CITGO Petroleum Corporation

2316 Terminal Drive
Arlington Heights, IL 60005

April 13, 2020 Reference No. 11209494

Ms. Wawczak and Mr. Gmitro – Project Managers
United States Environmental Protection Agency
Region 5 [Mail Code LU-16J]
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Send Via E-mail
(Wawczak.Renee@epa.gov)
(Gmitro.Todd@epa.gov)

Dear Mr. Gmitro and Ms. Wawczak:

Re: Quarterly Progress Report – Q1-2020
EPA Docket No. RCRA-05-2020-0005
CITGO Terminal, East Chicago, Indiana

This submission has been prepared on behalf of CITGO Petroleum Corporation (CITGO) in accordance with the Section 3008(h) Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(h) Administrative Order on Consent (AOC) (RCRA Docket No: RCRA-05-2020-0005 with an effective date of January 24, 2020) for the CITGO Terminal at 2500 East Chicago Avenue, East Chicago, Indiana (EPA ID: IND 095267381) (Site).

This report is organized to address reporting requirements set out in Section VII of the AOC.
This report summarizes the activities conducted at the Site from January 24, 2020 (effective date of AOC) through March 31, 2020.

1. **Summary of Work Performed during the Reporting Period (January 24, 2020 – March 31, 2020)**
   - Project status call including discussion on draft CAF with CITGO, EPA, OXY, and GHD on March 12, 2020.

2. **Summary of Reports, and Other Deliverables Completed During the Reporting Period**
   - RCRA Facility Investigation Work Plan was submitted to EPA on February 24, 2020.
   - A draft Corrective Action Framework was submitted to EPA on March 6, 2020.
   - Transmittal of hard copies of documents (Investigation Results Report Phase I and RCRA Facility Investigation Work Plan) to Public Repository (East Chicago Public Library on Columbus Drive) in accordance with AOC.

3. **Summary of Problems Encountered and Planned Resolutions**
   - In response to the COVID-19 crisis, the State of Indiana is currently under an Order to stay home due to COVID-19. The preliminary investigations did not identify conditions that are immediately harmful to human health and the environment. As a result, should the Order to stay home extend to when the investigation is tentatively scheduled (end of May/Beginning of June), the work may be delayed until the Order to stay home has been lifted.

4. **Summary of Results of Samplings, Tests, or Other Data Received or Generated**
   - None during this reporting period.

5. **Anticipated Activities During the Next Reporting Period**
   - RFI field activities are scheduled to commence in late-May or early-June, following receipt of EPA approval.

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6. Project Schedule

- Attachment A presents the currently anticipated project schedule completed in accordance with the AOC.

7. Percent Project Completed

- At the time of this report, the project is approximately 5% completed.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions on the above, please do not hesitate to contact us.

Respectfully submitted,

CITGO Petroleum Corporation

Scott Buckner, CITGO Project Manager

JP/kf/1

cc: Thomas Krueger, U.S. EPA (Krueger.Thomas@epa.gov)
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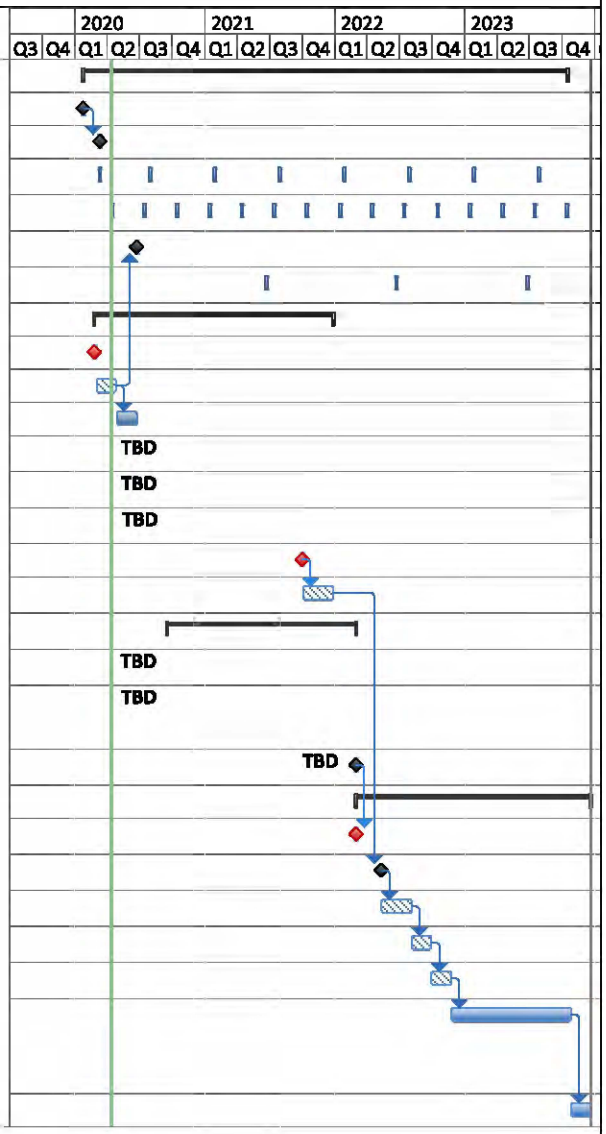
ATTACHMENT A

