

Everett Spellman

From: Stucky-Gregg, Elise [StuckyGE@kochind.com]
Sent: Wednesday, March 23, 2011 10:18 AM
To: Stone.AndreaR@epamail.epa.gov; Rohrman.Wray@epamail.epa.gov; Everett Spellman; Mostafa Kamal
Cc: LeRock, Gary; Siegrist, Thomas; Zellers, Cory
Subject: Meeting Summary and Presentation Copy for the March 3, 2011 Meeting with Region 7 EPA, KDHE, and ~~Koch Nitrogen Company, LLC Dodge City~~
Attachments: KNC Dodge City March 3 2011 Meeting Summary.PDF; EPA and KDHE Presentation 3 2 11.pdf

Attached is the meeting summary and presentation slides that we agreed to provide during the March 3, 2011 meeting. Let me know if you have any questions.

Thank you

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RCRA



531866

Meeting Summary

Koch Nitrogen Company, LLC Meeting with Region VII EPA and KDHE on March 3, 2011
Region VII EPA Headquarters
Kansas City, Kansas

Attendees:	Andrea Stone	R7 U.S. EPA
	Mostafa Kamal	KDHE/BWM
	Everett Spellman	KDHE/BWM
	Cory Zellers	KNC
	Warren Brady	Geosyntec Consultants
	Tom Peel	Geosyntec Consultants
	Gary LeRock	KNC
	Elise Stucky-Gregg	KNC
	Randy Rohrman	R7 U.S. EPA

Meeting began at 09:00 hours on March 3, 2011 with introductions and preliminary conversation about the meeting outline and the purpose of the meeting: which is to provide an update on activities with the RCRA project at the KNC Dodge City facility and to discuss the best methodology for presenting the data for the Phase II RFI Work Plan Tier II Soils Plan proposal.

The discussion began with Warren Brady, Geosyntec Consultants, providing an update on the monitoring well cluster installation, which was approved in October 2010 with the Groundwater Characterization Addendum to the Phase II RFI Work Plan.

- The contractor bids for the perimeter well installations have been received and KNC is reviewing the bid packages for selection.
- The access agreements with neighboring property owners are in place with the exception of the business development park to the west of the facility (the locations of MW-18 and MW-19). The DC/Ford County Development Corporation has requested moving the proposed well locations to fit better with projected development of the property. The proposed locations will be reviewed by R7 EPA to verify whether the proposed locations will provide the data needed.
- For the shallow well screen determinations per the approved Groundwater Characterization Addendum, KNC has submitted to KDHE a request for temporary authorization to shut off the recovery well system for the purpose of establishing the static water level within the aquifer. Everett Spellman, KDHE, expressed concern about the approved methodology to determine the placement of the well screens for the shallow wells. In Everett's opinion there should be a greater emphasis on water levels in aquifer while the system is operating rather than when the system is down. He was concerned that if the screen is placed in the shallow well 5 feet below the static non pumping level, the shallow well may be dry when the system is operating. His other concern was regarding the decline in water level within the aquifer over the past decade or so which averages one foot per year. Agreement was reached for KNC to communicate with EPA and KDHE as screening issues are identified during well installation. As stated in Section 3.1, bullet 1, of the Groundwater Characterization Addendum to the Phase II Work Plan, it was agreed that at some locations

it may not be necessary to install both a shallow and deep monitoring well and the suitability for the well clusters will have to be determined in the field based on the geology encountered. KNC agreed to provide the boring logs for nearby wells in the memo that provides the recommendations for the shallow screen intervals. The static level determinations are planned for March 14, 2011 through March 25, 2011.

- R7 EPA indicated that it would be sufficient to only log the deep wells at each well cluster as stated in Section 3.2 of the Groundwater Characterization Addendum to the Phase II Work Plan.
- The field work schedule for the perimeter monitoring well installations was provided with discussion about the aggressiveness of the schedule recognizing the objective to complete the perimeter well installations during the summer 2011. Given the projected start date of May 2, 2011 and the anticipated 45 – 60 days (estimated from drillers bids) to completion with minimal delays, KNC requested EPA and KDHE to work with KNC on finalizing the shallow well screen determinations in a timely manner.

The next part of the discussion was the proposed methodology for presenting data for the Tier II Soils Work Plan for the Phase II RFI work plan. Prior to the meeting, KNC provided example figures and a summary table to present a method of depicting data from the Tier I soil sampling for the SWMUs and AOCs in the western portion of the facility. The example constituent used on the figures was total chromium. The locations where the data indicated additional delineation may be needed were included on the figures and provided on the example summary table. To facilitate discussion, KNC provided an example E sized figure of the proposed layout.

Warren Brady began the discussion with a brief overview of the data depiction methodology and the reasoning for grouping the SWMUs and AOCs. Randy Rohrman added the information that from the perspective of R7 EPA, the chromium species with the highest risk is hexavalent chromium. Trivalent chromium is a much lower risk species. From Randy's recommendation, it was agreed that instead of delineating to background levels at this phase of the project we should be delineating to the Regional Screening Levels for Trivalent and Hexavalent Chromium as determined by EPA Regions 3, 6, and 9. KNC will do the same with KDHE Risk Based Standards for Nitrate.

