	Department - Environmental	SOP #	ENV-EES-11
		Revision #	1
		Implementation Date	8/15/2020
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SOP Owner	K. Janis	Approval	R. Kalinowsky

Standard Operating Procedure – Parking Lot and Road Visible Emission Observations

1. Purpose

The purpose of this SOP is to define how to properly observe fugitive dust emissions due to Parking Lots and Roads outside the Coal Field and the Area B Coke Storage Piles.

2. Scope

This document is intended to provide a description on how to properly observe and document visible emissions from Parking Lots and Roads outside the Coal Field and the Area B Coke Storage Piles.

3. Responsibilities

Sidock Field Personnel are responsible for implementing this procedure. Only Field Personnel certified to USEPA Method 9 shall perform visible emission observations of fugitive dust emissions from Parking Lots and Roads outside the Coal Field, and the Area B Coke Storage Piles.


4. PPE Requirements

The following PPE is required for personnel responsible for implementing this procedure:

1. Standard Battery PPE (leather gloves; FR clothing; hard hat; safety glasses; radio; metatarsal safety boots; hearing protection; CO detector; ½- face respirator on person). This can be all on person, if Field Personnel is reading from the truck.

5. Communication

1. Have the radio tuned to the correct channel depending on reading location.
2. Contact any required personnel based on reading location.
3. If a reading cannot be obtained for any reason, Field Personnel shall immediately inform EES Coke Environmental personnel via text.
4. If the average opacity for any Method 9D observation is $\geq 5\%$, Field Personnel shall inform EES Coke Environmental Engineer.


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6. Safety Requirements

1. Field Personnel shall not walk on or along roadways. Field Personnel will utilize a Sidock vehicle equipped with a light beacon when performing visible emission observations of roads and parking lots.
2. Field Personnel shall ensure that the light beacon is on while the vehicle is occupied.
3. Be aware of all surroundings while performing visible emission observations.

7. Procedure

1. Field Personnel shall complete visible emission observations of roads, and parking lots listed on the Method 9D Checklist for Parking Lots and Roads (Form N) five (5) days per week (Monday – Friday).
2. Field Personnel shall observe visible emissions from one (1) paved road, one (1) unpaved road, and one (1) parking lot listed on the Method 9D Checklist for Parking Lots and Roads (Form N) each day.
3. Visible emission observations of paved roads, unpaved roads, and parking lots shall be performed in accordance with USEPA Method 9D.
4. Each Method 9D observation shall consist of twelve (12) consecutive opacity readings at 15 second intervals.
5. Field Personnel shall select the roads and parking lots to be observed based on sources listed on the Method 9D Checklist for Parking Lots and Roads (Form N), and will ensure that each paved road, unpaved road and parking lot specified on the Method 9D Checklist for Parking Lots and Roads (Form N) is observed at least once each calendar month.
6. Field Personnel shall document the daily visible emission observations of paved roads, unpaved roads and parking lots on the Visible Emission Observation Form for Parking Lots and Roads (Form M).
7. The following information shall be documented on the Visible Emission Observation Form for Parking Lots and Roads (Form M):
 - Date Method 9D observations are performed.
 - The name of the paved road that was observed.
 - The time the observations of the paved road started.
 - The time the observations of the paved road ended.
 - The twelve (12) opacity readings for the paved road.
 - The name of the unpaved road that was observed.
 - The time the observations of the unpaved road started.
 - The time the observations of the unpaved road ended.
 - The twelve (12) opacity readings for the unpaved road.
 - The name of the parking lot that was observed.
 - The time the observations of the parking lot started.
 - The time the observations of the parking lot ended.
 - The twelve (12) opacity readings for the parking lot.
 - The observer's name.

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- The most recent date the observer was certified to Method 9.
- 8. Field Personnel shall inform the EES Coke Environmental Engineer, or their designee, if the average opacity for any Method 9D observation is $\geq 5\%$.
- 9. Field Personnel shall update the Method 9D Checklist for Parking Lots and Roads (Form N) daily to reflect the roads and parking lots observed during that day by inserting the date and their initials on the line for the roads and parking lot that were observed. The intent of Form N is to provide a tracking mechanism to ensure that each road and parking lot outside of the Coal Field is observed at least once each calendar month.
- 10. Field Personnel shall review the completed Visible Emission Observation Form for Parking Lots and Roads (Form M) daily and confirm that all of the items specified in Step 7 above are documented on the form.
- 11. Field Personnel shall document their review of the five (5) daily Visible Emission Observation Form for Parking Lots and Roads (Form M) for the week by checking each item specified for the Visible Emission Observation Form for Parking Lots and Roads (Form M) on the EES Coke Weekly Environmental Inspections QA/QC Form on Friday.
- 12. The completed Visible Emission Observation Forms for Parking Lots and Roads (Form M) for the week and an updated copy of Form N shall be included in the weekly inspection report and distributed in accordance with the requirements for the weekly inspection reports specified in ENV-EES-19.

