



KOCH NITROGEN COMPANY

July 30, 2004

Mr. Everett Spellman
Hazardous Waste Permitting Section
Kansas Department of Health and Environment
1000 SW Jackson Street, Suite 320
Topeka, Kansas 66612-1366



RCRA RECORDS

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RE: Response to Comments on 2003 Annual Groundwater Monitoring Report
Koch Nitrogen Company, Dodge City, Kansas
EPA ID# KSD044625101

Dear Mr. Spellman:

On June 2, 2004, the Kansas Department of Health and Environment (KDHE) provided comments on the 2003 Annual Groundwater Monitoring Report. In the following paragraphs, Koch Nitrogen Company (KNC) is providing a response to each of the seven comments in the June 2, 2004 letter from KDHE. KNC has also attached to this letter additional supporting information.

1. Section 1.1, second paragraph, Page 1, states that "...KNC has been working with the USEPA and KDHE to finalize the RCRA Part B permit and complete the RFI Work Plan and Closure Plan for the Chromium Destruction Unit." KDHE assumes the text should read "Part B permit **application**." Should this be the case, KDHE concurs with KNC's statement. Please modify the text in accordance with KNC's intent.

Response: Part B Application is correct. Correction is noted.

2. Section 1.2, second paragraph, Page 1, states that plant personnel initiated a private well sampling program in 1968. KDHE is unaware of such sampling. Please submit all documentation associated with the stated sampling program.

Response: The historical residential well data is summarized in the attached table and the laboratory data sheets are also included

3. Section 4.2, Page 9, Second Paragraph: The annual report does not provide sufficient information to substantiate KNC's claim of natural attenuation for chromium. Provide such information otherwise delete reference to natural attenuation.

Response: Activities planned, as part of the Resource Conservation and Recovery Act (RCRA) Facility Investigation will provide additional data on the attenuation of constituents in groundwater. Decreasing concentrations in some wells indicates attenuation is occurring in some areas of the site; however, the mechanisms of attenuation are not clearly understood. The RCRA Facility Investigation should aid in the understanding these attenuation processes.

4. The rate of groundwater migration was not provided. Please submit revised text that includes a discussion and calculated groundwater flow rates.

Response: *Based on previous information developed by Woodward and Clyde, the estimated groundwater velocity at the site is between 2×10^{-4} and 5×10^{-4} feet per minute. The RCRA Facility Investigation will include collecting data to facilitate a better understanding of flow rates. In addition, the groundwater modeling currently in progress will also result in better data on the groundwater conditions at the site.*

5. The annual groundwater monitoring report should inform KDHE of any complications in sampling procedures. KNC's recent concern about the use of dissolved oxygen as a purge parameter is an example. Please include issues of concern in future reports.

Response: *Comment noted. Any technical problems encountered during field sampling will be recorded in the field notes and discussed in future reports. Please note that the dissolved oxygen parameter concern was not related to a specific field challenge. Instead, the discussion was initiated to manage foreseeable technical issues.*

6. A digital copy of analytical data for sampling year 2003 was provided in a ChemPoint Database format. Submit a digital copy of analytical data in tab-delimited format.

Response: *The 2003 analytical data in tab-delimited format is included with this response, as requested.*

7. Modify the text in this report to include analytical data for samples collected from residential wells. Also include this information in future reports.

Response: *The 2003 analytical data from the residential wells is summarized in the attached table. Future reports will include residential well data.*

If you have any questions regarding these responses, please do not hesitate to contact me at (620) 227-8631, extension 120.

Sincerely,



Katrina Krier
Koch Nitrogen Company

Enclosures

cc: Steven B. Ellingson, Ph.D., Koch Mineral Services, Wichita, Kansas
Frank VanRyn, Reiss Remediation Inc., Wichita, Kansas
Andrea Stone, U.S. Environmental Protection Agency, Kansas City, Kansas w/o encs.
Tina Lowery, U.S. Environmental Protection Agency, Kansas City, Kansas w/o encs.
Bill Bider, Kansas Department of Health and Environment, Topeka, Kansas w/o encs.