It was agreed that the Tier II Work Plan would be a simple document that focused on identifying sample locations, depths, and analysis. The short text section would reference the field and analytical procedures outlined in the RFI Work Plan and other documents with a short description of the methodology for sample locations and depth. The remainder of the work plan would consist of figures and a table that summarize the proposed sampling locations and analysis.

The meeting was adjourned.

2011 Path Forward KNC Dodge City Facility



Proposed Major Activities - 2011

- **Well Cluster Installation**
 - **Drilling Contractor Procurement**
 - **Shallow Well Screen Determination**
 - **Well Cluster Field Work**

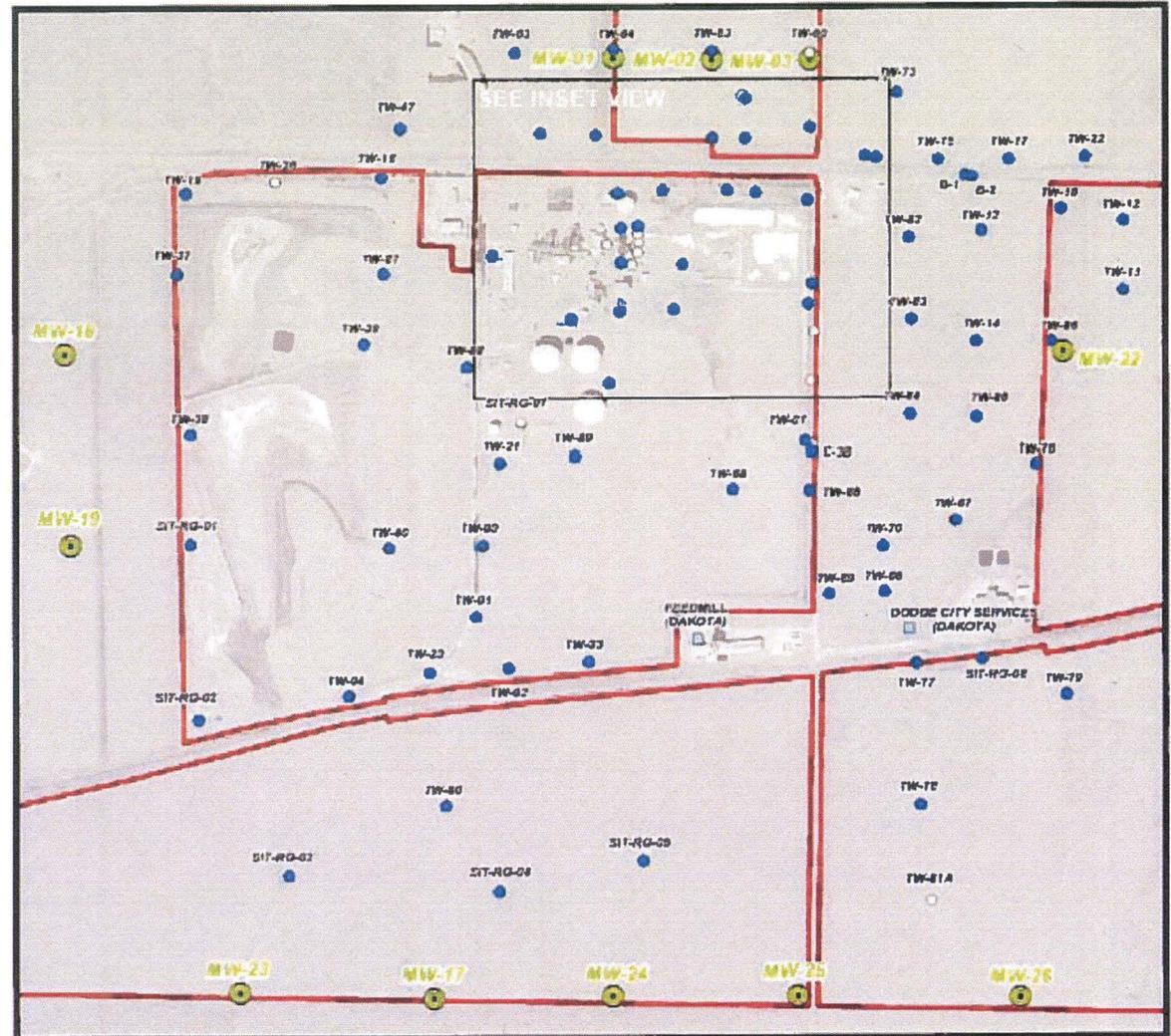
- **Soil Assessment**
 - **Work Plan**
 - **Initial Activities**

Well Cluster Installation – Shallow Well Screen Determination

- Group 1 and 2 Wells H₂O Levels – Baseline (3/14/11)
 - System Shut Down (3/16/11)
 - Group 2 H₂O Levels (3/16/11 Until Stable)
 - Group 1 and 2 Wells H₂O Levels
 - System Turn On
 - Submission of memo to EPA and KDHE (2 weeks after field completion)
 - Request EPA and KDHE concurrence on shallow well screen depths prior to mobilization of drilling contractor (5/2/11)
- Group 1 Wells
 - A-3B, B-1, C-3B, SIT-RG01, SIT-RG02, SIT-RG03, SIT-RG04, SIT-RG05, 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-63, TW-79, and TW-80
 - Group 2 Wells
 - TW-10, TW-12, TW-24, TW-57, TW-60, TW-62, TW-71, TW-72, TW-80, and TW-85

