

May 9, 2013

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

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AWM/DWR/7 MRP

**RE: RCRA Post-Closure Permit Application - Technical Review of Appendix E-1: Groundwater Sampling and Analysis Plan
Koch Nitrogen Company, Dodge City
EPA ID# KSD044625010**

RCRA



524532

Dear Mr. Sherbak:

The Kansas Department of Health and Environment (KDHE) reviewed the Groundwater Sampling and Analysis Plan (SAP) which details the groundwater monitoring program for the Dodge City facility. The SAP was submitted by Koch Nitrogen Company, LLC (KNC) on October 22, 2012 as Appendix E-1 of the Part B Post-Closure Permit Application. KDHE's review of the procedures described in the SAP is in addition to the comments provided in the April 23, 2013 letter from the Environmental Protection Agency (EPA). KDHE has identified the following deficiencies:

1. Section 2, Objectives and Scope, Page 2, First Paragraph: Once approved, the text in this SAP will supersede prior versions. Therefore, to reduce possible confusion, delete the word "revised" from the third sentence of the first paragraph.
2. Section 2.1, Groundwater Monitoring Program, Page 3, Second Paragraph: Once issued, the text in the renewal permit will supersede the conditions in the previous permit. Therefore, to reduce possible confusion, delete the word "existing" from the third sentence of the second paragraph.
3. Section 3, Groundwater Monitoring Procedures, Pages 4-7: In appropriate sub-sections, describe the glove use procedures that will be followed while obtaining static water level measurements, conducting well purging activities, and collecting groundwater samples. In particular, specify that gloves will be changed immediately prior to handling sample containers at each well.
4. Section 3.1, Well Gauging, Page 4, First Paragraph: State that all depth-to-water measurements will be acquired from the survey point marked on the top of the well casing and will be measured to the nearest one-hundredth (0.01) foot. Also, please forward a copy of the survey report to KDHE and EPA.
5. Section 3.1, Well Gauging, Page 4, Second Paragraph: Identify the criteria that will be used to determine when the wells will be redeveloped.
6. Section 3.1, Well Gauging, Page 4, Third Paragraph: Please add well identification and the top of casing reference mark to the list of items to be inspected in the field.

7. Section 3.3, Sample Collection, Page 6, First Paragraph: For clarification, please list Nitrate/Nitrite separate from Hexavalent Chromium. In addition, state that care will be taken to avoid the loss of preservative by overfilling the sample containers.
8. Section 4.2, Documentation of Field Activities, Page 9, First Paragraph: To avoid the potential for unnecessary permit modifications to change field forms, rewrite the first paragraph by removing references to specific forms, and instead, listing the information that will be recorded in the first portion of the groundwater sampling file.
9. Section 4.3 Statistical Analysis, Page 10, Second Paragraph: As specified in 40 CFR 264.96, the compliance period must be extended until the owner or operator can demonstrate that the groundwater protection standard has not been exceeded for three consecutive years. Therefore, change the text in the third sentence of the second paragraph from "three consecutive quarters" to "three consecutive years."
10. Table 1: Revise this table to designate the hydrogeologic position (upgradient or downgradient) of each well.
11. Table 3: Revise this table to identify the holding time, preservative, sample container type, sample container size, and maximum contaminant levels (MCL) for each analytical parameter. Also, list each volatile organic compound (VOC) to be included in the monitoring program and identify their corresponding practical quantitation limits.
12. Appendix B, Field Forms: Specific forms will not be required in the SAP as long as the text specifies the information that will be recorded on the field forms. Therefore, to avoid the potential for unnecessary permit modifications caused by a change in field forms, change the name of Appendix B from "Field Forms" to "Example Field Forms."

Please revise the SAP and submit a revised document for inclusion as Appendix E-1 of the Part B Permit Application by the deadline specified in EPA's April 23, 2013 letter. 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