



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 11 2013

Mr. Everett Spellman
Kansas Department of Health and Environment
Bureau of Waste Management
Hazardous Waste Permits Section
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

RE: EPA Comments on Koch Nitrogen Company, LLC Section E Groundwater Monitoring 40 CFR 270.14 (c) of the Permit Renewal Application dated October 2012
Koch Nitrogen Company Dodge City Plant
EPA I.D. #KSD044625010

Dear Mr. Spellman:

The U.S. Environmental Protection Agency Region 7 has reviewed Koch Nitrogen Company, LLC (KNC's) Section E Groundwater Monitoring 40 CFR 270.14 (c) section of the Permit Renewal Application dated October 2012. The EPA is transmitting our enclosed comments to you for incorporation, in their entirety, into the Kansas Department of Health and Environment (KDHE's) comment letter to KNC.

If you have any questions, please contact me by phone at (913) 551-7662 or by email at stone.andrear@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Andrea R. Stone for".

Andrea R. Stone
Project Manager/Environmental Scientist
Waste Remediation and Permitting Branch
Air and Waste Management Division

Enclosure



ENCLOSURE

Project Manager Specific Comments:

1. Section E-2 Groundwater Monitoring, First Paragraph, Page E-8 of E-15: There is a sentence in this paragraph that states, "This schedule will be followed until the concentration of constituents of concern at the compliance point wells have been reduced to levels at or below the groundwater protection standard for a period of 3 years. The groundwater protection standard for all constituents of concern has to be at or below for a period of three (3) consecutive years and approved by KDHE and EPA.

In addition, there is no mention of where the compliance wells are located. In the Groundwater Sampling and Analysis Plan on Figure 2, it shows all of the compliance wells as proposed to being plugged and abandoned.

Based on the conversation with the EPA and KDHE June 5, 2013, the compliance point wells are not going to be replaced, because Koch will be required to maintain and operate the groundwater recovery system until the levels throughout the entire plume(s) of contamination (Chromium, Nitrite, Nitrate and VOCs) have been reduced to levels at or below the groundwater protection standards for a period of three (3) consecutive years for all of the constituents of concern. Please revise the third sentence in this section to read, "This schedule will be followed until the concentrations for all of the constituents of concern (Chromium, Nitrite, Nitrate, and VOCs) throughout the entire plume(s) have been reduced to levels at or below the groundwater protection standards for a period of three (3) consecutive years, and approval has been granted by KDHE and EPA. In the last sentence of the first paragraph in this section, please delete out, "... at the compliance point..." so the sentence reads, "Since the timeframe for achieving this reduction cannot be predicted, the monitoring and recovery program will continue for such time as is necessary to achieve the groundwater protection standards throughout the plume(s) of contamination for all constituents of concern (Chromium, Nitrite, Nitrate, and VOCs) for a period of three (3) consecutive years, and approval from KDHE and EPA has been granted."

Second Paragraph of the same section: The last section states, "The groundwater analyses results are provided to the KDHE in Corrective Action Reports on an annual basis." Add "and EPA" after "KDHE" in that sentence.

2. Table E-1: Protection Standards for Groundwater Constituents of Concern, Page E-9 of E-15: Add Hexavalent Chromium to this table and its current Regional Screening Level.

Footnote #2 for Table E-1 states, "Groundwater protection standards are from the EPA Regional Screening Level (RSL) Summary Table (April 2012). The RSL tables are periodically updated. The current RSLs are dated November 2012. Please change the Footnote #2 to read, "Groundwater protection standards are from the most recent EPA Regional Screening Level (RSL) Summary Table. The current update is November 2012; however when the RSLs are updated the most current version will be used."

Geologist Comment:

1. Section E-5 Site Hydrogeologic Setting, Page E-12, Second Paragraph, and Page E-13, First Paragraph:

The accuracy of the data resulting from a rising head slug test in which a submersible pump was used to “instantaneously” remove a volume of water over a 10-20 second period of time is very questionable. Additionally, in the discussion regarding the averaging of results from the wells tested there is no indication that consideration was given to the interval of the unconsolidated aquifer that was tested, since hydraulic conductivity can vary with depth. The screened interval of the well being tested should be matched up with its drilling log, and only wells that are screened across approximately the same zones should be averaged together. This process of ensuring that similarly screened wells are grouped together for averaging may be useful in locating zones of higher permeability, if present, in the unconsolidated aquifer.