KOCH

KOCH NITROGEN COMPANY LLC

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November 3, 2010

UPS Tracking # *1Z 693 661 03 9208 3363*
Chief - RCRA Corrective Action & Permits Branch
Air, RCRA and Toxic Division
U.S. Environmental Protection Agency – Region VII
901 North Fifth Street
Kansas City, Kansas 66101

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Andrea R. Stone
Environmental Scientist
RCRA Corrective Action & Permits Branch
Air, RCRA and Toxics Division
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901 North Fifth Street
Kansas City, Kansas 66101

UPS Tracking # *1Z 693 661 03 9046 3376*
Chief of the Hazardous Waste Permits Section
Bureau of Waste Management
Kansas Department of Health and Environment
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

RE: Response to EPA Comments Letter Dated October 4, 2010 on the Revised Volume II Quality Assurance Plan
Koch Nitrogen Company, LLC Dodge City, Kansas
EPA ID NO. KSD044625010

Dear Ms. Stone:

Enclosed are the replacement pages for the revised Volume II Quality Assurance Project Plan (QAPP) (Revision 2.0) for the Sampling and Analysis Plan for the RCRA Facility Investigation at the Koch Nitrogen Company, LLC (KNC) Dodge City Facility and a copy of the Background Assessment Work Plan December 2005. The replacement pages are in response to comments provided by the EPA in a letter dated October 4, 2010 that provided comments on the June 25, 2010 submittal of the revised

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RCRA

QAPP. The specific comments and KNC's responses are attached along with the replacement pages for the sections revised as provided in the responses.

Please call Elise Stucky-Gregg (620) 22708631 Ext. 350 if you have any questions or would like to schedule a meeting to discuss.

In accordance with Section B.22 of the Part II permit, 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 other 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

Gary J. LeRock
Plant Manager

Enclosures: Replacement Pages for the Sampling and Analysis Plan RCRA Facility Investigation: Volume II Quality Assurance Project Plan (Version 2.0)
Copy of Background Assessment Work Plan, December 2005

cc: Cory Zellers, KNC Dodge City Plant, Dodge City, Kansas (electronic)
Tom Siegrist, KF, Wichita, Kansas (electronic)

QUALITY ASSURANCE PROJECT PLAN
RCRA FACILITY INVESTIGATION
KOCH NITROGEN COMPANY, LLC
DODGE CITY, KANSAS

Approved by:

Elise M. Hurley-Gregg — 11/3/10

KNC Project Coordinator — Date

Gary J. LeRock — 11/3/10

KNC Plant Manager — Date

USEPA Project Manager — Date

USEPA QA Manager — Date

Source characterization and delineation of the specific constituents present at each SWMU/AOC will be accomplished through the collection and analysis of media from each SWMU/AOC. Table II-1-1 provides a summary of Phase II RFI Work Plan and Addendum #1, #2, and #3 work activities. The surface, subsurface, and deep soil samples will be analyzed for total and hexavalent chromium, nitrate, and nitrite with analyses of volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) for select SWMUs (SWMU#7 and SWMU#19). VOC analysis, in addition to total and hexavalent chromium, nitrate, and nitrite analyses will also be performed on soil samples from AOC #3. The borings and data needs for each SWMU/AOC are described in Table II-1-1. These sample results will be used to determine the nature and extent of constituents in soil. If the delineation is not completed initially, additional on- and off-site samples will be collected to complete the delineation.

To address naturally-occurring constituents (e.g., chromium and nitrate), KNC developed and submitted a Background Assessment Work Plan to the EPA and KDHE in December 2005 (KNC, 2005[5]). The results of the background study were provided to the EPA in a March 2006 report (KNC, 2006[6]). Additional assessment of background soil levels that may be required will be performed using the methodology described in the EPA and KDHE approved Background Assessment Work Plan (KNC, 2005).

