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RCRA



KOCH NITROGEN COMPANY

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November 20, 2008

Via First Class Mail

To: Addressee on Facility Mailing List

Re: RCRA Permit Temporary Authorization and Class 1 Modification
Koch Nitrogen Company - Dodge City Plant
EPA ID No. KSD044625010

Ladies/Gentlemen:

Koch Nitrogen Company (KNC) is the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas. KNC holds a RCRA Post Closure and Corrective Action Permit (the Permit) which governs the extraction and treatment of groundwater affected by historical operations at the Plant prior to its acquisition by KNC in 2003. We are sending you this letter to provide notice of (i) a temporary authorization and (ii) a Class 1 modification to the permit, both issued by the Kansas Department of Health and Environment (KDHE). You are a recipient of this notice because you are on the facility mailing list for the Permit as maintained by KDHE.

Temporary Authorization

The original groundwater treatment system was installed in 1992. KNC replaced the system's water purification unit with a more effective reverse-osmosis unit in early 2007. However, one of the original parts of the system, a concrete basin for the collection and equalization of the extracted groundwater, is in need of repair. KNC has requested and received from KDHE a temporary authorization to shut down the groundwater extraction system for no more than 15 calendar days to perform necessary maintenance and repairs, which will ensure the reliable and effective operation of this equipment in the future. During the shutdown period, KNC will monitor potential hydraulic and chemical changes in the groundwater near the Facility boundaries and in the area of private (residential) wells. At the end of the shutdown period, KNC will initiate the startup of the system gradually and continue appropriate monitoring of the upgraded system's performance.

Class 1 Modification

The groundwater extraction equipment that is used in the Plant's groundwater recovery system was originally installed by KNC's predecessor in 1981-82. Due to the age of this equipment and changes in the groundwater level, one of the wells, TW-18, on the extreme eastern terminus of the system, has experienced recurring malfunctions, including repeated pump and motor failures from sedimentation, and damage to the well screen. KNC has made several attempts to repair this well but has been unsuccessful in restoring it to full functionality. Test data from the wells in this area of the recovery

system have shown levels of chromium and nitrogen-bearing compounds below the EPA's drinking water standards (that is, results that are within the levels that EPA has deemed acceptable for public drinking water supplies). KNC has requested, and KDHE has approved, disconnecting the malfunctioning well, TW-18, from the recovery system and incorporating existing well TW-13 into the monitoring system. KNC will continue to maintain TW-18 for use as a monitoring well for purposes of making water level measurements.

If you have any questions about this information, please contact AnnieLaurie Burke, the Plant's Environmental Leader, at (620) 227-8631, ext. 350.

Sincerely,
KOCH NITROGEN COMPANY



Gary J. LeRock
Plant Manager

Cc: Tom Siegrist, KMS, Wichita, KS
AnnieLaurie Burke, KNC, Dodge City, KS
Cory Zellers, KNC, Dodge City, KS