



KOCH NITROGEN COMPANY LLC

VIA E-MAIL AND OVERNIGHT DELIVERY

November 20, 2012

UPS Tracking #

1Z 693 661 03 9068 6091

Mostafa Kamal
Chief, Hazardous Waste Permits Section
Kansas Department of Health & Environment
1000 SW Jackson
Topeka, KS 66212

**Re: Corporate Restructuring of Koch Nitrogen Company, LLC
Dodge City Facility RCRA Permit, Facility ID KSD044625010**

Dear Mostafa:

This letter responds to your November 16, 2012, e-mail. Koch Nitrogen Company, LLC (“KNC”) appreciates KDHE’s expedited review of our request for approval for a planned corporate restructuring and is submitting the enclosed information within the time period requested by your preliminary approval.

As mentioned in our correspondence, KNC will be pursuing either the company’s preferred approach of a change of state of organization (via a merger of the existing Koch Nitrogen Company, LLC, a Delaware limited liability company, into a new Koch Nitrogen Company, LLC, a Kansas limited liability company), or a conversion of the existing Koch Nitrogen Company, LLC into a limited partnership within the same state (Delaware). Because the preferred option constitutes a “change of control” of the permittee for the Dodge City facility, RCRA Facility ID KSD044625010, KNC has requested approval of both KDHE and EPA to execute this change.

Consistent with the request of your November 16, 2012, e-mail, KNC is enclosing the information necessary for KDHE’s approval of the preferred restructuring approach. However, because the company has not yet obtained EPA’s approval for the planned action, the enclosed information and request for approval are being submitted contingent upon EPA’s approval of the change of state of organization. If KNC is not able to obtain EPA’s approval in time for the planned restructuring, the company will instead proceed with the conversion of the existing company from a limited liability company to a limited partnership, a change which constitutes merely a change in form of the existing company within the same state of organization. Should KNC proceed with that approach, the updates

620.227.8631 Tel
620.227.6016 Fax

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

RCRA



522203

enclosed within this letter will no longer be valid and the company will provide appropriate updates to the extent necessary.

The requested organizational charts for the proposed corporate structure of the proposed new Koch Nitrogen Company, LLC, a Kansas limited liability company are enclosed.

The requested updated Part A application is enclosed. Due to the short timeline for submittal, the enclosure contains a copy of the certification signature. The original signature will be submitted next week after the holiday.

The proposed change of state of organization does not result in any changes to the Part B application; therefore, no pages are enclosed.

Provided that KNC is permitted to proceed with the planned restructuring, KNC does not currently believe that any other updates will be necessary to the current permit renewal application. However, we will review and will be happy to discuss the current documents with the agency to ensure we have provided you with all necessary information.

Please let me know if you have any questions or need additional information. We sincerely appreciate KDHE's cooperation in helping us achieve this corporate restructuring within such a tight timeline. Please do not hesitate to contact me if I can provide any additional assistance.

