



2020

Mon Valley Works Clairton Plant
**Operations and
Environmental Report**



United States Steel Corporation

Table of Contents

Message from the Plant Manager	1
S.T.E.E.L. Principles	2
Overview of the Clairton Plant and the Mon Valley Works	3
Safety	6
State-of-the-Art Facility	8
A. Coke Batteries	9
B. Environmental Controls - Highlights	12
C. Low Emissions Quench Towers (LEQT)	15
D. C Battery	16
E. By-Products Plant and Emissions Controls	16
Environmental Training	19
A. ISO 14001 Certified Environmental Management System (2015)	19
B. Continuous Improvement to the Environment (CITE)	20
Environmental Performance – <i>Air</i>	21
A. National Ambient Air Quality Standards (NAAQS)	22
B. National Emission Standards for Hazardous Air Pollutants/Maximum Achievable Control Technology (NESHAP/MACT) Requirements	24
C. Allegheny County Health Department (ACHD) Standards	26
D. June 2019 Settlement Agreement and Order #190606 Update	27
Environmental Performance – <i>Water</i>	28
A. National Pollutant Discharge Elimination System (NPDES Permit) and Performance	28
B. Storm Water Management	29
Environmental Performance – <i>Recycling</i>	30
A. Utilization of Coke Oven Gas	30
B. Recycling Projects	30
Commitment to Community Involvement	31
A. Community Projects	31
B. Community Advisory Panel (CAP)	34
C. Community Benefit Trust	36
Commitment to the Environment and Community – Now and in the Future	37

Message from the Plant Manager



Michael S. Rhoads
Plant Manager
Mon Valley Works –
Clairton Plant

U. S. Steel has been a part of the Mon Valley for 120 years, providing the steel to build America, made by generations of proud United Steelworkers and U. S. Steel management employees. We know that to be a good neighbor, we must also continuously improve our environmental performance.

While I am proud of the environmental progress and achievements described in this report, under U. S. Steel's commitment to its Continuous Improvement to the Environment (CITE) program, we will never waver in our efforts to improve. Not only do we employ a formal CITE program in our training, but we have also embedded our CITE program in our day-to-day operations as a commitment to environmental stewardship.

Our successes are a result of our resolve to always follow our S.T.E.E.L. Principles - Safety First, Trust and Respect, Environmentally Friendly Activities, Ethical Behavior, and Lawful Business Conduct, which will be discussed in more detail in this report.

This past year was challenging for all of us. As part of an essential industry, the Clairton team stepped up in the face of these challenges and continued to strongly forge ahead. Coke, iron, and steel are crucial to many necessary items for everyday life. The steel production that we (the Clairton Plant) support(s) is critical for essentials like transportation, construction and tinplate food containers. Domestic manufacturing has been particularly critical during the pandemic, supplying many products that support national, economic and health security. In 2020, U. S. Steel's Clairton Plant

reached many significant environmental milestones, and the pages ahead summarize some of our major successes during the year. Remarkably, at the conclusion of 2020, employees at the Mon Valley Works' Clairton Plant achieved record-setting performance levels in several environmental compliance areas.

Thanks to the consistency and focus of Clairton Plant employees, the plant achieved a monthly (May 2020), quarterly (First Quarter 2020), and annual (Calendar Year 2020) compliance record for battery combustion stack performance. Stack compliance at Clairton Plant in May 2020 was a near-perfect 99.95%. First quarter 2020 saw a new quarterly record for combined stack performance as well, recording a combined stack compliance rate of 99.92%. Finally, Clairton Plant's 2020 stack performance of 99.87% compliance rate was the best ever recorded, surpassing 2019's previous record-setting performance compliance rate of 99.67%. To reach the level of performance the Clairton Plant team achieved, there were 229 days in 2020 in which all 10 batteries recorded a stack compliance rate of 100%.

Stack performance is considered a key indicator of the overall environmental performance of the coke batteries both by the company and by U. S. Steel's regulating agency. That is why there is a strong emphasis placed on this compliance rate and why this record-breaking performance is so important.

In addition to the landmark combustion stack performance over the past several years, the Clairton Plant also achieved record-setting fugitive emissions performance. The fugitive emissions performance exceeded 99% compliance in third quarter 2020 for the first time in history. These achievements, as well as other environmental accomplishments, are in no small part a result of U. S. Steel's implementation of the Continuous Improvement to the Environment (CITE) program and continued commitment to environmental stewardship. U. S. Steel values our shared environment, employees, and the communities in which we operate. Safety and environmental performance remain our top priorities, now and in the future.

U. S. Steel—S.T.E.E.L. Principles

Our success is a result of our commitment to always follow our S.T.E.E.L. Principles – Safety First, Trust and Respect, Environmentally Friendly Activities, Ethical Behavior, and Lawful Business Conduct:

S SAFETY FIRST ▶ *Our Unyielding Dedication to Safety*

We believe that safe companies are sustainable companies, and that belief is driving our quest for world-class safety performance. By building trust and empowering employees to always put safety first, we are making significant strides to ensure that every employee safely returns home from work at the end of the day.

T TRUST ▶ *Our Commitment to Trust and Respect*

The success of our company depends on all of us working together to achieve our common goals. We must build strong relationships with one another that are rooted in trust. Building and maintaining trust requires all employees to operate with unwavering integrity, continually improve their personal and professional capabilities, and demonstrate their loyalty by always acting in the company's best interests. Treating others with dignity and respect is critical to sustaining and enhancing relationships rooted in trust, which means embracing the strengths and unique differences each of us brings to our work. We must understand and appreciate the importance of diversity and inclusion, fostering a high-performance environment of accountability, fairness, and respect that values individual differences and encourages every employee to reach his or her full potential at our company.

E ENVIRONMENT ▶ *Our Commitment to Environmentally Friendly Activities*

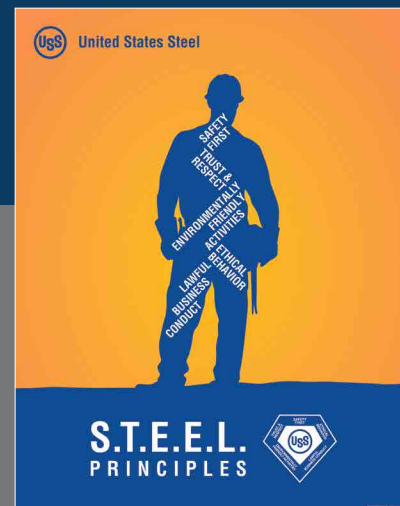
Environmental stewardship is a core value of our company that is incorporated into our day-to-day operations, as well as our strategic corporate decisions. We must operate our facilities in an environmentally responsible manner and take steps to protect and preserve our shared natural resources. Doing what's right for the environment is also doing right for our business. Our commitment to innovation, a hallmark of U. S. Steel for more than a century, is key to the sustainable operations of our facilities and the delivery of sustainable products and solutions for our customers. Some of our most recent innovations are already contributing to efforts to create a more sustainable world, such as our lightweight advanced high-strength steels that help meet automobile fuel efficiency standards, and our high-efficiency electrical steel that enhances electric motor efficiency. We are committed to being environmental stewards in the communities in which we live and operate. We consistently strive to increase our energy efficiency, reduce emissions, and conserve energy and other resources, while prioritizing the reuse and recycling of materials into our products so that our environmental footprint is minimized.

E ETHICAL BEHAVIOR ▶ *Our Commitment to Ethical Business Practices*

We measure our corporate conduct by asking a simple yet demanding question: "Is it the right thing to do?" U. S. Steel was founded on principles of ethical business practices that foreshadowed the code of conduct we follow today.

L LAWFUL BUSINESS CONDUCT

U. S. Steel was the first company in the United States to hold an annual meeting of stockholders and publish an annual report. Business has grown more complex since the beginning of our company, but the principles by which we do business have never changed. Each employee has the duty to conduct business fairly and in compliance with all applicable laws and regulations.



These S.T.E.E.L. Principles are the foundation on which we operate and are reflected in the environmental progress realized by the Clairton Plant operations as explained below with all applicable laws and regulations.

Overview of the Clairton Plant and the Mon Valley Works



Figure 1 – The Clairton Plant – the largest coke plant in the Western Hemisphere, is located along the Monongahela River outside of Pittsburgh.

The Clairton Plant of the Mon Valley Works is located 20 miles south of Pittsburgh on 392 acres along 3.3 miles of the west bank of the Monongahela River. The plant has the capacity to produce approximately 4.3 million tons of high-grade metallurgical coke per year in 10 coke batteries comprised of 708 ovens. The Clairton Plant is the only remaining U. S. Steel coke-producing plant in the United States. This plant supplies coke needed for iron and steel production at the Mon Valley Works' Edgar Thomson Plant and other steel-producing locations. The Clairton Plant is the largest producer of high-grade metallurgical coke in the Western Hemisphere.

The significance of the Clairton Plant, including its products and byproducts, goes well beyond its geographical footprint. Clairton Plant's products are used as the raw material feeds to other steel

plants throughout the United States. In addition, its byproducts are used in chemical and manufacturing operations of many corporations.

The Clairton Plant operations have a tremendous impact on the local, regional, and national economy. The Clairton Plant employs approximately 1,400 highly skilled United Steelworker union-represented and non-represented employees. Since the Clairton Plant is the nation's largest producer of coke and coal chemicals, its operations have a multiplier effect in supporting thousands of additional steel plant, chemical, energy, transportation, and supplier jobs, not only in the Clairton area in Allegheny County, and Southwestern Pennsylvania region, but also across the United States. In fact, the Clairton Plant is an integral part of the four-plant steelmaking complex U. S. Steel calls the Mon Valley Works.



Figure 2. U. S. Steel's operations and offices in Allegheny County, Pa., plus the Clairton Community Advisory Panel communities as described in section IX.B.

The Mon Valley Works consists of:

- 1) **Clairton Plant** – produces coke and coke by-products.
- 2) **Edgar Thomson (ET) Plant** – produces hot iron in blast furnaces, which is then converted into steel at the Basic Oxygen Shop.
- 3) **Irvin Plant** – finishes and processes steel slabs.
- 4) **Fairless Plant** – includes a finishing mill, located outside of Philadelphia.

The Edgar Thomson Plant and Irvin Plant rely on the Clairton Plant for its metallurgical coke (which is used as a raw material in ET's blast furnaces) and coke oven gas, which is used throughout the facilities as a clean fuel.

The economic impacts of the Mon Valley Works are significant locally as well as nationally. Steel is a critical foundation for our nation's economy, security, infrastructure, energy independence, and downstream manufacturing capabilities. The United States must maintain the ability to mine, melt, and make the steel needed to defend, build, and power our country.

In 2018, the federal government determined that domestic steelmaking is necessary for our nation's security production requirements, and without domestic steel production, we run the risk of not being able to adequately respond to a national emergency. Furthermore, the U.S. Department of Homeland Security has designated steelmakers like U. S. Steel, including its Clairton coke plant, to be a vital component of our nation's critical manufacturing sector, which is necessary for the economic prosperity, security, and continuity of the United States. The COVID-19 pandemic has highlighted the importance of having robust domestic manufacturing capabilities to supply important products that are essential to national, economic, and health security.

While the Clairton Plant has been producing coke for more than 100 years, it continues to evolve into a state-of-the-art manufacturing facility with a proven track record of environmental performance like no other coke plant in the world. The plant has achieved significant milestones over the last century, including many recent environmental milestones, as highlighted on right:

History of Clairton Plant

Significant Milestones

YEAR	TIMELINE OF EVENTS
1901	Built by St. Clair Steel Company
1904	Purchased by U. S. Steel
1918	Construction of 12 Koppers batteries with total of 768 ovens
1948	Maximum capacity of cokemaking achieved (approximately 8 million tons/year with 22 batteries and 1,482 ovens)
1973	Coke Oven Gas Desulfurization Plant installed
1977	Coke capacity reduced to approximately 5 million tons/year
1982	B battery commissioned
1988-1990	Pushing Emissions Controls installed
1991	By-Products Plant upgrades
2001	Pushing Emissions Control Baghouse improvements
2005-2008	B battery through-walls replaced
2008	Plant status: 12 batteries with 816 ovens in operation
2009	3 batteries permanently shut down – 624 operating ovens
2010-2020	Batteries 13-15 major refractory upgrades
2010-2020	Batteries 19-20 through-walls replaced
2011-2020	Batteries 1-3 endflues replaced
2012	C battery Start-up: 10 batteries with 708 ovens with capacity of approximately 4.3 million tons of coke/year
2013	2 additional Low Emission Quench Towers constructed (Reductions: 1,107 tons of TSP, 301 tons of PM ₁₀ , 812 tons PM _{2.5})
2018	Coke Oven Gas Desulfurization Vacuum Carbonate upgrades
2020	New High-Efficiency Bags installed on Pushing Emissions Control Baghouses – completed in May 2020

Safety

Safety Policy

U. S. Steel continues to develop and implement innovative ideas to improve the Safety & Industrial Hygiene processes and management systems which are the drivers of a sustainable culture. This culture incorporates a framework for setting and reviewing objectives and targets, which, like our commitment to environmental stewardship, go beyond mere compliance with applicable laws and regulations. Such programs require management to communicate pertinent job-related

Safety & Industrial Hygiene requirements to an engaged and highly skilled workforce, who are empowered with capabilities and resources needed to assess, reduce, and eliminate workplace risks and hazards.

