



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

08 AUG 2006

Article No. 7004 2510 0006 9717 7147

Mr. Gary J. LeRock  
Plant Manager  
Koch Nitrogen Company  
P.O. Box 1337  
Dodge City, KS 67801-1337

Dear Mr. LeRock:

RE: Koch Nitrogen Company  
Dodge City, KS  
EPA I.D. #KSD044625010  
July 13, 2006, letter regarding Soil Sampling – Andco Overflow and Recovery Well Pipeline Fracture Sites and Sampling and Analysis Plan (SAP); and  
July 13, 2006, letter regarding Damage to Piping at Station 3, Groundwater Recovery System

The U.S. Environmental Protection Agency (EPA) Region VII is in receipt of KNC's above-referenced letters and SAP.

In accordance with C.3., and C.4. of the Part II of the Permit, KNC notified EPA July 13, 2006, of damage to piping at Station 3, east of the Lime Pond, which occurred on July 7, 2006. This resulted in a spill to soil of approximately 1,000 gallons of recovered (untreated) groundwater.

This spill is considered an "Area of Concern" (AOC) and will require investigation under the Part II portion of KNC's permit. In accordance with Permit Conditions C.3., and C.4., EPA is notifying KNC that a work plan is necessary to describe the investigation for this AOC. Please submit and include all information required in Permit Conditions C.3. and C.4. on this newly identified AOC/release.

As discussed with AnnieLaurie, of your staff, on July 28, 2006, this AOC/release could be included as an Addendum to the SAP submitted for the Andco Overflow and Recovery Well Pipeline Fracture. Please include all information necessary to investigate this recent AOC/release, such as sampling locations, number of samples, equipment used, etc.

In addition, the EPA has reviewed the above-referenced SAP and offers the following comments:

**Specific Comments:**

1. Page 2, Section 1.0 Introduction: This section describes the spills. Please include additional detail to the text regarding the spills such as: surface area of ground covered by spill, direction of flow from the spill, depth of the spills, etc. Was the area of the spill marked in some manner? How deep were the pipes that fractured? Was any soil excavated, etc.?
2. Page 2, Section 2.0 Andco Overflow, 2<sup>nd</sup> sentence: The sentence states, "KNC believes that the treated groundwater within the Andco clarifier basin contained 0.24 milligram per liter (mg/L) or less of chromium." Please explain how KNC arrived at this concentration.
3. Page 3, Pipe Fracture Leak, 3<sup>rd</sup> sentence: This sentence states that a water sample was collected during the release event. Please provide the sampling results.
4. Page 4, Table 2.1 Sample Locations: This table states that "composite samples" will be taken. EPA prefers that "grab samples" be taken. Please change the text to state that grab samples will be taken.

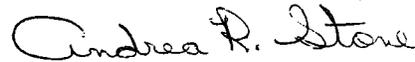
In addition, the number of samples collected is not adequate to determine if any contamination exists. The 1,000 gallon spill appears to cover a large area. Samples should be collected throughout the spill area. The sample depth is not appropriate either. Samples should be taken at several depths for both spill areas. The spill at the Andco area would have soaked in eventually, and the fractured pipe area where the pipe is buried is quite a few feet below ground surface (bgs). Taking samples at 0-6 inches is not appropriate for a pipe that is buried quite a few feet bgs. Samples should be taken at depth around and below where the pipe fractured. Please revise accordingly.

5. Page 4, Section 2.2 Sample Collection, 2<sup>nd</sup> paragraph: As stated above, EPA prefers grab samples instead of composite samples. In addition, four samples are not adequate for either spill area. Please revise accordingly.
6. Page 4, Section 2.4 Laboratory Sample Analyses: This section states that analysis for Chromium using the Synthetic Precipitation Leaching Procedure (SPLP) may be completed pending results of the total analysis for Chromium. Please change this sentence to state that KNC will analyze samples for *total* chromium and *total* nitrate plus nitrite as N. If KNC chooses to use SPLP, it may do so. Please revise accordingly.

7. Page 5, Section 4.0 Analysis and Reporting, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: This sentence states that, "The report will include an analysis and interpretation of the laboratory results and recommendations for further action, if needed." Please revise this sentence to state that the analytical results from the sampling event will be included in the report.
8. Figure No. 1: Please add a scale on this figure. Also, include approximate width, length, and depth (if known) of the spill area.
9. Figure No. 3: Please add a scale on this figure. Also, include approximate width, length, and depth (if known) of the spill area. Also, show the depth of the buried pipe from ground surface.

Please revise this SAP within fifteen (15) days of certified receipt. Since revision is necessary on the SAP, KNC should consider adding the newly identified AOC/release from the piping at Station 3 to this SAP. If KNC chooses to do this, and needs additional time to include this information, please send a written request for an extension of time to submit the revised SAP, to my attention. If you have any questions, please call me at (913) 551-7662 or toll-free at 1-800-223-0425, ext. 7662.

Sincerely,



Andrea R. Stone  
Environmental Scientist  
RCRA Corrective Action & Permits Branch  
Air, RCRA & Toxics Division

cc: Everett Spellman  
KDHE  
Kathy Dunn  
KDHE  
AnnieLaurie Burke  
KNC-Dodge City, KS