Well Cluster Installation - Well Cluster Field Work

- Tentatively Scheduled to Begin 5/2/11
- Drilling estimated to require between 30 and 65 days to complete
- Groundwater sampling & analysis from all wells after completion of drilling and well development
- Access obtained for all but 2 wells (MW-18 and MW-19)



Well Cluster Installation - Well Cluster Field Work

- Verbal approval for access to MW-18 and MW-19 based on revised locations

LEGEND

- KNC MONITORING WELL
- KNC WELL NOT IN USE
- PRIVATE WELL
- ▲ PROPOSED KNC WELL
- ⊕ NEW/OLD LOCATION OF PROPOSED WELL
- NEW LOCATION OF PROPOSED WELL



Tier II Soils Work Plan

- **Objective: Provide a plan for completing lateral and vertical soil delineation**

- **Deliverable Schedule**
 - **Dependent on level of detail required by EPA and KDHE to approve the proposed plan to complete the delineation**

Tier II Soils Work Plan – Figure Considerations

- **SWMU and AOC-Specific Maps – Phase II RFI Work Plan**
 - 120 individual 11 X 17 maps
 - Chromium and Nitrate (2 constituents)

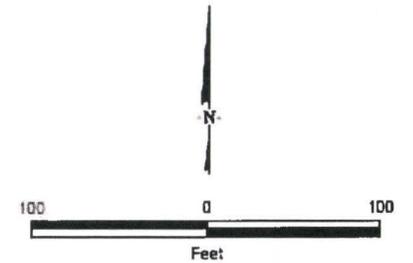


LEGEND

- SWMU 17 SOIL SAMPLE WHERE TOTAL CHROMIUM DETECTION DID NOT EXCEED 20.1 mg/kg
- SOIL SAMPLE FROM AN INVESTIGATION AREA NEAR SWMU 17

NOTES:

1. ALL SAMPLES COLLECTED FROM 18-20 FT DEPTH.
2. TOTAL CHROMIUM CONCENTRATIONS (mg/kg) ARE POSTED BELOW SAMPLE IDs AT EACH SAMPLE LOCATION.



**SWMU 17
EAST LIME SLUDGE LANDFILL
SOIL INVESTIGATION - TOTAL
CHROMIUM CONCENTRATIONS
AT 18-20 FT DEPTH**



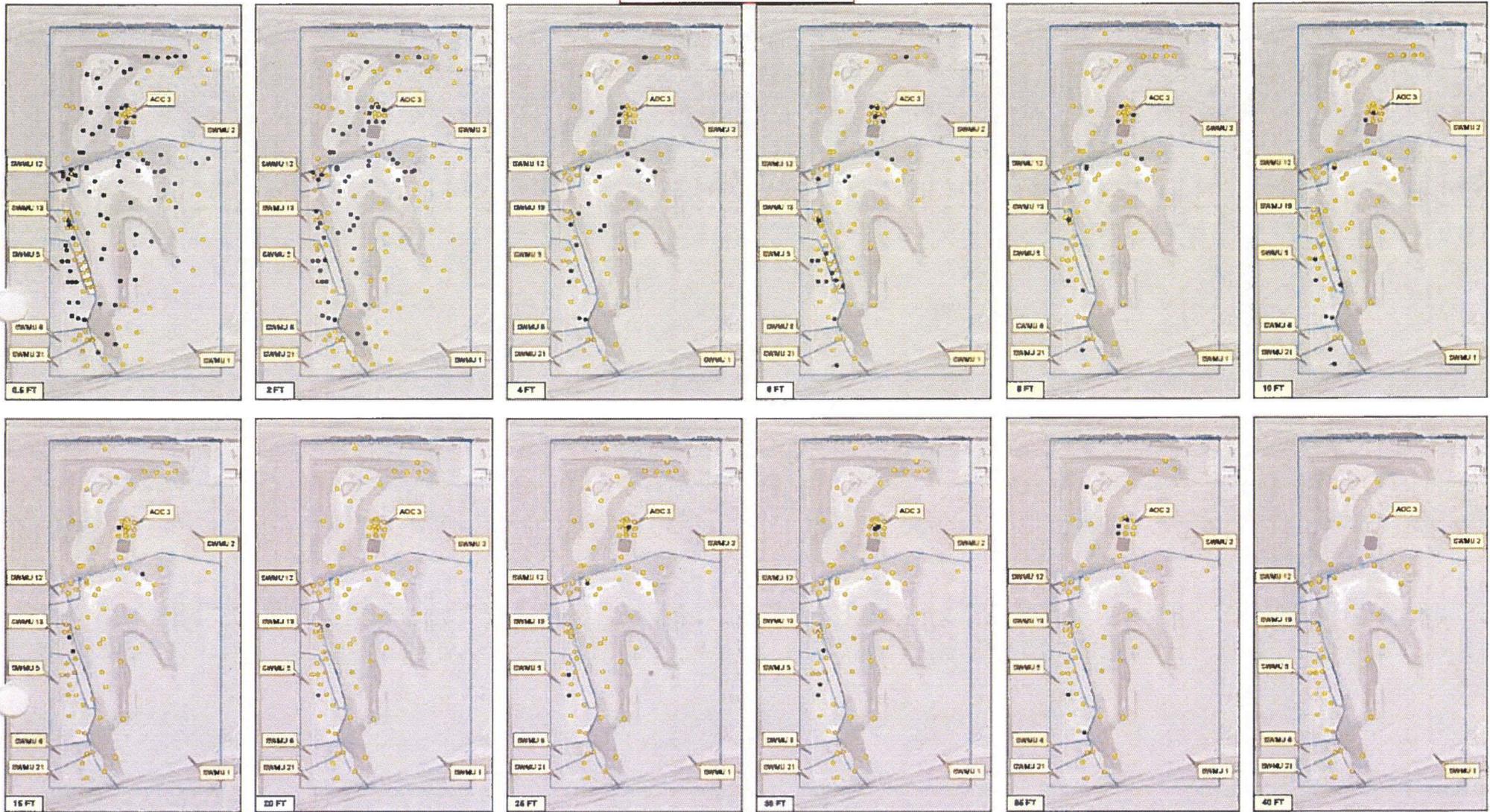
PROJECT NO	FIGURE NO. S17-04
DATE SEPTEMBER 2006	FILE NO.