Sincerely,



Elise Stucky-Gregg

Enclosures: Organization Charts
 Part A Application

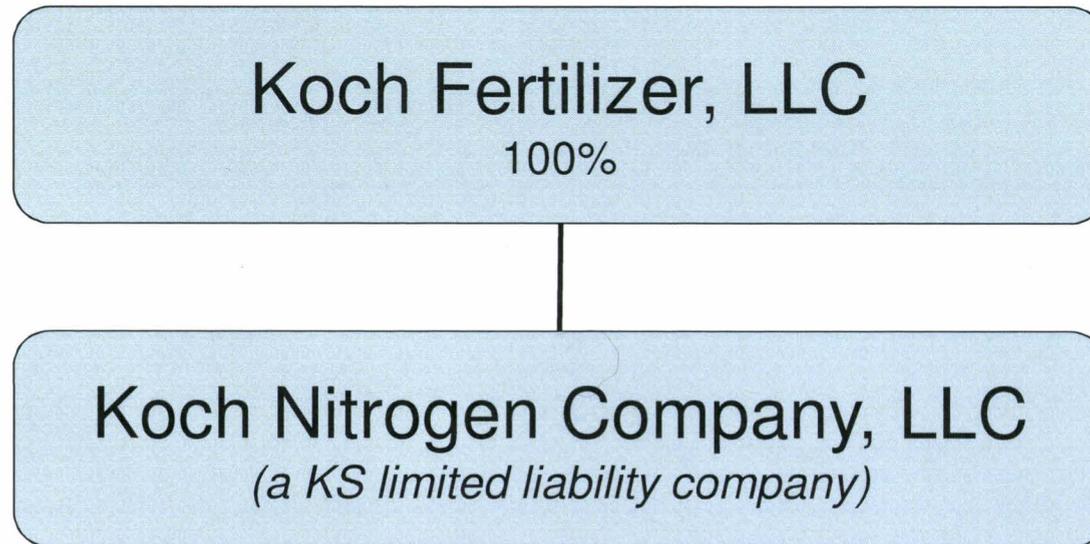
cc Brian Busby, KDHE Financial Assurance Section
 Nancy Ulrich, KDHE Legal
 Andrea Stone, EPA RCRA
 Jeff Johnson, EPA RCRA
 Belinda Holmes, EPA Office of Regional Counsel
 Tom Safley, KCPS
 Jessica Merrigan, Lathrop & Gage LLP

All cc via e-mail with enclosures

Current Ownership Structure for Koch Nitrogen Company, LLC



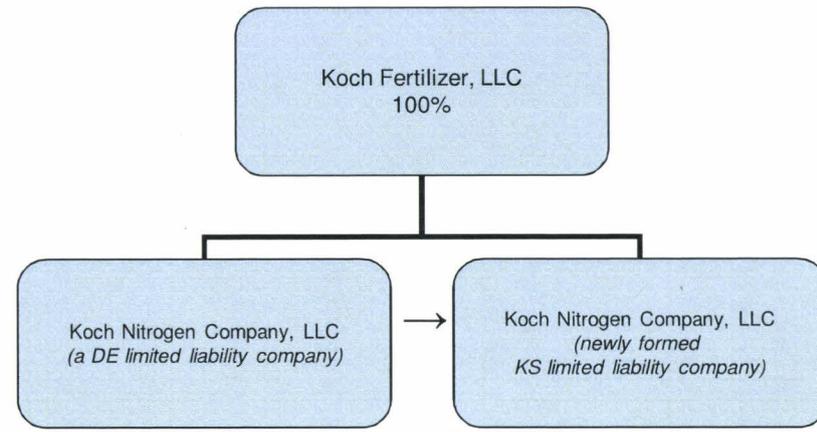
Proposed Post-Restructure Ownership Structure for Koch Nitrogen Company, LLC



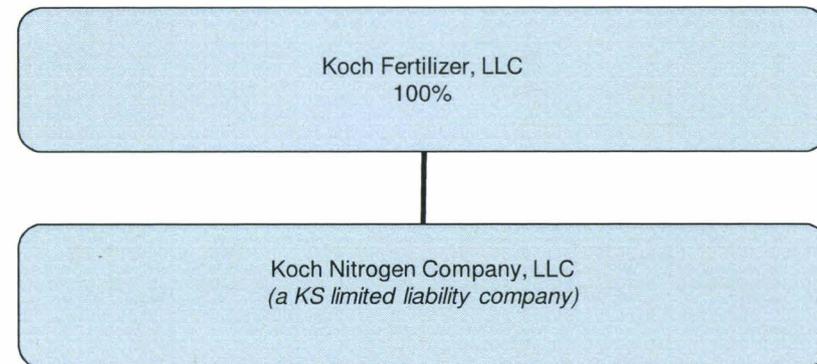
Current Proposed Transaction

- Proposed Transaction
 - Step 1. Koch Nitrogen Company, LLC (a KS limited liability company) is created as a wholly-owned subsidiary of Koch Fertilizer, LLC
 - Step 2. Koch Nitrogen Company, LLC (a DE limited liability company) merges into Koch Nitrogen Company, LLC (a KS limited liability company)
- After
 - Koch Nitrogen Company, LLC (a KS limited liability company) is the successor to Koch Nitrogen Company, LLC (a DE limited liability company) and assumes all assets and liabilities of Koch Nitrogen Company, LLC (a DE limited liability company)