The following values guide the development of our Safety & Industrial Hygiene processes and programs and our Safety Management System:

Safety Values

- “Safety First” is a Core Value at U.S. Steel.
- We believe that ALL incidents and injuries can be prevented.
- Safety is a personal responsibility. Management is accountable for results.
- Employee engagement and training is essential.
- Hazardous exposures can be eliminated or safeguarded.
- Prevention of incidents and injuries is the right thing to do and is good business.



All employees are empowered to STOP work for conditions that endanger individuals, equipment or our work environment. Please engage, STOP, and involve others when you have concerns. Employees and supervisors must work in partnership and resolve any STOP work issues that arise.

DBR

DAVID B. BURRITT
President & Chief Executive Officer

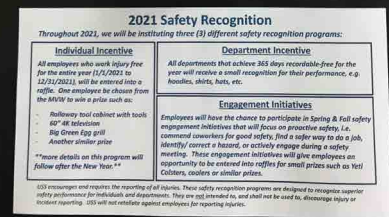
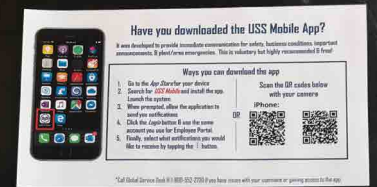
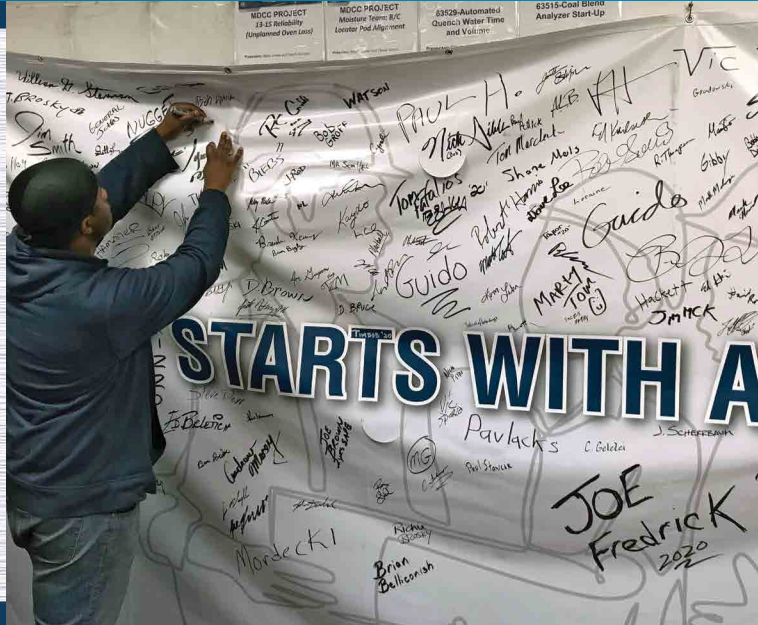


Figure 3. – A copy of a wallet-sized “Stop and Act” card (top left), a photo of an employee signing Clairton’s Safety Banner (middle), and a photo of the contents of the December COVID Care Package (top right).

Employee Engagement

U. S. Steel encourages, promotes, and recognizes that employee engagement is a key factor in the success of our Safety Management System. We establish, implement, and maintain processes for consultation and participation of employees at all levels and functions.

Some of the in-plant safety engagement initiatives we have encouraged over the last year include:

- **STOP & ACT**

Every U. S. Steel employee is empowered to STOP work during conditions that endanger individuals, equipment, or our work environment.

- **Annual Safety Commitment**

At the beginning of every year, all U. S. Steel employees are invited to display their commitment to safety by signing the plant safety banner.

- **Safety Conversations**

We have established a process in which all members of the organization can engage with one another about work practices, conditions, and/or safety concerns about a job in a non-threatening and collaborative way.

- **Safety Baseball**

Spring and Fall engagement competitions to encourage safety communication and the identification and elimination of hazards throughout our plants.

- **COVID Care Packages**

To encourage compliance with CDC and Commonwealth of PA Coronavirus Guidelines, care packages were sent to all employees periodically throughout the year. These packages included various face coverings, individual hand sanitizers, and other communications to encourage safety precautions.

State-of-the-Art Facility

While the Clairton Plant has been a vital part of Allegheny County, Pa., for more than 100 years, it continues to evolve into a state-of-the-art facility. While the fundamentals of coke-making have not changed,

the ancillary operations and the technologies used have significantly evolved to be more environmentally friendly and efficient. The diagram below provides a high-level summary of the Clairton Plant's operations:

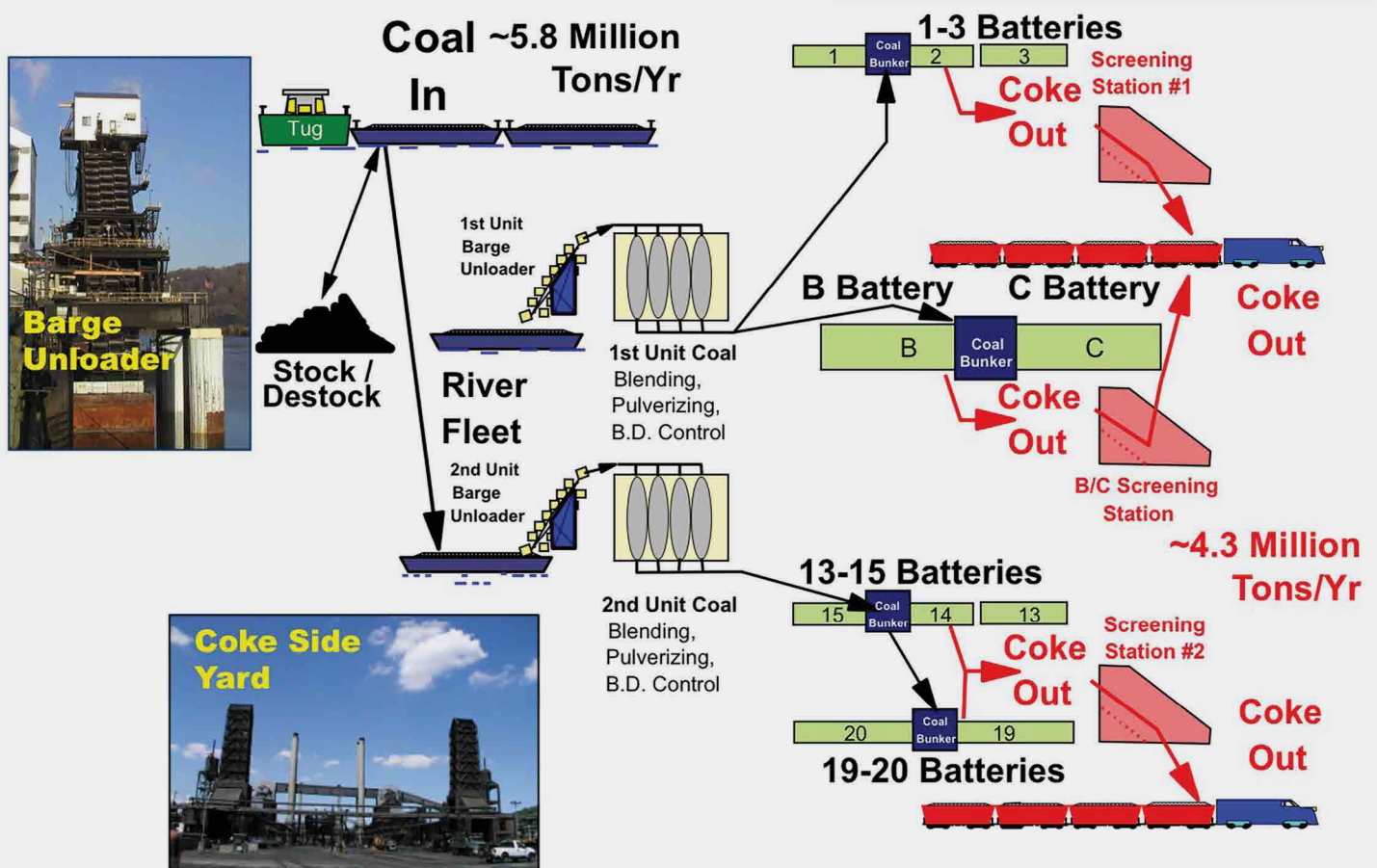


Figure 4. Clairton Plant – General Plant Process Flow Diagram, from left to right: the coal being brought by barge to the plant; coal blending & pulverizing operations; coal being charged to the batteries; and coke produced, screened, and loaded into railcars for customer delivery.

A. COKE BATTERIES

Coal is a mineral consisting mainly of sedimentary fossilized carbon with smaller amounts of other elements such as sulfur, hydrogen, oxygen, nitrogen, and more. Coal is found under the earth's crust as lignite, or brown coal, bituminous coals, and anthracite. It is extracted either from underground by shaft mining or at ground level by open-pit mining. The bituminous coals are used at the Clairton Plant to produce metallurgical coke.

According to the U.S. Energy Information Administration, in 2019, coal made up about 23.4% of the United States' electricity generation

and is also used in the production of metallurgical coke for blast furnace fuel. Some smaller blast furnaces can utilize charcoal as a carbon source, but larger blast furnaces require the strength and durability of coke. U. S. Steel operates several blast furnaces throughout the corporation. The coke supplied by Clairton is a key ingredient that fuels our blast furnaces to produce the iron that is refined to steel at the basic oxygen process (BOP) shops. The steel is molded into steel slabs at our continuous caster operations and sent to our various finishing facilities to be rolled and coated into the final customer-specific products.

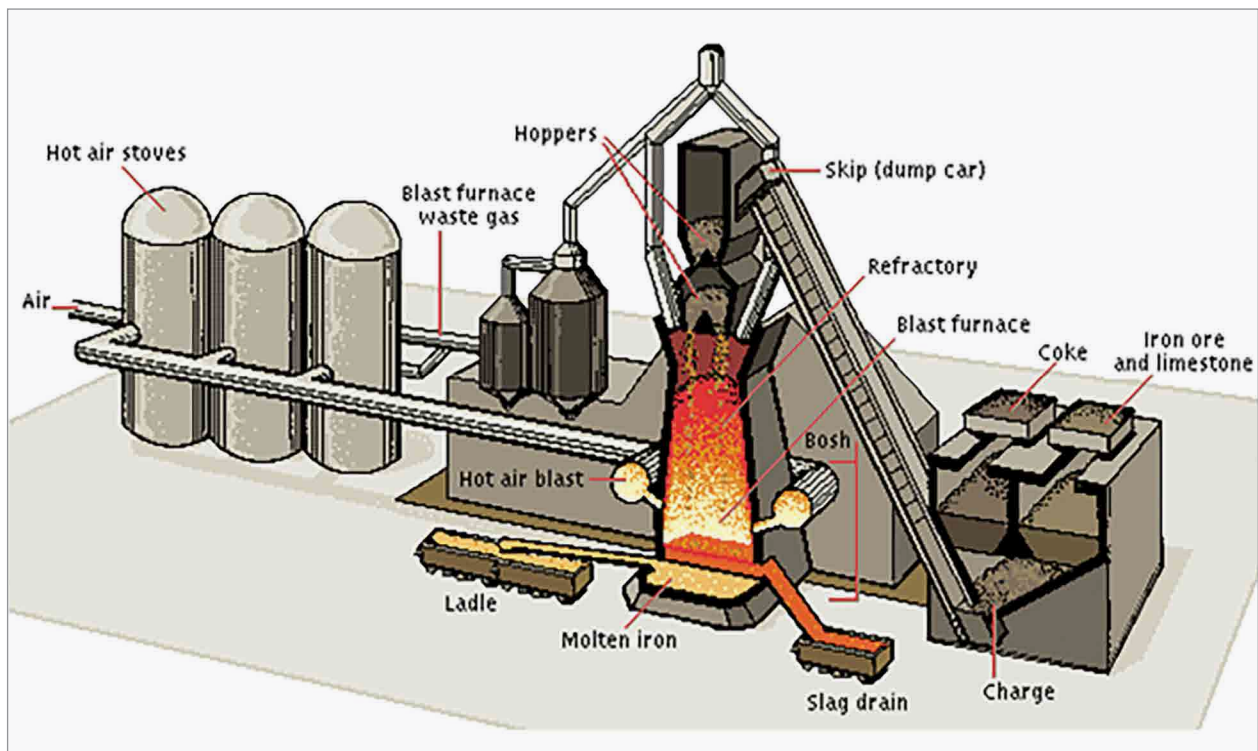


Figure 5. A blast furnace operations overview showing coke, iron ore, and limestone storage and charging into a blast furnace where molten iron is produced. The molten iron is then transferred to a Basic Oxygen Process to be converted from iron to steel.

COKE

...is a **fuel** to supply heat and a **reductant** to reduce the iron ore to elemental iron.

...**permeability** lets wind, hot blast air, travel up through the furnace.

