US ERA ARCHIVE DOCUMENT



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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 - Pagel
Crecy Mazik - URS
Philip Hight - URS
Due to the large number of pites to be
sampled, each pile will be measured and sample
points datermined before actual sampling takes
place: Each pile will have 15 sample points (except N-6).
South Terminal - Pile 5-1
Perimeter measured at 1,074 feat.
Height was estimated at 20 text.
Material was being added to the north end of
the pile diping measurement
South Terminal - Pile 5-2
Porimeter measured at 1,515 feet.
Maximum height is approximately 40 fact
South Teaminal - Pile 5-3
Could not be mensured due to meterial being, pushed oven the side where we would need a
pushed oven the side where we would need 's
to measure. Will reformed when this actuity
has ended
South Terminal - Pile S-4
toximeter of pile measured 657 feet.
Hoight is estimated at 30 feet.
North Terminal - Pile 10-1
Perimeter measured at 445 feet.
Estimated height is 15 feet.
North Texminal - Pile N-Z
 Peninten measured at 176 ft.
Pile height extimated at 10 feet.

Nach Teerminal - Pile N-3 Premittee of pile measured at 930 feet.  Estructed maximum height of main pile is 20 feet, a series of 6 feet piles are located to the West is the same material.  North Terminal - Pile N-4 Premittee measured at 184 feet.  Height estimated at 60 feet.  North Terminal - Pile N-5 Premittee measured at 1/67 feet Pile height estimated at 60 feet.  North Terminal - file N-5 Premittee estimated at actificity south and and half of western boundary was under ivater of valueum depths. Sample points were and located at safe accessable locations. (I) total)		2/03/11
North Terminal - Pile N-3  Perimetra of pile meagured at 990 feet.  Estimated maximum height of main pile is 20 feet, a series of a feet piles are located to the west is the same material.  North Terminal - Pile N-4  Perimetric measured at 754 feet.  Height estimated at 60 feet.  North Terminal - Pile N-5  Perimeter measured at 1167 feet  Pile height estimated at 60 feet.  North Terminal - Pile N-6  Perimeter estimated at 60 feet.  North Terminal - Pile N-6  I height estimated at 804 feet. South and and half of western boundary was under index of in known depths Sample points  were only located at safe/accessable		KCRX Petrole Somoline Page 2
Perimeter of pile measured at 990 feet.  Estimated maximum height of main pile is 20 feet, a series of a foot piles are located to the west is the same material.  North Terminal - Pile N-4 lerimeter measured at 704 feet.  Height estimated at 60 foot.  North Terminal - Pile N-5 Perimeter measured at 1167 feet Pile height estimated at 1167 feet  Pile height estimated at 80 feet.  North Terminal - Pile N-6  Perimeter estimated at 804 feet, South end and half of western boundary was under ware only located at safe/accessable		terby tereste sumprings
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Estinated maximum height of main pile is 20 feet,  a series of 6 feet piles are located to like  west is the same material.  North Terminal - Pile N-4  Perimeter measured at 784 feet.  Height extimated at 60 feet.  North Terminal - Pile N-5  Perimeter measured at 1,167 feet  Pile height extimated at 60 feet.  I North Terminal - Pile N-6  Perimeter extimated at 804 feet.  South end  and half of western boundary was under  water of valgour depth, Sample points  were only located at safe/accessable	4	
a series of 6 feet piles are located to the  West is the same material.  North Terminal - Pile N-4  Perimeter measured at 784 feet.  Height extimated at 60 feet.  Morth Terminal - Pile N-5  Perimeter measured at 1167 feet  Pile height extimated at 60 feet.  "North Terminal - Pile N-6  Perimeter extimated at 60 feet.  "North Terminal - Pile N-6  perimeter extimated at 804 feet. South and and half of western boundary was under water of integer of integer depths Sample points  were only located at 864 accessable		
North Terminal - Pile N-4  Perimetric measured at 784 feet.  Height estimated at 60 feet.  Marth Terminal - Pile N-5  Perimeter measured at 1167 feet  Pile height estimated at 60 feet.  North Terminal - Pile N-6  Perimeter estimated at 804 feet. South and and half of western bacardary was under water of inknown depths 5ample points  were only located at 50 feet accessable		a series of it all all all all all all all all all al
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Height estimated at 60 feet.  Marth Terminal - Pile N-8  Perimeter measured at 1/67 feet  Pile height estimated at Gotest.  Nexth Terminal - Pile N-6  Perimeter estimated at 804 feet. South and and half of western boundary was under indeed only located at 50 fe/ accessable	1	
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Perimeter measured at 1167 feet  Pile height estimated at 60 feet.  North Terminal - Pile N-E  Perimeter estimated at 804 feet, South and and half of western boundary was under  Water of unknown depths Sample points  were only located at safe/accessable		40 14 - 10 0.1
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Perimeter estimated at 804 feet, South and and half of western boundary was under water of unknown depths Sample points were only located at safe/accessable	4	
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were only located at safe/accessable		
were only located at safe/accessable		and half of western boundary was under
were only located at safe/accessable		water of unknown depths Sample points
locations (11 total)		were only located at safe/accessable
		locations (11 total)
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KCBX Petcoka Sampting South Tanning Page 3
Greg Mazik -URS
Phil Hight - URS