Transaction



After



MAIL COMPLETED 8700-12 FORM TO: KDHE-BWM 1000 SW Jackson, Suite 320, Topeka, KS 66612-1366	Kansas Department of Health and Environment Notification of Regulated Waste Activity for Kansas Treatment, Storage, and Disposal Facilities KANSAS FORM 8700-23 (RCRA SUBTITLE C SITE IDENTIFICATION FORM)		
1. Reason for Submittal (See page 4 of the instructions) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update information) <input type="checkbox"/> As a component of a FIRST-Kansas RCRA Hazardous Waste Part A Permit Application <input checked="" type="checkbox"/> As a component of a REVISED-Kansas RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (See page 5 of the instructions)	EPA ID Number: KSD044625010		
3. Site Name (See page 5 of the instructions)	Name: KOCH NITROGEN COMPANY, LLC		
4. Site Location Information (See page 5 of the instructions)	Street Address: 11559 U.S. Highway 50		
	City or Town: Dodge City	State: KS	
	County Name: Ford	Zip Code: 67801-1337	
5. Site Land Type (See page 5 of the instructions)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (See page 5 of the instructions)	A. 325311	B.	
	C.	D.	
7. Site Mailing Address (See page 6 of the instructions)	Street or P. O. Box: P.O. Box 1337		
	City or Town: Dodge City		
	State: Kansas		
	Country: USA	Zip Code: 67801-1337	
8. Site Contact Person (See page 6 of the instructions)	First Name: Elise	MI:	Last Name: Stucky-Gregg
	Phone Number & Extension: 620-371-7910		Email Address: stuckyGE@kochind.com
9. Legal Owner and Operator of the Site (See page 6 of the instructions)	A. Name of Site's Legal Owner: Koch Nitrogen Company, LLC		Date Became Owner (mm/dd/yyyy): 12/31/2008
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

	B. Name of Site's Operator: Koch Nitrogen Company, LLC	Date Became Operator (mm/dd/yyyy): 12/31/2008
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	

10. Type of Regulated Waste Activity (Mark the appropriate boxes for activities that apply to your site. See pages 7-11 of the instructions)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste (Choose only one of the following three classifications)

- a. EPA: 1,000 kg/mo (2,200 lbs in any single mo.) or more of non-acute hazardous waste, greater than 1 kg of acute hazardous waste;
or
- b. KSG Sub-Class 1: 100 kg or more and less than 1,000 kg (220 - 2,200 lbs in any single mo.) of non-acute hazardous waste;
or
- c. KSG Sub-Class 2: 25 kg or more and less than 100 kg (55 - 220 lbs in any single mo.) of non-acute hazardous waste;
or
- d. SQG: Less than 25 kg/mo (55 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities. (Mark all that apply)

- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, mark all that apply.

- 2. **Transporter of Hazardous Waste**
- 3. **Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- 4. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- 5. **Exempt Boiler and/or Industrial Furnace**
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- 6. **Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to Kansas regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (Mark all boxes that apply):

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

2. **Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Mark all boxes that apply.)

- 1. **Used Oil Transporter - Indicate Type(s) of Activity(ies)**
 - a. Transporter
 - b. Transfer Facility
- 2. **Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)**
 - a. Processor
 - b. Re-refiner
- 3. **Off-Specification Used Oil Burner**
- 4. **Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)**
 - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See page 11 of the instructions)						
Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.						
D001	D007	F005				
D002	D009	U134				
D003	D011	U161				
D005	D035					
D006	F003					
12. Comments (See page 11 of the instructions)						
The facility does not routinely generate hazardous waste. Equipment painting/tank cleaning waste (D001, D002, D005, D035, F003, F0005)						
may be generated once or twice annually. Other wastes generally are from chemical cleanups. There is the possibility of generating D007						
waste as investigation derived waste (IDW) or from future remedial programs with soil contaminated by historical activities.						
Underground Injection Control wells are permitted for nonhazardous wastewater injection only.						
13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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. (See page 11 of the instructions)						
Signature of owner, operator, or an authorized representative		Name and Official Title (type or print)		Date Signed (mm/dd/yyyy)		
MILLER II		Michael Sherbak - Plant Manager		11/19/2012		

