



CON 12-15
Doc #28890

November 4, 2013

Ms. Tami S. Quam
Environmental Specialist Senior, Contaminated Sites Section
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319-0034

Via FedEx: 8024 7439 7925

RE: Free Product Removal Method Modification
FHR Dubuque Asphalt Terminal (Formerly Koch Pavement Solutions)
1550 Koch Court
Dubuque, IA 52001

Dear Ms. Quam,

The purpose of this letter is to obtain approval from the Iowa Department of Natural Resources (IDNR) to modify the free product removal method for the Flint Hills Resources Pine Bend, LLC (FHR) - Dubuque Asphalt Terminal.

The FHR Dubuque Asphalt Terminal currently utilizes a free product skimmer and proposes to replace this with disposable hydrophobic oil absorbent socks (see attached product data sheet). The current technology has not collected measurable product for a number of monitoring periods. It is possible that this is an indication of very little, if any, free product. The proposal to modify the collection technology is to pursue an alternate, potentially more effective, collection method. The proposed oil absorbent socks are reported to effectively collect free product when thicknesses are in the ranges observed at the site. The reported effectiveness is described to be due to the design of the specific gravity floats and position of the collector inlet.

We propose to replace the passive skimmers in MW-1 and MW-2 with disposable hydrophobic oil absorbent socks. We will monitor the effectiveness of the proposed change and provide updates to the DNR in our routine sampling reports. Please note that the socks will be removed, inspected and replaced on a quarterly frequency.

If you have any questions or comments related to the content of this letter, please do not hesitate to contact me at (651) 480-3830 or eric.dominiack@fhr.com.

Sincerely,

Flint Hills Resources, LP

Eric Dominiack
Lead Environmental Engineer

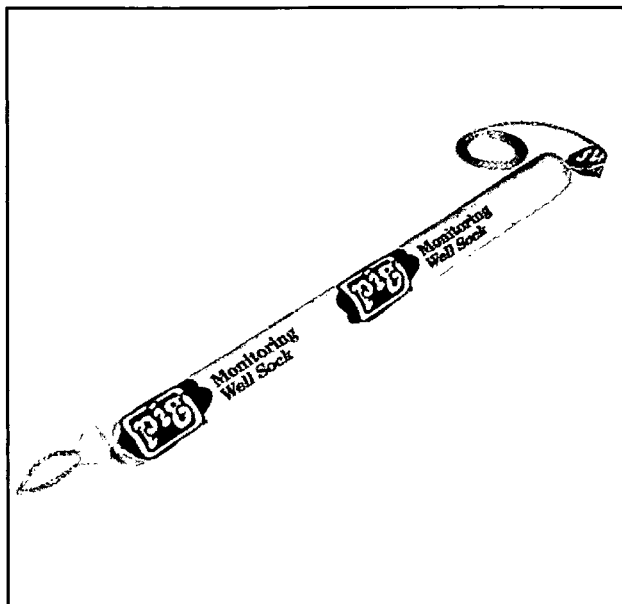
Cc: Mr. Greg Yaklich, Flint Hills Resources Pine Bend, LLC

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Attachment - Monitoring Well Skimming Sock Product Data Sheet

PIG® Monitoring Well Skimming Sock

#SKM401 - 1.5" x 18" • Absorbs up to 17 oz. per sock • 30 socks



These small-diameter absorbents are just the right size for monitoring well maintenance. Small-diameter sock absorbs oil but not water.

- Simply lower this floating sump skimmer into a monitoring well to absorb oils without taking in any water
- Polypropylene skin resists tearing; meets NFPA 99 standards for static decay
- Polypropylene loop can be attached to rope (not included) for easy deployment and retrieval
- Absorbs and retains oils and oil-based liquids - including lubricants and fuels - without absorbing a drop of water
- Bright white color makes absorbed oil easier to see; clearly shows saturation level
- Can be incinerated after use to reduce waste or for fuels blending

Always in stock. Ships within 24 hours.

Pricing (based on quantity)

1-2	3-9	10+
\$74.00	\$72.00	\$70.00



New Pig

By Phone:
1-800-HOT-HOGS

Online:
newpig.com

Email:
hothogs@newpig.com

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ITEM: SKM401 - Pg 1 of 2

SKM401 Specifications

Color:	White
Dimensions:	ext. dia. 1.5" x 18" L
Fluids Absorbed:	Oil-based Liquids But Not Water
Absorbency:	Up to 4 gal. per box
Absorbency per:	Up to 17 oz. per sock
Sold as:	30 socks per box
Weight:	6 lbs.
# per Pallet:	30
Composition:	Skin: Polypropylene Filler: Polypropylene
UNSPSC:	47131904

SKM401 Metric Equivalent

Dimensions:	ext. dia. 3.8cm x 45.7cm L
Absorbency:	Up to 15.1 L per box
Absorbency per:	Up to 502.7 mL per sock
Weight:	2.7 kg

Technical Information

Warnings & Restrictions:

There are no known warnings and restrictions for this product.

