



KOCH NITROGEN COMPANY

**CERTIFIED MAIL; RETURN RECEIPT REQUESTED:**

7005 0390 0006 6702 1350

July 13, 2006

Ms. Andrea Stone  
U.S. Environmental Protection Agency  
Region VII  
Air, RCRA, and Toxics Division  
901 North 5th Street  
Kansas City, KS 66101 (2 copies)

469369



RCRA RECORDS

**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 groundwater collection and treatment system. This system collects groundwater from areas around the Plant and treats the groundwater to convert 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 July 7, 2006, a section of piping east of the Lime Pond, which conveys recovered groundwater from Station 3 to the treatment unit, sustained damage where the east leg of piping turns north parallel to the main north-south pipeline. This damage may be due to the settling of soils in the vicinity of the newly installed Bogner water line, although the exact cause of the damage has not yet been determined. This station is located in the NE central section of the recovery well system, and can include recovered water from wells on the northeast Crane property and the Dodge City Services property east of the Plant. Based on conservative estimates, a maximum of 1000 gallons of recovered groundwater could have leaked through a crack in the pipe before the leak was discovered and the line was removed from service. It is currently being repaired. Based on the analysis of water taken during the repair process, the leakage could have contained a maximum total of 0.7 gram (0.0016 lb.) of chromium. The reportable quantity for chromium under 40 CFR Part 302 is 5000 pounds (2,270,000 grams), well in excess of the maximum potential release.

Due to the small quantity of chromium involved, and the fact that the release consisted of unaltered groundwater, it is not clear whether this incident would constitute a release event required to be

RECEIVED

JUL 17 2006  
ARTD/RCAP

reported under Part II, Section C.4 of the KNC Permit. This section requires written notification of any release of hazardous waste or hazardous constituents identified during the course of groundwater monitoring within fifteen days after discovery. Please consider this letter to constitute a Section C.4 notification in the event EPA determines that the event is subject to this requirement.

By this letter, KNC is also notifying the Kansas Department of Health and Environment, in accordance with K.A.R. 28-48-2, of this occurrence. Based on their previous guidance, KDHE does not consider this incident to be a reportable release because of the *de minimis* quantity of chromium involved, and the fact that the substance released from the pipe was unaltered local groundwater that had just been removed from the ground.

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: Mr. Paul Belt  
Kansas Department of Health & Environment  
Bureau of Environmental Remediation  
1000 SW Jackson  
Topeka, KS 66612-1366

(by certified mail to:)  
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