

US EPA ARCHIVE DOCUMENT

March 13, 2014

**By Overnight and Electronic Mail**

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

George T. Czerniak  
Director, Air and Radiation Division  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60647

Nicole Cantello  
Attorney-Advisor  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60647

**Re: KCBX Terminals – Response to Request No. 17 of Attachment B of  
EPA Information Request Dated November 15, 2013**

Dear Mr. Czerniak and Ms. Cantello:

This letter and its attachments are hereby submitted by KCBX Terminals Company (“KCBX”) in response to Request No. 17 of the above-referenced November 15, 2013 request for information, issued by the United States Environmental Protection Agency pursuant to Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a).

KCBX submitted a petroleum coke sampling plan on December 16, 2013, and EPA approved the sampling plan in a letter dated December 24, 2013. KCBX received sampling protocols and shipping instructions from EPA via an electronic message dated February 12, 2014. The attached document, titled “Response to B-17 – Petroleum Coke Storage Pile Sampling Logbook and Photos,” provides information and photographs regarding the piles sampled by KCBX.

Please contact us should you have any questions or comments regarding this letter or the enclosed information.

Sincerely,

/s/ Adam M. Kushner  
Adam M. Kushner

Partner  
adam.kushner@hoganlovells.com  
(202) 637-5724

Enclosure

Figure 1. Petcoke Sampling Locations at South Terminal



Blue line is approximate KCBX property boundary



Figure 2. Petcoke Sampling Locations at North Terminal



Blue line is approximate KCBX property boundary

KCBX Petcoke Sampling

Page 1

Greg Wlazik - URS

Philip Hight - URS

Due to the large number of piles to be sampled, each pile will be measured and sample points determined before actual sampling takes place. Each pile will have 15 sample points (except N-6).

South Terminal - Pile S-1

Perimeter measured at 1,074 feet.

Height was estimated at 20 feet.

Material was being added to the north end of the pile during measurement.

South Terminal - Pile S-2

Perimeter measured at 1,515 feet.

Maximum height is approximately 40 feet.

South Terminal - Pile S-3

Could not be measured due to material being pushed over the side where we would need to measure. Will returned when this activity has ended.

South Terminal - Pile S-4

Perimeter of pile measured 652 feet.

Height is estimated at 30 feet.

North Terminal - Pile N-1

Perimeter measured at 445 feet.

Estimated height is 15 feet.

North Terminal - Pile N-2

Perimeter measured at 176 ft.

Pile height estimated at 10 feet.



2/24/14  
2/25/14

## KCBX Petroco Sampling

Page 2

North Terminal - Pile N-3

Perimeter of pile measured at 990 feet.

Estimated maximum height of main pile is 20 feet, a series of 6 foot piles are located to the west is the same material.

North Terminal - Pile N-4

Perimeter measured at 784 feet.

Height estimated at 60 feet.


North Terminal - Pile N-5

Perimeter measured at 1,167 feet

Pile height estimated at 60 feet.

North Terminal - Pile N-6

Perimeter estimated at 804 feet. South end and half of western boundary was under water of unknown depth. Sample points were only located at safe/accessible locations (11 total).



KCBX Petcoke Sampling South Terminal Page 3  
Greg Mazik - URS  
Phil Hight - URS

We will be sampling Petcoke piles that were measured last week and sampling points determined.

Most piles are covered with snow and have a frozen layer of material on top. We used a garden trowel to break through this top layer and access the material.

0830 - 935

Collect samples at pile S-1.

Photograph #1 taken looking north along the pile.

Photograph #2 taken of the sample jars.

0950 - 1025

Collect samples at pile S-2.

Photograph #3 taken looking northwest.

Photograph #4 taken of samples collected.

1040 - 1110

Collect samples at pile S-3.

Photograph #5 taken of the pile looking west.

Photograph #6 is S-3 collected samples.

1125 - 1345

Collect samples at pile S-4.

Photograph #7 taken looking east.

Photograph #8 shows S-4 samples.

1310 - 1335

Collect samples at pile S-5.

Photograph #9 taken looking northwest.

Photograph #10 shows S-5 samples.



KCBX Petcoke Sampling South Terminal Page 4

1335 - 1400

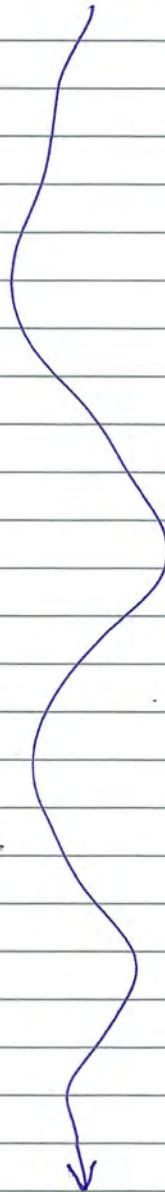
Collect samples at pile S-6.

Photograph #11 of pile was taken looking NNW.

Photograph #12 was taken showing the S-6 samples.

Covered samples with ice and placed tape over the edges of the cooler.

Dropped cooler off at the EPA laboratory.