Project Schedule

Project Schedule - AOC
CITGO Terminal
East Chicago, IN

ID	Task Name	Duration	Start
1	**Administrative**	**965 days**	**Fri 1/24/20**
2	Effective Date of AOC	1 day	Fri 1/24/20
3	Met with U.S. EPA to discuss objectives, expectations, and timelines and provide to EPA for approval a draft CAF	1 day	Thu 3/12/20
4	Semi-Annual Meetings - Meeting with EPA either by phone or in person on at least a semi-annual basis	874 days	Thu 3/12/20
13	Quarterly Reports - Fifteenth day of the month after the end of each quarter	906 days	Wed 4/15/20
29	Financial Assurance - Within 60 days of EPA approval of the RFI workplan (initial estimated cost of work)	1 day	Tue 6/23/20
30	Financial Assurance Update (Updated annually and/or with subsequent work plans)	523 days	Wed 6/23/21
34	**RFI**	**473 days**	**Tue 2/25/20**
35	Submitted RFI Workplan (With SAP/QAPP)	1 day	Tue 2/25/20
36	EPA Review and Approval of RFI Work Plan	2 mons	Mon 3/2/20
37	RFI Field Activities	2 mons	Tue 4/28/20
38	Additional RFI Work Plan(s), as needed	1 day	Thu 9/17/20
39	EPA Review and Approval of RFI Work Plan(s), as needed	1 day	Fri 9/18/20
40	RFI Field Activities, as needed	1 day	Mon 9/21/20
41	Submit RFI Report - No later than October 1, 2021	1 day	Fri 10/1/21
42	EPA Review and Approval of the RFI Report	3 mons	Mon 10/4/21
43	**Interim Corrective Measures, as needed**	**373 days**	**Thu 9/17/20**
44	Interim Corrective Measures Work Plan(s), as needed	1 day	Thu 9/17/20
45	Interim Corrective Measures Implementation, as needed (90 days following submittal of Interim Corrective Measures Work Plan and Schedule)	1 day	Fri 9/18/20
46	Interim Corrective Measures Report (Either prior to or as part of the Environmental Indicators Report)	1 day	Tue 3/1/22
47	**Final Corrective Measures**	**472 days**	**Tue 3/1/22**
48	Environmental Indicators Report - No later than March 1, 2022 (unless EPA agrees to extend that deadline)	1 day	Tue 3/1/22
49	Final Corrective Measures Proposal (Including schedule) - Within 135 days of EPA's approval of the RFI report	1 day	Wed 5/11/22
50	EPA review and comments, supplemental information / investigation request	3 mons	Thu 5/12/22
51	Public review and comment	2 mons	Thu 8/4/22
52	EPA Final Decision	2 mons	Thu 9/29/22
53	Final Corrective Measures Implementation - (According to the schedule in the Final Decision, i.e. much of the construction completed within one year, or within a reasonable period of time after EPA selects the final corrective measures)	12 mons	Thu 11/24/22
54	Final Remedy Construction Completion Report (Including an Operation and Maintenance Plan)	2 mons	Thu 10/26/23



Project: CITGO Terminal, East Chicago, IN
Date: Mon 4/13/2011:38 AM

Expected Timeframe — Expected Date — Summary
Contingent Timeframe — Fixed Date

Note: Per AOC, 'days' refers to calendar days and thus do not reflect weekends, holidays, etc.
Schedule subject to change based on regulatory reviews/approvals, weather, and other factors beyond Respondent's control