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KOCH NITROGEN COMPANY

October 26, 2004

Chief of the Hazardous Waste Permits Section
Bureau of Waste Management
Kansas Department of Health and Environment
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366
Certified Mail No. 7003 2260 0005 5497 9791
Return Receipt Requested

Chief, RCRA, Corrective Action and Permits Branch
Air, RCRA and Toxics Division
U.S. Environmental Protection Agency – Region VII
901 North Fifth Street
Kansas City, Kansas 66101
Certified Mail No. 7003 2260 0005 5497 9807
Return Receipt Requested

Re: Additional Sampling Information for CDU Closure Plan
Koch Nitrogen Company – Dodge City, Kansas Nitrogen Plant
Hazardous Waste Management Permit No. KSD044625010

To Whom It May Concern:

By letter of January 13, 2004, Koch Nitrogen Company (KNC) submitted to each of your agencies a closure plan (the Closure Plan) for the inactive chromium destruction unit at the above reference facility (the Dodge City Facility). With this letter, KNC amends the Closure Plan as described below.

The purpose of this amendment is to conform the Closure Plan to newly identified facts relating to solid waste management units 23 and 24 at the Dodge City Facility. These facts are addressed in the recent information submittal by KNC dated September 27, 2004 and reflect that KNC, as the new owner of the Dodge City Facility, has continued to diligently review records and data generated by the prior facility owner in an effort to ensure that KNC and the agencies have the most accurate information possible about events that occurred at the facility prior to KNC's ownership. KNC continues to review these records and will apprise the agencies as additional pertinent information is discovered.

441585



RCRA RECORDS

Specifically, the following changes are being made to the background information presented in the Closure Plan:

- The Closure Plan currently reflects that the effluent structure forming part of the chromium destruct unit had been removed in approximately 1993, prior to KNC's purchase of the Dodge City Facility, and that new basins had been built over this area. See, for example, Sections 2.1, 2.4 and 4.1 of the Closure Plan. However, recent information indicates that the effluent structure was not removed and that it is currently part of the existing neutralization basins in use at the site for management of non-RCRA regulated facility process water. These basins are identified as SWMUs 23 and 24 in the Dodge City Facility RCRA permit.
- The Closure Plan currently reflects that KNC is not aware of any data indicating the flow of wastewater from the detention basins to the effluent structure exhibited any hazardous characteristics. See, for example, Section 2.1.3 of the Closure Plan. However, recent information suggests that chromium-containing wastewaters (e.g., ammonia plant cooling tower blow-down and recanted regeneration water) may have historically been discharged directly to the effluent structure prior to initial treatment in the influent box or detention basins. These wastewaters likely contained elevated chromium levels that would have caused them to be characterized as hazardous waste. KNC believes it is likely that these wastewaters would have been pumped to the influent box from the effluent structure and then processed in the chromium destruct unit prior to disposal.

In response to this new operating information, KNC is providing the following additional sampling information to the CDU Closure Plan:

- SWMUs 23 and 24 are part of an operating neutralization basin system. From time to time the plant is not operated for an extended period (e.g., during "turn-arounds" for equipment maintenance or cleaning). During those infrequent "turn-around" periods, these basins may be dewatered.
- In October 2004, the plant was shut down for equipment maintenance and cleaning. In anticipation of the shutdown, sludge from the neutralization basins (SWMUs 23 and 24) was sampled in September 2004 and analyzed for chromium and other inorganics using the Toxicity Characteristics Leaching Procedure (TCLP). The chromium level in this sample was less than the detection limit of 0.01 milligrams per liter (mg/L) (copy attached). The regulatory limit for characteristically hazardous chromium is 5 mg/L.
- Consistent with the procedures described in the CDU Closure Plan, four concrete chip subsamples were collected from each of the four walls of SWMU 24 (West Basin). Each of these four subsamples was formed into a single composite sample from each wall. Four concrete chip subsamples were also collected from the floor of SWMU 24 and formed into a single composite sample. The chromium levels in these samples were all less than the detection limit of 0.01 mg/L (copy attached). The regulatory limit for characteristically hazardous chromium is 5 mg/L.

- SWMU 23 (East Basin) is coated with epoxy. To minimize the disruption to this epoxy coating in an operating basin, a single, representative sample was collected from each of the four walls. A single, representative sample was also collected from the floor of this epoxy-coated operating basin. The chromium levels in these samples ranged from < 0.01 to 0.20 mg/L (copy attached). The regulatory limit for characteristically hazardous chromium is 5 mg/L.