*SOUTH TERMINAL  
PETCOKE PILE  
SAMPLING PHOTOGRAPHS*





VIEW OF PILE S-1 LOOKING NORTH



VIEW OF PILE S-1 SAMPLES

FIGURE 1  
PILE S-1 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL



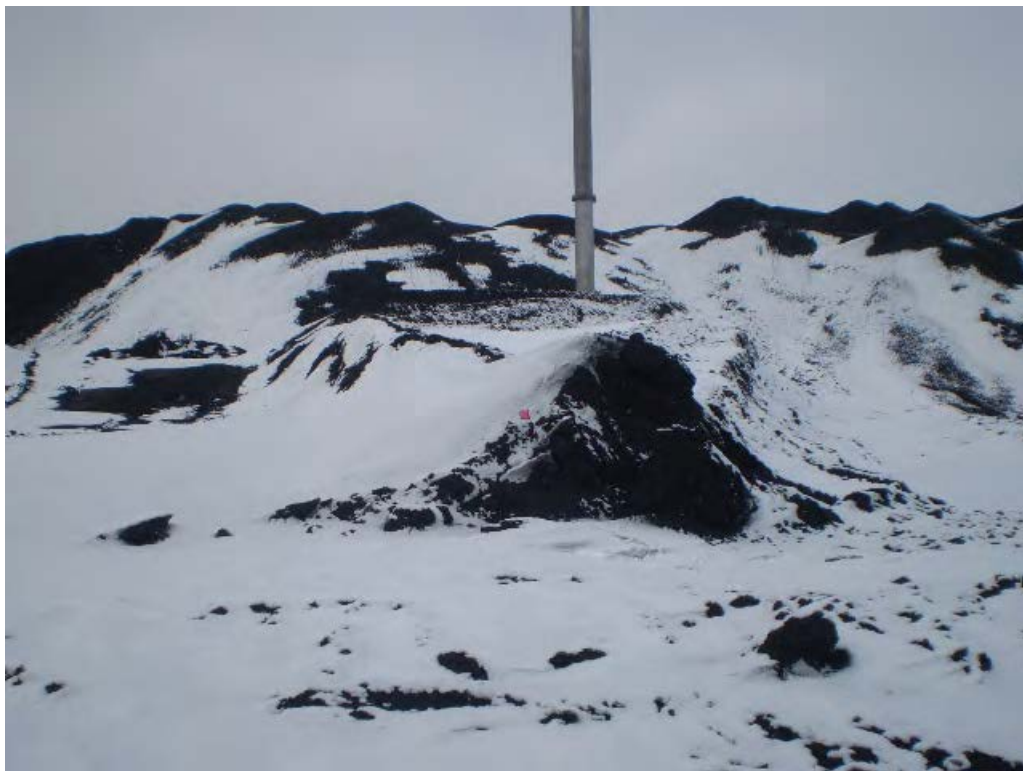
VIEW OF PILE S-2 LOOKING NORTHWEST



VIEW OF PILE S-2 SAMPLES

FIGURE 2  
PILE S-2 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL





VIEW OF PILE S-3 LOOKING WEST



VIEW OF PILE S-3 SAMPLES

FIGURE 3  
PILE S-3 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL



VIEW OF PILE S-4 LOOKING EAST



VIEW OF PILE S-4 SAMPLES

FIGURE 4  
PILE S-4 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL





VIEW OF PILE S-5 LOOKING NORTHWEST



VIEW OF PILE S-5 SAMPLES

FIGURE 5  
PILE S-5 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL



VIEW OF PILE S-6 LOOKING NORTH-NORTHWEST



VIEW OF PILE S-6 SAMPLES

FIGURE 6  
PILE S-6 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL



## KCRX Petcoke Pile Sampling North Terminal

Greg Mazik - URS  
Phil Hight - URS

0838 - 0900

Collect samples at pile N-1.

Photograph of pile taken looking north. - #13.

Photograph #14 is of the N-1 sample jars.

0910 - 0945

Collect samples at pile N-2.

Duplicate samples will be collected at this location.

Photograph of the pile is looking east. - #15.

Photograph #16 shows the regular and duplicate sample jars.

0950 - 1025

Collect samples at pile N-4.

Photograph #17 shows the pile looking southeast.

Photograph #18 is of the N-4 samples.

1030 - 1058

Collect samples at pile N-3.

Photograph #19 of the pile is looking south.

Photograph #20 taken of N-3 samples.

1250 - 1315

Collect samples at pile N-5.

Photograph #21 view of the pile is southeast.

Photograph #22 shows the N-5 samples.

1320 - 1350

Collect samples at pile N-6.

Photograph #23 of the pile is looking south.

Photograph #24 is of the N-6 samples.

Petroleum Pile Sampling

North Terminal Page 6

1400

Cover samples with ice and place tape over the cooler edges.

Dropped North Terminal samples of at the EPA laboratory.



*NORTH TERMINAL  
PETCOKE PILE  
SAMPLING PHOTOGRAPHS*





VIEW OF PILE N-1 LOOKING NORTH



VIEW OF PILE N-1 SAMPLES

FIGURE 1  
PILE N-1 SAMPLING PHOTOGRAPHS  
NORTH TERMINAL



VIEW OF PILE N-2 LOOKING EAST



VIEW OF PILE N-2 SAMPLES

FIGURE 2  
PILE N-2 SAMPLING PHOTOGRAPHS  
NORTH TERMINAL





VIEW OF PILE N-3 LOOKING SOUTH



VIEW OF PILE N-3 SAMPLES

FIGURE 3  
PILE N-3 SAMPLING PHOTOGRAPHS  
NORTH TERMINAL





VIEW OF PILE N-4 LOOKING SOUTHEAST



VIEW OF PILE N-4 SAMPLES

FIGURE 4  
PILE N-4 SAMPLING PHOTOGRAPHS  
NORTH TERMINAL



VIEW OF PILE N-5 LOOKING SOUTHEAST



VIEW OF PILE N-5 SAMPLES

FIGURE 5  
PILE N-5 SAMPLING PHOTOGRAPHS  
SOUTH TERMINAL





VIEW OF PILE N-6 LOOKING SOUTH



VIEW OF PILE N-6 SAMPLES

FIGURE 6  
PILE N-6 SAMPLING PHOTOGRAPHS  
NORTH TERMINAL