



KOCH NITROGEN COMPANY

CERTIFIED MAIL; RETURN RECEIPT REQUESTED:

7007 0710 0003 4183 1990

February 1, 2008

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

RCAP-RECEIVED

FEB 05 2008



Re: SWMU 1 (South Pond)

Koch Nitrogen Company (KNC), Dodge City Nitrogen Plant, Dodge City, Ford County, KS
EPA I.D. No. KSD044625010
Historical Operations and Unit Boundaries with Recommended Additional Sampling Activity

Dear Ms. Stone:

Under its Hazardous Waste Management Permit (the Permit) and the approved Sampling and Analysis Plan (SAP) and RCRA Facility Investigation Work Plan (RFI WP), Koch Nitrogen Company (KNC), the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas, is conducting a field investigation of historical solid waste management units (SWMUs) at the Facility. The RFI WP identified sixteen SWMUs for further investigation under the SAP; SWMU 1, the South Pond, located at the west boundary of the Facility, is one of these 16 identified SWMUs.

KNC personnel recently realized that an old aerial photograph of the plant showed the use of the upper portion of SWMU 1 by the former plant owner extending further to the east than the recent SWMU 1 boundaries indicate. KNC had subsequent discussions with a retired employee, and learned that during the 1980s, the use of this area likely extended beyond the area that is currently included in SWMU 1. Part II, Section C.4, of the Permit requires that KNC notify the U.S. Environmental Protection Agency (EPA) of any releases of hazardous wastes or hazardous constituents identified during the course of the RFI WP investigation. While it is not clear that this information is reportable under Section C.4 of the Permit, we thought this was information that EPA would want to be aware of.

The recent information suggests that water from SWMU 1, which may have contained chromium compounds, was pumped to irrigate a series of planted terraces contained within a sloped area.

The terraces were designed to allow excess water from this irrigation operation to flow back to the pond. After Disposal Well 2 was installed in 1992, our investigation suggests that this operation was discontinued. Chromium compounds have been identified as a compound of interest (COI) for SWMU 1, and may have been present in the waters that were pumped to this area. According to records of the former owner in the facility files, the use of chromate corrosion-control compounds was discontinued in 1984.

Based on the historical photograph, it is estimated that the east boundary of the upper portion of the South Pond at that time was approximately 350 feet to the east of the boundary shown in more recent aerial photos. The estimated extent of SWMU 1 is shown on the attached Figure 1.

KNC previously sampled the western and part of the southern portions of this area during the Phase I sampling, and the results were submitted to EPA as part of the RFI Interim Status Report, dated August 10, 2007. KNC's additional Phase II sampling at SWMU 1, as described in the Phase II Work Plan which KNC just submitted on January 25, 2008, proposed sample locations that encompass to test the soils in the eastern and southern portions. Implementation of this portion of the Phase II Work Plan will allow for characterization of the impacts of this newly discovered use in the area, and KNC requests that EPA consider this element of the Phase II Work Plan for expedited implementation. Dodge City Community College (DCCC) would like to plant the area during the growing season in 2008. As the presence of nitrate in soils at this site has been demonstrated to be relatively small in relation to fields used for agriculture where there is routine agricultural application of nitrogenous fertilizers, nitrogen-bearing compounds from past plant activities are not considered to be an issue for planting.

