



July 11, 2014

**Via Email**

Chicago Department of Public Health  
Attn: Environmental Permitting and Inspections  
333 South State Street, Room 200  
Chicago, IL 60604  
[EnvComments@cityofchicago.org](mailto:EnvComments@cityofchicago.org)

**Re: For a Variance from the City of Chicago Rules and Regulations Pertaining to the Handling and Storage of Bulk Material Piles**

To whom this may concern:

On behalf of the Chemical Industry Council of Illinois (CICI), we urge the Department of Public Health of the City of Chicago to grant a variance in the above entitled matter on behalf of KCBX Terminals Company.

KCBX requires certain variances, as allowed in the new rule, to meet the ultimate goal of that rule, which is the construction of a fully enclosed facility for the storage and handling of petroleum coke. The company has already invested more than \$30 million in upgrading that facility, including a state-of-the-art dust suppression system that just went online in November of 2013. Further, air monitoring and soil sampling data show that the neighborhood will be protected by existing dust suppression programs during the time the enclosure is built. In addition, five other companies have, to date, requested variances. We feel that this is evidence that the rule poses unintended compliance difficulties that can only be addressed through the rule's variance procedures.

The chemical industry in Illinois is the 3rd largest manufacturing sector in the state. Illinois is also the 4th largest chemical producing state in the nation. The industry directly employs almost 45,000 Illinoisans at an average wage of \$97,000 a year. In addition, 299,242 Illinois jobs are supported by the business of chemistry. In all, the business of chemistry in Illinois generated \$40 billion worth of products, and exported \$7.9 billion, making the industry the second largest exporter in the state. Further, in July, 2012 Chemical Week reported that the Chicago-Joliet-Naperville area was listed as the top metro area in the U.S. for chemical manufacturing employment.

Thank you for your time and consideration. If you or your staff has any questions or comments, please do not hesitate to contact me in the Springfield office at (217) 522-5805.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Biel", with a stylized flourish at the end.

Mark Biel  
Executive Director

**Headquarters**

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