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To AndreaR Stone/ARTD/R7/USEPA/US@EPA

cc Wray Rohrman/ARTD/R7/USEPA/US@EPA

bcc

Subject Koch Nitrogen Company, Dodge City KS Plant - Areas of agreement from meeting of 8/26/2005

Hello, Andrea,

I have been unable to get a message to your mailbox to let you know I will be sending out my notes on the areas of agreement from our meeting of August 26. Basically, the areas to be covered in the notes are summarized below. I will send an e-mail of the notes and follow up with a hard copy. Please let me know if you have any questions.

#### AREAS OF AGREEMENT:

- Work to expedite start of field work
- Use of informal frequent, communications
- Use of web-enabled tools for "real time" knowledge sharing.
- already a good volume of historical data, major issues well defined
- The chromic acid spill is the major issue, but SWMUs need further investigation.
- Nitrates a major issue, but there are other sources of nitrates
- EPA guidance documents and precedents from other projects will be useful
- no requirement to clean up levels beyond background.
- Contamination outside of a SWMU would not become part of the corrective action
- KNC would delineate to background for Cr and NO<sub>3</sub>
- KNC will develop an acceptable background determination methodology.
- KNC will also collect and analyze the soil samples described in Table I-2-3 (June 2004 Sampling and Analysis Plan).
- A calculated site-wide SPLP may be used
- In landfill areas, characterize the landfilled material
- The background will be the next outermost group of wells from the current "background wells"
- The "test hole" approach will be used as an optimization tool
- The gradient in the Dakota will be defined

#### AREAS NEEDING RESOLUTION

- Agreement needs to be reached on background values for chromium and nitrate and acceptable endpoints for other constituents.
- The handling of the investigation at the recent Andco release site

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