

April 22, 2013

Michael J. Sherbak II, Plant Manager
Koch Nitrogen Company
11559 US Highway 50
P. O. Box 1337
Dodge City, KS 67801-1337

RECEIVED

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AWMD/WRAP-MIRP

**RE: RCRA Post-Closure Permit Renewal Application – Determination of Completeness
Koch Nitrogen Company, Dodge City
EPA ID# KSD044625010**

Dear Mr. Sherbak:

The Kansas Department of Health and Environment (KDHE) reviewed Part A and Part B of the RCRA Post-Closure Permit application that was submitted by Koch Nitrogen Company, LLC on October 22, 2012 for the Dodge City facility. The review process for approval of a RCRA permit application consists of two parts. The first part is a completeness review to determine if the applicant has submitted sufficient information as defined in federal regulations 40 CFR 270.10 thru 270.14. The second part is a technical review that focuses on procedures and technical accuracy of the information provided in the application. KDHE has concluded the completeness review of the RCRA permit application and has identified the following deficiencies with the Part B application:

1. The text in Volume I of the permit application includes the checklist used to review the document. This checklist is not intended to be part of the application. Please remove the checklist and renumber the remaining pages of text. If KNC desires, the checklist can be included as an appendix to the application.
2. In Section I of the permit application, the text makes several references to Part II of the existing permit. KDHE anticipates receiving authorization from EPA to administer the Corrective Action Program prior to the completion of the renewal permit. As a result, most of the conditions specified in Part II of the existing permit will be moved to Part I of the renewal permit. Therefore, to facilitate the preparation of permit conditions for the renewal permit, please remove the references to Part II in the text of the permit application.
3. The map features specified in 40 CFR 270(b)(19) are included in the figures provided in the permit renewal document, but not at a scale to reveal site details. Therefore, please submit a topographic map that is at a scale of 1 inch equals not more than 200 feet.
4. Information that describes the nature and extent of any contaminants present in the groundwater is provided in the text, but not presented graphically. Please submit maps that depict the constituents on these groundwater plumes.

RCRA



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5. Figure B-7 shows the location of the monitoring wells, but does not identify them. Please revise this figure to show the label of each well.
6. Please revise Figure J-1 to show the boundaries of each solid waste management unit and area of concern at a scale of 1 inch equals not more than 200 feet.
7. According to 40 CFR 270.14(c)(3), KNC is required to identify the point of compliance on a topographic map. None of the maps submitted by KNC meet this standard. Therefore, please submit a figure that shows KNC's proposed point of compliance.
8. According to 40 CFR 270.14(c)(2), KNC is required to identify the direction of groundwater flow. To fulfill this requirement, please add arrows on Figure E-2 to indicate the direction of groundwater flow.

Please submit all revisions to the permit renewal document by May 3, 2013. If you have any questions regarding this letter, you may contact me via e-mail at espellman@kdheks.gov or by phone at (785) 296-1616.

Sincerely,

Everett Spellman
Professional Geologist
Hazardous Waste Permits Section

cc: **Andrea Stone** - EPA Region 7/RCAP Branch
Erich Glave - KDHE/DEA/SWDO/Waste Programs
Bill Bider - KDHE/BWM