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Standard Operating Procedure – Communication of Inspection Data

1. Purpose

The purpose of this SOP is to define how to properly communicate Method 303 and other environmental data within Sidock Group, Inc. (Sidock) and between Sidock and EES Coke Battery LLC.

2. Scope

This document is intended to give a description on how to properly communicate Method 303 and other environmental data within Sidock and between Sidock and EES Coke Battery LLC.

3. Responsibilities

Sidock field personnel, Project Managers and their designees are responsible for implementing this procedure.

4. PPE Requirements

1. None

5. Communication

1. See procedure.


6. Safety Requirements

1. None.

7. Procedure

A. Daily Method 303 and Push-Travel Inspection Reports

1. After Field Personnel review the completed daily forms for Charging, Lids and Offtakes, Doors, Collection Main and Push – Travel observations and document their review, in accordance with ENV-EES-01, ENV-EES-02, ENV-EES-04 through ENV-EES-06. Field Personnel shall electronically scan and distribute the daily reports to the Sidock Project Manager and/or their designee for review.
2. Sidock Project Manager and/or their designee shall review the daily field reports for Charging, Lids and Offtakes, Doors, Collection Main and Push – Travel observations before the reports are forwarded to EES Coke Environmental and

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Operations personnel, in accordance with ENV-EES-01, ENV-EES-02, ENV-EES-04 through ENV-EES-06.

3. After the electronic copy of the daily report is reviewed, and if necessary revised, by Sidock Project Manager or their designee, the electronic copy of the daily report will be forwarded to EES Coke Environmental and Operations personnel via email. The report shall be distributed to the following EES Coke personnel:


- Plant Manager
- Director of Operations - Steel
- Business Unit Manager – Operations
- Business Unit Manager – Material Handling
- Operations Turn Managers
- Material Turn Manager
- Technology Project Manager
- Senior Environmental Engineer
- Associate Environmental Engineer
- Others as requested

4. On Saturday, Sunday and EES Coke observed Holidays, Field Personnel shall electronically distribute the daily reports as follows after reviewing the completed daily forms for Charging, Lids and Offtakes, Doors, Collection Main and Push – Travel observations and documenting their review:

- the Sidock Project Manager and/or their designee.
- the EES Coke Environmental personnel.
- EES Coke Management and Operations personnel.

B. Weekly/Monthly Environmental Inspection Reports

1. After Field Personnel review the week's completed weekly/monthly inspection forms for Fugitive Dust Inspections, Method 9D Visible Emission Observations of the Coal Field, Random Truck Inspections, Gooseneck Inspections, Pump Seal Inspections/Monitoring, Visible Emission Observations of the PECS Stack, Visible Emission Observations of the Combustion Stack, Quench water Sampling, Quench water Chain of Custody, Safety Tool Box, Vision Emission Observations of Coal Bin Vents and Mixer Building Baghouse, Method 9D Observations of Roads, Lots, and Storage Piles, Daily Observations of Stormwater Outfall, Spill Kits, Tanks, Waste Storage and the leak detection wells for Tank 37 and document their review in accordance with ENV-EES-19, Field Personnel shall electronically distribute the weekly inspection reports to the Sidock Project Manager and/or their designee.
2. Sidock Project Manager and/or their designee shall review the weekly inspection reports and document their review, in accordance with ENV-EES-19 before the reports are forwarded to EES Coke Environmental and Operations personnel.

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3. After the weekly inspection reports are reviewed by Sidock Project Manager and/or their designee and the review has been documented, the weekly reports will be forwarded to the following personnel at EES Coke:

- Plant Manager
- Business Unit Manager – Operations
- Business Unit Manager – By-Products
- Business Unit Manager – Material Handling
- Business Unit Manager - Maintenance
- Material Turn Manager
- Senior Environmental Engineer
- Associate Environmental Engineer
- Others as requested

C. Charging

1. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel prior to the fourth charge if the sum of the first three charges are greater than or equal to 35.0 seconds.

D. Lids and Offtakes

1. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel immediately after the lid traverse if there were any leaks found.
2. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel immediately after the offtake traverse if there were any leaks found.

E. Doors


1. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel immediately after the doors traverse if there were any leaks found.

F. Collection Main

1. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel immediately upon identification of a leak on the collection main. Field Personnel shall not resume inspection until all notifications have been made.

G. Push Travels

1. The Field Personnel shall notify EES Coke Battery Management and Environmental Personnel immediately upon identification of all fugitive opacity values greater than or equal to 20% during pushing, immediately after the push travel and no later the start of the next push travel.

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H. LDAR

1. The Field personnel will immediately inform the By-Products management, Environmental Personnel and Sidock Project Manager and/or their designee of any leak detected during LDAR monitoring. Additional LDAR Monitoring will be suspended until the notifications have been made.

I. Waste


1. The Field personnel will immediately inform the appropriate area management and Environmental Personnel of any issues or concerns identified during the Weekly Waste Inspection of the applicable area.

J. Monthly Tank & Spill Kit Inspections

1. The Field personnel will immediately inform the appropriate area management and Environmental Personnel of any issues or concerns identified during the Monthly Tank & Spill Kit Inspections of the applicable area.

K. General Communication and Follow-up

1. Once the Field person is onsite to complete the Method 303 and other daily inspections, he/she will send a daily text to the group consisting of the Environmental Personnel, Sidock Project Manager and designees and all other Field personnel. When Field personnel arrive before 7:00 AM on weekdays, or before 8:00 on weekends/holidays, it is acceptable to wait until after 7:00 AM on weekdays and after 8:00 AM on weekends before sending the texts.
2. If Field personnel are expecting to arrive onsite at an unusual hour (example: after 12 noon or before 6 AM), Field personnel need to alert Environmental Personnel and Sidock Project Manager and designees and all other Field personnel so there is not a concern regarding the schedule, so the group does not attempt to send other personnel onsite to cover the daily inspections.
3. If there are ovens which have not been observed for push/travel emissions in more than 75 days, the number of the oven(s) and the date that it coincides with 90 days since the previous observation will be transmitted to Environmental Personnel, Sidock Project Manager and/or designee and all other Field personnel.
4. Each Thursday, Field personnel will check the weekly inspections to determine if all weekly tasks have been completed so any remaining tasks can be completed on Thursday or Friday. This information will be shared with the Sidock Project Manager and/or designee.
5. By the 25th of each month, the Field personnel will check the monthly inspections to determine if all monthly tasks have been completed so any

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remaining tasks can be completed prior to month's end. This information will be shared with the Sidock Project Manager and/or designee. The status of Monthly tasks will be shared with Environmental Personnel on the fourth Monday of the month or the 26th of the month.

6. By the 20th of each month, the Field personnel will check the quarterly inspections to determine if all quarterly tasks have been completed so any remaining tasks can be completed prior to the end of the quarter. This information will be shared with the Sidock Project Manager and/or designee. The status of quarterly tasks will be shared with Environmental Personnel on the third Monday of the month or the 22nd of the month, whichever is later.
7. LDAR Monitoring status will be reviewed with EES Coke on
 - a. Quarterly Valves – by the 26th of the month in January, March, July and October.
 - b. Semi-annual (Volume 2) – by the 15th of the month in the last month of each semi-annual period (June and December).
 - c. Difficult to Monitor (once per year) by the 10th of December each year.
 - d. Unsafe to Monitor (once per 5 year; annual list) by the 10th of December each year.

8. References

1. None

9. Attachments

1. None