0	49	0	0	0
20	0	0	0	0	50	0	0	0
21	0	0	0	0	51	0	0	0
22	0	0	0	0	52	0	0	0
23	0	0	0	0	53	0	0	0
24	0	0	0	0	54	0	0	0
25	0	0	0	0	55	0	0	0
26	0	0	0	0	56	0	0	0
27	0	0	0	0	57	0	0	0
28	0	0	0	0	58	0	0	0
29	0	0	0	0	59	0	0	0



COY BALBONI ENVIRONMENTAL, INC.

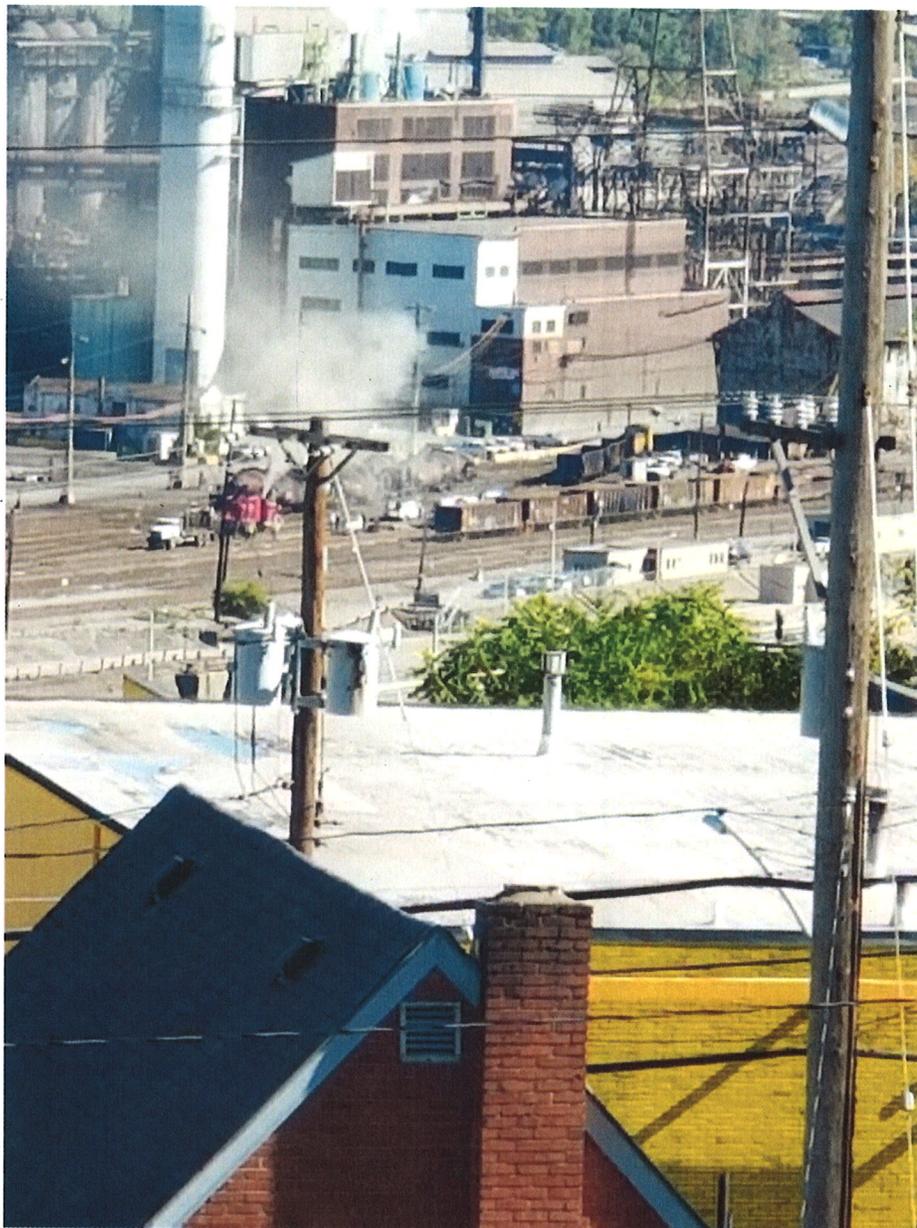
DATE: 10/6/19
 PROJECT: ACHO
 CLIENT: Coy Balboni Env
 COMPLIANCE ASSURANCE: 9/6/19



