

JUL 26 2010

K. KOCH

KOCH NITROGEN COMPANY LLC

July 22, 2010

UPS Tracking Number**1Z 693 661 03 9339 0672**

Everett Spellman
Professional Geologist
Hazardous Waste Permits Section
Kansas Department of Health and Environment
Bureau of Waste Management
1000 SW Jackson St., Suite 320
Topeka, KS 66612-1366

Re: Response to Comments for Part A Permit, EPA ID No. KSD 044625010
Revisions of the Part A for the Facility Contact Change
Koch Nitrogen Company, LLC – Dodge City Facility

Dear Mr. Spellman:

Koch Nitrogen Company, LLC (KNC) has received and considered your comments, provided by email on June 3, 2010, and is providing a revised Part A:

1. As you requested, we have placed a check mark in Item 3 of Box 10A on page 2 of the Regulated Waste Activity Form.
2. We have listed the Chrome Destruct Unit (CDU) on page 6 of the Hazardous Waste Permit Information Form using T04 (Other Treatment) as a process code, as instructed by KDHE on July 9, 2010 via email.

The CDU has been listed in the Part A under Process Code T02 (surface impoundment treatment) in previous Part A submissions. KDHE has advised us that the T04 process code better describes the current status of the CDU and should be used on the revised Part A.

We have attached the Part A pages with changes, page 2 of the Regulated Waste Activity Form and page 6 of the Hazardous Waste Permit Information Form.

Since the revision to the Part A is considered a Class I Modification under the KDHE rules, the property owners on the Facility Mailing List have been notified of the changes to the Part A. KNC

620.227.8631 Tel
620.227.6016 Fax

11559 U.S. Highway 50
P.O. Box 1337
Dodge City, Kansas 67801-1337



sent the Class I Modification Notification to the property owners on the Facility Mailing List on July 20, 2010.

Thank you for your assistance and guidance in the preparation of these documents. If you have any questions regarding this submittal, please contact Elise Stucky-Gregg, Environmental Leader, at (620) 227-8631, Ext. 350.

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,



Gary J. LeRock
Plant Manager

Enclosure: Revised Part A form pages 2 and 6

cc: **Via UPS, Tracking No.**
Mr. Mostafa Kamal
Chief-Hazardous Waste Permits Section
Bureau of Waste Management
Kansas Department of Health and Environment
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

1Z 693 661 03 9015 4665

Via UPS, Tracking No.
U.S. Environmental Protection Agency Region 7
Attn: Chief, RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division
901 N. 5th St.
Kansas City, Kansas 66101 [2 copies]

1Z 693 661 03 9098 5857

Tom Siegrist, Koch Fertilizer, Wichita, KS (electronic copy)
Cory Zellers, KNC Dodge City, KS
Elise Stucky-Gregg, KNC Dodge City, KS

	B. Name of Site's Operator: Koch Nitrogen Company, LLC	Date Became Operator (mm/dd/yyyy): 12/31/2008
	Operator Type: <input checked="" type="checkbox"/> Private • <input type="checkbox"/> County • <input type="checkbox"/> District • <input type="checkbox"/> Federal • <input type="checkbox"/> Indian • <input type="checkbox"/> Municipal • <input type="checkbox"/> State • <input type="checkbox"/> Other	

10. Type of Regulated Waste Activity (Mark the appropriate boxes for activities that apply to your site. See pages 7-11 of the instructions)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste (Choose only one of the following three classifications)

- a. EPA: 1,000 kg/mo (2,200 lbs in any single mo.) or more of non-acute hazardous waste, greater than 1 kg of acute hazardous waste;
or
- b. KSG Sub-Class 1: 100 kg or more and less than 1,000 kg (220 - 2,200 lbs in any single mo.) of non-acute hazardous waste;
or
- b. KSG Sub-Class 2: 25 kg or more and less than 100 kg (55 - 220 lbs in any single mo.) of non-acute hazardous waste;
or
- c. SQG: Less than 25 kg/mo (55 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities. (Mark all that apply)

- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, mark all that apply.

- 2. Transporter of Hazardous Waste
- 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- 6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to Kansas regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (Mark all boxes that apply):

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	•	•
b. Pesticides	•	•
c. Thermostats	•	•
d. Lamps	•	•
e. Other (specify) _____	•	•
f. Other (specify) _____	••	••
g. Other (specify) _____	•	•

• 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Mark all boxes that apply.)

1. Used Oil Transporter - Indicate Type(s) of Activity(ies)

- a. Transporter
- b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)

- a. Processor
- b. Re-refiner

• 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)

- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only						
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)											
X	1	S	0	2	5 3 3 . 7 8 8	G	0	0	1				
	1	T	0	4	. 0		0	0	1				
	2				.								
	3				.								
	4				.								
	5				.								
	6				.								
	7				.								
	8				.								
	9				.								
1	0				.								
1	1				.								
1	2				.								
1	3				.								

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 18 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)					
X	1	T	0	4	.		In-situ Vitrification
	1				.		
	2				.		
	3				.		
	4				.		