Based on these results, KNC is proposing not to conduct any additional investigatory work inside of these two basins. However, the adjacent soil samples described in the CDU Closure Plan will be collected and analyzed.

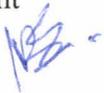
If you have any questions concerning this amendment, please contact AnnieLaurie Burke, Plant Environmental Excellence Leader, at (620) 227-8631, extension 350.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely yours,



Larry Angell
Vice President



cc: AnnieLaurie Burke, Environmental Excellence Leader, KNC, Dodge City, Kansas
Gary LeRock, Plant Manager, KNC, Dodge City, Kansas
Katrina Krier, Chemist, KNC, Dodge City, Kansas
Stephen B. Ellingson, Ph.D., Koch Mineral Services, Wichita, Kansas

**Attachment A
Sludge Sampling Result
From
Neutralization Basin (NEUT Basin)
SWMUs 23 and 24**

September 24, 2004 Laboratory Report



Continental

Analytical Services, Inc.

09/24/2004

Koch Nitrogen
Attn: Katrina Krier
P.O. Box 1337
Dodge City, KS 67801-1337

Date Received: 09/15/2004
Continental File No.: 5731
Continental Order No.: 96956

Dear Ms. Krier:

This laboratory report, consisting of 6 pages, contains the analytical results for the following samples:

<u>CAS LAB ID #</u>	<u>SAMPLE DESCRIPTION</u>	<u>SAMPLE TYPE</u>	<u>DATE SAMPLED</u>
04090978	VANCT	Sludge	09/08/2004
04090979	NEUT Basin	Sludge	09/07/2004
04090980	WW BLDG	Sludge	09/07/2004
04090981	N43CT	Sludge	09/08/2004
04090982	Mix Tank	Organic Liquid	09/08/2004

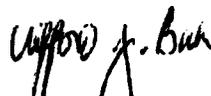
Continental is accredited by the State of Kansas through the National Environmental Laboratory Accreditation Program (NELAP). The results contained in this report were obtained using Continental's Standard Operating Procedures. These procedures are in substantial compliance with the approved methods referenced and the standards published by NELAP unless otherwise qualified in the Appendix to this report. The Appendix is an integral part of this report.

All results are reported on a wet weight basis unless otherwise stated.

Samples will be retained for thirty days unless Continental is otherwise notified.

Thank you for choosing Continental for this project. If you have any questions, please contact your Project Manager at (800)535-3076.

CONTINENTAL ANALYTICAL SERVICES, INC.


Clifford J. Baker
Technical Manager


Melisa D. McElwee
Project Manager

Page 1

P.O. Box 3737 • 525 N. EIGHTH ST. • SALINA, KS 67402-3737
785-827-1273 • 800-535-3076 • FAX 785-823-7830
KDHE Environmental Laboratory Accreditation No. E-10148



Client: Koch Nitrogen
 Attn: Katrina Krier
 P.O. Box 1337
 Dodge City, KS 67801-1337

Date Sample Rptd: 09/24/2004
 Date Sample Recd: 09/15/2004
 Continental File No: 5731
 Continental Order No: 96956

Lab Number: 04090978
 Sample Description: VANCT

Date Sampled: 09/08/2004
 Time Sampled: 1400

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Arsenic, TCLP	ND(0.10)	mg/L	09/22/2004	5863/1
Barium, TCLP	ND(1.0)	mg/L	09/22/2004	5863/1
Cadmium, TCLP	ND(0.03)	mg/L	09/22/2004	5863/1
Chromium, TCLP	ND(0.10)	mg/L	09/22/2004	5863/1
Lead, TCLP	ND(0.5)	mg/L	09/22/2004	5863/1
Mercury, TCLP	ND(0.0002)	mg/L	09/21/2004	5672/114
Selenium, TCLP	ND(0.10)	mg/L	09/22/2004	5863/1
Silver, TCLP	ND(0.10)	mg/L	09/22/2004	5863/1

