

*Rock-Dodge City
green file*



Katherine Dunn
04/20/04 08:42 AM

To: "Moore, Brian" <MooreB@kochind.com>
cc: "LeRock, Gary" <lerockg@kochind.com>, "Andrea R. Stone (E-mail)" <stone.andrear@epa.gov>, Mostafa Kamal/Kdhe@Kdhe, Everett Spellman/Kdhe@Kdhe
Subject: Re: Draft Informal Responses to KDHE and EPA Comments on RCRA Part B Permit Application

Brian,

KDHE has reviewed Koch's response to comments, submitted on April 12, 2004. KDHE accepts Koch's response for the General Comments, Part B Comments, and SAP Comments with the following exceptions.

- Comments #9 and 17 reference the cost estimate, which has not been approved. KDHE anticipates these comments will be resolved after approval of a cost estimate. After the cost estimate has been approved, Koch has 60 days, in accordance with the permit, to secure a financial mechanism.
- Comment #20 must be resolved prior to approval of the Class 1a modification request. KDHE requests the certification be submitted after the cost estimates issues have been resolved.
- Comment #22 mentions that Koch will submit all analytical data from the private wells prior to 1982 in a separate submission. In addition, please submit any analytical data from groundwater sampling events prior to 1982 of which Koch may be aware.
- Comment #23 specifies the appropriate number of wells in the recovery system as 66 wells. KDHE will change the language in the permit to reflect this number.
- Comment #27 addresses the inclusion of dissolved oxygen as a sampling purge parameter. KDHE believes a range of +/- 10 percent is appropriate. Although dissolved oxygen is often the final purge parameter to stabilize, difficulty achieving stabilized measurement may be indicative of equipment limitations. Koch may need to evaluate the necessity to replace the purge parameter measurement equipment currently used during sampling events.

Although KDHE accepts Koch's response to EPA comments, EPA will provide separate comments to their portion of the submittal. Since this permit modification is a based program responsibility, KDHE will be providing the final approval of this Class 1a modification request. After Koch has reviewed our comments, an official (hard copy) response to comments must be submitted to KDHE and EPA.

KDHE would like to resolve issues related to the Class 1a and Class 2 modification requests. It is paramount that corrective action at this site proceeds forward. Having an both Part I and Part II of the Permit in effect would expedite this process. Please contact me if you have any question regarding these comments.

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04/12/04 04:54 PM

To: "Andrea R. Stone (E-mail)" <stone.andrear@epa.gov>, "Kathrerine Dunn (E-mail)" <kdunn@kdhe.state.ks.us>
cc: "LeRock, Gary" <lerockg@kochind.com>
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RCRA



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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.

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CommentsApplication 03012004-rev1.doc>> <<RedlinedSAP040704.doc>>



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