



LEGAL DEPARTMENT

LAURIE CRICK SAHATJIAN
ASSOCIATE GENERAL COUNSEL
ENVIRONMENTAL HEALTH & SAFETY

December 12, 2008

Mostafa Kamal
Chief, Hazardous Waste Permits Section
Kansas Department of Health and Environment
1000 SW Jackson Street, Suite 320
Topeka, Kansas 66612-1366

Ms. Andrea Stone
Air, RCRA and Toxics Unit
U.S. EPA Region VII
901 North 5th Street
Kansas City, KS 66101

**Re: Request for Class I Administrative Change
Koch Nitrogen Company Dodge City Nitrogen Fertilizer Facility
EPA ID: KSD044625010**

Dear Mr. Kamal and Ms. Stone:

Please be advised that, as part of a corporate restructuring, effective December 31, 2008, Koch Nitrogen Company, a Nebraska corporation ("KNC"), will merge with and into its affiliate, Koch Nitrogen Company, LLC, a Delaware limited liability company ("KNCLLC"). KNCLLC will be the surviving entity. KNCLLC will be the successor to KNC and by operation of law will become the owner and obligor with respect to the assets and liabilities of KNC. As with KNC, 100% of KNCLLC will be owned directly by Koch Mineral Services, LLC.

Koch Nitrogen Company is currently the holder of the above-referenced RCRA permit. On behalf of Koch Nitrogen Company, I am submitting this as its written request for a Class I Administrative Change to the RCRA Permit, effective December 31, 2008, to reflect the name change from Koch Nitrogen Company to Koch Nitrogen Company, LLC.

Along with this request, KNC and KNCLLC will submit a completed Application for Solid Waste Permit Modification to KDHE. KNCLLC will also submit its Business Concern Disclosure Statement Form I to KDHE.



We appreciate the assistance of KDHE and EPA in helping Koch achieve this corporate restructuring by its target date of December 31, 2008. Should you need any additional information or have any questions, please do not hesitate to contact me or Jessica Merrigan of Lathrop & Gage at (816) 460-5706.

Very truly yours,

A handwritten signature in black ink, reading "Laurie C. Sahatjian". The signature is written in a cursive style with a large initial "L" and "S".

cc. Nancy Ulrich, KDHE Office of Counsel
Alex Chen, U.S. EPA Office of Regional Counsel
Jessica Merrigan, Lathrop & Gage