Note that much of the field and laboratory analytical work described in the Phase II Work Plan and subsequent addendums has been completed. Table II-1-1 provides a summary of the work status for these SWMU/AOC assessments and identifies the laboratory analytical methods utilized. Upon approval of this QAPP, KNC will utilize the updated analytical procedures summarized in Table II-1-2 to complete specific constituent of interest delineation in each of these areas, as necessary. The Phase II RFI Work Plan (KNC, 2008a) provided a tiered approach for delineation in each area. Tier 1 sampling (described in Table II-1-1) consists of using the "step-out" approach to assess soil impacts in specific areas beginning in the areas most likely impacted. After completion of the Tier 1 sampling, KNC will revise the existing isoconcentration maps and create new isoconcentration contour maps for each SWMU and AOC. Based on these data, additional borings will be identified, if needed, to further delineate the horizontal and vertical extent of soil impacts during Tier 2.

[5] KNC. 2005. Background Assessment Work Plan. Submitted to the EPA and KDHE in December 2005.
[6] KNC.2006. Soil Background Assessment Report. Submitted to the EPA and KDHE in March 2006.

contractors being utilized for a field event are responsible for documenting the integrity of supplies used during the field event.

II.2.9 (B9) Non-Direct Measurements

Non-direct measurements consist of a broad range of data, mostly historical, that may include: site photos, aerial photographs, previous consultant reports, work plans, and historical laboratory data. Previous investigations have resulted in historical data for chromium, nitrate, and VOC data from soil and/or groundwater. These historical data are considered non-direct measurements and will be used as a baseline to better evaluate results obtained during the RFI.

II-2.10 (B10) Data Management

II-2.10.1 Field

All field personnel will typically log all field measurements, observations and field instrument calibrations in bound field notebooks, field sheets or electronic data logging instrumentation or equivalent. Entries will be legible and contain accurate and inclusive documentation of an individual's project activities. Data obtained with electronic data logging instrumentation will be printed off and hard copies retained in the project files. An example of field forms previously used during implementation of the RFI Work Plan (KNC, 2005) and field forms that may be utilized during Phase II activities are provided in Appendix II-B.

II-2.10.2 Laboratory

Each laboratory will perform in-house analytical data reduction and review of analyses under the direction of the laboratory's technical staff, QA Officer, and Project Manager for this project. These individuals are responsible for assessing data quality and advising KNC and its consultant of any data that may be rated "preliminary" or "unacceptable" or other notations that would caution the data user of possible unreliability. A case narrative prepared by the analytical laboratory assessing data quality will be submitted to the laboratory Project Manager or designee with every data package prior to transmittal to the client.

Data reduction, review and reporting by the laboratory will be conducted as follows:

Draft KNC Responses to EPA Comments

Critical Comments

EPA Comment #1 – Signature Page. When the Document is ready for final approval it will need to be submitted with the appropriate signatures.

KNC Response – Comment noted. Attached please find a signed copy of the QAPP Signature Page.

General Comments

EPA Comment #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.

KNC Response – Page II-10 of the QAPP has been revised to include the correct reference for this document, "Background Assessment Work Plan", which was submitted to the EPA and KDHE in December 2005. The QAPP replacement page and a copy of the Background Assessment Work Plan are attached for EPA reference.

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

KNC Response – To clarify the use of non-direct measurements, the text for this section has been revised to read, "Non-direct measurements consist of a broad range of data, mostly historical, that may include: site photos, aerial photographs, previous consultant reports, work plans, and historical laboratory data. Previous investigations have resulted in historical data for chromium, nitrate, and VOC data from soil and/or groundwater. These historical data are considered non-direct measurements and will be used as a baseline to better evaluate results obtained during the RFI." The replacement page of the QAPP documenting this change is attached.

EPA Comment #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?"

KNC Response - Yes, methods 6010, 7196, 4500NO3F, and 8260 are not the most recent versions of SW846 methods. Note that the reporting limits for these methods meet the data quality objectives outlined in the QAPP (Table II-I-3) and will be performed by a laboratory (Continental Analytical Services) certified by the KDHE NELAP program to perform these analyses.