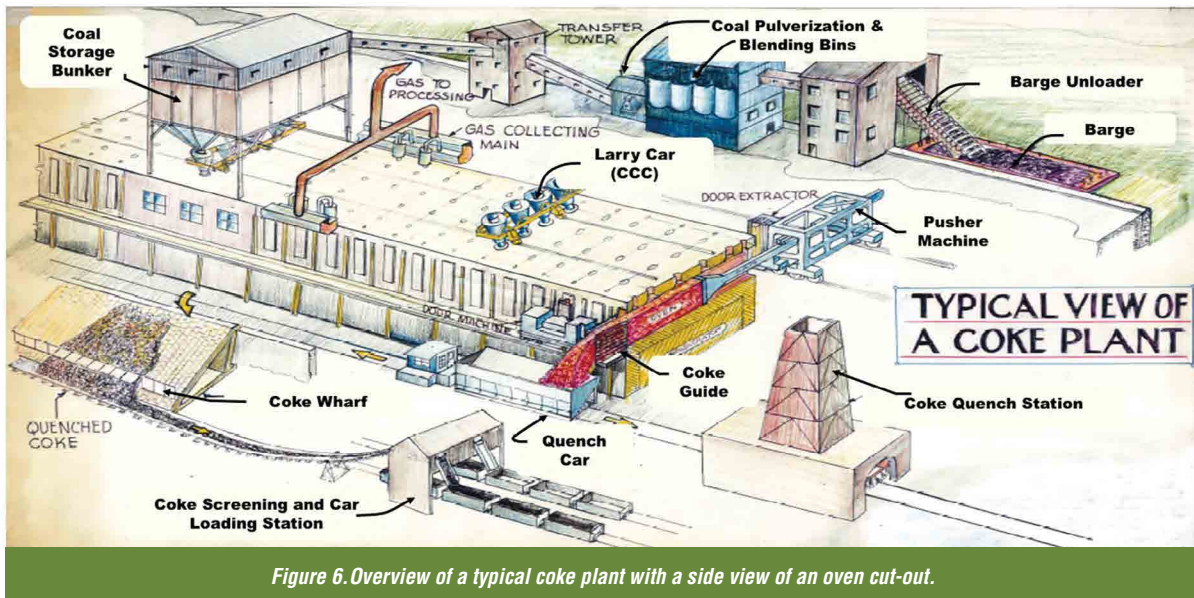
...**supports the burden or layer** of iron ore and limestone in the furnace.

To produce the coke needed to directly reduce iron, bituminous coal is superheated under reduced oxygen conditions in oven batteries specially designed for this process. A coke battery is made up of multiple ovens. Coal is crushed and blended prior to being moved to the coal storage bunkers located on each battery unit. The coal is transferred from the coal storage bunker to each oven by a coal charging railcar called a larry car, a specially designed railcar that transports the coal from the coal storage bunker to each oven and includes specially designed chutes to “charge” each oven with the blended coal. Coal is dropped into the ovens through four coal charging holes. The coal is heated, or baked, at approximately 1,900 degrees F for 18 hours in the ovens. During that time, gases, including the volatiles of the coal, are driven off by the heat into the off-gas piping

system to be further processed downstream. The pure carbon that remains in the oven is called “coke.”

Once the coke is produced, the pusher-side and coke-side doors of the oven are removed. A “pusher” machine is then positioned in place, where the pusher machine ram “pushes” the coke through an 18-inch slot into a rail mounted catch, or quench, car. When the coke is pushed from the oven into the quench car, it is quickly moved to the battery unit’s quench towers to cool the coke and stop the burning process.

The cooled coke is then dumped onto a coke wharf, where it is taken to a facility to be screened and sized prior to being charged into the blast furnace. The figures below show a typical layout of a coke plant and the current coke battery configuration at the Clairton Plant:



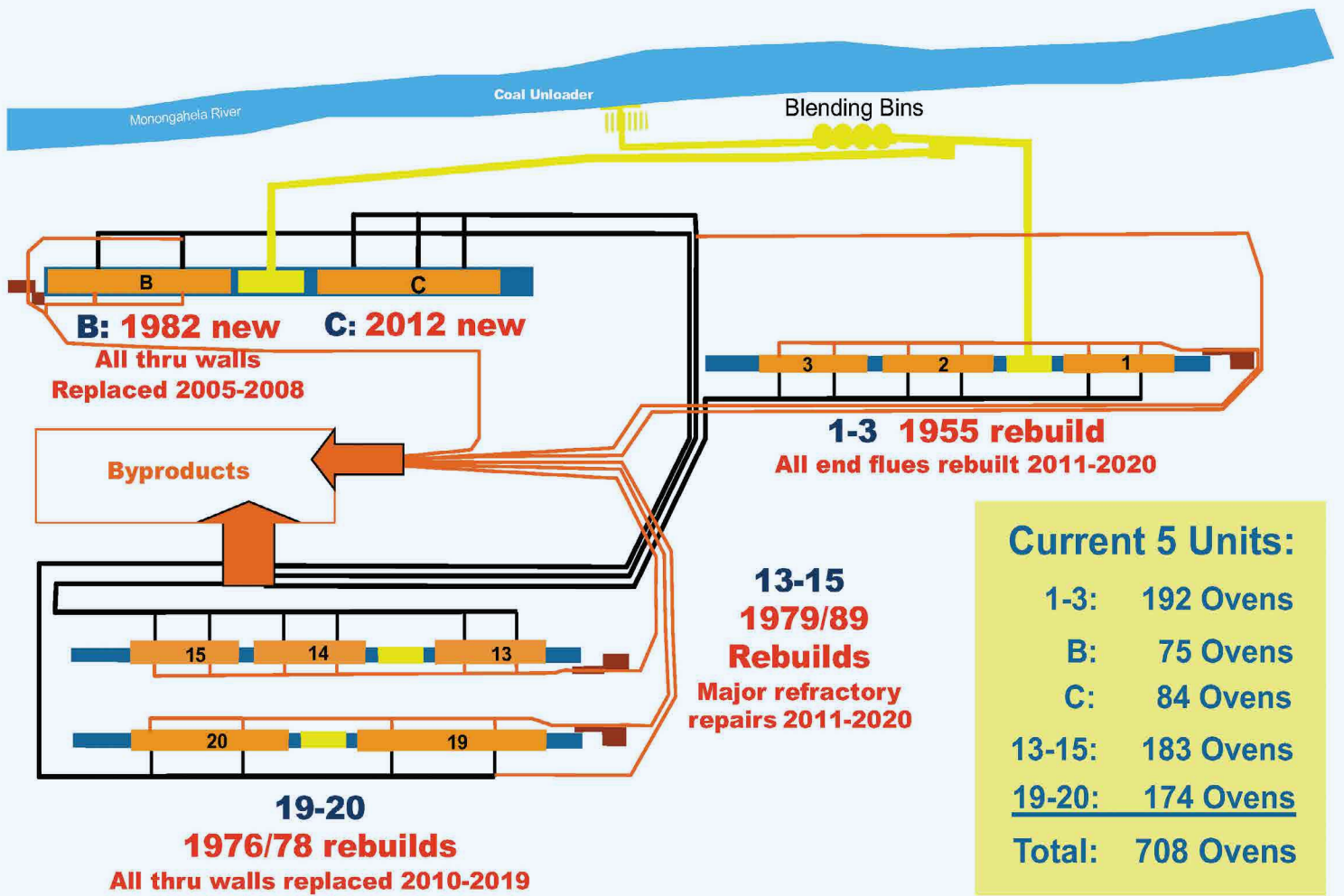


Figure 7. Clairton Plant – Battery Configuration in 2020.

B. ENVIRONMENTAL CONTROLS – HIGHLIGHTS

As indicated above, the Clairton Plant coking facility consists of 10 batteries ranging in height from 3.6 to 6 meters, which have an annual coke capacity of 4.3 million tons. There are several potential emission points throughout the coking process that U. S. Steel and the regulating agencies monitor. Specifically, emissions are monitored during the process of charging coal into the ovens, during the pushing of the coke out of the oven and into the quench car, during the travel of the coke-filled quench car to the quench tower, at the doors on each side of each oven, at the lids that cover the charging port through which the coal enters the oven, at the offtake piping on each oven that carries the off-gases to be processed, and at the combustion stacks from which the by-products of combustion from natural gas and coke oven gas exit the batteries after the heat is used to bake the coal. While each battery is unique, air emissions are minimized at each potential emission point either through the installation of control equipment, such as the pushing emissions control baghouses, or the implementation of advanced employee work practices.

Stage Charging - Batteries 1-3, 13-15, 19-20 and B

We have installed gravity-discharge larry cars and screw conveyor larry cars to charge the coal more evenly into the ovens. Larry cars operate on top of the batteries delivering coal to each oven. The coal is brought over to each of the batteries via conveyor systems. The act of delivering coal into each of the ovens is called “charging.”

Stage charging involves the planned sequential release of fixed amounts of coal from the hoppers of the larry car in conjunction with high-pressure steam aspiration and leveler bar operation. Stage charging is a detailed charging procedure that evenly distributes the coal into the oven, aimed at reducing charging emissions, reducing the number of passes made by the leveler bar, and keeping the tunnel head open to the gas collecting main. Without a clear path for the off gases to travel, the oven pressure increases, and the gases may escape out of the lids or the doors, providing for a higher likelihood of emissions. To complete the charge properly, lidmen – who are trained to remove and replace oven charging hole lids – replace the lids as soon as the coal-charging hopper runs empty to minimize air infiltration and visible charging emissions.

Figure 8. Lidman replaces the lid after the coal has been charged into the battery.





Coke oven door design and improved operating and maintenance techniques continue to improve, with the Clairton Plant serving as a leader in innovation. Coke oven doors are removed and put back on each oven after a coking cycle is complete. Clairton has its own door repair shop onsite with the expertise to repair doors more efficiently than taking them offsite for repair. Door coordinators continually stop door leakage and make door adjustments to minimize door leakage around the clock.

Clairton Innovative Coke Battery Door Design Project

U. S. Steel has worked with a third party to design and trial an innovative adjustable door seal technology for use at its Clairton Plant. A unique adjustable door seal has been designed for the coke side and pusher side doors of 1-3 Batteries, 13-15 Batteries, 19-20 Batteries, and B Battery. The design includes an improved new seal arrangement and new seal components made of more durable and flexible material. The new design allows the door to seal better than the current door design. Clairton continues to search for opportunities through alternative designs and materials to improve door sealing on all units.

Automatic door and jamb cleaners are installed on the coke-side of all batteries to further reduce emissions. The door and jamb cleaners will remove any buildup or debris where the face of the door mates with the battery. This ensures proper seating. The positioners, or locators, on the door machines ensure that the doors are placed back in the proper place for each oven.

Heating affects the quality and quantity of the coke produced from the destructive distillation of the coal but also impacts potential emissions. Even and controlled heating through each oven and battery is essential. Clairton has been a leader in developing flue temperature monitoring to ensure consistent heating.

Due to the fluctuations of extreme temperatures (thermal shock) over time, there are occasions when the refractory brick will need to be patched/repared. Again, Clairton has been a leader in the



Top: Figure 9. Top left: Above is a picture of the new door seal that is adjustable, seals better, and allows for better maintenance. Middle: Figure 10. Central Door Repair Shop where doors are repaired, with the new design implemented. Bottom: Figure 11. New Door Plug. Door plugs fit into the oven and are used to reduce emissions while lowering heat losses from the oven chamber through the door.

development of advanced patching practices including wet slurry, dry gunning, fused silica dry gunning, and ceramic welding patching techniques.

Cryogenic Coke Oven Gas Process

To our knowledge, the Clairton Plant has the only cryogenic coke oven gas (COG) separation facility in the world. While many coke plants throughout the world do not employ any coke oven gas desulfurization, the Clairton Plant has enhanced the cryogenic process. Per the Association for Iron and Steel Technology (AIST), the desulfurization process at the Clairton Plant provides the lowest hydrogen sulfide, clean coke oven gas in North America. The hydrogen sulfide gas content of the cleaned coke oven gas is well under half the hydrogen sulfide content of those coke plants that desulfurize coke oven gas through other processes and is approximately 90% lower than those that do not desulfurize coke oven gas.

As discussed below in the by-products section, the cryogenic process produces much cleaner and consistent coke oven gas, which benefits combustion users including the battery heating.

Pushing Emissions Control Systems

Once the coking cycle is complete, the coke is “pushed” out of the oven via a “pusher” machine. Emissions from the pushing process are captured by the Pushing Emission Control Systems (PECs). PECs are installed on all 10 batteries. PECs on nine of the batteries use a traveling canopy hood over the coke cars to capture pushing emission and a baghouse to control emissions. The pushing emissions on B battery are captured and controlled by a fixed coke-side shed and baghouse as opposed to the traveling canopy hood.



Figure 12. PEC Baghouse for #1 Unit (Batteries 1-3).

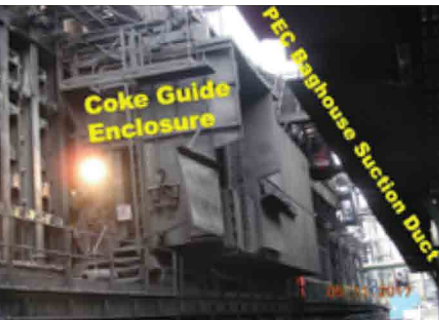


Figure 13. PEC Baghouse Infrastructure and PEC Baghouse Batteries 13-15 showing the coke guide enclosure, PEC hood and 13-15 & 19-20 PEC, or second unit, baghouse.

