

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

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77 West Jackson Boulevard
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U.S. Environmental Protection Agency
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**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.

George T. Czerniak
Nicole Cantello

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March 13, 2014

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
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(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
Greg Mazick - URS
Philip Hight - URS

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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 Petcoke Sampling

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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 - 1145

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

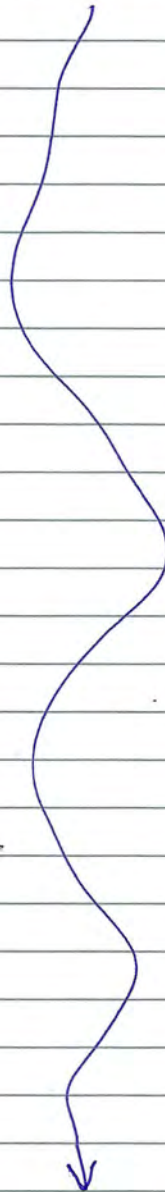
Collect samples at pile S-6.

Photograph #11 of pile was taken looking NW.

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 Petroco 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.

Petroco 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**