



KOCH NITROGEN COMPANY

CERTIFIED MAIL; RETURN RECEIPT REQUESTED:

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November 16, 2005

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



**Re: Damage to Piping at Station 3, Groundwater Recovery System
Koch Nitrogen Company, Dodge City Nitrogen Plant, Dodge City, Ford County, KS
EPA I.D. No. KSD044625010**

Dear Ms. Stone:

Under its Part II Hazardous Waste Management Permit (the Permit), Koch Nitrogen Company (KNC) the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas, operates a treatment system for recovered groundwater. This treatment system converts hexavalent chromium (Cr), which may be present in the groundwater as a result of historical operations at the Facility, into the trivalent form.

KNC is notifying the U.S. Environmental protection Agency (EPA) by this letter that on November 2, 2005, a section of piping that conveys recovered groundwater from Station 3 to the treatment unit developed a crack that allowed some leakage. This station is located in the NE central section of the recovery well system, and can include recovered water from wells TW-4, 7, 8, 9, 13, 18, 28, 65, 68, 71, 72, 82, 83, and 84. Based on conservative estimates, a maximum of 500 gallons of groundwater could have leaked through the crack before the line was removed from service and repaired. Based on the analysis of water taken during the repair process, the leakage could have contained a maximum total of 0.39 gram (0.0008 lb.) of chromium. The reportable quantity for chromium is 5000 pounds (2,270,000 grams).

On November 3 KNC notified Mr. Paul Belt of the Kansas Department of Health and Environment, in accordance with K.A.R. 28-48-2. Mr. Belt indicated that KDHE does not consider this incident a release because of the "de minimis" quantity. KNC also believes that this is not a release under

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Section C.4 of its Permit. However, we are submitting this letter to keep EPA informed of KNC's activities relating to the groundwater recovery and treatment system.

If you have any questions or require additional information regarding these matters, please contact AnnieLaurie Burke (620) 227-8631 ext. 350.

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
AnnieLaurie Burke, KNC