

Via Email to [R9LandSubmit@epa.gov](mailto:R9LandSubmit@epa.gov)

April 17, 2024

Director, Land Division  
US Environmental Protection Agency, Region 9  
75 Hawthorne Street (LND-1)  
San Francisco, CA 94105

**Re: Desotec US LLC – Parker, Arizona Facility**  
**USEPA ID No.: AZD 982 441 263**  
**Modification No. 013 – Class 1: Appendix IV – Waste Analysis Plan - Appendix A**

Dear Director Trombadore:

In accordance with 40 CFR 270.72(a), Desotec US LLC hereby submits a Class 1 permit modification notification to the Environmental Protection Agency, Region 9 for the Hazardous Waste Permit issued to its facility located at 2523 Mutahar Street in Parker, Arizona. This permit modification is classified as a Class 1 modification in 40 CFR 270.42 Appendix I, A.1. "Administrative and informational changes".

Permit Attachment Appendix IV – Waste Analysis Plan – Appendix A has been modified as follows:

- Profile Instruction sheet – Removed
- Spent Carbon Profile Form – replaced with reformatted Desotec US document
- Added Process Schematic/Sketch sheet
- Profile Addendum for Benzene Waste Operations NESHAP (BWON) - replaced with reformatted Desotec US document Addendum A
- Profile Addendum for Listed Waste Applicability - replaced with reformatted Desotec US document Addendum B
- Profile Addendum for Ethylene Manufacturing Process Unit Wastes MACT – replaced with reformatted Desotec US document Addendum C
- Profile Addendum for Sludge Exemption - replaced with reformatted Desotec US document Addendum D

Pursuant to 40 CFR 270.42(a)(1), this modification does not require any other changes to applicable information previously submitted pursuant to 40 CFR 270.13 – 270.21, and 40 CFR 270.62 - .63 do not apply.

Posting Instructions for this modification:

Please replace existing Appendix A dated August 2023 with the attached Appendix A (9 pages)

Notifications:

A Class 1 permit modification requires a notice to the Facility mailing list within 90 days of the date the change is put into effect.

Permit modifications will be posted at the follow electronic address:

<https://www.desotec.com/en/legal/permits-modifications-and-contingency-plans>

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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.*

Permittee

DESOTEC US LLC



KIRT DIXON COO

*The Colorado River Indian Tribes certifies under penalty of law that it understands that this application is being submitted for the purpose of modifying a permit to operate a facility to receive, store, treat, recycle, repackage and subsequently transport hazardous waste. I understand fully that the Colorado River Indian Tribes, as the beneficial landowner pursuant to P.L. 88-302, and Desotec US LLC, the lessee of the land and owner of certain fixtures located thereon, are jointly and severally responsible for compliance with applicable provisions of RCRA, its implementing regulations and any permit modification approved pursuant to the application and those regulations.*

Co-Permittee

COLORADO RIVER INDIAN TRIBES

By: \_\_\_\_\_

Its: \_\_\_\_\_

## FOR DESOTEC INTERNAL USE ONLY

PA profile no	_____	AZ/CA profile no	_____
PA END no	_____	AZ/CA Expiration Date	_____
PA Expiration Date	_____	Creation date	_____

## GENERATOR INFORMATION

<b>1A Generator</b>	_____	<b>1B Consultant</b>	_____
Mailing address	_____	Mailing address	_____
City, State, ZIP	_____	City, State, ZIP	_____
Name	_____	Name	_____
Phone	_____	Phone	_____
Email	_____	Email	_____
EIN	_____		
<b>1C Site</b>	_____	Site Contact	_____
Site address	_____	Site Phone	_____
City, State, ZIP	_____	Site EPA ID #	_____