Regulations and Compliance:

40 CFR 122.26 - When applying for a National Pollutant Discharge Elimination System (NPDES) permit, facilities must have a plan in place that describes actions, procedures, control techniques, management practices and equipment available to prevent illegal discharge of pollutants into waterways.

Technical Documents:

(Available at newpig.com)

Product Data Sheet (PDS)

Material Safety Data Sheet (MSDS)



New Pig

By Phone:
1-800-HOT-HOGS

Online:
newpig.com

Email:
hothogs@newpig.com

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ITEM: SKM401 - Pg 2 of 2

Safety Data Sheet

1. Product And Company Identification

Product Identifier: Oil-Only PIG Absorbents (MSD-016)

General Use: Oil-Only PIG Absorbents are designed to confine and absorb oil-based chemicals such as oil, gasoline, kerosene, diesel fuel, vegetable oil, etc., while repelling water and water-based products from machinery, leaks, drips, over-spray and spills.

Specific Product Identifier: PIG Oil-Only Absorbent Mat, PIG FAT MAT Oil-Only Absorbent Mat, PIG Rip-n-Fit Oil-Only Absorbent Mat, PIG 4-in-1 Oil-Only Absorbent Mat, PIG Brown Oil-Only Absorbent Mat, PIG Ham-O Oil-Only Absorbent Mat, PIG Oil-Only UV-Resistant Absorbent Mat, PIG Oil-Only Railroad Absorbent Mat, PIG Absorbent Ground Tarp System, PIG Leak and Drip Pad, PIG Coolant Skimming Pad, PIG Oil-Only Barrel Top Absorbent Mat, PIG UV-Resistant Oil-Only Barrel Top Absorbent Mat, PIG Oil-Only Absorbent Diaper Mat, Oil-Only Mop System, PIG Oil-Only Absorbent Sock, PIG Skimmer Sock, PIG Spaghetti Boom, PIG Oil-Only Absorbent Boom, PIG Dark Oil-Only Absorbent Boom, PIG Skimming Sweep, PIG Sump Skimmer, PIG Monitoring Well Skimming Sock, PIG Rigid Monitoring Well Sock, PIG Skimmer Pillow, PIG Spaghetti Pillow, PIG Printer's Pillow, PIG Poly-Back Oil-Only Absorbent Pillow, PIG Outdoor Pan, PIG PomPom Oil-Mops, PIG Oil-Only Absorbent Valve Wrap, PIG Oil Only Pulp, PIG LeakTrapper Absorbent Bag, PIG LeakTrapper Absorbent Valve Wrap, PIG Oil only heavy Fluids Mat, PIG SunSafe™ UV-Resistant Mat, STAT-MAT Absorbents, Static Dissipative Skimming PIG Mat, PIG Brown Oil Only Poly Back Mat, PIG Oil Only Brown Mat.

Product Description: These white, yellow, blue, green, brown, black, or Multi-Colored absorbents are provided in many forms such as a mat (pad or rolls), spaghetti strips (pads cut into thin strips), pom-pom, pulp (mat ground into a particulate) or may come in a pan.

COMPANY PROFILE:

New Pig Corporation
One Pork Avenue
Tipton, PA 16684-0304
Information Number
1-800-468-4647

EMERGENCY TELEPHONE:

INFOTRAC
200 North Palmetto Street
Leesburg, FL 34748
24 hrs, 7 days/week
1-800-535-5053

Website: www.newpig.com, **Email:** hothogs@newpig.com

2. Hazards Identification

GHS Classification: Not a dangerous substance according to GHS

POTENTIAL HEALTH EFFECTS:

Eye Contact: May cause irritation

Ingestion: No hazard in normal use of product

Inhalation: No hazard in normal use of product

Skin Contact: Not applicable

Chronic: Not applicable

3. Composition/Information on Ingredients

CAS: 9003-07-0	Polypropylene	>97%
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May contain one or more of the following:

CAS: None	Brown pigment	<0.3%
CAS: None	Zelec-Anti Static Agent	
CAS: 9003-07-0	Polypropylene: Film, Clips, Rope Mesh	
CAS: 9002-88-4	Polyethylene Film, Cord	
CAS: Not Avail.	Grommets, Steel Wire Tie	
CAS: 25038-59-9	Polyester Fleece or Mesh	
CAS: 9003-07-0	Pan: Polypropylene	
CAS: 9002-86-2	Pan: PVC	
<i>Ink</i>		
CAS: 1336-21-6	Aqua Ammonia	1-1.5%
EC: 215-647-6		
CAS: 108-01-0	Dimethylethanolamine	1-1.5%
EC: 203-542-8		

Used to contain the following :

CAS: 9002-88-4	High Density Polyethylene
CAS: 63428-83-1	Mesh: Nylon
CAS: 9002-88-4	Mesh: Polyethylene

4. First Aid Measures

Eye Contact: Flush with water for 15 minutes. Consult a physician.

Ingestion: Not applicable

Inhalation: Not applicable

Skin Contact: Not applicable

5. Fire Fighting Measures

Extinguishing Media: Unused form: Not applicable Used form: that which is compatible to liquid(s) absorbed.

