



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

11 SEP 2006

Article No. 7004 2510 0006 9718 9379

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

Dear Mr. LeRock:

RE: Approval, with comments, of Koch Nitrogen Company's (KNC's) Revised RCRA Facility Investigation Work Plan dated May 26, 2006.

The U.S. Environmental Protection Agency Region 7 (EPA) has received KNC's above-referenced document. Based on a review by EPA, and the Kansas Department of Health and Environment (KDHE), the EPA hereby approves this document with comments.

For every comment that states, "Please correct," please send in revised/replacement pages with the date of the revision on the page(s).

EPA offers the following comments.

KNC Responses dated May 26, 2006:

1. In KNC's response to Specific Comment #1, it states, "Comment noted. Table 6-1 of the first revision of the RFI WP dated August 1, 2005 and the attached RFI WP identify that both anion and anion..." EPA assumes that KNC intended to state "cation and anion."

In addition, in looking at Table 6-1, under "Site-Wide Activities," Cation and Anion Exchange Capacity (CAEC) is not listed. Instead, CAE is listed. Please correct Table 6-1 and throughout, if applicable.

2. In KNC's response to Specific Comment #2, second paragraph, it states, "Additional text has been inserted into the RFI Objective for "Site Wide Activities" in Table 6-1 to identify the importance of grain size data. The additional text reads, "Identify the optimum well construction requirements for new monitoring and/or recovery wells." In reviewing Table 6-1, this text has not been added. Please correct.

GENERAL COMMENTS on the REVISED RFI WP DATED MAY 26, 2006:

1. Throughout this document reference is made to Figures and Tables that are not included in this revised RFI Work Plan. For example, reference is made to Figures 2-1 through 2-8, 3-1 through 3-9, 3-12, 4-1, through 4-18, etc., but none of those figures are included. The only figures that are included are: Figures 3-10, 3-11, 4-19, 4-23, 4-29, 4-34, 6-1, and 6-2. Please correct.

Reference is also made to Tables 2-1, 3-1 through 3-3, 4-1 through 4-9, etc., but none of those tables are included. The only tables included are: Tables 6-1/I-2-1, 6-3, and 6-6. Please correct.

Send in all of the appropriate Figures and Tables that are referenced in the Revised RFI WP, when KNC submits the revised/replacement pages.

SPECIFIC COMMENTS on the REVISED RFI WP DATED MAY 26, 2006:

1. Section 1. Introduction, Page 1-1, third paragraph, second sentence: This sentence states, "The FSP and QAPP were revised and Revision 1.0 of these documents was approved by the EPA in a letter dated January 24, 2005." (*Emphasis added*). The correct date is January 24, 2006. Please correct.
2. Section 2.7 Environmental Indicators, Page 2-7: This paragraph discusses the Chaffin business; Coker residence and shop; and the Bogner residence. The information on the Bogners needs to be updated. The paragraph states that the Bogner residence is in the process of being connected to the City of Dodge City water supply, and they are currently supplied with bottled water. Please correct.
3. Section 4.1.3 SWMU 14 – Settling Basin By Chromium Treatment Building, Page 4-3, last paragraph, last sentence: This sentence states, "[AB note: should this not indicate that the spill area is being investigated independently of the RFI WP?]" It is assumed that this note should not have remained in the final version. Please correct. If KNC intends to add additional information to the text, it should do so in the revised/replacement pages.
4. Section 4.1.4 SWMU 15 – Equalization Tank, Page 4-4: The first paragraph describes the types of liquids that the tank holds. One is described as carbon filter backwash. What is this and where does it come from? Are the carbon filters tested? If so, please provide the results. How are they disposed? Please correct by providing additional information.

5. Section 4.1.7 SWMU 20 – Disposal Well No. 3, Page 4-5: In the second paragraph, reference is made to a “wastewater filter building.” Please correct by providing additional information on this building and the filters. Are the filters tested? If so, please provide the results. How are the filters disposed? How often are the filters changed, etc.?
6. Section 4.2.5 Former Chrome Destruct Unit and Neutralization Basins, Pages 4-17 & 4-18: On page 4-18, there are two paragraphs that mention that “soil in the inactive CDU was removed.” What was done with this soil? Was it tested? Was it disposed onsite, etc.? Please correct by including additional information to these paragraphs to explain how much soil was removed, what was done with the soil, was the soil tested, was the soil hazardous, if so, include results, etc.
7. Section 4.2.5.3 SWMU 24 – Neutralization Basin #2, Page 4-23, second paragraph: Reference is made to the, “cooling tower side stream filter.” Are the filters tested? If so, please provide the results. How are the filters disposed? How often are the filters changed, etc.? Please correct by providing additional information.
8. Sections 6.2.2.1 Pond SWMUs; and 6.2.2.2 Miscellaneous SWMUs, and Pages 6-4, and 6-5, respectively: Both of these sections state, “Characterization activities for the (insert name of SWMU) will consist of sampling and analysis of soil/settleable matter within the (insert name of SWMU) at the proscribed locations specified in the RFI Work Plan comments dated April 27, 2005.” Characterization activities will be done in accordance with the December 2005 Field Sampling Plan (FSP) and the Quality Assurance Project Plan (QAPP) approved by EPA in a letter dated January 24, 2006. Please correct.
9. Section 6.2.2.5 Lime Landfill Areas, Page 6-9, first paragraph: The last sentence states, “The proposed sampling program will entail the collection of the number of samples specified in the USEPA comments dated April 27, 2005 and revisions identified in Revision 1 of the FSP.” The proposed sampling program will be done in accordance with the December 2005 Field Sampling Plan (FSP) and the Quality Assurance Project Plan (QAPP) approved by EPA in a letter dated January 24, 2006. Please correct.
10. Table 6-1:
 - a. Please be consistent with the title in Table 6-1. Page 1 of 13 lists the title as Table 6-1; Pages 2-13 lists the title as Table I-2-1. Please correct.

- b. In Table 6-1/I-2-1, Table I-2-2 is referenced, but there is no such Table. EPA assumes the correct Table that should be referenced is Table 6-3. Please correct.
- c. In Table 6-1/I-2-1, the Headings for each column are not carried through on every page. Please correct.
- d. Table 6-1/I-2-1 references Tables I-2-3 through I-2-17; and Figures I-3-1; I-3-5; and I-3-6. There are no such Tables or Figures in this version. Please correct.

Please send in the revised/replacement pages no later than thirty (30) calendar days from certified receipt of this letter. If you have any questions regarding this approval letter with comments, please call me at 1-800-223-0425 ext. 7662 or direct at (913) 551-7662.

Sincerely,



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

cc: Everett Spellman
KDHE
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