## SPENT CARBON INFORMATION

2 Carbon application

<input type="checkbox"/> Waste Water (WW)	<input type="checkbox"/> Solvent Recovery (SR)	<input type="checkbox"/> Potable Water (PW)	<input type="checkbox"/> Aqueous
<input type="checkbox"/> Ground Water (GW)	<input type="checkbox"/> Chem Processing (CP)	<input type="checkbox"/> Food Processing (FP)	<input type="checkbox"/> Vapor
<input type="checkbox"/> Water Treatment (WT)	<input type="checkbox"/> Air Filtration (HVAC)	<input type="checkbox"/> VOC Control (AF)	<input type="checkbox"/> SVE (AF)
<input type="checkbox"/> Other _____			

Profile renewal  YES  NO *If YES, existing profile approval number* \_\_\_\_\_

**3 Application Systems Description**

- Please provide original process details generating constituent(s), (manufacturing, releases etc.).
- Verify if process or spent carbon is considered a listed waste. If not, why?
- If state/federal or other remediation clean-up, please provide historical information, i.e. state/EPA records of decision, influent data and or other site historical characterization.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- 4 Carbon type 1  Liquid  Vapor  
 Carbon type 2  Lignite  Wood  Coal  Coconut  Other \_\_\_\_\_  
 Carbon type 3  Granular  Powder  Pellet  Other \_\_\_\_\_  
 Impregnated  YES  NO

Mesh size  8x30  8x40  12x40  4x6  4x8  4x10  6x16  Other \_\_\_\_\_

Annual usage (lbs) \_\_\_\_\_ Current volume (lbs) \_\_\_\_\_

System fill usage (lbs) \_\_\_\_\_

Will reactivated carbon be returned to the generator  YES  NO

- 5 Handling  Mobile filter  Bulk  Drum  Adsorber  Bulk bag  Other \_\_\_\_\_

## REGULATORY INFORMATION

- 6 Is the spent carbon a RCRA regulated material as per 40 CFR 261 or  YES  NO  
 is the spent carbon a hazardous waste per 25 PA Code 261a? *If yes, list codes (11 RCRA Analysis required for Arizona)*  
**NOTE: Completed and signed LDR must be submitted prior to profile approval for RCRA-regulated spent carbon**

\_\_\_\_\_  
 \_\_\_\_\_

Is the spent carbon a State Hazardous Waste? *If yes, list codes*  YES  NO

\_\_\_\_\_  
 \_\_\_\_\_

- 7 Does the spent carbon treat or contain any of the following:

- |  |   |
|--|---|
| A. Polychlorinated Biphenyls (PCBs) <input type="checkbox"/> YES <input type="checkbox"/> NO | H. Radioactive Material/Explosive/Pyrophoric <input type="checkbox"/> YES <input type="checkbox"/> NO           |
| B. Dibromochloropropane (DBCP) <input type="checkbox"/> YES <input type="checkbox"/> NO      | I. Heavy Metals (Identify, if yes, run total analysis) <input type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Dioxins and/or Furans <input type="checkbox"/> YES <input type="checkbox"/> NO            | J. Chlorinated Phenols <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| D. Pesticides or Herbicides <input type="checkbox"/> YES <input type="checkbox"/> NO         | K. Infectious Material <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| E. Halogenated Compounds <input type="checkbox"/> YES <input type="checkbox"/> NO            | L. Oxidizer <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| F. Sulphur Containing Compounds <input type="checkbox"/> YES <input type="checkbox"/> NO     | M. Shock Sensitive Material <input type="checkbox"/> YES <input type="checkbox"/> NO                            |
| G. Cyanide Containing Compounds <input type="checkbox"/> YES <input type="checkbox"/> NO     | N. PFAS, PFOS, or Fluorinated Compounds <input type="checkbox"/> YES <input type="checkbox"/> NO                |

**Metals**  Antimony  Barium  Cadmium  Lead  
 Selenium  Thallium  Arsenic  Beryllium  
 Chromium  Mercury  Silver  Other \_\_\_\_\_