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

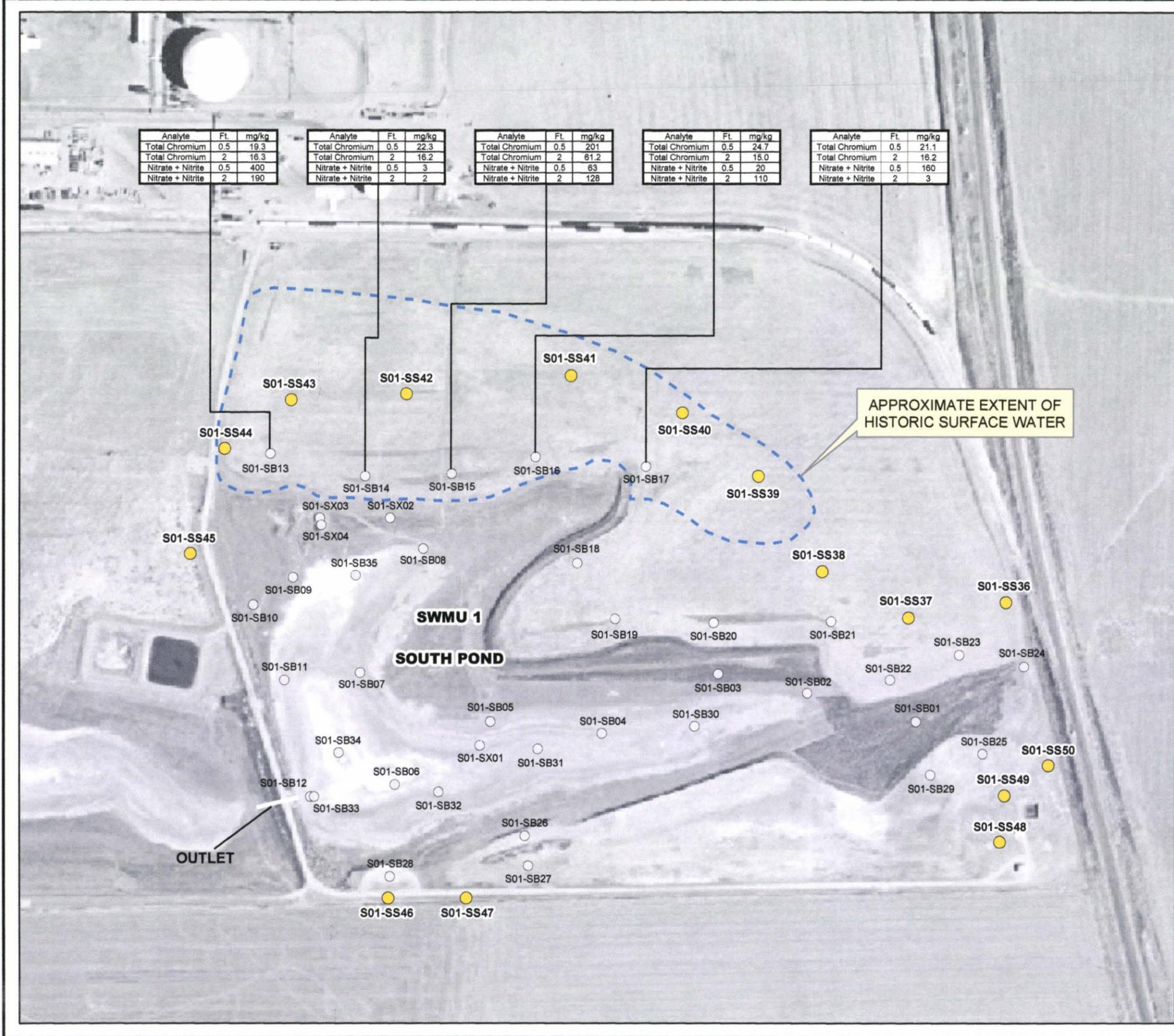
cc: CERTIFIED MAIL; RETURN RECEIPT REQUESTED

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Kansas Department of Health & Environment
Bureau of Waste Management
Hazardous Waste Permits Section
1000 SW Jackson, Suite 320
Topeka, KS 66612-1366

cc:

Hannah Valmont, KMS (electronic)
Cory Zellers, KNC Dodge City
AnnieLaurie Burke, KNC Dodge City



Analyte	Ft.	mg/kg
Total Chromium	0.5	19.3
Total Chromium	2	16.3
Nitrate + Nitrite	0.5	400
Nitrate + Nitrite	2	190

Analyte	Ft.	mg/kg
Total Chromium	0.5	22.3
Total Chromium	2	16.2
Nitrate + Nitrite	0.5	3
Nitrate + Nitrite	2	2

Analyte	Ft.	mg/kg
Total Chromium	0.5	201
Total Chromium	2	61.2
Nitrate + Nitrite	0.5	63
Nitrate + Nitrite	2	128

Analyte	Ft.	mg/kg
Total Chromium	0.5	24.7
Total Chromium	2	15.0
Nitrate + Nitrite	0.5	20
Nitrate + Nitrite	2	110

Analyte	Ft.	mg/kg
Total Chromium	0.5	21.1
Total Chromium	2	16.2
Nitrate + Nitrite	0.5	160
Nitrate + Nitrite	2	3

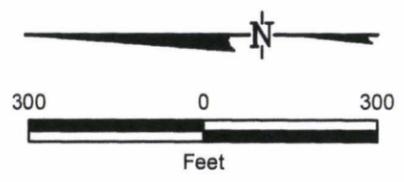
LEGEND

- LOCATION OF ADDITIONAL SOIL INVESTIGATION SAMPLE
- LOCATION OF PREVIOUSLY COMPLETED SOIL INVESTIGATION SAMPLE

NOTE:

DATA BOXES INDICATE SAMPLE DEPTHS BELOW GROUND SURFACE ALONG WITH TOTAL CHROMIUM AND NITRATE+NITRITE CONCENTRATIONS IN mg/kg.

APPROXIMATE EXTENT OF HISTORIC SURFACE WATER



**SWMU 1
APPROXIMATE EXTENT
OF EXPANDED SWMU 1
SURFACE WATER**

PREPARED BY: KOCH KOCH NITROGEN COMPANY 11558 US HIGHWAY 50 - P.O. BOX 1337 DODGE CITY, KS 67801	
PROJECT NO.	FIGURE NO. 1
DATE. FEBRUARY 2008	FILE NO.