



K A N S A S

RODERICK L. BREMBY, SECRETARY

DEPARTMENT OF HEALTH AND ENVIRONMENT

KATHLEEN SEBELIUS, GOVERNOR

May 14, 2004

Brian Moore
Environment Compliance Manager
Koch Nitrogen Company
11559 US Highway 50
P O Box 1337
Dodge City, KS 67801-1337

Certified Mail: 7000 0520 0017 4475 6947
Return Receipt Requested

Re: Revised Closure, Post-Closure, and Corrective Action Cost Estimate
Koch Nitrogen Company, Dodge City
EPA ID# KSD044625010

Dear Mr. Moore:

The Kansas Department of Health and Environment (KDHE) has reviewed the revised cost estimate required by Permit Condition II.J. and included in the RCRA Part B Application received on May 10, 2004. KDHE approves the cost estimate.

In accordance with Permit Condition II.J., the Permittee is required to submit the updated financial assurance within sixty (60) days. Therefore, Koch Nitrogen Company (KNC) must submit the revised financial assurance documents in instrument and amount corresponding to the approved cost estimate to KDHE no later than July 14, 2004. Prompt attention to this task will ensure continued processing of the February 11, 2004 Class 2 permit modification request by KNC. If you have any technical questions regarding this matter, please contact Everett Spellman at (785) 296-1616. Please feel free to contact me at (785) 296-1609.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Kamal".

Mostafa Kamal, PE, CPM
Chief, Hazardous Waste Permits Section

cc: Andrea Stone - USEPA/Region 7/ARTD/RCAP
Tina Lowery - USEPA/Region 7ARTD/RCAP
Allen Guernsey - KDHE/DEA/SWDO/Waste Program
Bill Bider - KDHE/BWM
Larry Angell - Koch Industries, Inc.

RCRA



531830

DIVISION OF ENVIRONMENT
Bureau of Waste Management
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE. 320, TOPEKA, KS 66612-1366
Voice 785-296-1600 Fax 785-296-1592 [Http://www.kdhe.state.ks.us/waste](http://www.kdhe.state.ks.us/waste)

Koch Nitrogen Company
Dodge City Nitrogen Plant
 Closure, Post-Closure, and Corrective Action Cost Estimate
 April 23, 2004

TASK	COST	CLOSURE	POST-CLOSURE
Groundwater Monitoring			
Sample Collection (Labor)			
Quarterly (25 wells)	\$18,960		
Semi Annual (13 wells)	\$3,920		
Residential (10 wells)	\$1,412		\$25,704
Sample Analysis			
Quarterly Chrome/Nitrate (25 wells)	\$3,920		
Semi Annual Chrome/Nitrate (13 wells)	\$1,050		
Semi Annual VOC samples (7 wells)	\$1,800		
Residential (10 wells)	\$1,680		\$8,450
Sample Shipment	\$800		\$800
Semi-Annual Reporting	\$12,400		\$12,400
Well Maintenance			
Mowing	\$2,000		
Well Cap Replacement	\$940		
Maintenance and Equipment Replacement	\$2,000		
Monitoring Well Replacement	\$2,500		\$7,440
Annual Groundwater Monitoring			\$54,794
30-YEAR GROUNDWATER MONITORING			\$1,643,820
Remedial System			
Recovery Well Operation (66 wells)			
Electricity Costs	\$26,040		
Maintenance (pmp/well)	\$5,000		
Inspection Costs	\$5,000		
Recovery Well Replacement	\$2,500		
Pipeline Maintenance	\$1,500		
Storage Tank Maintenance	\$2,000		
Storage Tank Inspection	\$2,400		
Sludge Disposal	\$1,000		
Semi Annual Reporting	\$2,000		\$47,440
Pre-Disposal Pipeline			
Pipeline Maintenance (pump, pH control system)	\$2,000		
Durco/Final Filter	\$5,000		
Inspection Costs	\$5,000		\$12,000
Disposal Well Operation (2 ICDWs)			
Annual Fall-off Test	\$10,000		
Mechanical Integrity Test (MIT - Internal/External)	\$2,400		
Inspection Costs - Labor	\$18,250		
Operation Monitoring - Analytical	\$3,000		
Reporting	\$10,000		
Routine Maintenance	\$5,000		
Repermitting	\$3,000		
Workover (as needed, may only be once every 10 yrs)	\$10,000		\$61,650
Annual Remedial System Operation			\$121,090
30-YEAR REMEDIAL SYSTEM OPERATION			\$3,632,700
Chrome Destruct Unit (Closure/Post-Closure)			
Closure			
See Closure Cost Estimate	\$114,000		
TOTAL CDU CLOSURE		\$114,000	
Post-Closure Monitoring			
Inspection Costs	\$170		
Reporting	\$500		
Maintenance	\$400		\$1,070
Annual Post-Closure Care			\$1,070
Post-Closure Certification (one time expense)	\$3,000		
30-YEAR CDU POST-CLOSURE CARE			\$35,100
SUBTOTALS		\$114,000	\$5,311,620
Contingency Cost (10%)		\$11,400.0	\$531,162.0
TOTAL		\$125,400.0	\$5,842,782.0

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Brian Moore
 Koch Nitrogen Plant
 11559 US Highway 50
 PO Box 1337
 Dodge City, KS 67801

2. Article Number (Copy from service label)

7000 0520 0017 4475 6947

PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

MAY 17 2000

C. Signature

X *Coglianiti*

- Agent
- Address

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

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4. Restricted Delivery? (Extra Fee) Yes

Domestic Return Receipt

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KDHE/BWM M Kamal

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Brian Moore

Street, Apt. No.; or PO Box No.

11559 US Highway 50, PO Box 1337

City, State, ZIP+4

Dodge City, KS 67801-1337

PS Form 3800, February 2000

See Reverse for Instructions