Tier II Soils Work Plan – Figure Considerations

■ Area-Specific Maps

- Assume 4 major areas
- ~12 depth intervals
- Chromium and Nitrate (2 constituents)
- Option 1
 - 96 maps (11 X 17) to contour chromium and nitrate by depth for each area
- Option 2
 - 8 Large Maps (E Size) to summarize chromium and nitrate in each area

DRAFT
For Discussion Purposes Only



LEGEND

- SOIL SAMPLE INDICATING A VALUE GREATER OR EQUAL TO BACKGROUND CONCENTRATION OF 20.1 mg/kg
- SOIL SAMPLE INDICATING A VALUE BELOW BACKGROUND CONCENTRATION OF 20.1 mg/kg
- APPROXIMATE OUTLINE OF SWMU



**TOTAL CHROMIUM
SOIL SAMPLE LOCATIONS
IN WESTERN PORTION OF SITE**

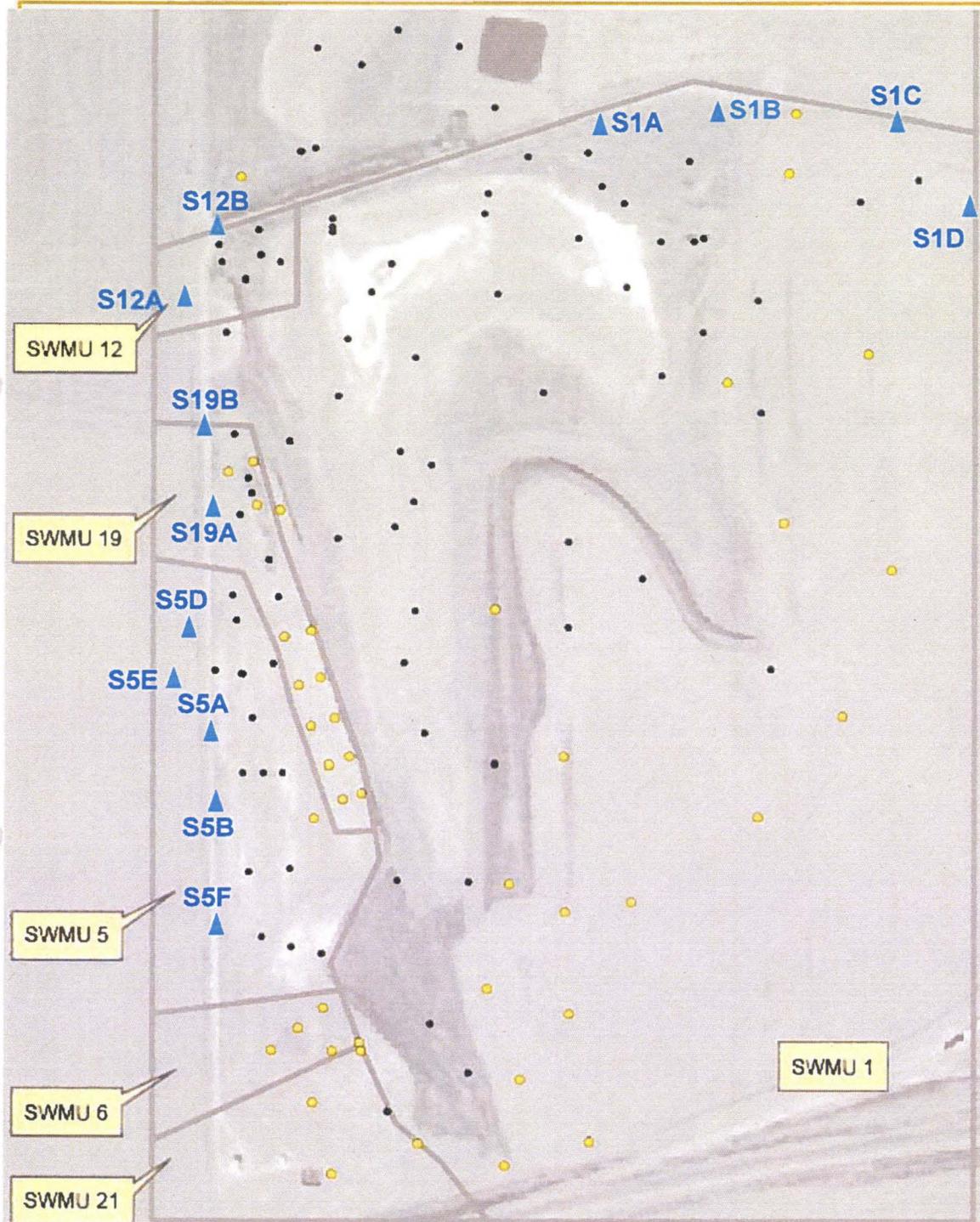
PREPARED BY:

