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KOCH NITROGEN COMPANY

October 29, 2004

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 9814
Return Receipt Requested

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 9821
Return Receipt Requested

RE: Koch Nitrogen Company - Dodge City, Kansas
EPA ID No. KSD044625010
Quarterly Progress Report for Third Quarter 2004

To Whom It May Concern:

In accordance with Section C.13 of the Hazardous Waste Post-Closure Part II Permit, Koch Nitrogen Company submits this first Quarterly Progress Report. Future Quarterly Progress Reports will be submitted within thirty days following the end of each calendar quarter until such time that the activities pursuant to the corrective action provisions of the Part II Permit are complete.

If you have any questions, please contact AnnieLaurie Burke at (620) 227-8631 ext. 350.

Sincerely,

Larry Angell
Vice President

441584



RCRA RECORDS

Enc.: Quarterly Progress Report for Third Quarter 2004

cc: Everett Spellman, Kansas Department of Health and Environment, Bureau of Waste Management,
Topeka, Kansas
AnnieLaurie Burke, Environmental Excellence Leader, Koch Nitrogen Company, Dodge City, Kansas
Gary LeRock, Plant Manager, Koch Nitrogen Company, Dodge City, Kansas
Stephen B. Ellingson, Ph.D., Environmental Compliance Director, Koch Mineral Services,
Wichita, Kansas



KOCH NITROGEN COMPANY

**QUARTERLY PROGRESS REPORT
3RD QUARTER 2004**

**DODGE CITY NITROGEN PLANT
KOCH NITROGEN COMPANY**

EPA ID No. KSD044625010

OCTOBER 29, 2004

CERTIFICATION STATEMENT

In accordance with Section B.2.b and B.22 of Part II Permit, 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.

By: Larry Angell
Larry Angell
Vice President

LA

A description of the work completed (Part II Permit Section C.13.a):

The first Quarterly Progress Report is due the first quarter in which the Director requires the Permittee to begin corrective action activities pursuant to Part II of this permit. The permit was effective on July 27, 2004 and this first Quarterly Progress Report covers the activities that have been conducted since that date.

In this quarter, KNC has completed the following activities:

- Met with the Kansas Department of Health and Environment (KDHE) and the U.S. Environmental Protection Agency (EPA) to discuss the scope of the RCRA Facility Investigation (RFI) Work Plan (September 16, 2004).
- Submitted additional information regarding SWMUs 23, 24, 25, and 26 (September 27, 2004).

Summaries of all findings, including summaries of laboratory data (Part II Permit Section C.13.b):

There has been no investigation work conducted under the Part II Permit during this quarterly reporting period.

Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems (Part II Permit Section C.13.c):

There have been no problems or potential problems encountered during the reporting period and therefore no actions were taken to rectify any problems.

Projected work for the next quarter (Part II Permit Section C.13.d):

In the next quarter, KNC expects to conduct the following work under the Part II Permit:

- Submit the draft RFI Work Plan for agency review and approval pursuant to Section C.6.a of the Part II Permit.
- Submit a revised Closure Plan for the former Chromium Destruct Unit as part of the draft RFI Work Plan for expedited approval pursuant to Section C.6.a of the Part II Permit.

Any instances of noncompliance with Part II of this permit not otherwise required to be reported pursuant to Part II Permit Conditions B.18 (Part II Permit Section C.13.e):

To the extent that Section C.5.e of the Part II Permit includes requirements to continue implementation of the existing groundwater monitoring and recovery system, we report the Supplemental Information Submitted with Semi-Annual Groundwater Corrective Action Report, which was attached to the Semi-Annual Groundwater Report submitted to the U.S. Environmental Protection Agency by KNC by letter of September 1, 2004. There have been no other instances of permit noncompliance during this reporting period.