MAIL TO:
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW JACKSON, SUITE 320
TOPEKA, KS 66612-1366

**United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM (8700-23)**

1. Facility Permit Contact (See instructions on page 16)	First Name: Elise	MI:	Last Name: Stucky-Gregg											
	Phone Number: 620-371-7910		Phone Number Extension:											
2. Facility Permit Contact Mailing Address (See instructions on page 16)	Street or P.O. Box: 11559 U.S. Highway 50													
	City, Town, or Village: Dodge City													
	State: Kansas													
	Country: USA	Zip Code: 67801 -1337												
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 17)	Street or P.O. Box: 11559 U.S. Highway 50													
	City, Town, or Village: Dodge City													
	State: Kansas													
	Country: USA	Zip Code: 67801-1337	Phone Number 620-371-7910											
4. Operator Mailing Address and Telephone Number (See instructions on page 17)	Street or P.O. Box: 11559 U.S. Highway 50													
	City, Town, or Village: Dodge City													
	State: Kansas													
	Country: USA	Zip Code: 67801-1337	Phone Number 620-371-7910											
5. Facility Existence Date (See instructions on page 17)	Facility Existence Date (mm/dd/yyyy): 07/01/1968													
6. Other Environmental Permits (See instructions on page 17)														
A. Permit Type (Enter code)	B. Permit Number							C. Description						
U	K	S	-	0	1	-	0	5	7	-	0	0	1	Class I Non-Hazardous Injection Well (UIC Well #2)
U	K	S	-	0	1	-	0	5	7	-	0	0	2	Class I Non-Hazardous Injection Well (UIC Well #3)
N	I	-	U	A	1	1	-	N	P	0	2			KS Water Pollution Control Non-Dicharge
E	3	7	5											Solid Waste (Non-Hazardous Only)
E	9	6	9	0	1	0	-	0	0					Remediation Wells
E	S	E	E	S	E	C	T	I	O	N	A	-	2	Above Ground Storage Tanks
E	0	5	7	0	0	0	3							Class I Air Emission Source Operating Permit
7. Nature of Business (Provide a brief description; see instructions on page 18)														
See Section A-1.														

8. Process Codes and Design Capacities (See instructions on page 18)

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	<u>Disposal:</u> Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day;
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Pounds Per Hour; Short Tons Per Hour;
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
S01	<u>Storage:</u> Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid Halogen Acid Furnaces Other Industrial Furnaces Listed In 40 CFR §260.10	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92		
S99	Other Storage	Any Unit of Measure Listed Below	T93		
T01	<u>Treatment:</u> Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour		<u>Miscellaneous (Subpart X):</u>	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T80	Boiler	Gallons; Liters; Gallons Per Day; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acre-feet.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only				
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)										
X	1	S	0	2	5 3 3 . 7 8 8	G	0 0 1					
	1	T	0	4	0		0 0 1					
	2											
	3											
	4											
	5											
	6											
	7											
	8											
	9											
1	0											
1	1											
1	2											
1	3											

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 18 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)						
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

10. Description of Hazardous Wastes (See instructions on page 18)

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES																
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))												
X 1	K	0	5	4	900	P	T	0	3	D	8	0											
X 2	D	0	0	2	400	P	T	0	3	D	8	0											
X 3	D	0	0	1	100	P	T	0	3	D	8	0											
X 4	D	0	0	2																			Included With Above

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))	
1															
2															
3															
4															
5															
6															
7															
8															
9															
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33															

SECTION A

PART A GENERAL INFORMATION REQUIREMENTS

40 CFR 270.13

A-1 Nature of Business - 40 CFR 270.14 (b)(1)

The Dodge City Nitrogen Facility is an existing facility that manufactures nitrogen fertilizers (SIC Code 2873), specifically anhydrous ammonia and urea ammonium nitrate (UAN). The ammonia unit is based on the steam-methane pressure reforming process for production of synthesis gas. The primary feedstock is natural gas.