As noted above, the Clairton Plant has five Pushing Emissions Control (PEC) baghouses to capture and control particulate matter emissions from “pushing” the coke out of the battery ovens after the coal-to-coke oven cycle is complete. These five baghouses capture and control the pushing emissions from all 10 batteries.

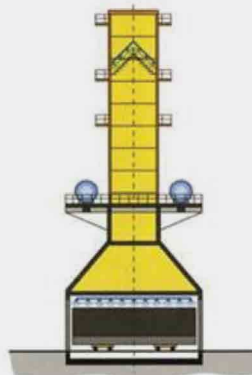
U. S. Steel Clairton Plant is committed to improving the emissions control performance of all five PEC baghouses by installing new cages and upgrading the systems by using high-control efficiency bags. These improvements were completed in 2020. The high-control efficiency bags are 92% efficient at removing the particulate matter 2.5 microns or less ($PM_{2.5}$). The previous baghouse bags were approximately 80% efficient at removing $PM_{2.5}$. This is a 15% increase in capture at all five baghouses, resulting in a significant emissions reduction of $PM_{2.5}$.

C. LOW EMISSIONS QUENCH TOWERS (LEQT)

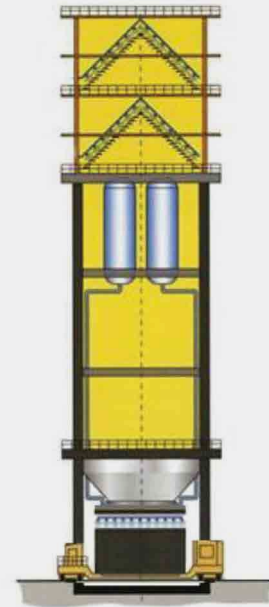
Once the coke is pushed out of the oven, the coke is quenched at quench towers to stop the coke from burning. While the coke from all batteries is quenched, Low Emissions Quench Towers (LEQTs) have been installed for C Battery, Batteries 13-15, and Batteries 19-20. As shown below, LEQTs are much higher, have a much larger cross-sectional area, and have a state-of-the-art double baffle configuration that leads to significant reductions of particulate emissions during the coke quenching operation. A photo of the new LEQTs for Batteries 13-15 (Quench Tower 5A) and Batteries 19-20 (Quench Tower 7A) is provided below. Quenching coke from C Battery is also conducted in an LEQT.

New Low Emissions Quench Tower

Conventional Quench Tower



Emission of more than 50 grams per ton of coke



Emission of less than 10 grams per ton of coke

Figure 14. Comparison of Conventional Quench Tower and Low Emissions Quench Tower

Figure 15. 5A and 7A LEQT – installed in 2013



D. C BATTERY

C Battery is the most advanced by-product battery in the United States. It was installed and commenced operation in November 2012. It consists of 84 large ovens with dimensions of 6 meters in height by 18 inches wide (average) by 16.7 meters in length. Each oven is made with specially designed refractory brick. The brick is designed to withstand temperatures as high as 2,650 degrees F.

Charging emissions are reduced by using a screw feed larry car to allow for more controlled charging of coal into the ovens. C Battery is the only battery in the United States equipped with the state-of-the-art Pressure Oven Regulated system or PROven® technology. PROven® is an electronic control system that individually controls the pressure in each oven depending on the stage of coking that oven is experiencing. The collector main is maintained at a negative pressure to draw the off-gases released during charging and coking, thus reducing emissions and high spikes in oven pressure. In

addition, a low NOx heating system reduces the amount of coke oven gas per ton of coal charged as compared to traditional batteries.

The Pushing Emission Control (PEC) system consists of a hood that is integral to the door machine to reduce pushing fugitive emissions whenever a door is opened. U. S. Steel has also installed a Low Emission Quench Tower to significantly reduce particulate emissions during the coke quenching operation.

C Battery replaced three older batteries (Batteries 7-9, which were permanently idled) and resulted in reductions of hundreds of tons of particulate matter.

E. BY-PRODUCTS PLANT AND EMISSIONS CONTROLS

The Clairton Plant maintains and operates a state-of-the-art by-products plant that recovers tar, ammonia, light oil (benzene, toluene, and xylene), and elemental sulfur from the coke oven gas (COG). The general process flow diagram below provides a high-level summary of the by-products plant.

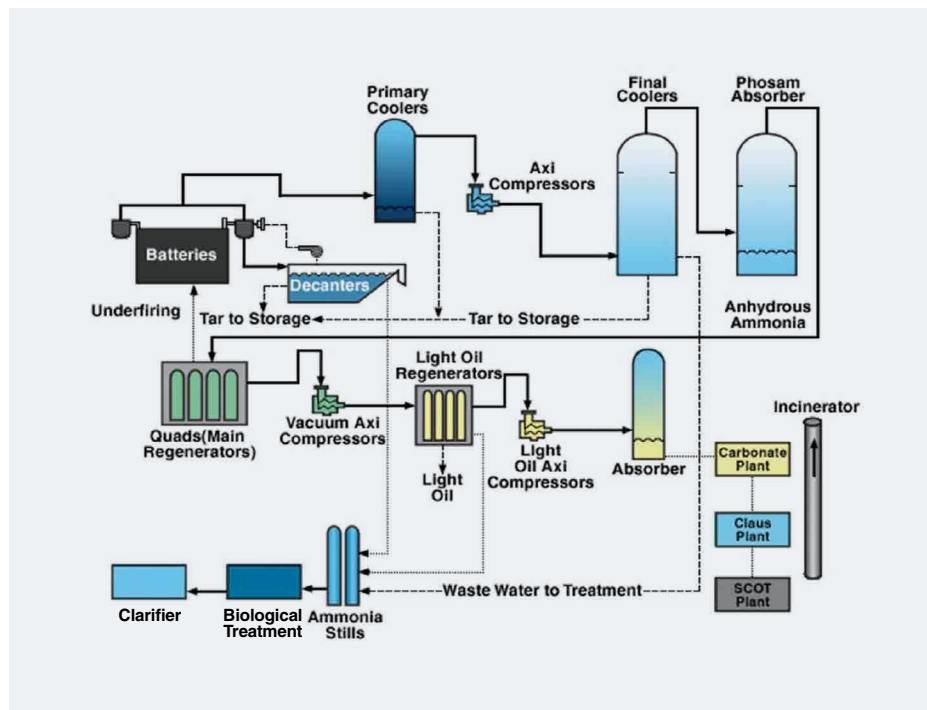


Figure 16. Clairton Plant By-Products Process Flow Diagram.

The by-products plant utilizes axial compressors to draw the raw coke oven gas into the battery topside collecting mains and through the primary coolers where tar, naphthalene, and water are recovered.

The raw coke oven gas is drawn through the #1 Control Room axial compressors and then pushed through the U. S. Steel-patented PHOSAM process to recover ammonia

before being processed at the #2 Control Room cryogenic gas separation plant.

The cryogenic gas separation plant utilizes vacuum compressors to pull and push the raw coke oven gas through the main regenerators, which remove and concentrate the hydrogen sulfide and light oil from the raw coke oven gas.

The light oil is recovered in a separate heat transfer, separation, and cryogenic process at #2 Control Room.

The #5 Control Room desulfurization plant converts the concentrated hydrogen sulfide through catalytic technology into elemental sulfur in molten form.

The contaminated water treatment plant is responsible for processing all contaminated water generated by the coke oven gas cleaning process. Here it is treated to meet technological and water quality-based effluent limitation limits before discharging into the Monongahela River.

A few facts about the Clairton by-products facility:

The cryogenic gas separation facility for coke oven gas provides a high-quality gaseous fuel and is the only one of its kind in North America and, to our knowledge, the world. The facility can remove significantly more light oil than traditional by-products facilities.

The Clairton by-products facility, especially the desulfurization facility, can remove more hydrogen sulfide than traditional by-product desulfurization units. At the Clairton Plant's state-of-the-art desulfurization plant, the process removes the coke oven gas hydrogen sulfide content to a level that is well less than half of traditional desulfurization process and well over 90 percent less than most coke plants, which do not desulfurize coke oven gas.

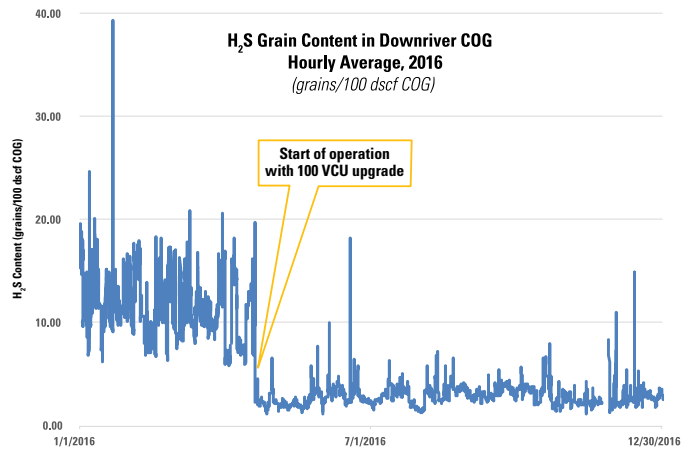


Figure 17. The above figure, as depicted in the September 2017 Allegheny County Health Department (ACHD) State Implementation Plan (SIP) Revision shows hourly H₂S grain content in COG in 2016, before and after the desulfurization process upgrades. The upgrades were completed on April 20, 2016, leading to significant decreases in sulfur content in COG. We continuously monitor the results to demonstrate continuous efficient operation of the desulfurization process.

In 2016, upgrades were made to Clairton Plant's coke oven gas (COG) desulfurization process, specifically an innovation at the Vacuum Carbonate Unit (VCU) that reduces the concentration of hydrogen sulfide (H₂S) in the coke oven gas. Within the VCU, the COG passes through a soda ash solution in a trayed absorber column. The H₂S is absorbed by the soda ash, and the desulfurized gas exits the absorber column as a desulfurized fuel. The COG processed through the desulfurization process is combusted across multiple units throughout the Mon Valley Works Plants (Clairton, Edgar Thomson, and Irvin).



In addition to its superior efficiency and hydrogen sulfide removal, the Clairton desulfurization process includes redundancy which allows maintenance to be performed without losing the ability to desulfurize COG, whereas traditional by-product facilities require a two- to three-week maintenance outage at which time such facilities are not desulfurizing coke oven gas.

In North America, according to the most recent AIST data, there are 12 operating coke plants. Of the 12 metallurgical coke plants in the United States, only four currently desulfurize coke oven gas. Of the four that desulfurize, Clairton has the highest efficiency from an H₂S removal standpoint.

Products from Coke Batteries and By-Products Plant

While the By-Products Plant provides a significant environmental benefit by cleaning the coke oven gas (COG), which reduces emissions when the COG is combusted, the materials recovered in the Clairton by-products facility are sold as product and not disposed of as solid waste, providing a benefit to the environment. The quantity of coal charged and each of the by-products recovered is shown in table to the right.

- **Metallurgical Coke** is a fuel and reducing agent in blast furnaces.
- **Coal Tar** is a feedstock for producing electrode binder pitch, roofing pitch, road tar, and numerous basic chemicals.

- **Light Oil** is an important source of aromatic chemicals, principally benzene, a chemical essential to the production of materials such as polystyrene and ABS plastics.
- **Anhydrous Ammonia** is a high-quality agricultural fertilizer and a chemical feedstock.
- **Sulfur** is a basic industrial chemical commodity.
- **Coke Oven Gas** is a high-quality fuel like natural gas at half the heating (MMBtu/scf) value.

	Daily	Annual	Units
Coal Charged	15,918	5,810,204	Tons
Coke Produced	11,700	4,270,500	Tons
Tar Recovered	119,388	43,576,531	Gallons
Light Oil Recovered	44,571	16,268,571	Gallons
Anhydrous Ammonia Recovered	44	15,978	Tons
Elemental Sulfur Recovered	42	15,397	Tons
Coke Oven Gas Recovered	192,612	70,303,469	MCF

Table 1: Coke Batteries and By-Products Plant Recoveries

By producing these products, the advantages of a state-of-the-art by-products facility are realized both locally and nationally.

Environmental Training



Figure 18: U. S. Steel Clairton Plant's current ISO14001 Certificate of Registration.

U. S. Steel invests significant resources to ensure that its employees are properly trained in all aspects of their responsibilities to ensure, among other things, that environmental compliance is achieved. This is conducted in various ways, including one-on-one training as well as more comprehensive training programs, such as those related to ISO 14001.

A. ENVIRONMENTAL MANAGEMENT SYSTEM AND ISO14001 (2015)

The Clairton Plant is firmly committed to environmental compliance, beginning with the incorporation of International Organization for Standardization (ISO) 14001 into our environmental management systems.

ISO 14001 standards seek to assist a company or an organization to “minimize harmful effects on the environment caused by its activities, and to achieve continual improvement to its environmental performance.”

The Clairton Plant is certified in compliance with this standard and has been since 1998, becoming the first coke plant in the country to get certified.

There were two ISO 14001 surveillance audit events in 2020 – one in March and one in September – and the Mon Valley Works achieved unconditional approval of the ISO 14001 Environmental Management System because of each audit.



CONTINUOUS IMPROVEMENT TO THE ENVIRONMENT

Figure 19: Clairton Plant's Environmental Policy.