KOCH
KOCH NITROGEN COMPANY
11559 US HIGHWAY 50 - P.O. BOX 1337
DODGE CITY, KS 67801

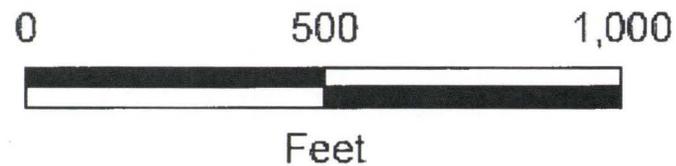
PROJECT NO.
DATE: FEBRUARY 2011

FIGURE NO.
FILE NO.

Total Chromium 0-4 FT BGS



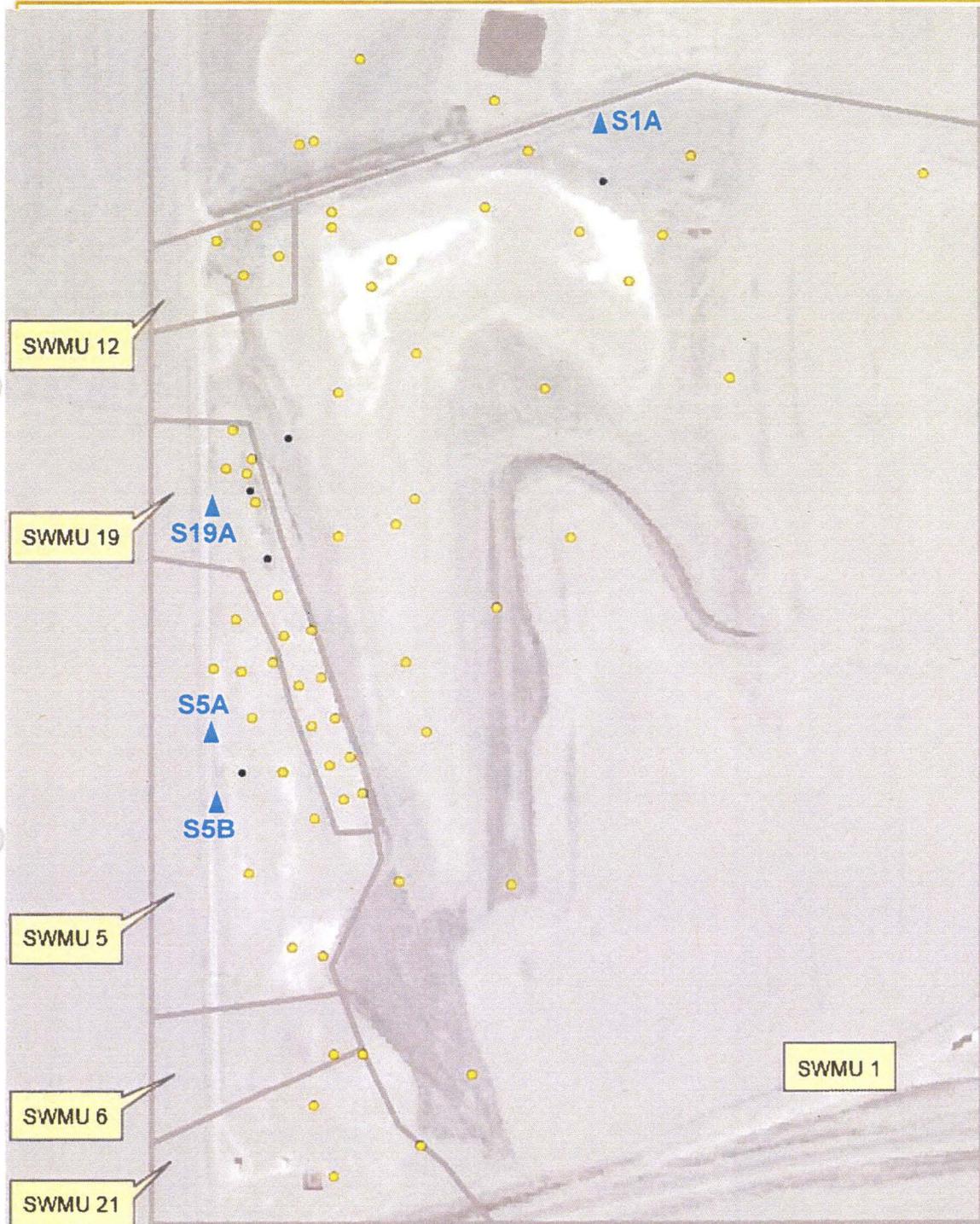
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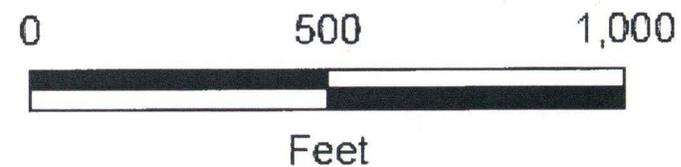
LEGEND

