



"Burke, Annie"
<BURKEA@KOCHIND.COM
>

05/03/2007 04:50 PM

To ESpellma@kdhe.state.ks.us

cc MKamal@kdhe.state.ks.us, stone.andrear@epa.gov

bcc

Subject RE: Koch Nitrogen Dodge City Turnaround

Everett,

Thank you for your prompt response. We will ensure that the water levels are monitored and will also put together a schedule for other monitoring based on the results of the optimization.

AnnieLaurie Burke, PE
Environmental Excellence Leader
KOCH Nitrogen Company
11559 US Highway 50
P.O. Box 1337
Dodge City, KS 67801
(620)227-8631 x350 (voice)
(620)227-6016 (fax)
(620)339-9024 (mobile)

-----Original Message-----

From: ESpellma@kdhe.state.ks.us [mailto:ESpellma@kdhe.state.ks.us]
Sent: Thursday, May 03, 2007 3:23 PM
To: Burke, Annie
Cc: MKamal@kdhe.state.ks.us; Stone.AndreaR@epamail.epa.gov
Subject: Re: Koch Nitrogen Dodge City Turnaround

AnnieLaurie,

According to Permit Condition I.E.11, Koch Nitrogen Company (KNC) is required to notify KDHE of any planned activities that may result in noncompliance with the permit. KDHE accepts your email message as fulfilling this notification requirement. Following the maintenance activities at the facility, please provide documentation identifying the duration and any consequences of the recovery system shut down. Also, KDHE encourages KNC to obtain static water level measurements and other information during this time interval to validate the optimization study KNC conducted in 2006.

Please contact me if you have questions.

Everett Spellman
Professional Geologist
Bureau of Waste Management
Kansas Department of Health & Environment
Phone: (785) 296-1616
Fax: (785) 296-1592

"Burke, Annie"

<BURKEA@KOCHIND.C

RCRA



531880

To OM> ESPELLMA@KDHE.STATE.KS.US
05/01/2007 06:15
cc PM
Subject Koch Nitrogen Dodge City
Turnaround

Everett,

I was unable to reach you today, but wanted to follow up with something I think we just discussed in passing when you were out here in April.

We are starting our turnaround, where the Plant will be shut down for about 4 weeks. We do this about every two years. This particular turnaround is going to cover more systems than normal. As you know, some of this equipment is old. Some has not undergone any inspection and repair in the past.

Koch's mechanical integrity program and equipment codes require inspection and testing of this equipment. The work will include:

- * Shutting down the wastewater system;
- * Cleaning out the entire wastewater system, including pumping out all of the tanks that are part of it
- * Sampling and disposal of the sludges;
- * Inspect and repair of the tankage, associated piping and other equipment.

This will require that most of the wastewater system be out of service during these operations. We will not be able to inject into the disposal wells during this period, and so would have to shut in the recovered water system. We anticipate this will take about 14 days total. After it is all done, those [arts of the system that have been cleaned, inspected and tested will be more reliable for future operations.

Is there anything that we need to put together for you to complete this work?

AnnieLaurie Burke, PE

Environmental Excellence Leader

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