we will be sampling Petroke piles that were measured last week and sampling points determined.

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

0830 - 935

Collect samples at pile 5-1.

Photograph # 1 taken looking north along the pile.

Photograph # Z taken of the sample jans.

0950- 1025

Collect samples at pile 5-2.

Photograph #3 taken losking Nowthwest.

Photograph #4 taken of samples collected.

1040-1110

Collect samples at pile 5-3.

Collect samples at pile 5-3.
Photograph #5 taken of the pile looking west.
Photograph #6 is 5-3 collected Samples.

Collect samples at jule 5-4.

Photograph # 7- taken looking east.

Photograph #8 shows 5-4 samples.

Mutograph # 9 taken looking northwest.

Photograph # 10 shows 3-5 samples.

3/3/14) KCBX Petoske Sampling South Terminal Page 4 1335 - 1400 Collect samples at pile S-6. Photograph #11 of pile was taken looking NNW. Photograp #12 was taken showing the 5-6 Samples. Covered samples with ice and placed tape ovak 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

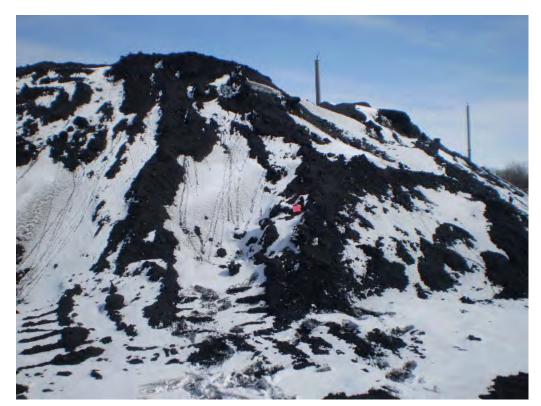


**VIEW OF PILE S-3 LOOKING WEST** 



**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

3/4/14) Page 5

Work Terminal KCKX Petroke Pile Sampling

Greg Mazik- URS Phil Hight - URS

Photograph of pilo taken looking worth. - #13. Photograph #14 is of the N-1 sample jaks.

Duplicate samples will be collected at this location Photograph of the pile is looking east -# 15. Photograph # 16 Shows the regular and duplicato

Photograph #17 shows the pile looking sootheast. Photograph # 18 is of the N-4 samples.

Photograph # 19 of the pile is looking south. Photograph #20 taken of N-3 samples.

Photograph # 21 view of the pile is southeast. Photograph # 22 shows the N-5 samples.

Collect samples at pile N-6.

Photograph #23 of the pile is looking sooth. Photograph #24 is at the N-6 samples,

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Patroke Pile . Sampling North Terminal Page 6 1400 Cover samples with ice and place tape over the cooler edges. Dropped North Terminal Samples of at Mc 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