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KOCH

KOCH NITROGEN COMPANY LLC

February 27, 2013

UPS Tracking Number ***1Z6936610392833025***

Director, RCRA Corrective Action & Permits Branch
Air, RCRA, and Toxics Division
U.S. Environmental Protection Agency Region VII
11201 Renner Boulevard
Lenexa, KS 66219

Re: Recovered Groundwater Release From Recovery Well Header Near TW-84
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) of a release of recovered groundwater to the soil from recovery well piping near TW-84. On February 12, 2013 a KNC contractor was inspecting the recovery well network and discovered water in a corrugated metal pipe vault (vault) at well TW-84 and wet soil surrounding the vault. KNC immediately shut down the system and blocked in the nearest isolation valve. After the release was stopped, KNC repaired the leaking piping and put the system back in service. Based on observations, approximately 500 gallons of recovered groundwater were initially released into the vault. Approximately 375 gallons of recovered groundwater were pumped out of the vault and sent to the wastewater system for disposal. Based on site conditions, KNC estimates that approximately 125 gallons of recovered groundwater were released into the soil.

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 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.

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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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 previously 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, Lenexa, KS

UPS Tracking Number ***1Z6936610390832235***

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

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