

**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
BUREAU OF WASTE MANAGEMENT  
MEMORANDUM**

**TO:** Koch Nitrogen Company Facility File

**THROUGH:** Kathy Dunn *KD*

**FROM:** Everett Spellman *ES*

**DATE:** September 2, 2005

**RE:** Meeting to discuss RFI work plan.

**ATTENDEES:** EPA – Art Spratlin, Don Toensing, Andrea Stone, Randy Rohrman  
KNC – Don Clay, Steve Ellingson, Gary LeRock, Annie Laurie Burke  
GeoSyntec Consultants – Tom Peel, Warren Brady  
KDHE – Mostafa Kamal, Kathy Dunn, Everett Spellman

On August 26, 2005, members of Koch Nitrogen Company (KNC), EPA, and KDHE met to discuss the RFI Field Sampling Plan KNC submitted on June 3, 2005. The meeting was in response to EPA's August 3, 2005 letter to KNC. Opening statements provided by Mr. Clay and Mr. Spratlin focused the meeting on resolving difference in project management and reaching an agreement to proceed with implementation of the work plan.

As an update, KNC informed EPA and KDHE that the railroad company recently granted permission to install the Bogner residence water line under the railroad south of the facility. KNC stated this connection would be completed in the next few weeks. KNC also stated data from past investigations and sampling events are being added to a GIS system that will be available for EPA and KDHE to download.

EPA identified specific concerns about the RFI Work Plan. These included the need for KNC to investigate the impact of past discharge of dilute contaminants into the wastewater ponds, investigate and remediate contaminated soils and groundwater resulting from the chromic acid spills and UAN tank leaks, and address off-site contamination.

One area of disagreement centered on the criteria used to delineate the extent of contamination. EPA expected KNC to delineate each SWMU and AOC to MCL values or the analytical method detection levels whereas Koch wanted to use a risk-based approach. To resolve their differences, Koch and EPA agreed to use chromium and nitrate background values as the remediation criteria for soil and groundwater contamination. Koch also agreed to delay the use of SPLP analysis until after the initial round of sampling.

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Following these discussions, the meeting focused on details of the investigation. KNC explained the proposed procedures to investigate the groundwater and particular SWMUs. KNC's intends to use the temporary sampling points as a means to assess groundwater conditions and to more accurately locate permanent monitoring wells. KNC also explained that details regarding the sample equipment and analytical methods were provided in the Tables of the Field Sampling Plan.

The meeting concluded with the understanding that KNC would submit revised pages based on the agreements from the meeting to facilitate approval of the RFI Work Plan. To promote open communication regarding the progress of the RFI investigation, KNC, EPA, and KDHE also agreed to hold scheduled meetings or conference calls and that KNC would regularly submit email progress reports.



## Sign In Sheet

for  
Technical Meeting  
between

U.S. Environmental Protection Agency, Region VII,  
Kansas Department of Health and Environment,  
and

Koch Nitrogen Company  
Friday, August 26, 2003

NAME	AGENCY/COMPANY	ADDRESS	PHONE #	E-MAIL
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Mostafa Kamal	KDHE	1000 SW Jackson Suite 320 Topeka, KS 66612	785-296-1609	mkkamal@kdhe.state.ks.us



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**Friday, August 26, 2003<sup>15</sup>**

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