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Arsenic, TCLP	09/21/2004	040921-1	MAG	6010B
Barium, TCLP	09/21/2004	040921-1	MAG	6010B
Cadmium, TCLP	09/21/2004	040921-1	MAG	6010B
Chromium, TCLP	09/21/2004	040921-1	MAG	6010B
Lead, TCLP	09/21/2004	040921-1	MAG	6010B
Mercury, TCLP	09/21/2004	040921-2	CRD	7470A
Selenium, TCLP	09/21/2004	040921-1	MAG	6010B
Silver, TCLP	09/21/2004	040921-1	MAG	6010B
TCLP Prep	09/20/2004	040920-2	CRD	1311
ICP Metals TCLP Preparation Method				3051
Mercury TCLP Preparation Method				7470A

Conclusion of Lab Number: 04090978

Lab Number: 04090979
 Sample Description: NEUT Basin

Date Sampled: 09/07/2004
 Time Sampled: 1440

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Arsenic, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Barium, TCLP	ND(1.0)	mg/L	09/18/2004	5848/25
Cadmium, TCLP	ND(0.03)	mg/L	09/18/2004	5848/25
Chromium, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Lead, TCLP	0.07	mg/L	09/18/2004	5848/25
Mercury, TCLP	ND(0.0002)	mg/L	09/17/2004	5672/113
Selenium, TCLP	ND(0.10)	mg/L	09/23/2004	5863/1
Silver, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25

-Continued-



CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 3

Client: Koch Nitrogen

Continental Order No.: 96956

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
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<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Arsenic, TCLP	09/17/2004	040917-7	MAG	6010B
Barium, TCLP	09/17/2004	040917-7	MAG	6010B
Cadmium, TCLP	09/17/2004	040917-7	MAG	6010B
Chromium, TCLP	09/17/2004	040917-7	MAG	6010B
Lead, TCLP	09/17/2004	040917-7	MAG	6010B
Mercury, TCLP	09/17/2004	040917-3	CRD	7470A
Selenium, TCLP	09/17/2004	040917-7	MAG	6010B
Silver, TCLP	09/17/2004	040917-7	MAG	6010B
TCLP Prep	09/16/2004	040916-2	CRD	1311
ICP Metals TCLP Preparation Method				3051
Mercury TCLP Preparation Method				7470A

Conclusion of Lab Number: 04090979

Lab Number: 04090980
Sample Description: WW BLDG

Date Sampled: 09/07/2004
Time Sampled: 1430

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Arsenic, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Barium, TCLP	ND(1.0)	mg/L	09/18/2004	5848/25
Cadmium, TCLP	ND(0.03)	mg/L	09/18/2004	5848/25
Chromium, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Lead, TCLP	ND(0.05)	mg/L	09/18/2004	5848/25
Mercury, TCLP	ND(0.0002)	mg/L	09/17/2004	5672/113
Selenium, TCLP	ND(0.10)	mg/L	09/23/2004	5863/1
Silver, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Arsenic, TCLP	09/17/2004	040917-7	MAG	6010B
Barium, TCLP	09/17/2004	040917-7	MAG	6010B
Cadmium, TCLP	09/17/2004	040917-7	MAG	6010B
Chromium, TCLP	09/17/2004	040917-7	MAG	6010B
Lead, TCLP	09/17/2004	040917-7	MAG	6010B
Mercury, TCLP	09/17/2004	040917-3	CRD	7470A
Selenium, TCLP	09/17/2004	040917-7	MAG	6010B
Silver, TCLP	09/17/2004	040917-7	MAG	6010B
TCLP Prep	09/16/2004	040916-2	CRD	1311
ICP Metals TCLP Preparation Method				3051

-Continued-

CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 4

Client: Koch Nitrogen
Sample Description: WW BLDG

Continental Order No.: 96956
Lab Number: 04090980

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Mercury TCLP Preparation Method				7470A

Conclusion of Lab Number: 04090980

Lab Number: 04090981
Sample Description: N43CT

Date Sampled: 09/08/2004
Time Sampled: 1410

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Arsenic, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Barium, TCLP	ND(1.0)	mg/L	09/18/2004	5848/25
Cadmium, TCLP	ND(0.03)	mg/L	09/18/2004	5848/25
Chromium, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25
Lead, TCLP	0.07	mg/L	09/18/2004	5848/25
Mercury, TCLP	ND(0.0002)	mg/L	09/17/2004	5672/113
Selenium, TCLP	ND(0.10)	mg/L	09/23/2004	5863/1
Silver, TCLP	ND(0.10)	mg/L	09/18/2004	5848/25