B. CONTINUOUS IMPROVEMENT TO THE ENVIRONMENT (CITE)

The Clairton road to environmental responsibility and excellence begins by focusing on people and encouraging each employee to participate fully. This is achieved through a comprehensive training approach – the Continuous Improvement to the Environment (CITE) training program.

CITE training is a classroom program with the addition of practical field training focused on environmental practices and improvement at the Clairton Plant. The training program is an 11-part program that touches on all aspects of the coking process, its environmental impact, procedures, and best-practices to mitigate environmental impacts from each potential emission point in the coke-making process. This program consists of environmental impact awareness training, learning relationships between processes and equipment, and the ways specific workers' actions and operating conditions affect upstream and downstream operations. Environmental regulations are reviewed as well as the role of the employee in maintaining the plant in compliance with the regulations.

The CITE programs includes, but is not limited to the following:

- Environmental Awareness for Air, Water, and Waste regulations and permits.
- Coal Handling Operations and Procedures including coal crushing, screening, blending, and transport.
- Larry Car Operations and the charging of batteries.
- Lidman Procedures and other top-side battery operations.
- Pusher Machine Operations for pushing the coke out of the ovens into the quench cars.
- Door Machine Operations for removing doors, cleaning the door and door jambs, and replacing the doors.
- Heating Procedures to review proper battery heating techniques.
- Patching Procedures for minor oven wall repairs.
- Repair and Maintenance of the various process and ancillary coke-making equipment.
- Other miscellaneous equipment and procedure reviews.

This program reiterates to employees that the environment is everybody's responsibility and procedures must be followed for U. S. Steel to meet its environmental requirements. U. S. Steel requires that all employees who work at the coking operations at the Clairton Plant are trained in the CITE program. Implementation of this program has helped Clairton workers improve their environmental awareness and work practices, resulting in a culture of environmental awareness. In 2020, U. S. Steel continued to provide our CITE program to all employees/workers assigned to work at the coking operations at the Clairton Plant.

Environmental Performance – Air

The Clairton Plant is subject to federal, state, and local (Allegheny County Health Department [ACHD]) air regulations. The ACHD regulates and closely monitors the environmental compliance of the plant. In addition to periodic monitoring, U. S. Steel continuously monitors many of its sources for environmental performance and compliance at the plant. These monitors include continuous opacity monitors (COMS), continuous emissions monitors (CEMs), and various continuous parametric monitoring systems throughout the plant, which read and record thousands of compliance monitoring data values every day. The ACHD regulates and closely monitors the environmental compliance of the plant. In addition to reviewing the plant's reports and compliance records, ACHD maintains two coke oven battery inspectors at the plant five days per week. These certified inspectors conduct daily visible emission observations of plant operations.

U. S. Steel continuously monitors many of its sources for environmental performance and compliance at the plant. These monitors include continuous opacity monitors (COMS), continuous emissions monitors (CEMs), and various continuous parametric monitoring systems throughout the plant, which read and record thousands of compliance monitoring data values every day.

In addition to the two inspectors, ACHD employs a third-party visible emissions observation contractor that is on-site every day of the year. The third-party contractor implements the USEPA-required Method 303 opacity readings (for which U. S. Steel reimburses ACHD) to monitor daily visible emissions from every battery at the plant to determine compliance with Federal Maximum Achievable Control Technology (MACT) Standards pursuant to Method 303 as well as to provide ACHD with data to determine compliance with Article XXI standards.

Method 303 is the USEPA method to determine visible emissions from by-product coke oven batteries.

U. S. Steel focuses on continuously improving environmental performance, and that includes the combustion stacks at the Clairton Plant. Combustion products generated by Clairton Plant's batteries during the coke-making process are directed to coke battery

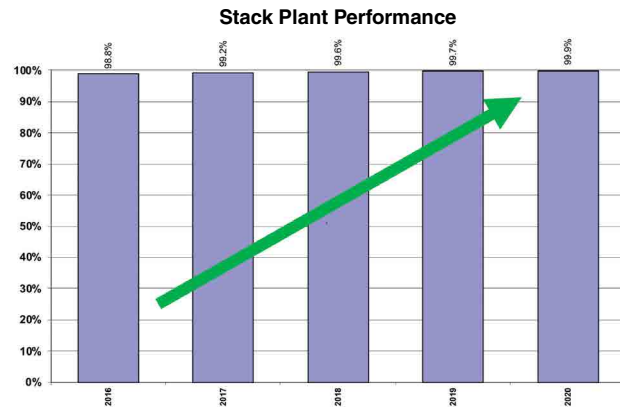


Figure 20: 2016 through 2020 Clairton Plant facility-wide combustion stack performance.

combustion stacks. Each coke battery combustion stack is equipped with a continuous opacity monitoring system (COMS), which continuously measures the degree to which smoke, dust, or other particles block light at any given time, or the opacity of the gases exiting the stack. Any combustion issue with the batteries can result in visible emissions from these stacks. According to the Allegheny County Health Department, environmental violations occur anytime this opacity is greater than 20% for more than three minutes aggregated in any given hour, or any instantaneous reading over 60%. Stack performance is calculated daily for all 10 coke batteries in the plant, *and just one three-minute period in an hour could cause a 20% stack violation and put that battery at a 97.9% performance for the day.*

Each hour, on every battery stack, there exists the opportunity for one or both violations to occur. Each year has a potential for 175,200 violations.

The Clairton Plant achieved a monthly (May 2020), quarterly (First Quarter 2020), and annual (Calendar Year 2020) compliance record for battery combustion stack performance. Stack compliance at Clairton Plant in May 2020 was a near-perfect 99.95%. First quarter 2020 saw a new quarterly record for combined stack performance as well, recording a combined stack compliance rate of 99.92%. Finally, Clairton Plant's 99.87% compliance rate in 2020 was the best ever recorded, surpassing 2019's previous record-setting compliance rate of 99.67%. To reach the level of performance the Clairton Plant team achieved, there were many days in 2020 in which all 10 batteries recorded a compliance rate of 100%. From 2019 to 2020, there was approximately a 170% increase in the number of zero-stack days at the Plant. See Figure 20 above.



Figure 21: Clairton Plant two-quarter fugitive compliance performance.

Stack performance is considered a key indicator of the overall environmental performance of the coke batteries both internally and by U. S. Steel's regulating agency. That is why there is a strong emphasis placed on this compliance rate and why this record-breaking performance is so important.

In addition to stack performance, two consecutive quarter fugitive compliance rates at the Clairton Plant are shown in Figure 21. For third and fourth quarter 2020, the Clairton Plant fugitive compliance rate was 99.04%.

A. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)

National Ambient Air Quality Standards (NAAQS) were developed for pollutants considered, in certain amounts, harmful to sensitive populations and the environment. EPA has set NAAQS for several pollutants, including particulate matter (including PM_{10} , and $PM_{2.5}$), SO_2 , NO_2 , ozone, CO, and lead. These standards are developed to be protective of public health for the most sensitive populations. USEPA air monitors operated by ACHD and located in the Liberty/Clairton area measure the ambient air quality, which accounts for emissions attributable from a variety of background sources, mobile sources, and the Clairton Plant. The Clean Air Act requires EPA to set NAAQS, and to periodically review the science upon which the NAAQS are based, as well as the NAAQS themselves. Reviewing the NAAQS is a lengthy undertaking and generally takes years for each individual pollutant. While the air quality continues to improve, EPA has recently lowered the NAAQS further for certain pollutants, including $PM_{2.5}$, ozone, and SO_2 .

EPA continues to lower the NAAQS levels, but U. S. Steel has a history of success. While the air quality improves and the Clairton Plant continues to reduce emissions, the NAAQS continue to become more stringent. In response, each time a standard gets lowered, U. S. Steel, with its commitment to environmental progress and innovation of its employees, rises to the challenge.

PM_{10} , NO_2 , Carbon Monoxide, Ozone and Lead NAAQS

Including 2020 monitor data, Allegheny County and the Liberty/Clairton area has now attained the PM_{10} NAAQS for 25 consecutive years; the NO_2 NAAQS for 36 years (including unclassifiable/attainment with the 2010 100 ppb NAAQS); the carbon monoxide (CO) standard for 32 consecutive years; the 2015 Ozone (O_3) standard for 4 years; and the lead standard since its latest promulgation in 2008.

$PM_{2.5}$ NAAQS

Liberty monitor data from 2020 shows attainment on the 3-year (2018-2020) 98th percentile daily average (32 $\mu g/m^3$ vs. 35 $\mu g/m^3$) and 3-year annual average (11.1 $\mu g/m^3$ vs. 12 $\mu g/m^3$) for the $PM_{2.5}$ NAAQS. ACHD will submit early certification of data and request a clean data determination from EPA. After the clean data determination is made by EPA, ACHD will submit a re-designation request to EPA for the area to be classified as attainment in 2021.

A study analyzing emission source impacts at the Liberty monitor and area traffic data found that there was a **40% decrease in $PM_{2.5}$ emissions concentrations** when comparing readings from before and after the COVID-19 stay-at-home order in Spring 2020. Over the period reviewed, there was no change in production at the Clairton Plant, while the number of total vehicles on southwestern Pennsylvania roadways fell by 50%. The data review opportunity afforded by these unique circumstances suggests a direct, significant correlation between the amount of vehicle traffic and Liberty monitor $PM_{2.5}$ concentrations, and further study is required.

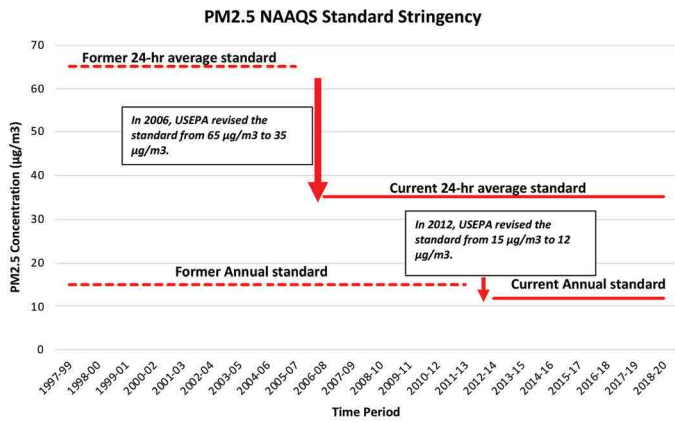


Figure 22: History of PM_{2.5} 24-hour average NAAQS.

The PM_{2.5} SIP was then submitted to the USEPA. On June 12, 2020, USEPA published a proposed rule in the Federal Register to fully approve most elements of the PM_{2.5} SIP and conditionally approve others.

As part of the ACHD's SIP submittal, U. S. Steel installed new Low-Emission Quench Towers (LEQT) 5A and 7A as the main quench towers for Batteries 13-15 and Batteries 19-20, respectively, replacing the older Quench Towers 5 and 7 that now serve as emergency/backup quench towers. The new LEQTs were instrumental in demonstrating attainment with the standard for Allegheny County.

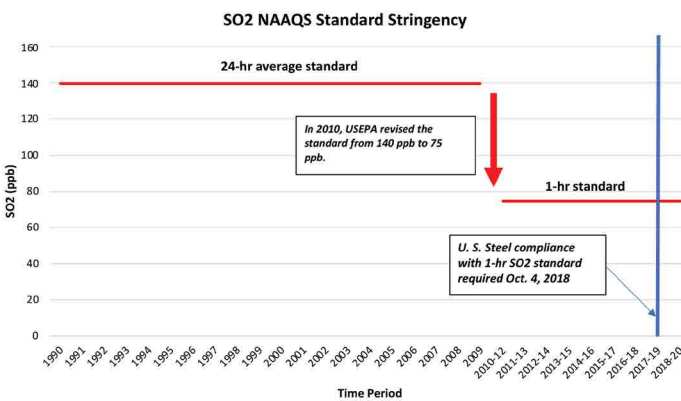


Figure 23: History of SO₂ NAAQS demonstrating change from a 24-hour average to a much lower one-hour standard.

SO₂

The following figure depicts how the SO₂ NAAQS has become more stringent over time. In 1971, the SO₂ standard was a 24-hour average standard of 140 ppb. Attainment had been reached for 10 consecutive years prior to the new 2010 primary one-hour NAAQS. The Liberty area is currently designated in nonattainment based upon pre-2010 ambient air quality data, although the controls currently in place have been shown to demonstrate attainment.

While the Liberty/Clairton monitor has met the PM_{2.5} standards based on recent monitor data, it is currently designated as nonattainment with the 2012 PM_{2.5} annual NAAQS based upon older monitoring data, including periods of time before our major investments. The nonattainment designation was made in 2015. On Sept. 11, 2019, the ACHD Board of Health unanimously approved the PM_{2.5} State Implementation Plan (SIP) for Allegheny County. A SIP is a state plan created for a pollutant non-attainment area (i.e., PM_{2.5}) intended for complying with the Federal Clean Air Act (CAA) by containing new rules to reduce emissions. In this case, ACHD created the PM_{2.5} SIP, and then shared it with the Pennsylvania Department of Environmental Protection (PADEP) for approval.

PM₁₀, NO₂, CO, and Pb NAAQS

The Liberty ambient air quality monitor, which measures the ambient air quality in the Liberty/Clairton area, has attained the PM₁₀ NAAQS for 24 consecutive years; the NO₂ NAAQS for 35 years (including unclassifiable/attainment with the 2010 100 ppb NAAQS); the carbon monoxide (CO) standard for 31 consecutive years; and the lead (Pb) standard since its latest promulgation in 2008.