- Chromium Concentration > 20 mg/kg
- Chromium Concentration ≤ 20 mg/kg
- ▲ Tier II Boring Location

Total Chromium 10-20 FT BGS



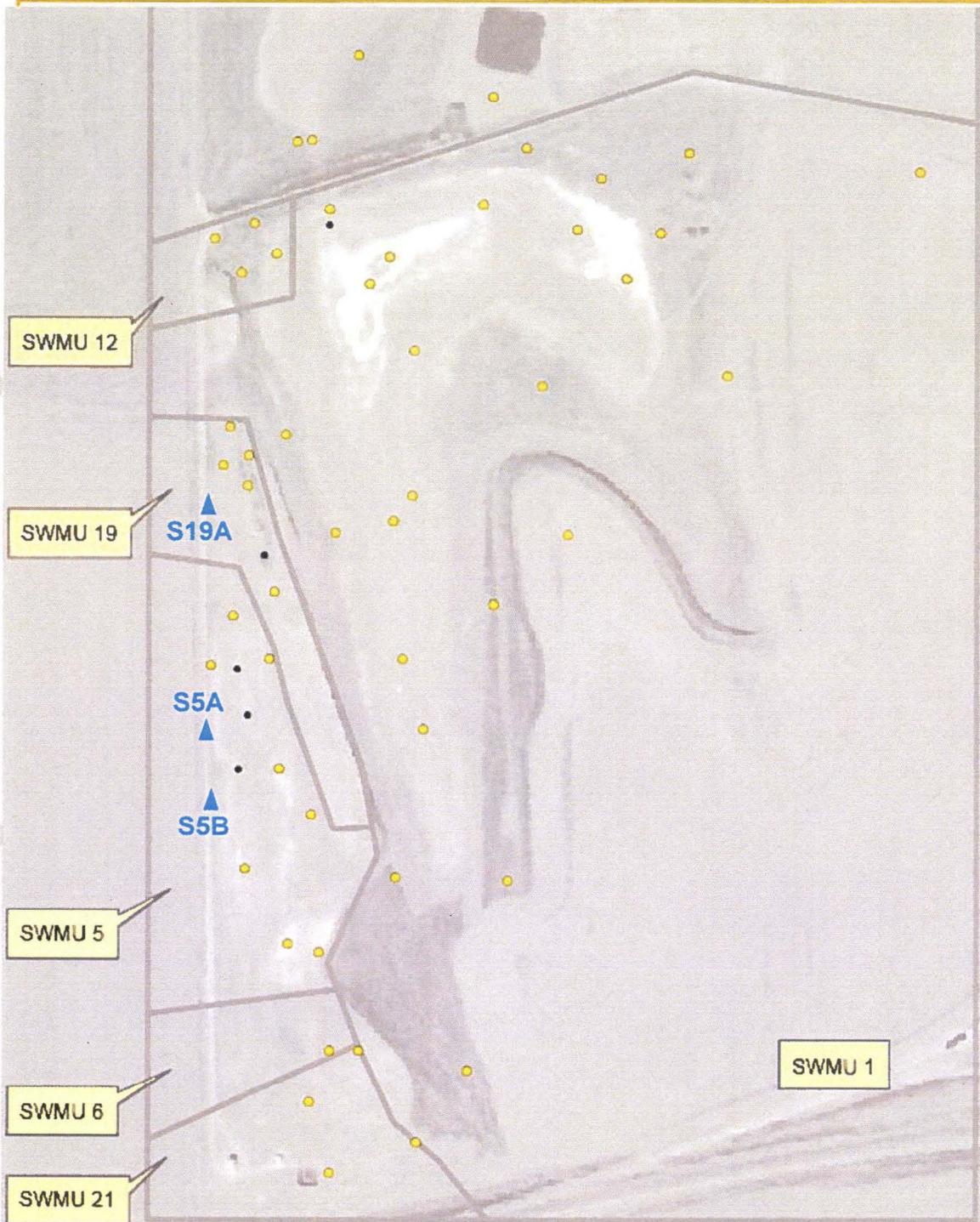
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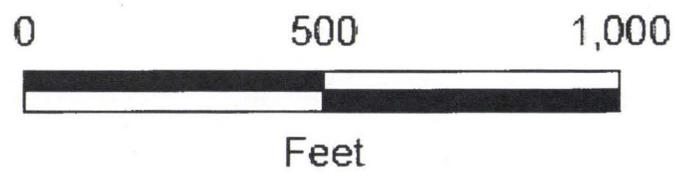
LEGEND

