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AWMD/WRAP-MIRP



KOCH NITROGEN COMPANY LLC

October 5, 2012

UPS Tracking Number

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Director, RCRA Corrective Action & Permits Branch  
Air, RCRA, and Toxics Division  
U.S. Environmental Protection Agency Region VII  
901 North 5th Street  
Kansas City, KS 66101

Re: Recovered Groundwater Release From Recovery Well Header Near TW-30  
Koch Nitrogen Company, LLC Dodge City Nitrogen Plant, Dodge City, Ford County, KS  
EPA I.D. NO. KSD044625010  
Notification of Release Event

Ladies/Gentlemen:

Under its Hazardous Waste Management Permit (the Permit), Koch Nitrogen Company, LLC (KNC), the owner and operator of the Dodge City Nitrogen Plant located near Dodge City, Kansas, operates a groundwater collection and treatment system. This system collects groundwater from areas around the Plant and treats the groundwater to remove hexavalent chromium (Cr6) and other constituents of concern, which may be present in the groundwater as a result of historic operations at the Facility.

By this letter, KNC is notifying the U.S. Environmental Protection Agency (EPA) that approximately 400 gallons of recovered groundwater were released from recovery well piping near TW-30. On September 27, 2012, KNC was re-starting the recovery well system after maintenance was performed on the system including the installation of eight flowmeters, seven check valves, and nine isolation valves. After re-starting the recovery wells, one of the new piping connections near recovery well TW-30 was observed to be leaking into the new flowmeter pit. KNC immediately shut down the system and blocked in the nearest isolation valve. Approximately 400 gallons of recovered groundwater was released into the new flowmeter pit and the most of the groundwater was recovered and sent to wastewater for proper disposal. Based on the observed thickness of the saturated soil in the pit, it is estimated that approximately 24 gallons of recovered groundwater was release into the environment.

Given the fact that the release consisted of unaltered groundwater and the groundwater was determined to be a nonhazardous waste, it is not clear whether the incident would constitute a release required to be reported under Part II, Section C.4 of the KNC Permit. This section requires written notification of any release of hazardous waste or hazardous constituents identified during the course of groundwater

620.227.8631 Tel  
620.227.6016 Fax

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

RCRA



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monitoring within fifteen days after discovery. Please consider this letter to constitute a Section C.4 notification in the event EPA determines that this incident is subject to this requirement. By this letter, KNC is also notifying the Kansas Department of Health and Environment (KDHE) Bureau of Waste Management in writing of this event. Based on guidance received from the KDHE Bureau of Environmental Remediation, we understand the agency would not consider this incident to be a reportable release under the Kansas spill reporting law and regulations.

If you have any questions or require additional information regarding these matters, please contact Elise Stucky-Gregg (620) 371-7910.

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



Michael J. Sherbak II  
Plant Manager

Cc:

Andrea Stone, U.S. Environmental Protection Agency (electronic copy)  
Region VII, Kansas City, KS

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

Tom Siegrist, Koch Fertilizer, Wichita, KS (electronic copy)