



KOCH NITROGEN COMPANY

July 29, 2005

***Via Certified Mail No. 7004 11600006 4176 3695
Return Receipt Requested***

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

**RE: Koch Nitrogen Company – Dodge City, Kansas
EPA ID No. KSD044625010
Quarterly Progress Report for Second 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 second quarter of 2005.

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, 2nd Quarter 2005

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
Via Certified Mail, Return Receipt Requested

REC'D
AUG 01 2005
RESP

QUARTERLY PROGRESS REPORT
2ND QUARTER 2005

DODGE CITY NITROGEN PLAN
KOCH NITROGEN COMPANY

EPA ID NO. KSD044625010

JULY 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

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

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

In this quarter, KNC has completed the following activities:

- Submitted a revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) and Response to Comments on June 2, 2005 in response to agency comments dated April 27, 2005 received by KNC May 2, 2005.
- Completed on- and off-site construction work necessary to connect the Bogners to the city water system with the exception of work to be constructed on property for which an easement must be obtained. KNC continues to seek approval of the easement with the Burlington Northern and Santa Fe Railroad (BNSF) and the Land O'Lakes feed mill.

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 in this report.

On June 24, 2005, approximately 1,000 gallons of recovered groundwater was released as the result of an overflow of the recovery wells during installation of the Bogner's potable water line, as detailed in KNC's July 8, 2005 letter to the EPA. The spill was due to an overflow of the electrochemical treatment settling basin, which is normally filled by recovered groundwater that has been treated. At the time of the spill, the treatment system was temporarily shut down to prevent damage to recovery system piping during installation of the potable water line. Due to a failure in the radio telemetry system, the wells continued to pump, causing overflow. An operator immediately took action to stop the release by manually overriding the automatic control and shutting down the recovery well system.

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:

- Submit a revised RFI Work Plan and Response to Comments by August 1, 2005.
- Finalize agreements with BNSF and the feed mill and complete the Bogner water connection to Dodge City's supply.
- Conduct soil sampling in area of recovered groundwater release.

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 document.

**SUPPLEMENTAL INFORMATION
SUBMITTED WITH THE
SECOND QUARTERLY REPORT 2005
Koch Nitrogen Company
Dodge City, Kansas
EPA ID No. KSD044625010
July 29, 2005**

Pursuant to Section I.E. 14 of the Hazardous Waste Management Facility Permit, Part I (Part I Permit), Koch Nitrogen Company (KNC) is required to "report all other instances of noncompliance not otherwise required to be reported above in Sections Permit Conditions I.E.10 through I.E.13, at the time monitoring reports are submitted." This document is intended to provide information on deviations discovered in the second quarter 2005, as requested by Section I.E. 14 of the Part I permit.

In this document, KNC also provides a description of planned changes in operating and maintenance procedures to resolve any such issues, and schedule resolution dates. Our review continues and KNC may add to the information in this document.

1. **Private Wells.** Attachment D of the Part I Permit and the September 7, 2001 RCRA Groundwater Sampling and Analysis Plan (SAP) (page 4) identifies ten private wells that are to be sampled quarterly. The plumbing at the Coker well has been disconnected and was not sampled in the first or second quarter of 2005. KNC proposes to plug and abandon the Coker well as the Cokers have now been connected to the City of Dodge City water system.
2. **Screen Occlusion.** Section IV.D.3.d of the Part I Permit and SAP (page 13) provide that wells that occlude 10 percent or more will be redeveloped before the next sampling period. Well A-3B was determined to be occluded but was not redeveloped prior to the next sampling period because the well maintenance contractor indicated the well size (2-inch casing) precluded redevelopment. However, KNC continued to investigate options for redeveloping this well and had the well redeveloped using an air-lift technology on July 7, 2005.
3. **Nitrogen Laboratory Method.** Section I.E.9.a of the Part I Permit specifies that chemical analyses must be those specified in the U.S. Environmental Protection Agency (EPA) Publication SW-846. The SAP indicates that the method to be used for nitrate plus nitrite analysis will be EPA Method 353.2, which is not a method provided by SW-846. The use of alternate EPA approved methods was discussed in the September 16, 2004 meeting. KDHE and EPA indicated that any EPA approved methods would be acceptable and that KNC would not be limited to those methods in SW-846. Upcoming modifications to the Permit will clarify the acceptable use of these alternate methods.
4. **Nitrogen Species Measured.** Section I.E.9.a and Attachment D of the Part I Permit states that the Permittee shall determine the concentrations of "nitrate" throughout the compliance period and any extension due to corrective action implementation according to the schedule set out in the SAP. There is no reference to testing for "nitrite" in the Part I Permit. However, Attachment C of the Part I Permit specifies that the Ground Water Protection Standard (GWPS) will be nitrate plus nitrite as N (See Part I Permit Attachment C). Table 2.3 of the SAP specifies that the groundwater sampling parameters should include nitrate plus nitrite. KDHE

and EPA indicated during the September 16, 2004 meeting that analysis for nitrite plus nitrate nitrogen was acceptable. The discrepancy is due to a conflict between the permit condition and the SAP requirement. Upcoming modifications to the Permit will clarify that the species measured is to be nitrite plus nitrate nitrogen.

5. **Field/Laboratory Forms.** Section IV.C.3.b of the Part I Permit provides that the Permittee will comply with the Ground Water Monitoring Plan set out in the Part B Permit Application. The Ground Water Monitoring Plan in the Part B Permit Application states that the data will be reported on Field Sampling and Laboratory Results Data Sheets (see Section E, p. E-2). In some cases alternate forms containing the same information were used. KDHE and EPA indicated during the September 16, 2004 meeting that this use of alternate forms was acceptable. Upcoming modifications to the Permit will formalize the acceptability of alternate forms.
6. **Purge Water Management.** The SAP provides that water purged from the wells will be collected and disposed into the on-site injection wells or to the sink in the on-site laboratory. Well TW-79 is an off-site monitoring well that has in the past been used by the landowner for watering cattle. (SAP pages 15-26.) A generator is brought to the site for purposes of pumping this well. As of the second quarterly sampling event in 2005, the groundwater that is purged from this well for purposes of sampling is collected and brought back to the site for disposal as described in the SAP. As discussed during the September 16, 2004 meeting with KDHE and EPA, upcoming modifications to the Permit will clarify the management of this purge water.
7. **Recovery Well Operation.** Well TW-2 has been identified in the Part I Permit as a recovery well (Part I Table 1 IV.C.1.a and Attachment D). As agreed during the September 16, 2004 meeting with KDHE and EPA, Well TW-2 has insufficient water to pump and therefore cannot be operated as a recovery well. This issue was discussed during the September 16, 2004 meeting with KDHE and EPA and will be addressed in the application modification. The upcoming modifications to the Permit will designate Well TW-2 as part of the supplemental network rather than the recovery network.
8. **Alternate Field Meters.** The SAP in Section E, Appendix F of the Part B Permit Application provides that a multi-parameter water quality meter (MP20 Flow Cell) will be used during low-flow groundwater purging (See page 15). KNC has on occasion substituted equivalent equipment rendering the same quality of results. The use of alternate equivalent equipments was discussed with KDHE and EPA. Upcoming modifications to the Permit will formalized the acceptability of alternate equivalent equipment.