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KOCH NITROGEN COMPANY LLC

June 6, 2014

UPS Tracking Number

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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
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 (the "Facility"), 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 the recovered water header near TW-30 and from subsequent disposition of the hydroexcavation materials. On the evening of May 27, 2014, KNC personnel discovered water coming out of the ground northwest of recovery well TW-30. KNC immediately shut down the recovery well system to stop the flow. Calculations based on the estimated flow and duration of the release indicate approximately 7,000 gallons of recovered groundwater were released to the soil. On May 29, 2014, contractors engaged in the cleanup hydroexcavated the soil and repaired the header. On May 30, 2014, KNC personnel discovered that the hydroexcavated materials had been deposited in a 600 ft² unlined staging area located north of TW-68. The hydroexcavated materials consisted of soil impacted by recovered groundwater from the header release on May 27, 2014 and raw water used in the hydroexcavation process. Upon discovery, KNC moved the materials to a concrete-lined area for staging before appropriate disposal. While removing the materials, KNC also removed soil from the unlined staging area down to a depth of approximately 6 inches.

620.227.8631 Tel
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11559 U.S. Highway 50
P.O. Box 1337
Dodge City, Kansas 67801-1337

RCRA



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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. 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 Cory Zellers (620) 371-7914.

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



Rachel L. Moore
Plant Manager

cc: Andrea Stone, U.S. Environmental Protection Agency (electronic copy)
Region VII, Lenexa, KS

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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

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