8. References

1. USEPA Method 9D
2. ENV-EES-19

9. Attachments

- Visible Emission Observation Form for Parking Lots and Roads (Form M)
- Method 9D Checklist for Parking Lots and Roads (Form N)
- Map of Roads

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Summary of changes			
Review	Date	Changes Description	Changed by
0	8/14/2020	Original procedure	M. Paul
1	10/22/2021	Reorganized observation requirements for coke storage piles onto Form C to segregate EES Coke sources on Form C from former USS roadway sources on Form M per EES Coke request.	R. Kimble
2	2/3/2022	Removed information about piles being on form M and N, now only roads and lots. Updated form N.	K. Janis
3			
4			
5			



Fugitive Dust Inspection
Parking Lots and Roads (M)
Method 9D Observations

EES Coke Battery LLC Contact Information
Security/Emergency/Medical: 313-216-2499
Environmental Engineer (mobile): 734-320-5255

Method 9D Observation - (M)

Observe one paved road, one unpaved road, and one parking lot per day

Facility Name: EES Coke Battery LLC

Date: _____

Roads

PAVED:		Start Time:		End Time:	
MIN/SEC	0	15	30	45	
0					
1					
2					
3-Minute Average Opacity (sum of the 12 readings above/12)					

UNPAVED:		Start Time:		End Time:	
MIN/SEC	0	15	30	45	
0					
1					
2					
3-Minute Average Opacity (sum of the 12 readings above/12)					

Parking Lot

Parking Lot:		Start Time:		End Time:	
MIN/SEC	0	15	30	45	
0					
1					
2					
3-Minute Average Opacity (sum of the 12 readings above/12)					

Observer: _____ **Certified Date:** _____

If average opacity > 5%, notify Environmental Engineer and contact EES Coke Material Handling and/or Transtar/DRCC so they can apply Dust Suppression Chemical or Vacuum Sweep Road	
Any Issues? Describe	
Person(s) Notified of Issue	Date
Corrective Action Taken	



