



KOCH NITROGEN COMPANY

CERTIFIED MAIL; RETURN RECEIPT REQUESTED:

December 9, 2004

Mr. Mostafa Kamal, P. E.,
Chief, Hazardous Waste Permits Section
Kansas Department of Health and Environment
Bureau of Waste Management
1000 SW Jackson St, Suite 320
Topeka, KS 66612-1366

Re: Fourth Quarter 2004 Groundwater Sampling Event Progress
Koch Nitrogen Company, Dodge City, Kansas, EPA ID #KSD044625010

Dear Mr. Kamal:

In a telephone conversation on December 1, 2004, Mr. Everett Spellman of your office and our Ms. Katrina Krier discussed the impact of adverse weather conditions on collecting all of the 2004 Fourth Quarter Groundwater Samples. This letter, per Mr. Spellman's request, serves as a written follow up to that conversation, in accordance with our permit condition I.F.

As Mr. Spellman and Ms. Krier discussed, the 2004 fourth quarter groundwater sampling event for the above referenced facility began the last week in October 2004. Water level gauging began the afternoon of October 25th, 2004 and was completed the 26th. Sampling began the 27th. All working wells have been sampled.

During the sampling event, it was noted that several of the wells would require repair before sampling would be possible. Some wells were repaired within 30 days and were subsequently sampled. However, adverse weather conditions made some other wells inaccessible before repairs could be completed. They remain to be sampled until weather conditions permit access to the wells.

The well repair contractor was on site October 28th, 2004 and completed the following repairs:

- Well 12: replaced pump and redeveloped well;
- Well 19: re-installed pump;
- Well 28: replaced pump;
- Well 93: replaced pump and redeveloped well. .

As Mr. Spellman and Ms. Krier discussed in their phone conversation on December 1st, four wells on the 4th quarter sampling list (Wells 08, 37, 49 and 68) have not yet been sampled because of mechanical problems that prevent sampling. Wells 08 and 37 appear to have pump problems. On well 68, the isolation valve broke off



below grade, and the well cannot be isolated from the system for sampling. The isolation valve is leaking through on 49, and the well cannot be isolated from the system. Despite our sincere efforts to make the needed repairs and sample the remaining wells, the periodic snowfall and rain without sufficient drying time in between the moisture events has not allowed the necessary access to the wells, which are, as you know, in remote locations.

On the 1st and 2nd of November we received only a trace amount of moisture which allowed sampling of the remaining working wells on the 3rd and the 4th. The week of the November 8th, we received rain. Since then, weather conditions have continued to impede access to the wells, preventing repair work and the subsequent sampling.

Historic weather data indicates rain, snow, or both, producing precipitation of equal to or greater than 0.05 inches on the following days in November 2004, the 10th, 13th, 16th, 17th, 20th, 26th, 28th and 29th. In addition, moisture events on the 1st, 2nd, 14th, 15th, 23rd, and 28th produced less than 0.05 inches of moisture each, but were indicative of conditions which did not allow the already saturated ground to dry sufficiently to allow repairs to be made.

After a couple of days of below freezing temperatures, we attempted to make repairs on the 30th. However, the wet ground had not completely frozen and due to surface conditions, the contractor's well pulling truck, along with the tractor that was used to try to pull out the truck, became stuck at well 37. Repair attempts have therefore been stalled until conditions can improve with sufficient drying time or with several consecutive days of below freezing temperatures, which would solidify the surface and make access possible.

We are planning to complete the repairs and sampling on these remaining wells as weather conditions allow. This weekend's moisture event has not helped to improve conditions to date. We will continue to update you as progress is made. If you have any questions or need additional information, please contact Ms. Krier or me at the number below.

In accordance with 40 CFR 270.11, 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,



Koch Nitrogen Company
Gary LeRock

cc: **US EPA Region 7, Attn: Chief, RCRA Corrective Action and Permits Branch**
Mr. Everett Spellman, KDHE
Mr. Stephen Ellingson, KMC Wichita
Ms. Katrina Krier, KNC Dodge City
Ms. AnnieLaurie Burke, KNC Dodge City

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