



KOCH NITROGEN COMPANY

January 27, 2006

**Via Certified Mail No. 7005 0390 0006 6702 1879**  
**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 Fourth Quarter 2005**

Ladies/Gentlemen:

In accordance with Section C.13 of the above referenced Permit, Koch Nitrogen Company (KNC) hereby submits the enclosed original and duplicate of the Quarterly Progress Report for the fourth quarter of 2005.

Please note under item 4 of this report (projected work for next quarter), that KNC received written approval for the project Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP) and Background Assessment Plan on January 26.

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

453839



RCRA RECORDS

cc: (via Certified Mail, return receipt requested)

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  
Bruce Ainsworth, KNC Dodge City  
AnnieLaurie Burke, KNC Dodge City

RECEIVED

JAN 30 2006  
ARTD/RCAP

QUARTERLY PROGRESS REPORT  
4<sup>TH</sup> QUARTER 2005

DODGE CITY NITROGEN PLAN  
KOCH NITROGEN COMPANY

EPA ID NO. KSD044625010

JANUARY 26, 2006

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JAN 30 2006

ARTD/RCAP

## 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 fourth quarter of 2005.

In this quarter, KNC has completed the following activities:

- Coordinated with EPA and KDHE to resolve remaining issues on the project Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP). Submitted the revised documents on December 20.

**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 field sampling program and obtain EPA's approval to complete the background determination sampling and the soil sampling phases of the program.
- Initiate background and 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  
FOURTH QUARTER REPORT 2005  
Koch Nitrogen Company  
Dodge City, Kansas  
EPA ID No. KSD044625010  
January 26, 2006**

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 fourth 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 will coordinate with the owner to discuss the plugging and abandonment of 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. **Recovery Well Operation.** Wells TW-2 and TW-79 have been identified in the Part I Permit as recovery wells (Part I Table 1 IV.C.1.a and Attachment D). As agreed during the September 16, 2004 meeting with KDHE and EPA, these wells are not used for recovery. Well TW-2 has insufficient water to pump and therefore cannot be operated as a recovery well. Well TW-79 was listed as a recovery well in error. It is located on private property and has never been part of the recovery system. The conflict between the permit condition and the use of these wells will be resolved by the above referenced permit modification.
6. **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.