**Fugitive Dust Inspection
Parking Lots and Roads (N)
Method 9D Monthly Checklist**

Facility Name: _____

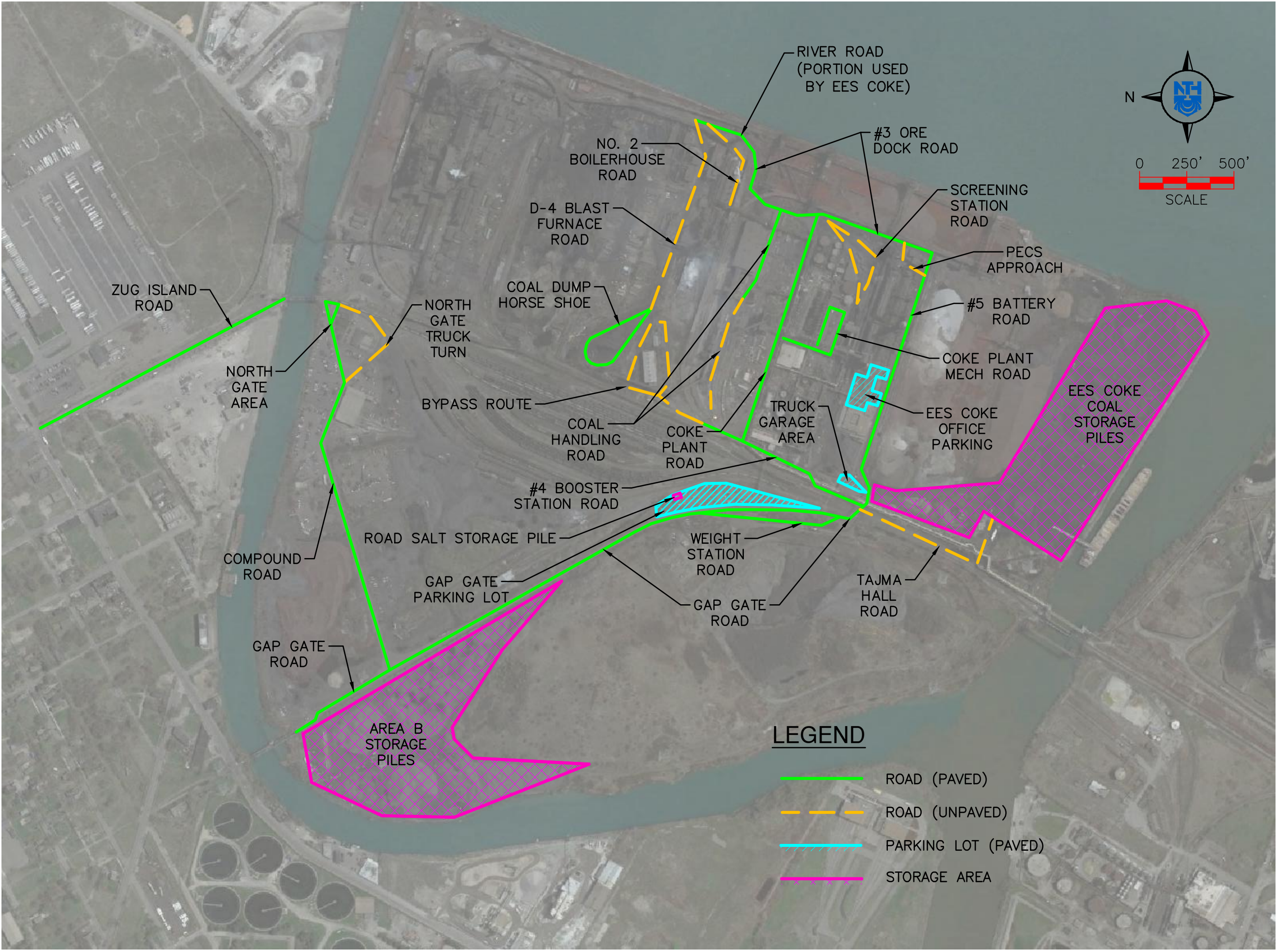
Month: _____


EES Coke Battery LLC Contact Information
Security/Emergency/Medical: 313-216-2499
Environmental: 313-297-4183

Technicians must enter their initials for each observation date and an "X" for each road/parking lot observed for the applicable day.
Each road/parking lot shall be observed at least twice during each calendar month.

	Day of Month																																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			
Inspector's Initials																																		
Paved Roads																																		
#4 Booster Station Rd																																		
#5 Battery Rd.																																		
Coal Dump Horseshoe																																		
Coal Handling Rd. (Partial)																																		
Coke Plant Rd.																																		
Coke Plant Mech Rd.																																		
North Gate Area																																		
Compound Rd.																																		
Gap Gate Rd.																																		
#3 Ore Dock Rd.																																		
River Rd. (Portion used by EES Coke)																																		
Weigh Station Rd.																																		
Zug Island Rd.																																		
Unpaved Roads																																		
North Gate Truck Turn																																		
Screening Station Rd.																																		
Coal Handling Rd. (Partial)																																		
Taj Mahal Rd.																																		
PECS Approach																																		
No. 2 Boilerhouse Rd.																																		
D-4 Blast Fce Rd.																																		
Bypass Route																																		
Paved Parking Lots																																		
Gap Gate Parking Lot																																		
Truck Garage Area																																		
EES Coke Office Parking																																		

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<div></div> <div>NTH Consultants, Ltd.</div> <div>Infrastructure Engineering and Environmental Services</div>		CAD FILE NAME: 200500-FD	
		PLOT DATE: 9/24/2021	
		DRAWING SCALE: 1" = 500'	
		INCEPTION DATE: 3/19/2020	
		EJM	
NTH PROJECT No.: 74-200500-03		DESIGNED BY: EJM	
DRAWN BY: APL		CHECKED BY: EJM	
FACILITY MAP - FUGITIVE DUST EES COKE BATTERY, L.L.C.			
1400 ZUG ISLAND ROAD RIVER ROUGE, MICHIGAN			
FIGURE:		1	