KOCH
KOCH NITROGEN COMPANY LLC

March 1, 2011

UPS Tracking #: ***1Z 693 661 03 9773 2410***

Chief, 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: Temporary Shutdown of Recovery Wells for Phase II RFI Work Plan: Groundwater Characterization Addendum Shallow Screen Determination
Koch Nitrogen Company, LLC – Dodge City Facility
Post Closure and Corrective Action Permit, EPA ID No. KSD 044625010

Dear Mr. Kamal:

As discussed by the Environmental Protection Agency (EPA) in its October 18, 2010 approval of the Phase II RFI Work Plan: Groundwater Characterization Addendum (Work Plan), Koch Nitrogen Company, LLC (KNC), as the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas, hereby submits a request for a temporary authorization from the Kansas Department of Health and Environment (KDHE) under Part I, Section IV.C.3 and IV.C.4 of its RCRA Post Closure and Corrective Action Permit (the Permit) to conduct a temporary shutdown of the wells within the recovery well network for a period of approximately 14 calendar days to allow KNC to perform testing as described in section 2.3 of the approved Work Plan. This testing will determine the ideal locations for the shallow screens of the well pair clusters that will be installed as described in the Work Plan.

Below is the applicable language from section 2.3 of the Work Plan:

2.3 Shallow Monitoring Well Screen Determination

As described in Section 3.1, the depth intervals for the shallow and deep monitoring well screens (proposed to be 5 feet in length) are defined as follows: 1) the shallow well screen will occupy an interval between five and ten feet below the water table during recovery well pumping conditions, and 2) the deep well screen will occupy an interval between five and ten feet above the top of bedrock. The shallow monitoring well screen intervals are of concern because of the regional trend of the water table

620.227.8631 Tel
620.227.6016 Fax

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

in the unconsolidated deposits. The reported regional trend indicates a two feet decline per year in the water table. At that rate the shallow monitoring wells may not have water in them after a period of time.

In support of determining the depths of the screened intervals for the new shallow monitoring wells a systematic study of pumping versus non-pumping water level conditions will be conducted. The study will involve turning off all of the recovery wells with measurement of water level changes in 10 select existing shallow monitoring wells (TW-10, TW-12, TW-24, TW-57, TW-60, TW-62, TW-71, TW-72, TW-80, and TW-85.) The EPA and KDHE will be notified in advance of the proposed system shutdown. Before turning the recovery wells off a round of water level measurements will be collected from the select wells mentioned above in addition to the monitoring wells normally used by the site for the construction of potentiometric maps (A-3B, B-1, C-3B, SIT-RG01, SIT-RG02, SIT-RG03, SIT-RG04, SIT-RG05, SIT-RG06, SIT-RG08, TW-05, TW-11, TW-12, TW-15, TW-22, TW-24, TW-25, TW-47, TW-59, TW-60, TW-61, TW-62, TW-63, TW-79, and TW-80.) These measurements will be used to establish the potentiometric surface under pumping conditions.

After the pumping wells have been turned off, water levels from the 10 select monitoring wells will be measured to track the rise and subsequent decline of water levels throughout the study. Water levels will be measured in the 10 select wells twice daily until the water level is considered stable. With the recovery wells turned off the water levels in the wells will begin to rise. The wells will be considered stable when the measured rise in water level does not exceed ten percent of the total rise in water level since the recovery wells were turned off. For instance, if the total water level rise occurring in well TW-72 was observed to be 10 feet over a 3 day period then the rise would have to be equal to or exceed one foot on the fourth day in order to continue the measurements. If the rise was less than one foot, the well would be considered sufficiently stabilized to static (non-pumping) conditions.

Once the 10 wells have stabilized a round of water levels measurements will be collected from monitoring wells normally used by the site for the construction of potentiometric maps. The pumping wells will then be placed back into operation.

The results of this testing will be provided to the EPA and KDHE with potentiometric surface maps for pumping and non-pumping conditions. These and other site data (estimated saturated thickness maps, boring logs that identify the depth to water during drilling, etc.) will be reviewed with EPA and KDHE to determine the screen interval for shallow monitoring wells at each of the proposed location. Upon EPA concurrence on the appropriate screen interval, the new shallow monitoring wells will be drilled and installed.

KNC would like to begin the testing the week of March 14th. If field conditions encountered during the work indicate that a longer shut down is necessary, KNC would immediately contact KDHE to discuss.

If you have any questions about this request, please do not hesitate to contact Elise Stucky-Gregg 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. With the exception that certain information in the attachments

may not reflect modifications to the Permit previously requested by KNC, as described above, 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

Gary J. LeRock
Plant Manager

Cc: *UPS Tracking #:* *1Z 693 661 03 9504 3025*
Chief of the 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 (2 copies)

Tom Siegrist, KF, Wichita (electronic copy)
Elise Stucky-Gregg, KNC Dodge City