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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

OCT 04 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article Number: 7006 2760 0000 8646 2190

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

RE: Koch Nitrogen Company's (KNC's) June 25, 2010 Volume II: Quality Assurance Project Plan

Dear Mr. LeRock:

The U.S. Environmental Protection Agency Region 7 (EPA) is in receipt of KNC's June 25, 2010 Volume II: Quality Assurance Project Plan (QAPP). The EPA has reviewed this document and offers the enclosed comments from our Quality Assurance (QA) program.

Please revise the document in accordance with the enclosed comments within thirty (30) days of certified receipt of this letter.

If you have any questions regarding this letter, you may reach me at 1-800-223-0425, extension 7662 or direct at (913) 551-7662.

Sincerely,

Andrea R. Stone

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

Enclosure

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

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Enclosure

Quality Assurance Program Comments

The review of the subject document dated June 2010 and prepared by Geosyntec Consultants has been completed according to *"EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,"* EPA QA/R-5 March 2001. The document was also reviewed against the critical comments outlined in the previous QA review memo from 2005.

Because the document was unsigned, it was reviewed as a draft and the comments are outlined below. Critical comments identify issues which need to be addressed before the document can be approved. General comments identify opportunities for strengthening the document but do not affect approval.

As noted on page II-10 of the QAPP, much of the work described in the Phase II Work Plan has been completed. Because the QA Office could not confirm QA approval of the 2005 version, please be aware that approval of this QAPP will apply to future work only.

Critical Comments

1. Signature Page. When the document is ready for final approval, it will need to be submitted with the appropriate signatures.

General Comments

2. §II.1.4 Project/Task Description, page 10. Although the Background Characterization Work Plan is referenced and it may address when additional background soil levels would be assessed and where the samples would be located, this could not be verified at the time of the review because the Work Plan was not provided with the QAPP.

3. §II.2.9 (B9) Non-Direct Measurements, page 38. It is assumed that in this case, historical data that was generated under an approved QAPP and met the QA criteria will be considered acceptable for entry into the database and use as a baseline. If so, it would be useful for the QAPP to state this.

4. It was noted in a letter dated June 25, 2010 that most current version of method may not be used due to lower reporting limits being available with previous versions through an accredited laboratory. The affected methods appear to be 6010, 7196, 4500NO3F, and 8260. Is this correct?