



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

September 24, 2014

Stephen A. Swedlow
Quinn Emanuel Urquhart & Sullivan, LLP
500 W. Madison St., Suite 2450
Chicago, Illinois 60661

RE: KCBX Terminals Company's Petition for Variance

Dear Mr. Swedlow,

I am writing to request additional information concerning KCBX Terminals Company's June 9, 2014 Petition for Variance to the Chicago Department of Public Health (CDPH) as to certain of the Rules and Regulations for Control of Emissions from the Handling and Storage of Bulk Material Piles (hereinafter "KCBX Variance Request") and related documents from KCBX.

Specifically, CDPH seeks additional details of the technical studies presented in Exhibits 1-3 of the KCBX Variance Request, which are offered as evidence to support KCBX's assertion that petcoke from the KCBX facilities has not substantially impacted the off-site environment. Accordingly, with regard to the soil and surface wipe samples referenced in Exhibits 1 and 2, please provide the following information:

- Additional details of the sampling protocol, including soil sampling procedures, soil sampling depths, QA/QC measures used to prevent cross-contamination of samples and procedures to evaluate if cross-contamination has occurred, etc.
- Copies of analytical reports providing the individual sample results for each analyte, including sample identifiers, analytical detection limits, qualifiers, and QA/QC data including blank sample results, surrogate recoveries, narrative information from the laboratory, etc.
- Information to identify the approximate locations of individual soil and surface wipe samples (sample coordinates, a geographic map with superimposed sample identifiers, etc.)
- Copies of spreadsheets, or other means of data reduction, used by KCBX's contractor, Environmental Health & Engineering, to illustrate PAH profiles and vanadium-to-nickel ratios

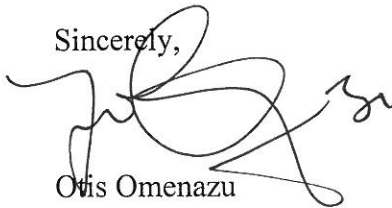
With regard to Exhibit 3 of the KCBX Variance Request and a subsequent study of emission source height presented in a supplemental September 9, 2014 letter report, please present the results of dispersion modeling studies conducted by KCBX's contractor, Sonoma Technology, Inc. (STI). Specifically, so that we may independently review these studies, please provide the following information:

- Copies of the AERMOD system input and output files used by STI to generate the results presented in the bar charts in Exhibit 3 of the KCBX Variance Request and Table 1 of the supplemental September 9, 2014 letter report, including the input and output files from preprocessing programs (e.g., AERMET, AERMAP, BPIP, etc.)
- The locations/coordinates of the surface and upper air meteorological data stations, as well as the raw meteorological data and the methods used to process the data (if different from the standard AERMET approach)
- Narrative descriptions that describe the assumed configuration and parameters of emission sources, as well as supporting data and calculations used to derive emissions estimates used in the modeling

Finally, CDPH also seeks additional backup information for the Fugitive Dust Plan, KCBX Facility, Revision _IR, June 9, 2014. Therein, the locations of air monitoring stations described in Section D are based in part upon a wind-rose pattern provided in the Fugitive Dust Plan. However an annual wind rose generated by the State Climatologist Office for Illinois (http://www.isws.illinois.edu/atmos/statecli/roses/wind_climatology.htm) shows that the predominant downwind area is more towards the east. Therefore, to evaluate the appropriateness of the PM10 monitoring locations, we request the location/coordinates of the station, as well as an electronic copy of the surface meteorological data, used to generate the Figure B-2 wind-rose.

Please submit the above information to my attention within two (2) weeks. If you have any questions, please call me at (312) 745-7206.

Sincerely,



Otis Omenazu
Chief Air Engineer