The USEPA approved ACHD's SO₂ SIP in late April 2020 with the final rule becoming effective on May 26, 2020.

U. S. Steel implemented the following projects and restrictions to reduce SO₂:

- Installation of VCU trays – direct reduction of SO₂ emissions from Coke Oven Gas
- Reroute of Shell Claus Off-gas Treatment (SCOT) Plant Tail gas – eliminates a source of high SO₂ Coke Oven Gas during planned/unplanned SCOT Plant outages
- Required to follow SO₂ emission limits throughout the Mon Valley operations by Oct. 4, 2019.

Data from the Liberty monitor shows an improvement in the standard based on the 3-year (2018-2020) 99th percentile (84.6 ppb vs.

75 ppb standard). Note that the 99th percentile for SO₂ at Liberty for 2020 was well below the 75-ppb standard (44 ppb). This value supports a finding that the current SO₂ SIP is working, as U. S. Steel's SIP controls were implemented in late 2018. U. S. Steel anticipates that the Liberty monitor will demonstrate attainment by the end of 2021, using 2019, 2020, and 2021 data.

B. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS/ MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (NESHAP/MACT) REQUIREMENTS

The Federal Clean Air Act (CAA) requires USEPA to regulate emissions of hazardous air pollutants for listed sources via National Emission Standards for Hazardous Air Pollutants (NESHAP). Hazardous air

pollutants are also known as toxic air pollutants or air toxics. They are pollutants that have been found to cause or may cause cancer or other serious health effects or adverse environmental and ecological effects. USEPA is required to control 187 hazardous air pollutants, or HAPs.

40 CFR Part 63 Subpart L is a NESHAP entitled "National Emission Standards for Coke Oven Batteries" and is applicable to the Clairton Plant. In 1992, the USEPA proposed national emission standards for the control of emissions from new and existing coke oven batteries. In October 1993, EPA finalized Subpart L and promulgated the national emission standards and visible emissions observation standards, Method 303, for the determination of visible emissions from by-product and nonrecovery coke oven batteries. U. S. Steel is 100% compliant with the requirements of Subpart L.

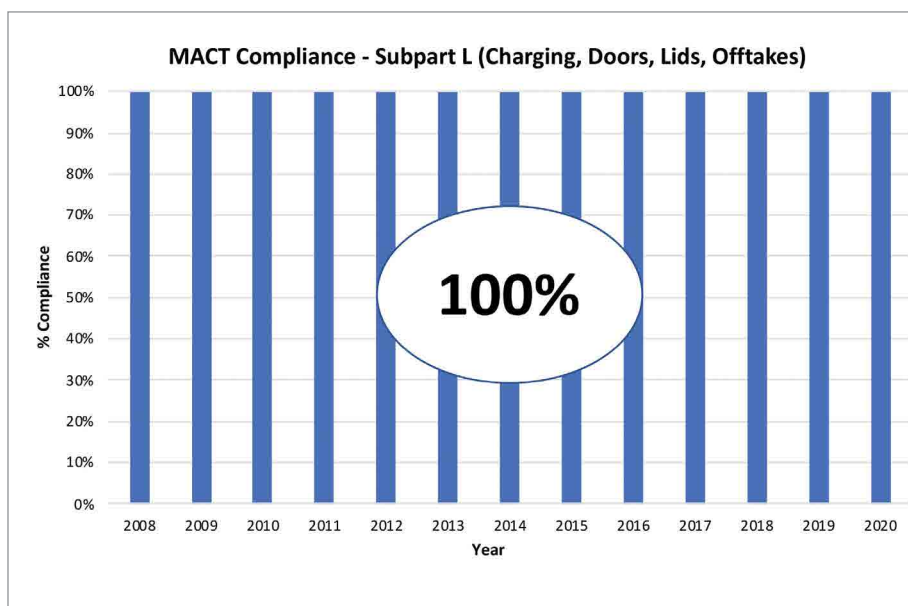
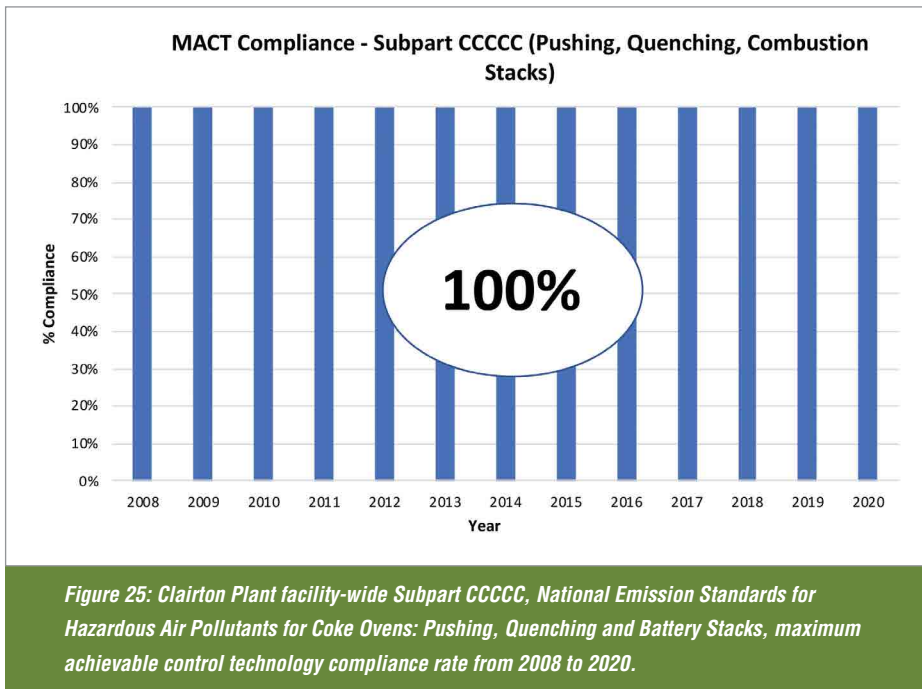


Figure 24: Clairton Plant facility-wide Subpart L, National Emission Standards for Coke Oven Batteries, maximum achievable control technology compliance rate from 2008 to 2020.

40 CFR Part 63 Subpart CCCCC is a NESHAP entitled “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching and Battery Stacks” and is applicable to the Clairton Plant. The USEPA issued a final rule to reduce emissions of toxic air pollutants from coke oven batteries in 2003. This rule applies to each new or existing coke oven battery at any coke plant that is considered a major source of toxic air emissions.

Major sources are those that emit 10 tons per year or more of a single toxic air pollutant, or 25 tons or more of a combination of toxic air pollutants. The CAA requires USEPA to identify categories of industrial sources that emit one or more listed 188 toxic air pollutants, of which coke oven emissions is one. U. S. Steel is 100% compliant with the requirements of Subpart CCCCC.

The CAA requires USEPA to assess the risk remaining after application of the final air toxics standards. This is known as a residual risk assessment, or Risk and Technology Review. Based on the completion of this risk assessment, including available health information and associated uncertainties, EPA determines whether the risks from the source sector are acceptable or not and whether the current standards provide an ample margin of safety to protect public health. During the residual risk assessment and as required by the CAA, the EPA will review and revise the maximum achievable control technology (MACT) standards as necessary, considering developments in practices, processes and control technologies since the standards were first issued in 2003.



In August 2015, the USEPA began an Information Collection Request (ICR) for the Risk and Technology Review (RTR) for 40 CFR Part 63 Subpart CCCCC, otherwise known as the Coke MACT, which includes the residual risk assessment from Pushing, Quenching and Battery Stacks. USEPA continues to work on the risk and technology analysis.

40 CFR Part 61 Subpart L is a NESHAP, not to be confused with Part 63 Subpart L, entitled “National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants” and is also applicable to the Clairton Plant. These standards are applicable to the equipment associated with the by-products recovery plant (tar decanters, tar storage tanks, light-oil condensers, light-oil sumps, etc.) including pumps, valves, exhausters, pressure relief devices, sampling connection systems, open-ended valves or lines, flanges or other connectors, and control devices.

40 CFR Part 61, Subpart FF for Benzene Waste Operations is also applicable to the Clairton Plant because the plant operates a coke by-product recovery plant with benzene-containing hazardous waste.

C. ALLEGHENY COUNTY HEALTH DEPARTMENT (ACHD) STANDARDS

In addition to certain federal regulations, the Clairton Plant is subject to Allegheny County Health Department requirements, which include performance metrics that, in most instances, are much more stringent than the corresponding federal standards.

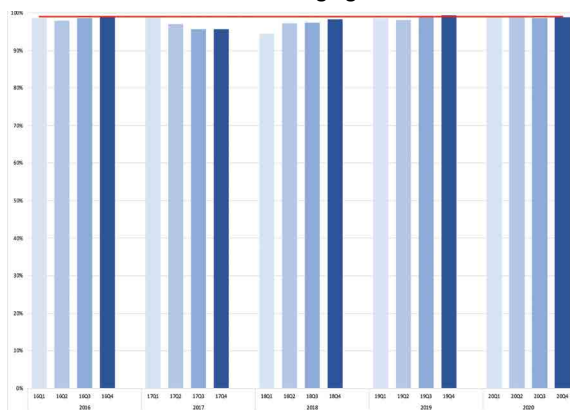
ACHD has recognized that it has promulgated the most stringent air regulations for coke plants in the country. The regulations, found in Article XXI, in most cases, are much more stringent than corresponding USEPA regulations and are enforceable by ACHD as well as USEPA as part of the State Implementation Plan. The regulations apply to various coke plant operations, including:

- **Charging** – visible emissions when charging coal into an oven.
- **Doors** – any visible emissions from the door areas during the coking process. In addition, during ACHD inspections, each emission's opacity is read. Opacity is read because there is a “high

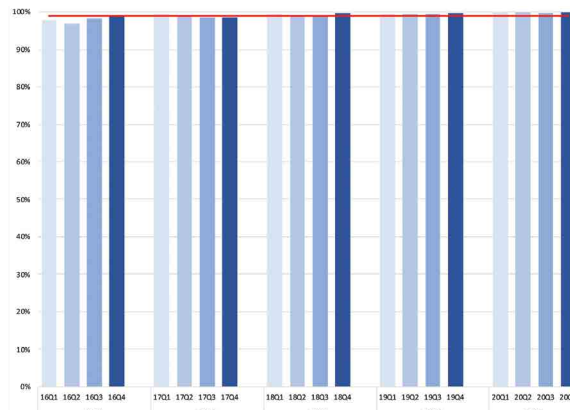
opacity door” limit of 30% for C Battery and a limit of 40% for all other batteries.

- **Charging ports** – visible emissions from the charging ports or charging seals on the battery top.
- **Offtakes** – visible emissions from the offtake piping on the battery top.
- **Pushing** – visible fugitive pushing emissions or emissions from the pushing emission control device outlet.
- **Traveling** – visible emissions from the transport of hot coke from the oven to the quench tower.
- **Combustion stacks** – all 10 battery stacks have Continuous Opacity Monitors (COMS) used to record opacity. There is a 20% aggregate opacity limit and an instantaneous 60% opacity limit.
- **Soaking** – uncombusted emissions from a standpipe.
- **Quenching** – emissions must be vented through baffles to control PM and water must be equivalent or better than the water quality standards established for the Monongahela River.

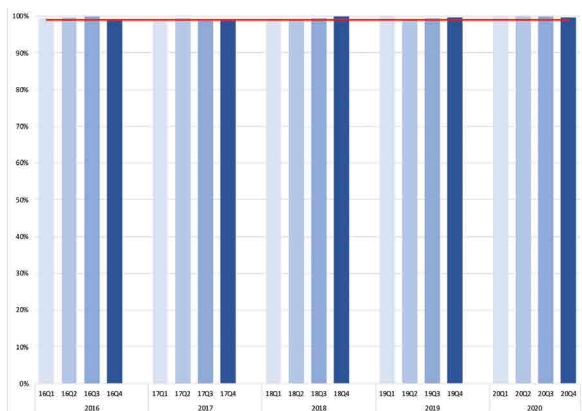
Charging



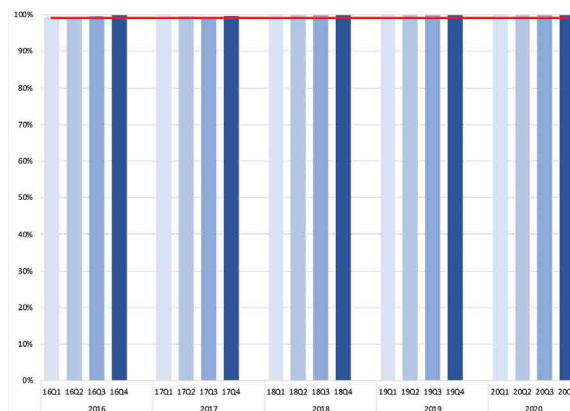
20% Stacks



Doors



60% Stacks



The Clairton Plant was issued a Title V operating permit from the ACHD. Title V permits are required for larger facilities by Title V of the Clean Air Act. The permit is enforceable by ACHD and USEPA. The comprehensive Title V permit is unique to Clairton and includes “all applicable requirements” under the Clean Air Act and underlying regulations that apply to the Clairton Plant. The permit, issued on March 27, 2012, is voluminous, consisting of 259 pages, and includes emissions limits, standards, and work practice requirements, as well as air pollution control equipment, stack testing, monitoring, recordkeeping, and reporting requirements. U. S. Steel is required to provide periodic monitoring reports to the ACHD and USEPA and certify compliance at least annually, identifying any deviations from any of the applicable requirements.

