



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAY 26 2010

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8647 4667

Mr. Gary J. LeRock
Plant Manager
Koch Nitrogen Company
P.O. Box 1337
Dodge City, Kansas 67801-1337

RE: Approval with comments, of Koch Nitrogen Company's (KNC's) Addendum No. 3 to the Phase II RFI Work Plan dated March 31, 2010
Koch Nitrogen Company
Dodge City, KS
EPA RCRA ID No. KSD044625010

Dear Mr. LeRock:

The U.S. Environmental Protection Agency (EPA) Region 7 is in receipt of the above-referenced Addendum. Based on a review by EPA of the Addendum, the EPA hereby approves this document with comments.

Specific Comments:

1. **Section 3.0 Sample Collection and Analyses, First paragraph, Page 4:** This paragraph states, "The sample collection procedures for the work to be conducted under this Addendum will be in accordance with the approved RFI SAP and accompanying Quality Assurance Project Plan (QAPP), which have been prepared..." I checked the QAPP to verify the methods listed in the Addendum on page 5 and found that some methods were different. I also noticed that the QAPP was not signed by our QA personnel. I had a discussion with one of our QA personnel about this and the recommendation was given to update the QAPP. The QA program had reviewed the 2005 QAPP and had two critical comments on the document. When Koch submitted the revised QAPP, the sections that the critical comments referred to had been removed. In addition, QAPPs should be updated every five (5) years. Since the QAPP is five years old, this will be a good opportunity to not only update the analysis methods, but update the QAPP as a whole. Please update the QAPP for review and approval within thirty (30) days of certified receipt of this letter.

2. **Section 3.0 Sample Collection and Analyses, First paragraph, Page 5:** This paragraph lists the analysis methods for total chromium, hexavalent chromium nitrate and nitrite; and volatile organic compounds (VOCs). As stated above, I compared the analysis methods to the QAPP and I also checked with our Laboratory to verify the analysis methods. Some of the analysis methods listed on this page of the Addendum are different than the QAPP. For example: Method 6020 is listed for the Chromium analysis in the QAPP, but the Addendum lists 6010 B for total chromium analysis. The laboratory said that 6010 C is the recent version of this method. I also checked SW-846 and it only lists 6010 C for the analysis of total chromium. The QAPP also lists Method 353.2 for Nitrates/Nitrites, but the Addendum lists 300.0. Please verify the analysis methods for the other constituents (i.e., hexavalent chromium & VOCs) and update the QAPP and Addendum, as appropriate.

Please send in the revised QAPP and any replacement page(s) for the Addendum no later than thirty (30) calendar days from certified receipt of this letter. KNC may proceed with the investigation for the North Sanitary Lagoon. If you have any questions regarding this letter, please call me at 1-800-223-0425 ext. 7662 or direct at (913) 551-7662.

Sincerely,



Andrea R. Stone
Environmental Scientist
Air and Waste Management Division
RCRA Corrective Action & Permits Branch

cc: Everett Spellman, KDHE
Elise Stucky-Gregg, KNC-Dodge Office