



KOCH NITROGEN COMPANY

May 26, 2006

*Via Certified Mail No.
Return Receipt Requested*

7005 0390 0006 6702 1497

Mostafa Kamal, P.E.
Chief, Hazardous Waste Permits Section
Kansas Department of Health and Environment
Bureau of Waste Management
1000 SW Jackson St., Suite 320
Topeka, KS 66612-1366

469879



RCRA RECORDS

Re: Koch Nitrogen Company – Dodge City Facility
Post Closure Permit, EPA ID No. KSD 044625010
Operation of the Recovered Water Treatment System during Shutdown:

Dear Mr. Kamal:

Under its Part I 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 groundwater recovery system, and an associated treatment unit, for the recovered water. This system addresses hexavalent chromium and nitrates, which may be present in the groundwater as a result of historical operations at the Facility.

On May 9, 2006, an electrical storm caused massive equipment damage that caused a shut down of the Plant for an extended period of time. It is estimated this outage will continue until the week of May 29, 2006. In this letter, KNC is following up on initial telephone notification and subsequent discussions with KDHE to provide additional information about the impacts of the outage. In particular, the equipment damage required that a portion of the groundwater recovery system, and the associated treatment unit, be out of service intermittently during the period of May 15 through 17. During that time, KNC continuously operated both the UIC disposal wells and the portion of the groundwater recovery system that injects directly into these wells.

KNC does not believe that the intermittent operation caused any measurable migration of the contaminant plume, or any impact on human health or the environment. Lower groundwater levels within the plant boundaries produce a strong inward gradient preventing hexavalent chromium and

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nitrites from flowing off site. Intermittent, short duration shut downs of the pumping systems do not significantly alter the groundwater flow directions.

Two factors associated with the existing system – the design of the Plant's drinking water system and the use of the recovered groundwater – combined to interfere with management of the Plant's water balance during the shutdown. During normal operations, the Plant's large-volume water wells supply both the process water and the drinking water systems. The drinking water system branches off from the main water supply, and this water is conditioned to meet potable water standards. The drinking water system supplies water for the Plant's restrooms, kitchen areas, and safety devices (safety showers and eyewashes) to meet OSHA requirements. The potable water use within the Plant is a very small percentage of the Plant's total water needs.

During a Plant shutdown, the potable water supply must still be maintained in operation to ensure that the Plant has potable water. However, due to the rating of the supply well, it becomes necessary to throttle down the well flow, however, the volume delivered from the main water supply still far exceeds the Plant's water needs during a shut down.

During normal conditions, the recovered and treated water is re-used as process water in the Plant. During an outage, this is not possible. During the current outage KNC found it necessary, due to the inability to use the volumes of water within the process, to shut off the portion of the recovery system that flows to the Andco unit and the treatment unit intermittently as noted above.

As recently described to Mr. Spellman, KNC implemented immediate short term corrective actions to alleviate the water balance problem. The Plant's operators manually monitored and adjusted the system in an attempt to maintain the balance and maximize the injection of the excess water into the UIC wells.

Prior to the current outage, KNC was in the process of implementing a change to its water supply that would have a number of beneficial impacts at the plant, including presenting a long-term solution for the outage problem we have just experienced. This project involves obtaining the Plant's potable water supply from the City of Dodge City via the City's line that runs parallel to the Plant's boundary with US Highway 50. Connection to this public water supply will provide a potable water supply that is independent of the Plant's water wells and process water needs. KNC has continued its process of completing the transition to City water during this outage

KNC believes that the problem with operation of the recovered water system that we experienced during this outage is an isolated, temporary condition, and we do not expect a recurrence. The tie-in to the Dodge City water supply will eliminate the underlying problems in the existing system, as described above.

If you have any questions regarding this request or the attachments, please contact AnnieLaurie Burke, Environmental Compliance Leader, at (620) 227-8631, Ext. 350.

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. With the exception that certain information in the attachments

may not reflect modifications to the Permit previously requested by KNC, as described above, 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,



Gary J. LeRock
Plant Manager

Enclosures

cc:

certified mail, w/ encl:

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U.S. Environmental Protection Agency Region 7

Attn: Chief, RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division
901 N. 5th St.
Kansas City, Kansas 66101.

by regular mail, w/encl.

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