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Arsenic, TCLP	09/17/2004	040917-7	MAG	6010B
Barium, TCLP	09/17/2004	040917-7	MAG	6010B
Cadmium, TCLP	09/17/2004	040917-7	MAG	6010B
Chromium, TCLP	09/17/2004	040917-7	MAG	6010B
Lead, TCLP	09/17/2004	040917-7	MAG	6010B
Mercury, TCLP	09/17/2004	040917-3	CRD	7470A
Selenium, TCLP	09/17/2004	040917-7	MAG	6010B
Silver, TCLP	09/17/2004	040917-7	MAG	6010B
TCLP Prep	09/16/2004	040916-2	CRD	1311
ICP Metals TCLP Preparation Method				3051
Mercury TCLP Preparation Method				7470A

Conclusion of Lab Number: 04090981

Lab Number: 04090982
Sample Description: Mix Tank

Date Sampled: 09/08/2004
Time Sampled: 1500

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
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-Continued-

CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 5

Client: Koch Nitrogen

Continental Order No.: 96956

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Arsenic, Total (ICP)	ND(0.1) Q	mg/L	09/18/2004	5848/25
Cadmium, Total	ND(0.03) Q	mg/L	09/18/2004	5848/25
Chromium, Total	0.261	mg/L	09/18/2004	5848/25
Lead, Total (ICP)	ND(0.05) Q	mg/L	09/18/2004	5848/25
Total Halogens, as Chlorine	ND(100)	mg/kg	09/21/2004	5844/26

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Arsenic, Total (ICP)	09/17/2004	040917-1	MAG	200.7/6010B
Cadmium, Total	09/17/2004	040917-1	MAG	200.7/6010B
Chromium, Total	09/17/2004	040917-1	MAG	200.7/6010B
Lead, Total (ICP)	09/17/2004	040917-1	MAG	200.7/6010B
Total Halogens, as Chlorine	N/A	040921-1	HAZ*	ASTM D 2361 (M)
ICP Metals Total Preparation Method				3051

Q - Data qualifiers were required. See the Appendix to this report.

Conclusion of Lab Number: 04090982

ND(), where noted, indicates none detected with the reporting limit in parentheses.

Client: Koch Nitrogen
 Attn: Katrina Krier
 P.O. Box 1337
 Dodge City, KS 67801-1337

Date Sample Rptd: 09/24/2004
 Date Sample Recd: 09/15/2004
 Continental File No: 5731
 Continental Order No: 96956

Data Qualifiers:

<u>CAS LAB ID #</u>	<u>TEST NAME</u>	<u>QC BATCH</u>	<u>QUALIFIER</u>
04090982	Arsenic, Total (ICP)	040917-1	M
04090982	Cadmium, Total	040917-1	M
04090982	Lead, Total (ICP)	040917-1	M

M - Reporting limit higher than normal due to matrix interferences.

No analysis with a holding time of seventy-two hours or less was performed in this Continental order.

The following table provides the name and certification number of each subcontract laboratory utilized by Continental for this Continental order. A subcontract laboratory is designated as the analyst on the laboratory report using an alphabetic code followed by an asterisk.

<u>ANALYST CODE</u>	<u>LABORATORY NAME, LOCATION</u>	<u>CERTIFICATE NO.</u>
HAZ*	Hazen Research, Colorado	KS: E-10265-Radiochem.

All samples were received at the recommended temperature of less than 6 degrees Celsius.

-Conclusion of Laboratory Report-



**Attachment B
Concrete Chip Sampling Results
From
Walls and Floors of Neutralization Basins
SWMUs 23 and 24**

October 21, 2004 Laboratory Report



10/21/2004

Koch Nitrogen
Attn: Katrina Krier
P.O. Box 1337
Dodge City, KS 67801-1337

Date Received: 10/14/2004
Continental File No.: 5731
Continental Order No.: 97582

Dear Ms. Krier:

This laboratory report, consisting of 7 pages, contains the analytical results for the following samples:

<u>CAS LAB ID #</u>	<u>SAMPLE DESCRIPTION</u>	<u>SAMPLE TYPE</u>	<u>DATE SAMPLED</u>
04100916	SWMU 24 East Wall	Solid	10/12/2004
04100917	SWMU 24 N Wall	Solid	10/12/2004
04100918	SWMU 24 Floor	Solid	10/12/2004
04100919	SWMU 24 W Wall	Solid	10/12/2004
04100920	SWMU 24 S Wall	Solid	10/12/2004
04100921	SWMU 23 E Wall	Solid	10/12/2004
04100922	SWMU 23 Floor	Solid	10/12/2004
04100923	SWMU 23 W Wall	Solid	10/13/2004
04100924	SWMU 23 S Wall	Solid	10/13/2004
04100925	SWMU 23 N Wall	Solid	10/10/2004

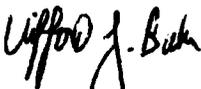
Continental is accredited by the State of Kansas through the National Environmental Laboratory Accreditation Program (NELAP). The results contained in this report were obtained using Continental's Standard Operating Procedures. These procedures are in substantial compliance with the approved methods referenced and the standards published by NELAP unless otherwise qualified in the Appendix to this report. The Appendix is an integral part of this report.