The Dodge City Nitrogen Facility is a small quantity generator of hazardous waste, but does not treat, store, or dispose of hazardous waste onsite.

From 1968 to 1983 the cooling tower was treated with hexavalent chromium as a corrosion inhibitor. Prior to disposal, the cooling tower blowdown was treated in the Chromium Destruct Unit (CDU). This regulated unit was certified closed as a hazardous waste treatment facility in February 1986. Additional information on the closure history is provided in Section I.

Based on the results of a 1992 soil survey, the facility's previous owner (Farmland Industries, Inc.) contended that the source of detected chromium in the groundwater was documented spills of chromate solution from the chromate storage tank that occurred in the early 1970s. The use of chromium as a corrosion inhibitor was discontinued in 1984.

A-2 Above Ground Storage Tank Permits

Tank #	Capacity (gallons)	Material
001	12,000	Nalco
004	61,000	Methyldiethanolamine
005	5,100	Sulfuric Acid
006	5,100	Sodium Hydroxide
007	4,900	Compressor Oil
008	2,000	Compressor Oil
009	1,100	Used Oil
013	3,800	GenGard GN8005
014	5,500	Empty/Clean
015	1,550	Sulfuric Acid
016	1,550	Sulfuric Acid
017	6,500	Sulfuric Acid
018	850	Biomate MBC781
019	5,300	NITROsolve 220