- Chromium Concentration > 20 mg/kg
- Chromium Concentration ≤ 20 mg/kg
- ▲ Tier II Boring Location

Total Chromium 20-30 FT BGS



SCALE



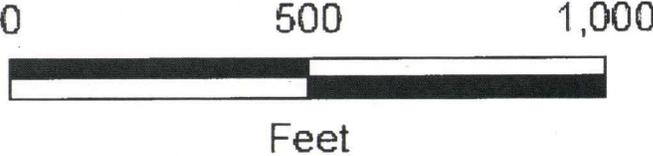
LEGEND

- Chromium Concentration > 20 mg/kg
- Chromium Concentration ≤ 20 mg/kg
- ▲ Tier II Boring Location

Total Chromium 30-40 FT BGS

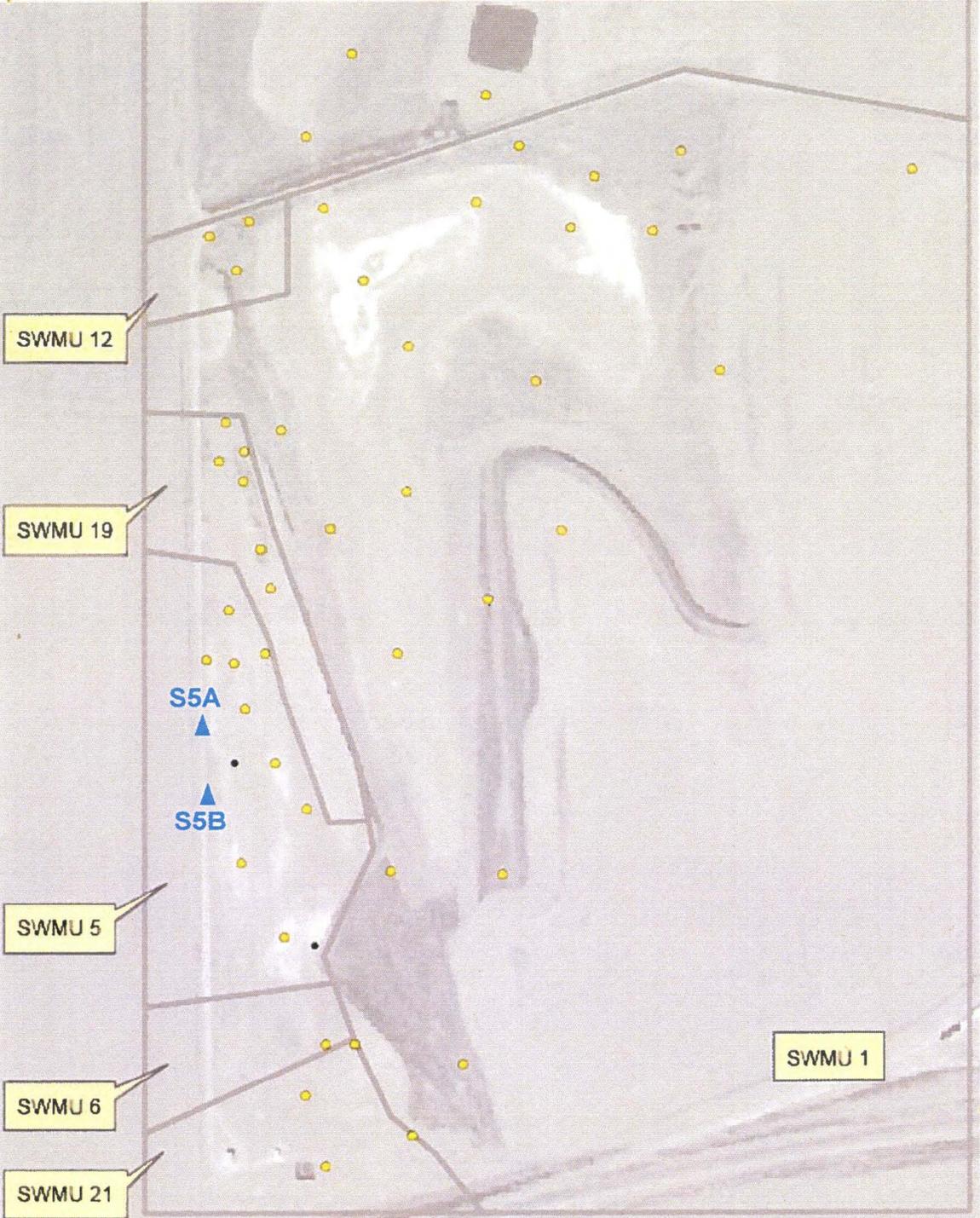


SCALE



LEGEND

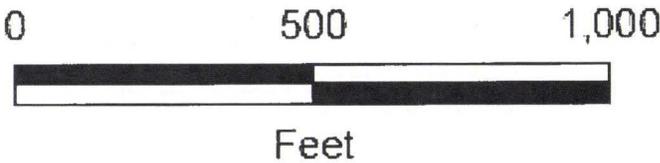
- Chromium Concentration > 20 mg/kg
- Chromium Concentration ≤ 20 mg/kg
- ▲ Tier II Boring Location