All results are reported on a wet weight basis unless otherwise stated.

Samples will be retained for thirty days unless Continental is otherwise notified.

Thank you for choosing Continental for this project. If you have any questions, please contact your Project Manager at (800)535-3076.

CONTINENTAL ANALYTICAL SERVICES, INC.


Clifford J. Baker
Technical Manager


Petra M. Craddock
Project Manager





Client: Koch Nitrogen
 Attn: Katrina Krier
 P.O. Box 1337
 Dodge City, KS 67801-1337

Date Sample Rptd: 10/21/2004
 Date Sample Recd: 10/14/2004
 Continental File No: 5731
 Continental Order No: 97582

Lab Number: 04100916
 Sample Description: SWMU 24 East Wall

Date Sampled: 10/12/2004
 Time Sampled: 1100

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/20/2004	5863/21

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100916

Lab Number: 04100917
 Sample Description: SWMU 24 N Wall

Date Sampled: 10/12/2004
 Time Sampled: 1105

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/20/2004	5863/21

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100917

Lab Number: 04100918
 Sample Description: SWMU 24 Floor

Date Sampled: 10/12/2004
 Time Sampled: 1120

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/20/2004	5863/21

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B

-Continued-



CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 3

Client: Koch Nitrogen
 Sample Description: SWMU 24 Floor

Continental Order No.: 97582
 Lab Number: 04100918

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100918

Lab Number: 04100919
 Sample Description: SWMU 24 W Wall

Date Sampled: 10/12/2004
 Time Sampled: 1126

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/20/2004	5863/21

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100919

Lab Number: 04100920
 Sample Description: SWMU 24 S Wall

Date Sampled: 10/12/2004
 Time Sampled: 1110

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/20/2004	5863/21

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100920

-Continued-

CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 4

Client: Koch Nitrogen

Continental Order No.: 97582

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
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Lab Number: 04100921
 Sample Description: SWMU 23 E Wall

Date Sampled: 10/12/2004
 Time Sampled: 1700

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	0.17	mg/L	10/20/2004	5863/23

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/19/2004	041019-1	MAG	6010B
TCLP Prep	10/18/2004	041018-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100921

Lab Number: 04100922
 Sample Description: SWMU 23 Floor

Date Sampled: 10/12/2004
 Time Sampled: 1710

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/21/2004	5863/23

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/20/2004	041020-2	MAG	6010B
TCLP Prep	10/20/2004	041020-2	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100922

Lab Number: 04100923
 Sample Description: SWMU 23 W Wall

Date Sampled: 10/13/2004
 Time Sampled: 0935

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	ND(0.10)	mg/L	10/21/2004	5863/23

-Continued-

CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

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Client: Koch Nitrogen

Continental Order No.: 97582

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP				
TCLP Prep				
ICP Metals TCLP Preparation Method				

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/20/2004	041020-2	MAG	6010B
TCLP Prep	10/19/2004	041019-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100923

Lab Number: 04100924
Sample Description: SWMU 23 S Wall

Date Sampled: 10/13/2004
Time Sampled: 0939

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	0.11	mg/L	10/21/2004	5863/23

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/20/2004	041020-2	MAG	6010B
TCLP Prep	10/19/2004	041019-1	CRD	1311
ICP Metals TCLP Preparation Method				3051

Conclusion of Lab Number: 04100924

Lab Number: 04100925
Sample Description: SWMU 23 N Wall

Date Sampled: 10/10/2004
Time Sampled: 2030

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
Chromium, TCLP	0.20	mg/L	10/21/2004	5863/23

<u>Analysis</u>	<u>Date Prepared</u>	<u>QC Batch</u>	<u>Analyst</u>	<u>Method(s)</u>
Chromium, TCLP	10/20/2004	041020-1	MAG	6010B
TCLP Prep	10/20/2004	041020-2	CRD	1311
ICP Metals TCLP Preparation Method				3051

-Continued-

CONTINENTAL ANALYTICAL SERVICES, INC.

