



KOCH NITROGEN COMPANY

457278



RCRA RECORDS

**CERTIFIED MAIL; RETURN RECEIPT REQUESTED:**

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July 8, 2005

U.S. Environmental Protection Agency  
Region VII  
Air, RCRA, and Toxics Division  
901 North 5th Street  
Kansas City, KS 66101  
Attn: Ms. Andrea Stone

**Re: Spill of Recovered Groundwater Containing Chromium  
Koch Nitrogen Company, Dodge City Nitrogen Plant, Dodge City, Ford County, KS  
EPA I.D. No. KSD044625010**

Dear Ms. Stone:

By this letter, Koch Nitrogen Company (KNC), as the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas, is notifying EPA of a spill to soil of approximately 1000 gallons of recovered groundwater that occurred on June 24, 2005. Under its Part II Hazardous Waste Management Permit (the Permit), KNC operates a treatment system to address chromium contamination in groundwater.

KNC believes that the recovered groundwater contained 0.24 milligrams per liter (mg/L) or less of chromium, based on recent testing of other groundwater. The spill occurred due to an overflow of the electrochemical treatment-settling basin, which is normally filled by recovered groundwater that has been treated by the electrochemical reduction unit. On June 24, 2005, the treatment unit was temporarily shut down to mitigate the risk of damage to recovery system piping during installation of the Bogner's potable water line. As part of shutting down the treatment system, KNC attempted to shut down the recovery wells. However, the radio telemetry system did not work properly, and the wells continued to operate, causing the overflow. An area operator noticed the overflow and immediately took action to stop the release by putting the system in manual override and shutting down the recovery well system.

KNC notified Paul Belt of the Kansas Department of Health and Environment of the spill, in accordance with K.A.R. 28-48-2. KNC is also providing KDHE with a copy of this letter.

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ARTD/RCAP

While it is not clear if this type of release is reportable under Section C.4 of the Permit, KNC is submitting this letter as part of its efforts to keep EPA informed of KNC's activities under the Permit. Consistent with the requirements of Section B.2.d of the Permit, enclosed please find a duplicate copy of this letter.

If you have any questions or require additional information regarding these matters, please contact Katrina Krier at (620) 227-8631 ext. 120.

In accordance with Section B.2.b of the Permit and 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 J. LeRock  
Plant Manager

cc: Kansas Department of Health & Environment  
Bureau of Waste Management  
Hazardous Waste Permits Section  
1000 SW Jackson, Suite 320  
Topeka, KS 66612-1366

Stephen Ellingson, KMS  
Annie Burke, KNC  
Katrina Krier, KNC