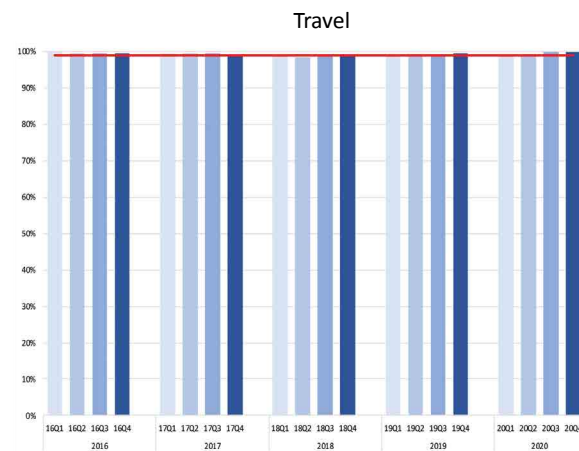
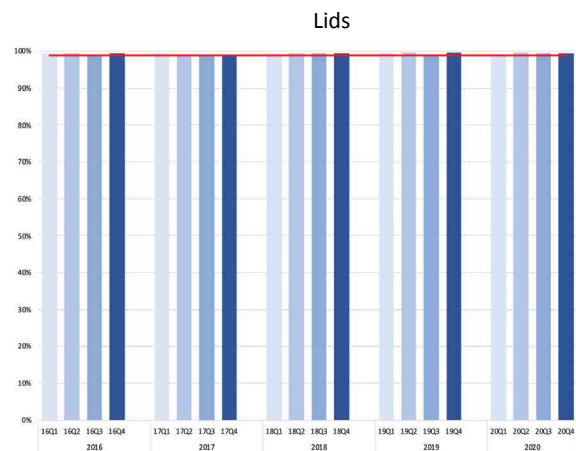
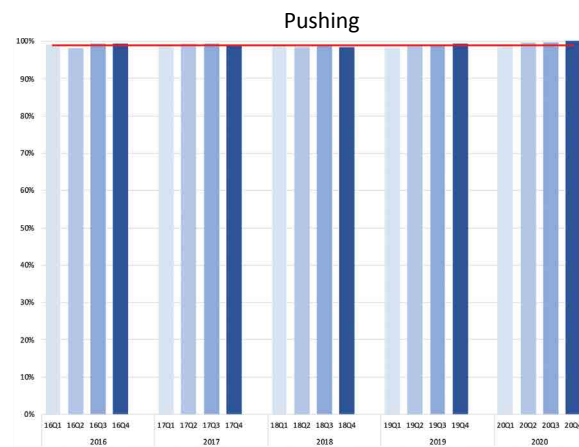
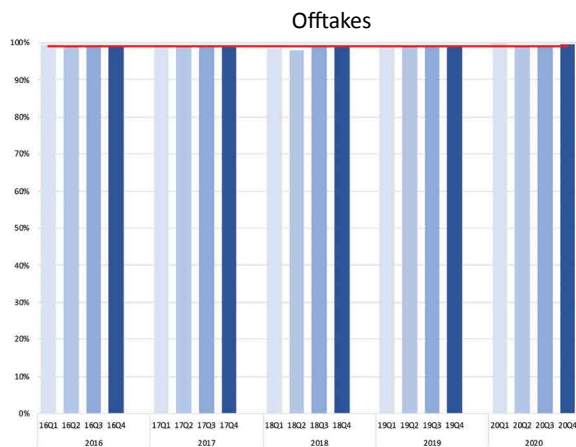
The current Title V permit is administratively extended because U. S. Steel submitted a Title V Permit Renewal Application to

ACHD on September 26, 2016. ACHD continues to work on updating the Title V Permit.

U. S. Steel's Clairton Plant has maintained nearly 100% compliance rate with the Federal Standards and has demonstrated an unprecedented high compliance rate with the ACHD standards that apply to charging emissions, door leaks, battery combustion stack opacity (20% and 60%), offtakes, lids, pushing (cannot exceed 10% at any time), and travel (cannot exceed 10% at any time).U. S. Steel's compliance with these standards is highlighted below:

D. JUNE 2019 SETTLEMENT AGREEMENT AND ORDER #190606 UPDATE

On June 27, 2019, a Settlement Agreement and Order (SAO) was entered into between U. S. Steel and ACHD. U. S. Steel is currently in compliance with all requirements of the SAO.



Environmental Performance – Water

A. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES PERMIT) AND PERFORMANCE

The quality of water discharged into the Monongahela River and Peters Creek is governed by a National Pollutant Discharge Elimination System (NPDES) Permit, which was issued on September 28, 2012. An application for renewal was submitted in March 2017, which administratively extends the permit until it can be reissued by the PADEP. There are eight (8) outfalls at the Clairton Plant that discharge a combination of process and noncontact cooling water. These outfalls are sampled once a week at all outfalls associated with the processes. There are also six (6) outfalls associated with emergency overflows, with a sample frequency of twice per discharge event. The Clairton Plant has achieved greater than 99% compliance since 2015 with the NPDES permit limits.

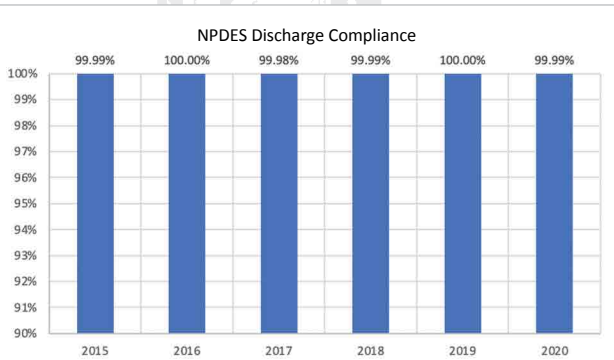


Figure 26: 2015 through 2020 Clairton Plant NPDES discharge compliance percentages.

Process Water

Clairton's raw material, coal, contains a significant amount of natural moisture that is removed during the process. Additional water is generated by chemical reactions, by-products recovery, and other operations. The Clairton Plant is continuously upgrading its technology and improving operating practices with the goal of minimizing impacts from plant discharges. All the water treatment additives used in water and wastewater treatment are subject to Pennsylvania Department of Environmental Protection (PADEP) approval before they are used.

The Contaminated Water Treatment Plant (CWTP) utilizes free and fixed ammonia distillation stills to remove ammonia and acid gases and a biological oxidation system to further treat the water. The biological treatment occurs in two aeration basins. This type of treatment utilizes microbiological organisms to consume and eliminate toxic chemicals in the wastewater. The microorganisms utilize these chemicals as sources of food and energy. Solids are then settled out in the clarifiers, and the treated water is then discharged to the Monongahela River.



Figure 27: Biological Plant Ammonia Stills and Clarifier



Figure 28: Clairton Plant's Coal Storage Area storm water collection and treatment system include solids and metals removal and pH adjustment prior to discharge to the Monongahela River.

B. STORM WATER MANAGEMENT

All storm water discharges at the Clairton Plant are regulated under their NPDES Permit. The NPDES permit, which was issued on September 28, 2012, by the PADEP, requires monitoring at 11 storm water-only outfalls twice per month during precipitation events. The NPDES Permit also requires that the Clairton Plant maintain a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP identifies potential pollutant sources as well as best management practices (BMPs) to mitigate those sources. A comprehensive site compliance evaluation is done annually in addition to quarterly inspections.

In addition to BMPs, Clairton has a storm water treatment plant that treats all storm water from the coal storage area prior to discharge to the Monongahela River. The storm water is first collected in two sedimentation basins to allow most solids to drop out. The storm water is then pumped to a secondary treatment system that consists of pH adjustment, polymer addition, and clarification to remove both

suspended solids and metals. The treated water is then discharged to the Monongahela River. The solids removed during this process (mostly coal fines) are recycled and become part of the metallurgical coal used to make coke at Clairton.

Quench Water

The water used for the quenching of the hot coke comes directly from the Monongahela River. This water is recycled, and normally there is no discharge due to the high evaporation rates associated with this process. The evaporated steam is vented through quench towers. In the event of a discharge, all cooling water must meet stringent discharge limits set by the PADEP and permitted through our NPDES.

Environmental Performance – *Recycling*

A. UTILIZATION OF COKE OVEN GAS

We reduce the amount of waste generated and emissions produced by reusing the by-product gas produced at our coke batteries. This reuse is good for the environment and for business.

By using coke oven gas generated by our coke batteries, approximately 130 million MMBtu from 2016 to 2020, we have avoided consuming enough natural gas and other fuels to heat nearly 1 million households each year from 2016 to 2020.

Mon Valley Works as an “Alternative Energy System”

U. S. Steel Mon Valley Works is one of the most energy-efficient integrated Iron and Steel facilities in the world. The Mon Valley Works reuses gases from the blast furnaces and coke ovens to support combustion processes at Clairton, Edgar Thomson, and Irvin as well as to generate electricity at the Edgar Thomson and Clairton Plants.

The Mon Valley Works is a certified Alternative Energy System recognized by the Pennsylvania Department of Environmental Protection (PADEP).

The generation of electricity at the Clairton and Edgar Thomson facilities allows the Mon Valley Works to purchase less electricity, thus reducing its carbon footprint. Working with one of our largest electricity suppliers, U. S. Steel has secured Emission Free Energy Certificates to meet all its purchased power needs through December 2024 for the three Pittsburgh-area Mon Valley facilities (Clairton, Edgar Thomson, and Irvin).

B. RECYCLING PROJECTS

Clairton generates process residues from the recovery of coal tar and light oil in the by-product's recovery plant. Rather than dispose of these residues, Clairton recycles the materials by blending them with the coal feedstock to the coke ovens for recovery in the by-products plant.

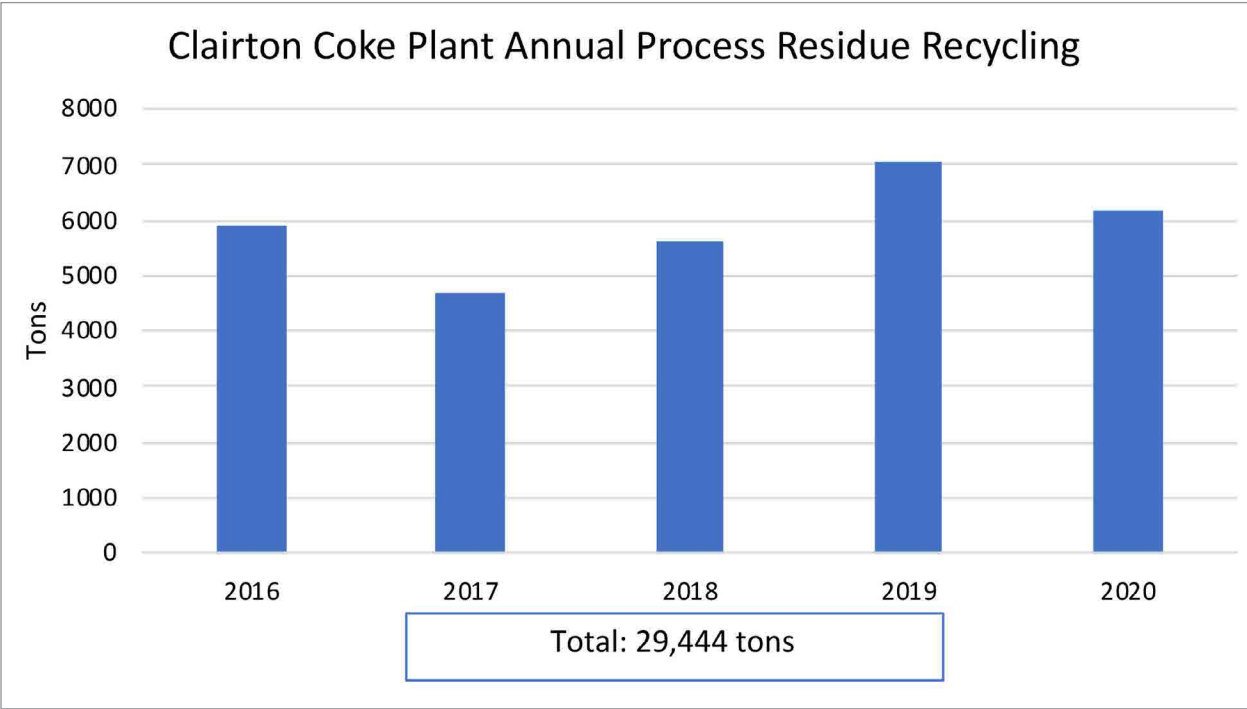


Figure 29: 2016 through 2020 tons per year of process residue recycling.

Commitment to Community Involvement

Community is important to U. S. Steel. We take pride in being a part of the Clairton community. From employees' volunteer work to corporate contributions providing support for important projects, U. S. Steel is engaging and supporting our neighbors and employees in strengthening our communities.