Total Chromium 40-50 FT BGS

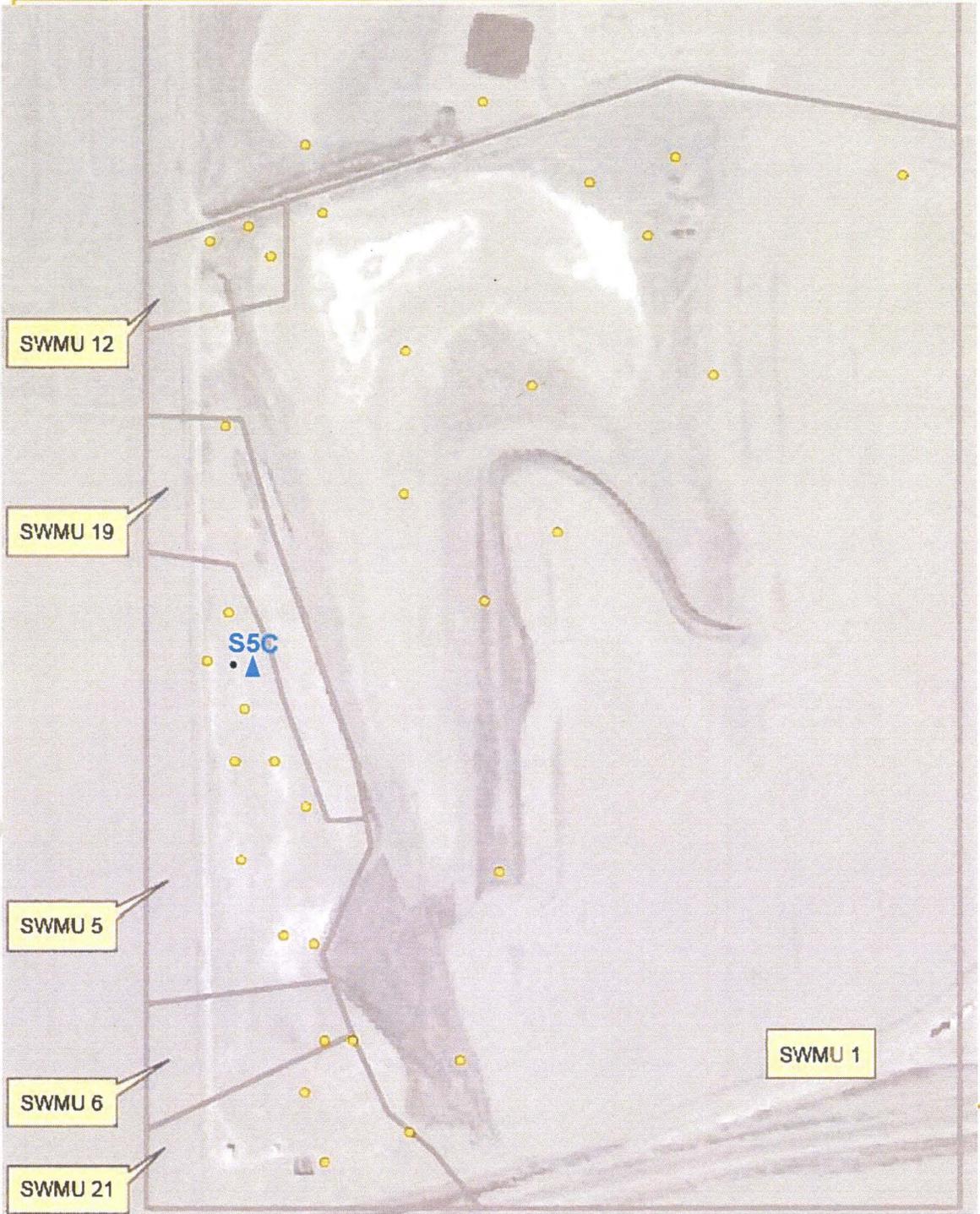


SCALE



LEGEND

- Chromium Concentration > 20 mg/kg
- Chromium Concentration ≤ 20 mg/kg
- ▲ Tier II Boring Location



Proposed Boring Summary Table Based on Maps

Boring Depth (FT BGS)	SWMU 1				SWMU-5						SWMU 12		SWMU-19	
	S1A	S1B	S1C	S1D	S5A	S5B	S5C	S5D	S5E	S5F	S12A	S12B	S19A	S19B
0-4	Cr	Cr	Cr	Cr	Cr	Cr		Cr	Cr	Cr	Cr	Cr	Cr	Cr
15	Cr				Cr	Cr							Cr	
20	Cr				Cr	Cr							Cr	
25					Cr	Cr							Cr	
30					Cr	Cr							Cr	
35					Cr	Cr								
40					Cr	Cr								
45							Cr							
50							Cr							
55							Cr							

Tier II Soils – Field Work

- Prepared to begin drilling after cluster well drilling and EPA and KDHE approval of the Tier II Soils Work Plan
- Propose to perform 2011 Tier II soil work prior to November to avoid weather delays
- Complete Tier II soil work starting in March/April 2012

Questions