



KOCH NITROGEN COMPANY

April 29, 2005

*Via Federal Express*

Director  
RCRA Corrective Action & Permits Branch  
Air, RCRA and Toxics Division  
U.S. Environmental Protection Agency Region VII  
901 North Fifth Street  
Kansas City, Kansas 66101

RECEIVED  
MAY 03 2005  
ARTD/RCAP

**RE: Koch Nitrogen Company - Dodge City, Kansas  
EPA ID No. KSD044625010  
Quarterly Progress Report for First Quarter 2005**

To Whom It May Concern:

In accordance with Section C.13 of the above referenced Hazardous Waste Management Permit - Part II, Koch Nitrogen Company (KNC) hereby submits an original and one duplicate of a Quarterly Progress Report for the first quarter of 2005. In accordance with Section IV.E of the Hazardous Waste Management Facility Permit - Part I, the 2004 Annual Groundwater Corrective Action Report is submitted with this quarterly progress report.

As part of this quarterly report, KNC would like to emphasize its commitment to the review of the groundwater program. KNC requests an opportunity to meet with the agencies to discuss its proposed implementation of this program, and in particular to pursue its request for expedited approval of certain portions of the RCRA Facility Investigation Report as well as the RCRA Closure Plan.

We are enclosing two copies of a signature delegation form authorizing the Plant Manager of the Dodge City plant to sign various environmental documents, including this report.

If you have any questions about the attachments, please do not hesitate to contact AnnieLaurie Burke at (620) 227-8631, Ext. 350.

Sincerely,

Gary J. LeRock  
Plant Manager

Encs.: Two copies of Quarterly Progress Report, 1st Quarter 2005  
Two copies of Signature Delegation Form

cc: Andrea Stone, U.S. Environmental Protection Agency – Region VII, Kansas City, Kansas  
Kansas Department of Health and Environment, Bureau of Waste Management, Topeka, Kansas

455709



RCRA RECORDS

QUARTERLY PROGRESS REPORT  
1st QUARTER 2005

DODGE CITY NITROGEN PLANT  
KOCH NITROGEN COMPANY

EPA ID NO. KSD044625010

April 29, 2005

### CERTIFICATION STATEMENT

In accordance with Sections B.2.b and B.22 of the 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: *Gary J. LeRock*  
Gary J. LeRock

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

This Quarterly Report covers activities in the first quarter of 2005.

In this quarter, KNC has completed the following activities:

- Submitted 2004 Annual Groundwater Report on April 30, 2005 in accordance with Part I Permit provision IV.E.
- Continued discussions with holder of railroad right-of-way relating to connection of the Bogners to city water system. KNC provided final comments to BNSF regarding design of piping across railroad easement. Approval of railroad right-of-way needed prior to final approval of system and meetings with railroad to be scheduled for this purpose.

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

There has been no investigation work conducted under Part II of the 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 arising under the Part II Permit encountered during the reporting period, except as identified and described below.

**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 Part II of the permit:

- Meet with KDHE and EPA at a time selected by the agencies to review the draft RFI Work Plan and revised CDU Closure Plan. KNC would like approval of specific portions of those plans (i.e., Subtask 3.A – Hydrogeologic Investigation and Recovery Well Optimization and Task 4 – Benchscale Treatability Study) that will expedite the assessment of the groundwater program as soon as possible.

**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 the Part II Permit includes requirements to continue implementation of the existing groundwater monitoring and recovery system, supplemental information regarding potential instances of noncompliance are described in the attached “Supplemental Information submitted with the Annual Groundwater Corrective Action Report.”

**DELEGATION OF SIGNATURE AUTHORITY**

**Koch Nitrogen Company  
Dodge City Nitrogen Plant  
Dodge City, Kansas**

I, Larry Angell, Vice President - Operations of Koch Nitrogen Company, which is the owner of the Dodge City, Kansas Nitrogen Plant (the "Plant"), do hereby delegate to the person whom from time to time is designated with the title of Plant Manager of the Plant the authority to sign the following documents:

**1. Water Discharge Permit Applications, Reports and Submittals**

All (i) applications for NPDES or other wastewater discharge permits, (ii) reports required by any NPDES, Underground Injection Control or other wastewater discharge or disposal permits or regulatory requirements, and (iii) other information submittals requested by the appropriate water discharge or disposal regulatory authorities for the Plant. This delegation is intended to constitute a signature delegation under the provisions of 40 CFR Part 122, 40 CFR Part 144, KAR 28-16, KAR 28-46, and all other similar federal, state and local authorized signatory requirements applicable to wastewater discharge and disposal.

**2. Solid and Hazardous Waste Permit Applications, Reports And Submittals**

All (i) applications for solid or hazardous permits, (ii) reports required by any solid and hazardous waste permits or regulatory requirements, and (iii) other information submittals requested by the appropriate solid and hazardous waste regulatory authorities for the Plant. This delegation is intended to constitute a signature delegation under the provisions of 40 CFR Part 270, KAR 28-31, KAR 28-29, and all other similar federal, state and local authorized signatory requirements applicable to solid and hazardous waste.

**3. Air Permit Applications, Reports and Submittals**

All (i) applications for air permits, (ii) reports required by any air permits or air regulatory requirements, and (iii) other information submittals requested by appropriate air regulatory authorities for the Plant. This delegation is intended to constitute a signature delegation under the provisions of 40 CFR Parts 52 and 70, KAR 28-19, and all other similar federal, state and local authorized signatory requirements applicable to air emissions.

**4. Other Environmental Permit Applications, Reports and Submittals**

All (i) applications for other environmental permits not specifically addressed above, (ii) reports required by any other environmental regulatory requirements not specifically addressed above, and (iii) other information submittals requested by appropriate environmental regulatory authorities for the Plant. This delegation is intended to constitute a signature delegation under the provisions of applicable federal, state and local authorized signatory requirements for requirements that are not specifically addressed above.

~~ORIGINAL~~ *ky*

This delegation of signature authority supersedes all prior delegations for the Plant, and shall remain in effect during such time as Koch Nitrogen Company is the owner/operator of the Plant and until either replaced with a new delegation of signature authority or withdrawn.

**KOCH NITROGEN COMPANY**

By *Larry Angell*  
**Larry Angell**  
**Vice President - Operations**

11-2-04  
Date

**ORIGINAL** *K26*

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Dodge City, Kansas**

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**KOCH NITROGEN COMPANY**

By Larry Angell  
**Larry Angell**  
**Vice President - Operations**

11-2-04  
Date