



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

CERTIFIED MAILRETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8645 1637

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

RE: Response to EPA Comments Letter Dated October 4, 2010 on the Koch Nitrogen Company's (KNC's) November 3, 2010 Revised Volume II: Quality Assurance Project Plan

Dear Mr. LeRock:

The U.S. Environmental Protection Agency Region 7 (EPA) is in receipt of KNC's November 3, 2010 Revised Volume II: Quality Assurance Project Plan (QAPP). The EPA has reviewed the replacement pages for this document and offers the enclosed comments from our Quality Assurance (QA) program.

Please revise the document replacement pages in accordance with the enclosed comments within fifteen (15) days of certified receipt of this letter. Please ensure that the pages that are changed in response to the comments don't affect the pages before or after. If it does, please include the affected pages with the submittal.

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,

A handwritten signature in cursive script that reads "Andrea R. Stone".

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

Enclosure

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



Enclosure

Quality Assurance Program Comments

The review of the subject document prepared by Geosyntec Consultants, dated November 2010, has been completed according to *"EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,"* EPA QA/R-5 March 2001.

Critical comments identify issues which need to be addressed before the document can be approved.

Critical Comments

1. §II.2.9 (B9) Non-Direct Measurements, page 38.
 - a) The QAPP should state how the data are used as a "baseline to better evaluate results". What is meant by this statement?
 - b) The QAPP must state the limitations in using such data.
2. §II.1.4 Project/Task Description, page 10. Will additional background soil levels be assessed? What would indicate additional background soil levels should be assessed? Where would the samples be located in the areas previously identified in the work plan?