

SEP 16 2011



KOCH NITROGEN COMPANY LLC

September 15, 2011

UPS Tracking Number1Z 693 661 03 9121 7416

Ms. Andrea Stone  
U.S. Environmental Protection Agency - Region VII  
Air, RCRA and Toxics Division  
901 North 5th Street  
Kansas City, KS 66101 (2 copies)

Re: Discovery of UAN Product Release Outside Secondary Containment System  
Dodge City Nitrogen Plant, Dodge City, Ford County, KS  
EPA I.D. NO. KSD044625010  
Notification of Release

Dear Ms. Stone:

As you know, Koch Nitrogen Company, LLC (KNC), the owner and operator of the Dodge City Nitrogen Plant (the Facility) located near Dodge City, Kansas, administers a corrective action permit (the Permit) at the Facility pursuant to which it is conducting an evaluation of historic impacts, as well as operating a groundwater collection and treatment system to remove constituents of concern. The activities under the Permit are being conducted under the supervision of the U. S. Environmental Protection Agency (EPA) and the Kansas Department of Health and Environment (KDHE).

The Facility is also an active fertilizer production plant, and as part of those operations KNC produces and stores urea ammonium nitrate (UAN), which is sold as a fertilizer to support regional agriculture.

KNC has discovered that a leak from one of its aboveground UAN storage tanks, designated as Tank ST-411, has migrated beyond the compacted clay secondary containment system for that tank. KNC has emptied the tank and temporarily taken it out of service for repair, and the tank remains temporarily out of service pending completion of repairs.

KNC has reported the leak to the Kansas Department of Agriculture, which regulates the design and operation of the tank and secondary containment system, and KDHE, which also has jurisdiction over release events. KNC plans to install an additional 6 inches of compacted clay, replace the rest of the floor system above the secondary containment and bring the tank back into service.

Given that this discovery concerns an existing product storage tank, and that the release concerns product in storage, it is not clear whether the incident would constitute a release required to be reported

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RCRA

under Part II, Section C.4 of the corrective action Permit. This section requires written notification of any new release of hazardous waste or hazardous constituents identified after issuance of the permit, within fifteen days after discovery. As a precaution, KNC is submitting this information to EPA in the event EPA believes this discovery is subject to Section C.4 notification.

Samples collected last week confirmed total nitrates (nitrate + nitrite + ammonia-nitrogen) in soil inside the secondary containment system at levels ranging up to 12,340 mg/kg, and total nitrates (nitrate + nitrite + ammonia-nitrogen) in soil just beneath the secondary containment system at levels ranging from 3 mg/kg to 471 mg/kg. A diagram showing the location and sampling results is attached for your information.

In view of several site-specific conditions, KNC is not proposing to remove the nitrogen-impacted soil beneath the tank at this time. The 185 foot diameter tank roof is supported by a number of internal roof supports. These supports rest on the tank floor. With the tank floor removed for replacement, the supports must be managed in a way that the support of the roof is not compromised. Removal of the soil would make support of the roof a very difficult task. To avoid conducting work that could jeopardize the integrity of the tank, KNC intends to take the following combination of steps to manage the soils underneath the tank:

- Installation of additional compacted clay to the secondary containment system, as approved by the Kansas Department of Agriculture;
- Replacement of the primary floor system above the secondary containment as approved by the Kansas Department of Agriculture;
- Treatment of the tank floor with a coating specifically intended to minimize corrosion in UAN applications; and
- Installation of an on-line system to monitor and control UAN quality parameters to minimize the corrosive nature of the product.

The combination of these steps will minimize the likelihood of additional releases from the tank as well as minimize vertical migration of the nitrogen content in the unexcavated soils that remain under the tank.

To the extent requested by EPA, KNC would propose to conduct additional sampling in this area during implementation of the RFI Phase II Tier II Work Plan. This plan has previously been submitted to EPA but will be revised following receipt of comments from EPA and KDHE. When KNC revises the plan, KNC will propose boring locations to evaluate any remaining impacts and sampling will be performed in accordance with the methods in that work plan, following agency approval.

If you have any questions or require additional information regarding these matters, please contact Elise Stucky-Gregg (620) 227-8631 ext. 350.

To the extent applicable, in accordance with Section B.2.b of the Permit and 40 CFR 270.11, 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 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,