A-3 Photographs of the Former Chromium Destruct Unit



CDU Facing North



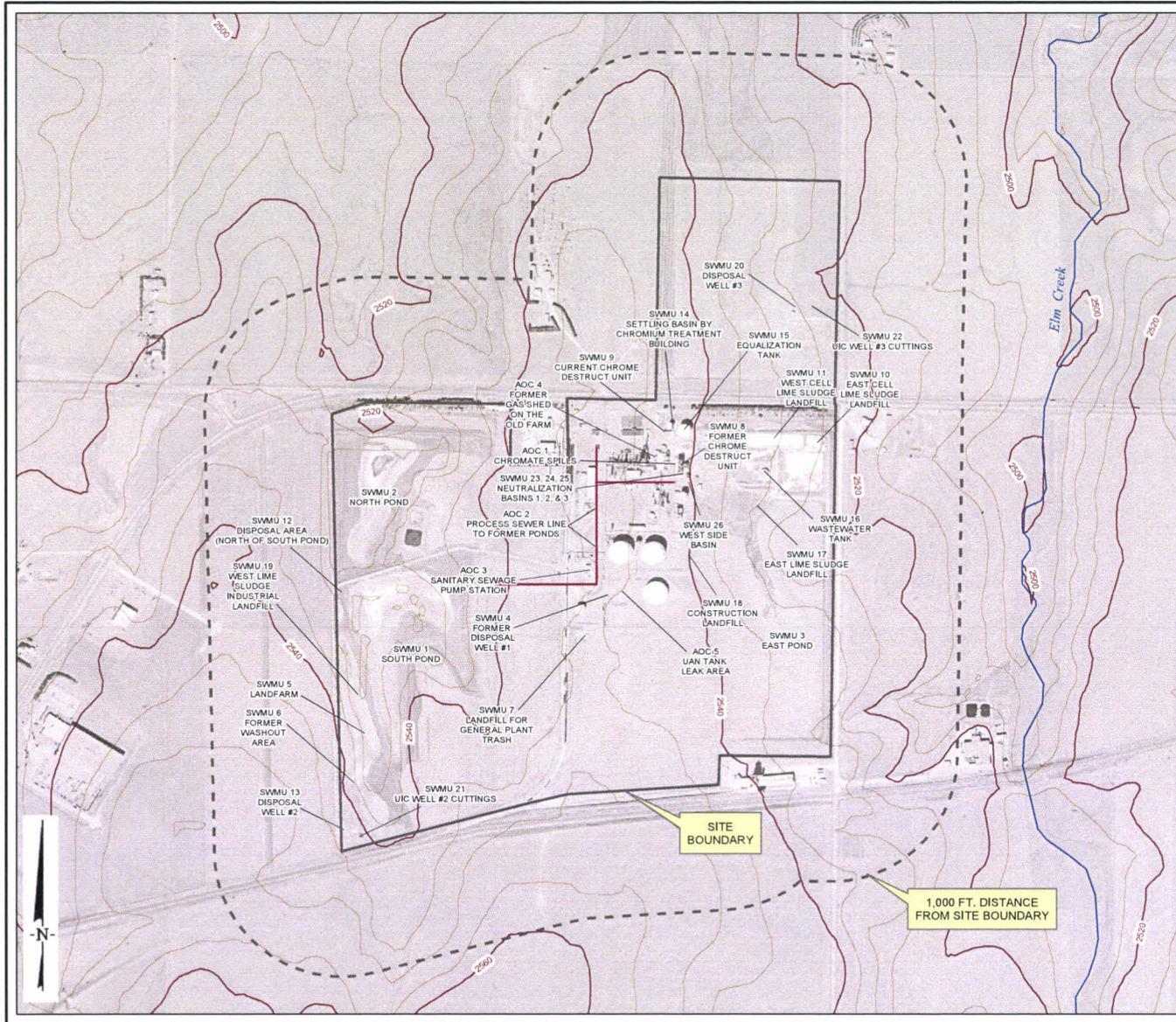
CDU Facing South



CDU Facing East



CDU Facing North



LEGEND

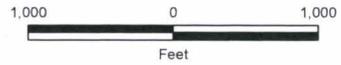
- STREAM
- INDEX TOPOGRAPHIC CONTOUR - 20 FT. INTERVAL
- INTERMEDIATE TOPOGRAPHIC CONTOUR - 5 FT. INTERVAL

SWMU LIST

1. SOUTH POND
2. NORTH POND
3. EAST POND
4. FORMER DISPOSAL WELL #1
5. LAND FARM
6. FORMER WASHOUT AREA
7. LANDFILL FOR GENERAL PLANT TRASH
8. FORMER CHROME DESTRUCT UNIT
9. CURRENT CHROME DESTRUCT UNIT
10. EAST CELL OF LIME SLUDGE POND
11. WEST CELL OF LIME SLUDGE POND
12. DISPOSAL AREA (NORTH OF SOUTH POND)
13. DISPOSAL WELL #2
14. SETTLING BASIN BY CHROMIUM TREATMENT BUILDING
15. EQUALIZATION TANK
16. WASTEWATER TANK
17. EAST LIME SLUDGE LANDFILL
18. CONSTRUCTION LANDFILL
19. WEST LIME SLUDGE INDUSTRIAL LANDFILL
20. INJECTION WELL #3
21. UIC WELL #2 CUTTINGS
22. UIC WELL #3 CUTTINGS
23. NEUTRALIZATION BASIN #1
24. NEUTRALIZATION BASIN #2
25. NEUTRALIZATION BASIN #3
26. WEST SIDE BASIN

