



KOCH NITROGEN COMPANY

October 26, 2005

***Via Certified Mail No. 7005 0390 0006 6702 0896
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 Third Quarter 2005**

Ladies/Gentlemen:

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 third 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, 3rd 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
Stephen B. Ellingson, KMS Wichita
AnnieLaurie Burke, KNC Dodge City

RECEIVED

OCT 31 2005
ARTD/RCAP

QUARTERLY PROGRESS REPORT
3RD QUARTER 2005

DODGE CITY NITROGEN PLAN
KOCH NITROGEN COMPANY

EPA ID NO. KSD044625010

OCTOBER 26, 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
Plant Manager

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

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

In this quarter, KNC has completed the following activities:

- Submitted the revised RFI Workplan on August 1.
- Met with representatives of EPA Region 7 and KDHE on August 26 to review progress on the revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) that was submitted during the second quarter.
- Completed all construction needed to connect the Bogners to the city water system, including integrity testing of the system and verification of water quality. City water service was made available as of noon on September 29.
- Received the comments, dated September 29th, from the EPA and KDHE on the Field Sampling Plan.

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.

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:

- Resolve remaining issues on the soil-sampling program and obtain EPA's approval to complete the soil sampling phase of the program.
- Initiate soil sampling.

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, recovery, and treatment system, supplemental information regarding potential instances of noncompliance are described in the attached document.

**SUPPLEMENTAL INFORMATION
SUBMITTED WITH THE
THIRD QUARTER REPORT 2005
Koch Nitrogen Company
Dodge City, Kansas
EPA ID No. KSD044625010
October 26, 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."

The following items are reported as deviations noted during the third quarter 2005, as requested by Section I.E. 14 of the Part I permit. All of these issues have been noted in previous reports, and, at the meeting of September 16, 2004, EPA and KDHE accepted the alternatives being currently used. Upcoming modifications to the Permit will clarify the acceptable use of these alternate methods.

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. As noted in the second quarter report, the plumbing at the Coker well has been disconnected and has not been sampled during 2005. KNC proposes to plug and abandon the Coker well, since the Cokers have been connected to the City of Dodge City water system since the fall of 2004.
2. **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 conflict between the permit condition and the SAP requirement is being resolved by the referenced permit modification.
3. **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.
4. **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.

5. **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.
6. **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.
7. **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 of SAP). Since that meter is no longer functional, KNC has substituted equivalent equipment rendering the same quality of results.

QUARTERLY PROGRESS REPORT
3RD QUARTER 2005

DODGE CITY NITROGEN PLAN
KOCH NITROGEN COMPANY

EPA ID NO. KSD044625010

OCTOBER 26, 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
Plant Manager

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

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

In this quarter, KNC has completed the following activities:

- Submitted the revised RFI Workplan on August 1.
- Met with representatives of EPA Region 7 and KDHE on August 26 to review progress on the revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) that was submitted during the second quarter.
- Completed all construction needed to connect the Boggers to the city water system, including integrity testing of the system and verification of water quality. City water service was made available as of noon on September 29.
- Received the comments, dated September 29th, from the EPA and KDHE on the Field Sampling Plan.

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.

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:

- Resolve remaining issues on the soil-sampling program and obtain EPA's approval to complete the soil sampling phase of the program.
- Initiate soil sampling.

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, recovery, and treatment system, supplemental information regarding potential instances of noncompliance are described in the attached document.

**SUPPLEMENTAL INFORMATION
SUBMITTED WITH THE
THIRD QUARTER REPORT 2005
Koch Nitrogen Company
Dodge City, Kansas
EPA ID No. KSD044625010
October 26, 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."

The following items are reported as deviations noted during the third quarter 2005, as requested by Section I.E. 14 of the Part I permit. All of these issues have been noted in previous reports, and, at the meeting of September 16, 2004, EPA and KDHE accepted the alternatives being currently used. Upcoming modifications to the Permit will clarify the acceptable use of these alternate methods.

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. As noted in the second quarter report, the plumbing at the Coker well has been disconnected and has not been sampled during 2005. KNC proposes to plug and abandon the Coker well, since the Cokers have been connected to the City of Dodge City water system since the fall of 2004.
2. **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 conflict between the permit condition and the SAP requirement is being resolved by the referenced permit modification.
3. **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.
4. **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.

5. **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.
6. **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.
7. **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 of SAP). Since that meter is no longer functional, KNC has substituted equivalent equipment rendering the same quality of results.