KOCH NITROGEN COMPANY, LLC

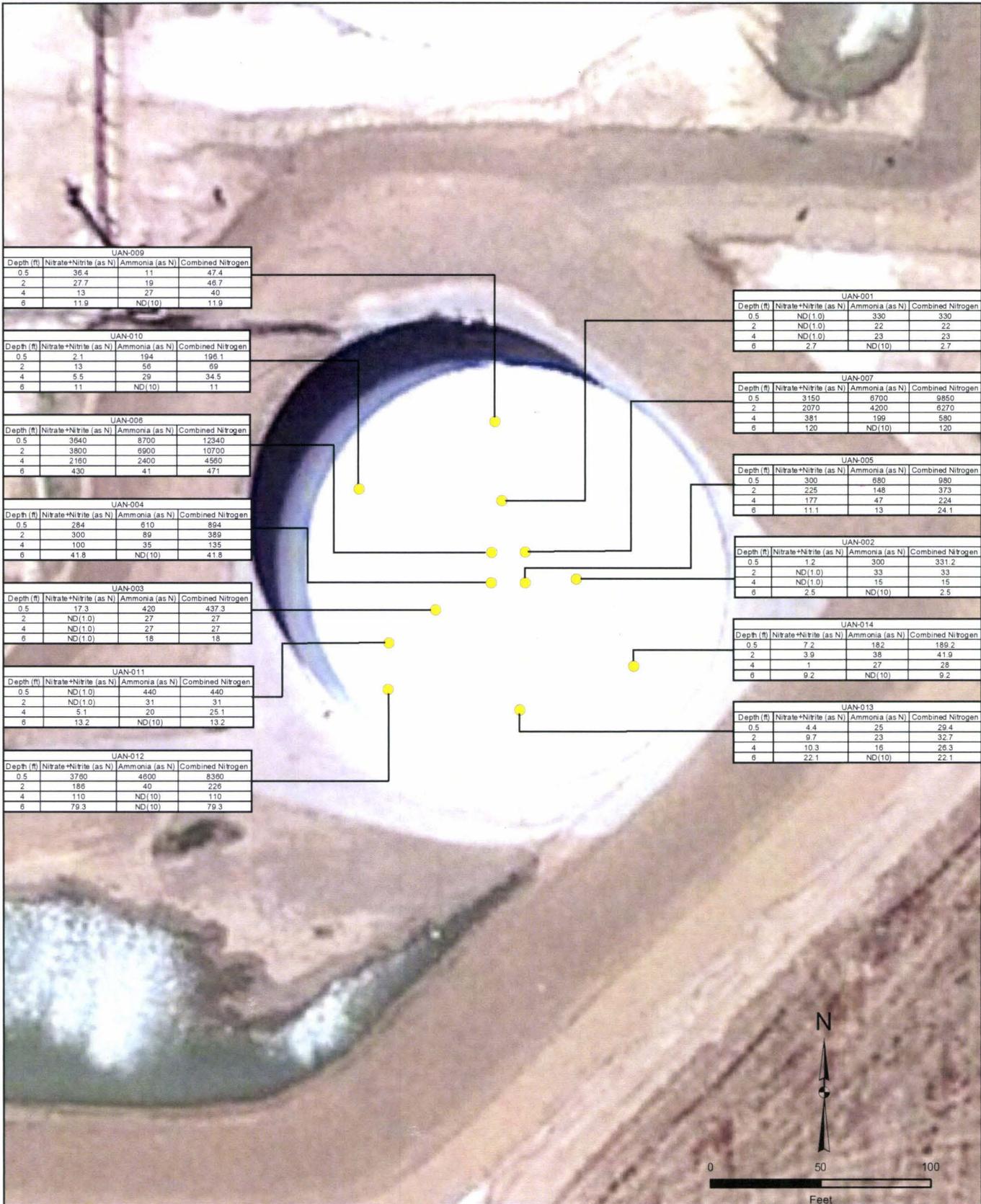
  
John Burns  
Vice President of Nitrogen Operations

Attachment: Sampling Diagram

cc: UPS Tracking Number  
Kansas Department of Health & Environment  
Bureau of Waste Management  
Hazardous Waste Permits Section  
1000 SW Jackson, Suite 320  
Topeka, KS 66612-1366

1Z 693 661 03 9473 3424

Tom Siegrist, Koch Fertilizer  
Elise Stucky-Gregg, KNC Dodge City  
Cory Zellers, KNC Dodge City



UAN-009			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	36.4	11	47.4
2	27.7	19	46.7
4	13	27	40
6	11.9	ND(10)	11.9

UAN-010			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	2.1	194	196.1
2	13	56	69
4	5.5	29	34.5
6	11	ND(10)	11

UAN-006			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	3640	8700	12340
2	3800	6900	10700
4	2160	2400	4560
6	430	41	471

UAN-004			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	284	610	894
2	300	89	389
4	100	35	135
6	41.8	ND(10)	41.8

UAN-003			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	17.3	420	437.3
2	ND(1.0)	27	27
4	ND(1.0)	27	27
6	ND(1.0)	18	18

UAN-011			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	ND(1.0)	440	440
2	ND(1.0)	31	31
4	5.1	20	25.1
6	13.2	ND(10)	13.2

UAN-012			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	3780	4600	8380
2	186	40	226
4	110	ND(10)	110
6	79.3	ND(10)	79.3

UAN-001			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	ND(1.0)	330	330
2	ND(1.0)	22	22
4	ND(1.0)	23	23
6	2.7	ND(10)	2.7

UAN-007			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	3150	6700	9850
2	2070	4200	6270
4	381	199	580
6	120	ND(10)	120

UAN-005			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	300	680	980
2	225	148	373
4	177	47	224
6	11.1	13	24.1

UAN-002			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	1.2	300	331.2
2	ND(1.0)	33	33
4	ND(1.0)	15	15
6	2.5	ND(10)	2.5

UAN-014			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	7.2	182	189.2
2	3.9	38	41.9
4	1	27	28
6	9.2	ND(10)	9.2

UAN-013			
Depth (ft)	Nitrate+Nitrite (as N)	Ammonia (as N)	Combined Nitrogen
0.5	4.4	25	29.4
2	9.7	23	32.7
4	10.3	16	26.3
6	22.1	ND(10)	22.1

**LEGEND**

- UAN TANK SOIL SAMPLE LOCATION ALONG WITH RESULTS IN mg/kg.

**UAN TANK  
SOIL SAMPLING  
RESULTS**

PREPARED BY:



PROJECT:	FIGURE NO. 1
DATE: SEPTEMBER 2011	FILE NO.