USS ET Sub-Ladle Car 10/24/19 12:40



USS ET Sub-Ladle Car 10/24/19 12:41(1)



USS ET Sub-Ladle Car 10/24/19 12:41(2)

Exhibit B

ALLEGHENY COUNTY BUREAU OF AIR POLLUTION CONTROL
VISIBLE EMISSION OBSERVATION

FIRM: USS-ET
ADDRESS: 1200 1st St

OBSERVER: [Signature]
DAY & DATE: 11-23-70

VIOLATION LOCATION: Shop Vac Truck on USS-ET premises

OBSERVATION PERIOD (AM or PM):
START: 7:11 END: 7:40

TYPE/INSTALLATION-EQUIPMENT:
Shop Vacuum

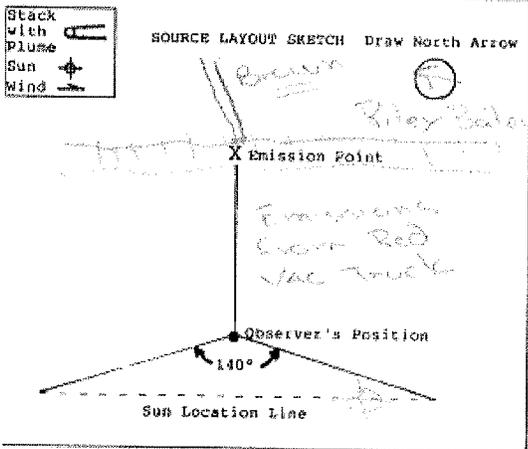
PERSON NOTIFIED:
Caleen Davis

TITLE: Environmental Control

PHONE: 412-957-9303

NOTIFIED: YES NO 9:28 TIME
COPY: GIVEN SENT (CIRCLE)

SOURCE
DISTANCE FROM 1/2 HT
BACKGROUND Clear
SMOKE COLOR Brown
SUN POSITION West
WIND: SPEED 0 DIRECTION 0
SKY COVER 0
TEMPERATURE 45F



REMARKS: Shop Vac Truck
1200 1st St
USS-ET
11-23-70
7:11 - 7:40

SEC MIN	0	15	30	45	SEC MIN	0	15	30	45
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

OBSERVERS SIGN: [Signature]
TITLE: Environmental Control
DATE: 11-23-70

READINGS > 20% OPACITY 17
READINGS > 60% OPACITY 3
VIOLATION: YES NO

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ALLEGHENY COUNTY BUREAU OF AIR POLLUTION CONTROL
VISIBLE EMISSION OBSERVATION

FIRM: URS FT

ADDRESS: 12th & Broad

VIOLATION LOCATION: _____

OBSERVER: W. D. ...

DAY & DATE: 4.23.2020

OBSERVATION PERIOD (AM or PM): _____

START: 9:41 END: 10:40

TYPE/INSTALLATION-EQUIPMENT: _____

PERSON NOTIFIED: _____

TITLE: _____

PHONE: _____

NOTIFIED: YES NO TIME

COPY: GIVEN SENT (CIRCLE)

SOURCE

DISTANCE FROM 1/2 mile HT 100 ft

BACKGROUND Urban Area

SMOKE COLOR _____

SUN POSITION SW

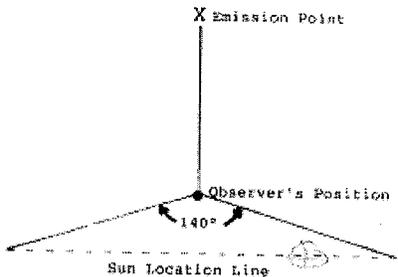
WIND: SPEED _____ DIRECTION C

SKY COVER 100% overcast

TEMPERATURE 47°F



SOURCE LAYOUT SKETCH Draw North Arrow



MIN	SEC				MIN	SEC			
	0	15	30	45		0	15	30	45
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	walked				42	0	0	0	0
13	back to				43	0	0	0	0
14	CAR				44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

REMARKS: _____

Conducted observation from 9:41 AM

Saw emissions in walkway to a boiler

observation location

OBSERVERS SIGN: W. D. ...

TITLE: _____

DATE: 4.23.2020

READINGS > 20% OPACITY 0

READINGS > 60% OPACITY 0

VIOLATION: YES NO X