LABORATORY REPORT

Page: 6

Client: Koch Nitrogen

Continental Order No.: 97583

<u>Analysis</u>	<u>Concentration</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Book/Page</u>
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Conclusion of Lab Number: 04100925

ND(), where noted, indicates none detected with the reporting limit in parentheses.

-Continued-



APPENDIX

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Client: Koch Nitrogen
Attn: Katrina Krier
P.O. Box 1337
Dodge City, KS 67801-1337

Date Sample Rptd: 10/21/2004
Date Sample Recd: 10/14/2004
Continental File No: 5731
Continental Order No: 97582

Data Qualifiers:

There were no data qualifiers for this Continental Order.

No analysis with a holding time of seventy-two hours or less was performed in this Continental order.

All samples were not received at the recommended temperature of less than 6 degrees Celsius.

-Conclusion of Laboratory Report-





525 N. 8th Street, Salina, KS 67401
 (785)827-1273 (800)535-3076 Fax (785)823-7830
 www.cas-lab.com

CHAIN OF CUSTODY RECORD

Continental Shipping Order Number: _____

Client/Reporting Information					Invoice Information					PARAMETERS/CONTAINER TYPE					COMMENTS
Company Name: Koch Nitrogen					Company Name: Koch Nitrogen										RUSH RESULTS BY 10-22-04
Address: P.O. Box 1337					Address: P.O. Box 1337										
City: Dodge City	State: KS	Zip: 67801-1337			City: Dodge City	State: KS	Zip: 67801-1337								
Contact: Katrina Krier		E-mail: kkrier@kochind.com			Contact: Katrina Krier		E-mail: kkrier@kochind.com								
Phone Number: (620)227-8631		Fax Number: (620)227-6016			Phone Number: (620)227-8631		Fax Number: (620)227-6016								
Sampler's Name (Printed): Katrina Krier			Sampler's Name (Signature): <i>Katrina Krier</i>		Purchase Order Number:					TCR-C					
Project Number:		Project Name: Weekly Disposal Well													
SAMPLE IDENTIFICATION (20 Characters or less)		Matrix (Sample Type)	Regulatory Program	Date Sampled	Time Sampled	Comps G-Gal	Total Containers	HCL	NaOH	HNOS	HERO	NONE	OTHER		
SWMU 24 East Wall				10-12-04	11:00AM	C								✓	
SWMU 24 N Wall				10-12-04	11:05AM	C								✓	
SWMU 04 Floor				10-12-04	11:20AM	C								✓	
SWMU 24 W Wall				10-12-04	11:21AM	C								✓	
SWMU 24 S. Wall				10-12-04	11:10AM	C								✓	
SWMU 23 E. Wall				10-12-04	5:00 PM	G								✓	
SWMU 23 Floor				10-12-04	5:10 PM	G								✓	
SWMU 23 W Wall				10-13-04	9:35 AM	G								✓	
SWMU 23 S Wall				10-13-04	9:31 AM	G								✓	
SWMU 23 N. Wall				10-10-04	8:30 PM	G								✓	
Regulatory Program: <u>N</u> -NPDES, <u>R</u> -RCRA, <u>D</u> -Drinking Water, <u>SL</u> -503 Sludge, <u>Q</u> -Other										(Please note if non-standard (unusual). Rush & Emergency subject to additional charge) Standard TAT: (15 working days) Rush TAT: (5 working days) Emergency TAT: (3 working days)					
Matrix (Sample Type): <u>DW</u> -Drinking Water, <u>GW</u> -Ground Water, <u>WW</u> -Waste Water, <u>W</u> -Wipe, <u>S</u> -Solid/Soil, <u>SL</u> -Sludge, <u>A</u> -Air, <u>OL</u> - Oil/Organic Liquid, <u>Q</u> -Other															
RELINQUISHED BY: <i>Katrina Krier</i>					DATE: 10-13-04	TIME:	RECEIVED BY:					DATE:	TIME:		
RELINQUISHED BY:					DATE:	TIME:	RECEIVED BY:					DATE:	TIME:		
RECEIVED AT LAB BY: <i>Paula Berman</i>					DATE: 10-14-04	TIME: 0910	SERPTED VIA:					SEAL #:			
							ARRILL:					SEAL DATE:			