

Koch - Dodge City
Green file



Katherine Dunn
04/14/04 01:48 PM

To: MooreB@kochind.com
cc: Everett Spellman/Kdhe@Kdhe, Mostafa Kamal/Kdhe@Kdhe,
Stone.AndreaR@epa.gov
Subject: RE: Revised Closure, Post-Closure, and Corrective Action Cost
Estimate

Brian,

KDHE has received Koch's submittal for the revised cost estimate and response to KDHE comments to the Part B permit application modification request. These submittals satisfy the requirement for submittal as requested in KDHE letter to Koch, dated March 22, 2004. Comments on each submittal will be forthcoming from KDHE upon completion of the review of these documents. Following KDHE's review and comments, Koch should be prepared to submit hard copies of the documents to KDHE for final approval. If you have any question related to these submittal, don't hesitate to contact me or Everett Spellman.

Katherine Dunn
KDHE Bureau of Waste Management
Hazardous Waste Permits Section
1000 SW Jackson, Suite 320
Topeka, KS 66612-1366
(785) 296-6561

----- Forwarded by Katherine Dunn/Kdhe on 04/14/04 01:32 PM -----



"Moore, Brian"
<MooreB@kochind.com>
m>
04/08/04 11:32 AM

To: "Katherine Dunn (E-mail)" <kdunn@kdhe.state.ks.us>, "Everett
Spellman (E-mail)" <ESpellma@kdhe.state.ks.us>
cc: "Mostafa Kamal (E-mail)" <mkamal@kdhe.state.ks.us>, "Stephen M.
Richmond [SRICHMOND@bowditch.com] (E-mail)"
<SRICHMOND@bowditch.com>
Subject: Revised Closure, Post-Closure, and Corrective Action Cost Estimate

Kathy & Everett,

I have attached KNC's Revised Cost Estimate for Closure, Post-Closure, and Corrective Action for the RCRA Part B Permit. I used the cost estimate supplied by KDHE as a guideline for preparing the cost estimate. I reviewed all of the tasks and costs and revised where needed based on recent data and costs. There were some instances where I used the same number as KDHE proposed since I could not find any better data than what KDHE had determined. One task was removed from the Remedial System. The Treatment (electrochemical reduction unit) was removed from the cost estimate since this is not a requirement for cleanup purposes but rather a unit used to clean the groundwater to levels where it can be used for operational purposes. If the facility were to go bankrupt or shutdown, the electrochemical unit would not be operated, so these costs would not continue. The groundwater currently recovered by the remediation system is well below the UIC injection well permit limits even prior to cleanup by the electrochemical unit.

Please review and determine if the Revised Cost estimate meets KDHE's approval. If the cost estimate is approved it will be included in the Permit Application currently under revision and it will also be submitted as a separate submittal for approval and ultimately a Financial Assurance will be provided to KDHE once approved.

<<RCRA Part B Cost Estiamte 040504.xls>>

Brian Moore

RCRA



531829

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RCRA Part B Cost Estiamte 040504.xls ----- Forwarded by Katherine Dunn/Kdhe on 04/14/04 01:32 PM -----



"Moore, Brian"
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m>

04/12/04 04:54 PM

To: "Andrea R. Stone (E-mail)" <stone.andrear@epa.gov>, "Kathrine
Dunn (E-mail)" <kdunn@kdhe.state.ks.us>
cc: "LeRock, Gary" <lerockg@kochind.com>
Subject: Draft Informal Responses to KDHE and EPA Comments on RCRA Part
B Permit Application

Kathy and Andrea,

I have attached the draft informal responses to the RCRA Part B Application and Sampling Analysis Plan. The marked up text in the RCRA Part B Application are KNC's responses to both EPA and KDHE's comments. The SAP contains markups from the original submittal in one color and the responses to the comments in a different color. A Draft summary of all of the Comments and Responses are also included to assist in the review process. I will wait to finalize the documents once I receive approval on the suggested responses to the comments or if additional clarification needs to be made on a specific comment. Call me if you have questions.

Brian Moore
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Fax (620) 227-6016

<<Summary of Response to comments Cover Let.doc>> <<Response to
CommentsApplication 03012004-rev1.doc>> <<RedlinedSAP040704.doc>>



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