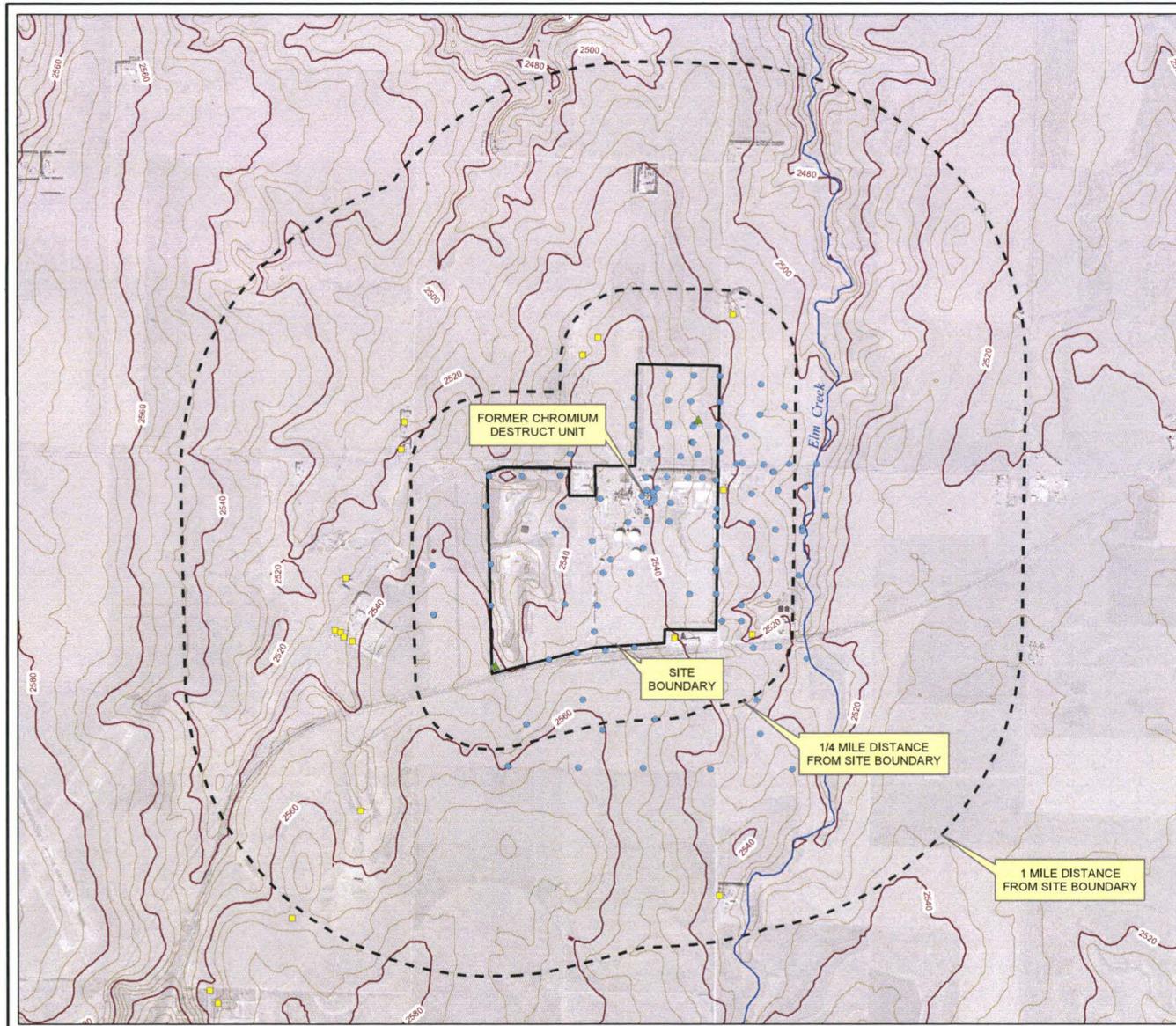
AOC LIST

1. CHROMATE SPILLS
2. PROCESS SEWER LINE TO FORMER PONDS
3. SANITARY SEWAGE PUMP STATION
4. FORMER GAS SHED ON THE OLD FARM
5. UAN STORAGE TANK LEAK
6. DAKOTA FORMATION (NOT SHOWN)



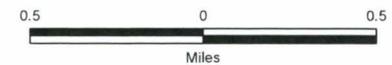
SWMU AND AOC LOCATIONS

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KOCH. KOCH NITROGEN COMPANY, LLC		
PROJECT NO.	FIGURE NO.	J-1
DATE. OCTOBER 2012	REVISION NO.	



LEGEND

- KNC MONITORING OR RECOVERY WELL
- PRIVATE WATER USE WELL
- ▲ KNC INJECTION WELL
- STREAM
- INDEX TOPOGRAPHIC CONTOUR - 20 FT. INTERVAL
- INTERMEDIATE TOPOGRAPHIC CONTOUR - 5 FT. INTERVAL



TOPOGRAPHIC MAP

PREPARED BY:



KOCH NITROGEN COMPANY, LLC

PROJECT NO.	FIGURE NO.	A-1
DATE. OCTOBER 2012	REVISION NO.	