



Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH
AND ENVIRONMENT

www.kdheks.gov

Division of Environment

October 21, 2008

Gary J. LeRock, Plant Manager
Koch Nitrogen Company
11559 US Highway 50
P. O. Box 1337
Dodge City, KS 67801-1337

RCAP-RECEIVED

OCT 28 2008

Re: Class 1 Permit Modification to Remove Recovery Well TW-18
Koch Nitrogen Company, Dodge City
EPA ID# KSD044625010

Dear Mr. LeRock:

The Kansas Department of Health and Environment (KDHE) received the above referenced Class 1 permit modification request submitted by Koch Nitrogen Company (KNC) on August 5, 2008. On October 14, 2008, KNC also submitted replacement pages identifying the proposed changes to the Permit, Part B Permit Application, and Sampling and Analysis Plan. This request, which requires KDHE approval prior to implementation, involves the removal of recovery well TW-18 from the groundwater recovery system due to irreparable well screen damage and proposes the incorporation of well TW-13 into the groundwater monitoring system as an additional monitoring well.

KDHE determined this change will not adversely impact the existing groundwater recovery system and therefore grants approval of this request. KDHE revised Part I of the Permit and incorporated the replacement pages submitted by KNC into the facility's Part B Permit Application on file at KDHE. Revised pages for the Permit are enclosed with this letter.

In accordance with 40 CFR 270.42, this Class 1 permit modification requires KNC to send notice of the modification to all persons on the facility mailing list within 90 calendar days after approval by KDHE. The notice must specify changes being made to the permit condition and supporting documents and must explain why the changes are necessary. KNC must also submit revised pages and an index of changes to each holder of the Part B permit application and Sampling and Analysis Plan.

If you have any questions or concerns about this letter, you may contact me at espellma@kdhe.state.ks.us or (785) 296-1616.

Sincerely,

Everett Spellman
Professional Geologist
Hazardous Waste Permitting Section

Enclosure – replacement pages for Part 1 of Permit

cc: **Andrea Stone** - USEPA/Region 7/ARTD/RCAP - w/enc.
Allen Guernsey - KDHE/DEA/SWDO/Waste Programs - w/enc.
Bill Bider - KDHE/BWM – w/o enc.

488243



RCRA

BUREAU OF WASTE MANAGEMENT
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE. 320, TOPEKA, KS 66612-1366
Voice 785-296-1600 Fax 785-296-8909 www.kdheks.gov/waste

the GWPS concentration limits shall be subject to corrective action pursuant to 40 CFR 264.100.

Based on current understanding of the hydrogeologic conditions at the Chromium Destruct Unit, the specified wells in Table 1 will serve as corrective action monitoring system at the locations specified on the map in Permit Attachment A and depicted in the Sampling and Analysis Plan (Section E, Appendix F) of the Part B Permit Application.

Table 1 - Corrective Action Monitoring System

Quarterly Monitoring Well Network
TW-5, TW-8, TW-11, <u>TW-13</u> , TW-16, TW-22, TW-23, TW-26, TW-28, TW-37, TW-39, TW-40, TW-52, TW-56, TW-63, TW-74, TW-76, TW-77, TW-78, TW-79, TW-80, TW-89, TW-93, A-3B, B-1, C-3B, Bogner, Buehne, Chaffin, Tawzer (formerly Cline), Coker, Conrardy, Farmland-Feed Mill, Lix, Kansas Byproducts, Maxwell
Semi-Annual Monitoring Well Network
TW-14, TW-19, TW-31, TW-38, TW-46, TW-49, TW-58, TW-68, TW-73, TW-84, TW-87, TW-91, TW-94
Supplemental Monitoring Well Network
TW-1A, TW-2, TW-4, TW-6, TW-7, TW-9, TW-10, TW-12, TW-13 , TW-15, TW-17, TW-18, TW-20, TW-21, TW-24, TW-25, TW-27, TW-29, TW-30, TW-36, TW-47, TW-48, TW-50, TW-51, TW-53, TW-54, TW-55, TW-57, TW-59, TW-60, TW-61, TW-62, TW-64, TW-65, TW-66, TW-67, TW-69, TW-70, TW-71, TW-72, TW-75, TW-81A, TW-82, TW-83, TW-85, TW-86, TW-88, TW-90, TW-92, CP-1, CP-2, CP-3, CP-4, CP-5, A-1, A-2, B-2, C-1, C-2, and any future well.

IV.B.5. Compliance Period

The compliance period for which the GWPS applies to the Chromium Destruct Unit shall be the number of years equal to the active life of the Chromium Destruct Unit [40 CFR 264.96]. The active life includes any waste management activities prior to permitting and the closure period. The active life of the Chromium Destruct Unit commenced in 1968 when the Chromium Destruct Unit was placed into operation and concluded when use of the Chromium Destruct Unit ceased in 1991. Therefore, the compliance period is no less than 23 years and began in 1991.

If the GWPS concentration limits are being exceeded at the end of the compliance period at or beyond the point of compliance, the Permittee's groundwater corrective action program shall continue until the Permittee complies with Permit Condition IV.F.