A. COMMUNITY PROJECTS

In 2020, U. S. Steel demonstrated its commitment to the communities in which it operates by providing hundreds of volunteer hours and financial support to a variety of projects and local organizations benefitting education, recreation, and families. Some of these contributions and volunteer efforts are highlighted below.

U. S. Steel Donates to Mon Valley Area Schools During Pandemic

Mike Rhoads, Plant Manager of Mon Valley Works' Clairton Plant, delivered a much-needed donation to the Clairton City School District in April to support the district's efforts around remote learning during the COVID-19 pandemic.

Thanks to our company's contribution and those made by other local companies, foundations, area residents, and school alumni, the district raised more than \$95,000 to purchase Chromebook laptops, internet access points, and other technology to enable remote learning for all students during the remainder of the 2019-2020 school year and beyond.

In addition to the donation to Clairton City School District, U. S. Steel partnered with the Pittsburgh Steelers to provide additional donations to area schools, as part of the Steelers STEM program. The program, which teaches science, technology, engineering, and math, and provides career examples available digitally for area schools, expanded during the pandemic. The free digital platform was available to schools throughout the area.



Figure 30: Practicing social distancing, Mike Rhoads (bottom left) presented U. S. Steel's donation check to Superintendent Dr. Ginny Hunt (bottom right) in the atrium of Clairton High School. Also pictured at top left to right: Middle/High School Principal Dr. John Wilkinson, Elementary Principal Debra Maurizio, and Clairton City School District Board of Directors President Richard Livingston.



Figure 31/32: (Left) The entrance to Memorial Hill Veterans Memorial after the volunteers completed their work. (Right) The volunteers remain safe during all of their hard work.

Clairton Plant Employees & Family Members Honor Area Veterans During Volunteer Event

More than 20 Clairton Plant employees and their families took time out of their weekend in July to give back to veterans in Pittsburgh's Mon Valley area. The event was the first in a series organized by Mon Valley Works' chapter of SERVE (Strengthening Employee Relationships with Veteran Employees) Employee Resource Group (ERG).

Our volunteers worked with Clairton American Legion Post 75 to beautify the grounds at Clairton's "Memorial Hill" Veterans Memorial. The group performed basic landscaping work, including cutting grass, cleaning up debris, clearing weeds, mulching and more, to prepare the site for upcoming events.

In addition to these volunteer efforts, U. S. Steel has committed financial support to assist American Legion Post 75 in repairing and installing new memorial markers.

U. S. Steel Partners with Local Organizations to Combat Food Insecurity in Mon Valley Area

U. S. Steel partnered with the American Heart Association, the Greater Pittsburgh Community Food Bank, and the Clairton School District for a two-year program to fight food insecurity among students on summer vacation.

U. S. Steel's contribution funded a supply of meals for children 18 years old and younger who live in the city of Clairton. This was especially critical this summer, as the resources of families and non-profit organizations were stretched to meet community needs associated with COVID-19. In addition to the meals, activities and resources to promote physical activity were provided such as yoga mats, jump ropes, mini vegetable growing kits, and more.

The program will be offered again in 2021 thanks in part to U. S. Steel's financial support.

"U. S. Steel is proud to partner with the American Heart Association to support children in the Mon Valley communities where our employees live and work. These meals and activities will ensure children will remain active and healthy," said Kurt Barshick, General Manager of Mon Valley Works, in the official news release. "We are pleased to lend our support during this challenging time and into the coming year."

Clairton Plant Employees Dedicate More Time to Beautifying Veteran's Memorial

In August 2020, Mon Valley Works Clairton Plant employees once again dedicated a Saturday to honoring veterans in the Mon Valley area. During the second in a series of events organized by members of Mon Valley Works' SERVE (Strengthening Employee Relationships

with Veteran Employees) Employee Resource Group (ERG) in partnership with American Legion Post 75, 18 U. S. Steel employees volunteered to beautify the nearby “Memorial Hill” veteran’s memorial.

Further expanding upon the progress made during the first event, Clairton Plant volunteers laid mulch, reinstalled temporary cross markers along pathways, trimmed hedges, and painted the memorial’s curb.

The contributions made by members of SERVE and American Legion Post 75 will help prepare the site for upcoming events and visitors.

Clairton Plant Employees Help to Green Community and Honor Local Residents

Clairton employees welcomed fall by planting trees as part of an ongoing memorial project in the city of Clairton. A Clairton resident spearheaded the effort to both beautify the community and give fellow residents the chance to memorialize deceased friends or family members. Residents funded the purchases of trees and a memorial plaque, and volunteers planted and installed them in the community, including along a popular bike trail.

Our volunteers planted 32 new trees and mulched nearly 150 existing trees they planted last year. Additionally, volunteers trimmed weeds, installed protective tubing around the tree trunks, and repaired fencing along the Montour Trailhead bike path. They also fabricated 40 new memorial name plaques for installation with their trees.



Figure 33: One of the new trees and plaques installed by our volunteers.

Clairton Plant Leadership Team Offers Support to Two Community Fire Departments

With support from U. S. Steel’s Community Engagement Committee (CEC), two members of the Mon Valley Works Clairton Plant leadership team presented two local fire departments with monetary donations in October 2020. Plant Manager Mike Rhoads and Manager of Safety & Security Drew Martin donned their face coverings to present the checks to the teams at both Glassport Hose Co. #1 in nearby Glassport, Pa., and Lincoln Borough Volunteer Fire & Rescue Co. in Elizabeth, Pa. In both cases, the funds will be used to support the purchase of new self-contained breathing apparatuses (SCBAs) that the men and women of both volunteer fire departments use to protect themselves when they are fighting a fire or in a hazardous environment.



Figure 34/35: (Above) Bruce Snyir (Chief of Glassport Hose Co. #1), Drew Martin, Mike Rhoads, and Dennis Hickman (Vice President of Glassport Hose Co. #1). (Below, left to right) Jim Beisler (Mayor of Lincoln and Assistant Chief of Lincoln Volunteer Fire & Rescue Co.), Mike Rhoads, Drew Martin, Tony Perozich (Chief of Lincoln Volunteer Fire & Rescue Co.), and George King (member of Lincoln Volunteer Fire & Rescue Co.).





Figure 36: (Left to right): Mike Rhoads, Steve Zelenski, Drew Martin, Kim Egidi (SAFE Program Supervisor SPHS Monessen Family Center), Jessica Anderson (SAFE Program Coordinator), Beata Herold.

Clairton Plant Employees Spread Holiday Cheer to Local Families

In December 2020, employees from U. S. Steel's Clairton Plant bought, wrapped, and delivered gifts to low-income families for the holidays through a partnership with the Southwestern Pennsylvania Human Services, Inc.'s Monessen Family Center's Adopt-A-Child program. The effort allowed our employees to extend their generosity to children and families in the Monessen, Donora, Belle Vernon, and Charleroi areas.

Clairton Plant employees stepped up and provided gifts to more than 90 children and 34 families. Many employees adopted multiple children, and some employees even took on families with five or six members. Their kindness helped the Monessen Family Center meet the needs of program participants and improve their holiday.

B. COMMUNITY ADVISORY PANEL (CAP)

In June 2019, the Clairton Plant established a Community Advisory Panel (CAP). A CAP is commonly defined as a group of representatives from area communities who meet periodically with representatives from a major employer to discuss issues of common interest. The purposes of the CAP are to proactively communicate, foster a collaborative relationship, and facilitate an understanding of community expectations and concerns. The Clairton CAP consists of key members of the Clairton Plant team along with community members of Clairton, Glassport, Liberty, Lincoln, and Port Vue. The quarterly meetings have included tours of the plant, discussions of current events, plant compliance, and content/information requested by the communities. In each meeting, the CAP is educated on the operations of the Clairton Plant. The CAP members, most of which hold local government office, are then better able to answer constituent questions.



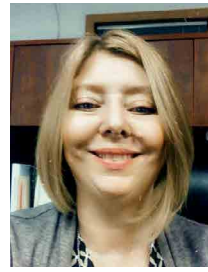
Richard Lattanzi



Mark Tortorice



Elaina Skiba



Tammy Firda



Janice Matyasovsky

Mayor Richard Lattanzi, City of Clairton

We firmly believe that so much negativity has gone away in Clairton thanks to the engagement that U. S. Steel has shown in our community.

I feel it is important for everyone to see that we do not make just steel – we make positive impacts in communities and form friendships.

Mark Tortorice, Port Vue Borough

The Clairton CAP, of which I am a representative for Port Vue Borough, has been a positive experience. I learned about all the safety measures and the processes at the Clairton Mill facility and how it operates. The Clairton Mill is working with the surrounding municipalities on education, safety, and awareness for all citizens. I am glad to be part of the CAP Board and to see the benefits for the residents of Port Vue.

Thank you, Brenda Petrilena and the United States Steel Corporation, for allowing me the opportunity to be part of the CAP Board.

Elaina Skiba, Glassport Borough

In May 2019, I heard that U. S. Steel was creating a Community Advisory Panel for adjacent communities to the Clairton Plant. Immediately, I became curious and interested in the idea. I felt privileged as an elected official to be asked to be a part of this newly created effort. This idea to bring surrounding communities to sit at the table with representatives from the Clairton Plant to discuss concerns and ask questions was a tremendous and remarkable idea. The communication between CAP members and U. S. Steel has been educational, informative, and most of all a great resource to provide to our residents. Our town stands to benefit greatly from the Community Advisory Panel.

I am honored to be a part of the CAP, and I hope that the relationships that have been formed between the Clairton Plant and surrounding community representatives continue to grow for a long time to come.

Tammy Firda, Lincoln Borough

I am a councilperson for the Borough of Lincoln. It is my privilege to serve as an elected official for 20 years. Throughout my tenure, I have served as a volunteer on many committees in different capacities to help our residents and local communities. When asked to serve as a member of the Community Advisory Panel (CAP) on behalf of the Borough of Lincoln, I was intrigued and honored.

I was taught that knowledge is power, and my intrigue is from a position of wanting to have more knowledge about the Mill, so that I can better serve our community. I have heard many opinions about the Clairton Mill over the years. Over the past 16 months, this position has given me the opportunity to learn firsthand about the Mill and its efforts for the communities. I look forward to continuing my education in this regard and using my knowledge to address the current and future needs of our area. I am also appreciative of the relationships that have developed on CAP and will strive to continue to develop even stronger working relationships for the benefit of all our residents, local communities, and the Mill.

Janice Matyasovsky, Liberty Borough

I have appreciated being on the Community Advisory Panel. I am impressed with the communication between U. S. Steel and the panel. We are extremely grateful for the time U. S. Steel takes to keep us informed on the efforts they put into making our communities environmentally safe. They have been very generous with helping our community by supplying funds that we use to repair our Memorial and spruce up our main street, among other projects.

C. COMMUNITY BENEFIT TRUST

In early 2020, U. S. Steel established a Community Benefit Trust as part of an agreement with the Allegheny County Health Department to resolve the company's appeal of enforcement orders issued by ACHD against the company. As part of the settlement, it was of the highest importance for U. S. Steel to represent the voices of the local communities where many of our employees live and work. At our urging, 90% of the disputed penalty and 90% of any future stipulated penalties are placed into the Trust to directly benefit the following localities: Clairton, Liberty, Lincoln, Glassport, and Port Vue.

Per the terms of the Trust, distributions from the Trust must benefit the localities or the local environment through supplemental projects, and the projects must be anticipated to improve, protect, or reduce the risk to public health or the environment. Such projects may include providing funding to improve physical community infrastructure (such as the creation or renovation of parks, green spaces, or playground spaces) or fostering the creation or expansion of programs aimed at directly improving the well-being of residents, and need not be air quality-related, if an environmental and/or public health benefit can be recognized. Any project proposals submitted must demonstrate a reasonable probability that the project will be successful.

The trustee, Smithfield Trust Company, is totally independent from U. S. Steel. The trust instrument requires that the trustee administer investments, issue funds for projects by the Trust Distribution Board (which is comprised of members representing the five community beneficiaries), and prepare periodic reports and financial documents. Neither U. S. Steel nor the trustee has any role in screening or approving projects, as that role is the sole responsibility of the Trust Distribution Board.

The Trust Distribution Board has elected a President and Vice President. To date, grant applications have been submitted and approved for the communities of Glassport, Lincoln, and Port Vue. Some of the items included in the applications are as follows:

- Upgrades to parks, playgrounds, and recreational facilities.
- Purchase of hybrid police vehicles, police body cameras, and a rescue boat.
- Repair of buildings, sidewalks, crosswalks, and roads.
- Purchase of breathing-pressure equipment for the fire department.
- Funding of demolition and asbestos studies.
- Purchase of a sewer line camera system and equipment for an emergency operations center.

Commitment to the Environment and Community – Now and in the Future

As shown throughout this 2020 report, U. S. Steel is strongly committed to environmental stewardship and to serve the communities in which we operate.

As we move into 2021, we remain committed to:

- Our S.T.E.E.L. principles
- Developing and implementing innovation projects to improve environmental performance
- Providing support to the communities in which we operate
- Assisting the company in achieving the Corporate GHG Reduction Goal to reduce global greenhouse gas emissions intensity by 20 percent, as measured by the rate of carbon dioxide (CO₂) equivalents emitted per ton of finished steel shipped, by 2030 based on 2018 baseline levels.



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