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Subject RCRA Field Investigation Update 06/01/07

Special Project Announcement: Koch Industries awarded the Dodge City RCRA Project Team its 2007 Environmental, Health & Safety Excellence Award at the Company's Annual EH&S Conference in Atlanta, GA on May 17. This award was made to recognize the progress that the entire team – especially Andrea Stone and Randy Rohrman of EPA Region 7; Mostafa Kamal, Everett Spellman, and Kathy Dunn of KDHE; consultants GeoStat, GeoSyntec and Continental Analytical Services; Steve Ellingson of Koch Mineral Services; and KNC-Dodge City's staff – have made in addressing historical groundwater and related issues. KNC-Dodge City staff appreciates the support and input of our agency representatives and consultants in making this progress possible.

Work Completed from 4/1 – 5/31/07. On April 9 – 10, 2007, KNC conducted the 2nd Quarter groundwater sampling event. Mr. Everett Spellman visited the site to inspect the groundwater recovery and monitoring well system and the new RO treatment unit. Mr. Spellman and KNC staff discussed upgrades to well surface equipment that would be desirable. The update on this work is being submitted under separate cover to KDHE.

During the April sampling event, KNC found that the valve at Well TW-28 had begun to leak. KNC notified KDHE and EPA, and has amended the SAP for similar previous events, which had been approved on November 7, 2006. The revisions and amended text have been submitted separately to EPA and KDHE to address the investigation at TW-28.

KNC notified KDHE on May 1 that it would be necessary to shut down the groundwater recovery system for a period of time during its scheduled turnaround to allow for cleanout, testing, inspection and repairs on parts of the wastewater system. KNC monitored groundwater elevations during this outage. This work started on May 3, and was completed on May 18, at which time the wells were put back into service. The monitoring of the water levels showed no apparent impact of the shutdown. The Plant started to come back online early on May 29, and should be fully operational by June 4. The startup should not affect the operation of the wells.

The field team installed the first dedicated pump in the new Dakota Well, RG-07-03. This pump was placed in the shallower completion zone (approximately 260 feet bgs).

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The Sampling and Analysis Plan (SAP), which is incorporated into the Part I Permit, requires calibration in odd-numbered years of the bladder pumps associated with some of the monitoring wells in the recovery-monitoring well network. On May 24 – 25, 2007, KNC completed these calibrations. The results of the calibrations are being submitted under separate cover to KDHE.

Work Planned for June 2007: KNC plans to submit a RCRA Interim Measures Report during June 2007. This report will propose recommendations for major upgrades to the groundwater recovery and monitoring system, based on the results of the Optimization Study that was conducted between July 2006 and January 2007 under the temporary permit authorization issued by KDHE on July 14, 2007.

KNC will schedule the sampling and analysis of the affected area at TW-28 after the approval of the amended SAP is received.

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