IV.B.6. Implementation of Corrective Action Program

The Permittee shall implement a corrective action program to ensure compliance with the GWPS. [40 CFR 264.100(d)]

IV.C. CORRECTIVE ACTION PROGRAM

The Chromium Destruct Unit, as defined in Permit Condition IV.A., is subject to the corrective action program requirements of 40 CFR 264.100, as incorporated by reference in K.A.R. 28-31-1, and this Permit until corrective action requirements contained in 40 CFR Part 264 Subpart F and this Permit have been satisfied. The corrective action program for the Chromium Destruct Unit shall consist of a program to ensure that groundwater quality will achieve compliance with the GWPS in a reasonable time period. This program shall consist of operation of the groundwater recovery and treatment system and installation/modification of the groundwater monitoring system in accordance with Permit Condition IV.D. The recovery system shall continue to operate until the GWPS established in Permit Condition IV.B. has not been exceeded for a period of three consecutive years at and beyond the point of compliance. [40 CFR 264.100 (c)]

IV.C.1. Groundwater Corrective Action System

IV.C.1.a. The corrective action system for the Chromium Destruct Unit shall consist of operation of the groundwater recovery and treatment system. This system consists of the recovery wells specified in Table 2, a RO unit, a 2.8 million gallon equalization tank, a 300,000 gallon wastewater tank, a filtration facility, and two Class I non-hazardous injection wells.

Table 2 - Groundwater Recovery Wells

Recovery Wells
TW-1A, TW-2, TW-4, TW-7, TW-8, TW-9, TW-10, TW-13, TW-14, TW-16, TW-17, TW-18 , TW-19, TW-20, TW-21, TW-23, TW-26, TW-27, TW-28, TW-29, TW-30, TW-31, <i>TW-36, TW-37, TW-38, TW-39, TW-40</i> , TW-46, TW-48, TW-49, <i>TW-50</i> , TW-51, TW-52, TW-53, TW-54, TW-55, TW-56, TW-57, TW-58, TW-64, TW-65, TW-66, TW-67, TW-68, TW-69, TW-70, TW-71, TW-72, TW-73, TW-74, TW-75, TW-76, TW-77, TW-78, <i>TW-79</i> , TW-82, TW-83, TW-84, TW-85, TW-86, TW-87, TW-88, TW-89, TW-90, TW-91, TW-92, TW-93, TW-94

All wells are pumped on a routine basis except italicized wells.

PERMIT ATTACHMENT D

Wells Installed at Koch Nitrogen Company Dodge City Facility *

Well Number	Well Function **					Constituents to Analyze	Sampling Method	Total Depth Measurements
	M	R	S	P	W			
TW-1A		X	X		X		Sampling Port	Five Year
TW-2		X	X		X		Sampling Port	Five Year
TW-4		X	X		X		Sampling Port	Five Year
TW-5	X				X	Cr / NO ₃	Low Flow Pump	Annual
TW-6			X		X		Portable	Annual
TW-7		X	X		X		Sampling Port	Five Year
TW-8	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-9		X	X		X		Sampling Port	Five Year
TW-10		X	X		X		Sampling Port	Five Year
TW-11	X				X	Cr / NO ₃	Low Flow Pump	Annual
TW-12			X		X		Portable	Annual
TW-13	X	X	X		X		Sampling Port	Five Year
TW-14	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-15			X		X		Low Flow Pump	Annual
TW-16	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-17		X	X		X		Sampling Port	Five Year
TW-18		X	X		X		Sampling Port	Five Year
TW-19	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-20		X	X		X		Sampling Port	Five Year
TW-21		X	X		X		Sampling Port	Five Year
TW-22	X				X	Cr / NO ₃	Low Flow Pump	Five Year
TW-23	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-24			X		X		Portable	Five Year
TW-25			X		X		Portable	Five Year
TW-26	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-27		X	X		X		Sampling Port	Five Year
TW-28	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-29		X	X		X		Sampling Port	Five Year

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TW-6			X		X		Portable	Annual
TW-7		X	X		X		Sampling Port	Five Year
TW-8	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-9		X	X		X		Sampling Port	Five Year
TW-10		X	X		X		Sampling Port	Five Year
TW-11	X				X	Cr / NO ₃	Low Flow Pump	Annual
TW-12			X		X		Portable	Annual
TW-13	X	X			X		Sampling Port	Five Year
TW-14	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-15			X		X		Low Flow Pump	Annual
TW-16	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-17		X	X		X		Sampling Port	Five Year
TW-19	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-20		X	X		X		Sampling Port	Five Year
TW-21		X	X		X		Sampling Port	Five Year
TW-22	X				X	Cr / NO ₃	Low Flow Pump	Five Year
TW-23	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-24			X		X		Portable	Five Year
TW-25			X		X		Portable	Five Year
TW-26	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-27		X	X		X		Sampling Port	Five Year
TW-28	X	X			X	Cr / NO ₃	Sampling Port	Five Year
TW-29		X	X		X		Sampling Port	Five Year