Special Fire Fighting Procedures: Wear a self-contained breathing apparatus and refer to absorbed liquid(s) MSDS(s).

Hazardous Combustion Products: When heated above the melting point: carbon monoxide, carbon dioxide, acrolein, ketones, aldehydes and other unidentified organic compounds.

Unusual Hazards: Refer to absorbed liquid(s) MSDS(s). The Oil-Only PIG Absorbents do not render liquids nonflammable, neutral or less hazardous.

6. Accidental Release Measures

Spill or Leak Procedures: If material is unused, sweep or pick up and dispose of as a non-hazardous material.

7. Handling and Storage

Handling Precautions: Camouflage pig pattern not recommended for use with solvents or aggressive liquids that may affect printed pattern.

Safety Data Sheet

7. Handling and Storage (Cont'd)

Storage Precautions: Store in a cool, dry place. Shelf Life: Indefinitely - as long as product is kept in a clean, dry place away from direct sunlight.

General: Refer to absorbed liquid(s) MSDS(s). The container can be hazardous when empty. Follow label cautions even after the container is empty. Do not re-use empty containers for food, clothing or products for human or animal consumption, or where skin contact can occur.

8. Exposure Controls/Personal Protection

Engineering Controls: None required

PERSONAL PROTECTION

Eyes: Safety glasses with side shields is a good industrial practice

Respirator: Not required.

Gloves: Not normally required. However, use of cloth, canvas or leather gloves is a good industrial practice.

Other: None required.

OSHA HAZARDOUS COMPONENTS (29 CFR 1910.1200):

EXPOSURE LIMITS 8 hrs. TWA (ppm)

OSHA PEL

ACGIH TLV

None

9. Physical and Chemical Properties

Appearance: White, yellow, blue, green, brown, black or multi-colored polymer material in a variety of shapes, may also be in a black pan. Interior color may vary.

Odor: No odor

Odor Threshold: Not applicable

pH: Not applicable

MELTING POINT/Freezing Point: >320° F (>160° C)

Initial Boiling Point and Range: Not applicable

Flash Point: Not applicable **Method:** Not applicable

Evaporation Rate: Not applicable

Flammable Limits: Not applicable

Conditions of Flammability: Not established

Explosive Properties: Not applicable

Vapor Pressure: Not applicable

Vapor Density: Not applicable

Relative Density (H₂O = 1): 0.9

Solubility in Water: Insoluble

Auto Ignition Temperature: 675° F (357° C)

Coefficient of Water/Oil Distribution: Not available

10. Stability and Reactivity

General: This is a stable material.

Conditions of Reactivity: Not established

Incompatible Materials: Strong oxidizing agents may degrade product over an extended period of time.

Conditions to Avoid: Not applicable

Hazardous Decomposition: When heated, it may emit toxic fumes.

Hazardous Polymerization: Will not occur

11. Toxicological Information

LD50: Not available

LC50: Not available

Dimethylethanolamine:

Oral: The oral LD50 for rats is 2000 mg/kg

Inh: The inhalation LC50 for rats is 1641 ppm/4H

Carcinogenicity: IARC: Not established

National Toxicology Program: Not established

OSHA: Not established

California Prop 65: No listed ingredient

Reproduction Toxicity: Not available

Teratogenicity: Not available

Mutagenicity: Not available

Synergistic Products: Not available

Irritancy of Product: See Section 2.

Sensitization to Product: Not available

12. Ecological Information

No data available

13. Disposal Considerations

Waste Disposal Method: If unused, no special precautions are necessary. Dispose of in accordance with federal, state and local regulations. In certain types of cleanup applications the nature of the material recovered will classify the resulting spent material as a hazardous component. In such instances the material should be disposed of via an approved hazardous waste disposal service and the appropriate manifesting obtained.

14. Transport Information

DOT (Department of Transportation):

Proper Shipping Name: Not regulated

Hazard Class: Not regulated

Identification Number: Not applicable

15. Regulatory Information

CERCLA (Comprehensive Environmental Response Compensation and Liability Act): No Reportable Quantity

OSHA Hazard Communication Standard, 29 CFR 1910.1200:

No listed ingredient

SARA Title III (Superfund Amendments and Reauthorization Act): No listed ingredient

TSCA (Toxic Substances Control Act): Ingredients of this product are on the Inventory list.

Safety Data Sheet

16. Other Information

NFPA Hazard Ratings: Health - 0
none → extreme Fire - 1
0 → 4 Reactivity - 0

Reason for Issue: Combined MSD-016 with MSD-017, MSD-077 and MSD-166. Reviewed, changes to Sections 1, 2, 3, 7, 9, 11 & 16. GHS changes to Sections 2 & 3.

Prepared by: Dale Gatehouse, Entreprises Krenda Inc.

Approved by: Lisa Baxter, New Pig Corporation

Previous Date of Issue: 03/06/2012

Revised Date: 03/11/2013

MSDS Number: MSD-016 (Formerly MSD-017, MSD-077 and MSD-166)

The following is in lieu of all warranties, expressed or implied: All information provided is based on testing and data believed to be accurate.