

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Bureau of Waste Management

MEMORANDUM

TO: Koch Nitrogen Company, LLC Facility File
THROUGH: Mostafa Kamal *mk*
FROM: Everett Spellman *ES*
DATE: March 15, 2011
RE: Meeting to Discuss RFI Activities

On March 3, 2011, representatives of Koch Nitrogen Company, LLC (KNC), the Environmental Protection Agency (EPA), and the Kansas Department of Health and Environment (KDHE) met to discuss the field activities associated with the Phase II RFI Work Plan Addendum: Groundwater Characterization and the data presentation proposals for the final RFI report. The meeting agenda and attendance list are attached.

Representatives of KNC began the meeting by informing attendees that the well installation field activities are scheduled to begin in May, 2011. KNC also provided an update of the placement of Monitoring Wells MW-18 and MW-19. KNC noted that a proposed industrial park expansion project will require these two wells to be relocated, but the location cannot be finalized due to design changes to the park. Meeting participants agreed that these wells could be installed at a later time.

Next, discussions focused on the placement of the screen interval for the shallow wells. All attendees were concerned that the screen intervals of the shallow wells will be dry within a short duration if the water levels continued to decline at the current annual rate of one to two feet per year. All parties agreed that the shallow screen intervals will need to be determined based on field observations at the time of well installation. As part of this discussion, KDHE agreed to approve KNC's temporary authorization request to turn off the recovery well system to measure the natural groundwater flow of the aquifer which was submitted a week prior to the meeting.

The final discussion item was the presentation of field data in the final RFI report. KNC's consultants presented a large plot with multiple drawings depicting contamination at various depths. The discussion concluded with the agreement that the panel maps would be acceptable in the final RFI report.

The day after the meeting, I reviewed an article titled "*A Multilevel System for High-Resolution Monitoring in Rotasonic Boreholes*" by Beth L. Parker, John A. Cherry, and Benjamin J. Swanson. The article described the use of a multilevel monitoring system to monitor multiple portions of an aquifer within the same borehole. I provided KNC and EPA with a copy of the article for their consideration. The concepts described in the article are ideal for the activities proposed at the facility.

RCRA



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Meeting Outline and Discussion Items – 2011 Activities
Koch Nitrogen Company, LLC Dodge City
March 3, 2011

I. Monitor Well Cluster Installation

- A. Perimeter Well Cluster Bid Progress**
- B. Access Agreement Update/Change to Locations of MW-18 and MW-19**
(well_network.pdf)
- C. Shallow Well Screen Determination**
- D. Monitor Well Installation Field Work Schedule**

II. Phase II RFI Work Plan - Tier II Soils Work Plan

A. Objectives of the Tier II Soils Work Plan

- Overall Objective - Provide a scope of work to complete lateral and vertical soil delineation for site SWMUs and AOCs based on the data collected to date, including the recently completed Phase II – Tier 1 Sampling.
- KNC Additional Objectives – Present a Tier II Soils Work Plan that clearly identifies data gaps, proposed sampling locations, depths, and analytical requirements that can be reviewed, discussed, and approved in an efficient manner

B. Proposed Approach

- Segregating the Site into roughly 4 areas (Example draft data postings for deeper depths of the western portion of the site are provided in the attachment titled "Example Delineation Maps 2 28 11.pdf")
- Development of constituents-specific postings to describe analytical results (one color for concentrations below the standard and a different color for concentrations above the standard)
- Identification of lateral delineation data needs based on the individual data postings on a particular map (Example Delineation maps.pdf)
- Identification of vertical delineation data needs based on the maps as a whole (Example Delineation Maps.pdf)
- Compilation of the lateral and vertical data developed from the individual maps into a summary table (Delineation Summary.pdf)

C. Schedule

Sign-in Sheet

KNC/EPA/KDHE meeting

3/3/11

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