8A pH  <2  2.0 – 4.0  4.1 – 10.5  10.5 – 12.4  >12.5

8B Flashpoint  <70  70 – 100  101 – 140  >140

- 9 Foreign material? (If yes, please describe or estimate quantity)  YES  NO \_\_\_\_\_
- 10 Free Liquid Range  0%  1-15% \_\_\_\_\_
- 11 Strong odor? (If yes, please describe or estimate quantity)  YES  NO \_\_\_\_\_
- 12 Is spent carbon generated from Superfund Site?  YES  NO
- 13 Is the spent carbon generated from any activity at a chemical manufacturing plant, petroleum refinery or coke by-product recovery plant, i.e., a facility subject to Subpart FF (Benzene Waste NESHAP)?  YES  NO
- 14 Is this waste subject to one of the following NESHAP rules:
- a) Hazardous Organic NESHAP (HON)  YES  NO
  - b) Pharmaceuticals production (subpart GGG)  YES  NO
- 15 Is the Spent Carbon generated from any activity at an ethylene manufacturing process unit subject to 40 CFR Part 63, Subpart XX (Ethylene MACT)?  YES  NO  
*If yes, complete the Addendum C*

## SPENT CARBON COMPOSITION

### 16 Constituents: % by Weight Activated Carbon

Activated Carbon \_\_\_\_\_ %

Water (Moisture) \_\_\_\_\_ %

Organic Contaminants (list below) %

Inorganic Contaminants (list below) %

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 17 Certification of Documents by Generator

I hereby certify that all of the information on this and all attached documents are true and that this information accurately describes the subject spent carbon. I further certify that all samples and analyses submitted are representative of the subject spent carbon in accordance with the procedures in 40 CFR 261 Appendix I or by using an equivalent method, approved by the PA Department of Environmental Protection. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize Desotec US LLC to obtain a sample from any waste shipment for purposes of confirmation or further investigation. If I am a consultant signing on behalf of the generator, I have their proper approval.

\_\_\_\_\_  
Signature of Generator or Generator's authorized agent

\_\_\_\_\_  
Name of Generator or Generator's authorized agent

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

### Questions, please contact:

**Parker, AZ/Red Bluff, CA**  
carbonprofiling@desotec.com

**Darlington, PA**  
Linda Willard: linda.willard@desotec.com  
(724) 827-8181 X1570

## PROCESS SCHEMATIC / SKETCH

*Please provide a schematic / sketch of process below or attach to profile.*

**PROFILE ADDENDUM A - BENZENE WASTE OPERATIONS NESHAP (BWON)**  
**40 CFR PART 61, SUBPART FF**  
**NOT REQUIRED FOR POTABLE WATER APPLICATIONS**

Generator name \_\_\_\_\_  
 Site address \_\_\_\_\_ City, State \_\_\_\_\_

1. Is the Spent Carbon generated from any activity at a chemical manufacturing plant, petroleum refinery or coke by-product recovery plant, i.e., a facility subject to Subpart FF (the Benzene Waste NESHAP)?

YES  NO

2. If YES, does the spent carbon contain any benzene?

YES  NO

**If YES, the Generator must provide analytical data for total benzene concentration that is representative of the waste stream, consistent with 40 CFR §61.355.**

3. If YES, does the Spent Carbon contain benzene which is required to be managed and treated in accordance with the provisions of Subpart FF?

YES  NO

**If YES, the Generator agrees that it will:**

- (i) Send a notice with each shipment of Spent Carbon that is subject to Subpart FF stating that the shipment contains benzene and must be managed and treated in accordance with Subpart FF [40 CFR §61.342(61(2)1: and
- (ii) Prior to each shipment, test each container of Spent Carbon subject to Subpart FF test requirements to confirm no detectable emissions using EPA Method 21 upon initial use of the container [40CFR §61.345(a)(1)].

**In addition to certification on the attached Spent Carbon Profile Form, 1 further certify that all information on this Addendum is true and accurate, and that all samples and analyses submitted are representative of the subject spent carbon in accordance with the procedures established in 40 CFR §61.355.**

\_\_\_\_\_  
 Signature of Generator or Generator's authorized agent

\_\_\_\_\_  
 Name of Generator or Generator's authorized agent

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Title



## PROFILE ADDENDUM B - WASTE APPLICABILITY

Generator name \_\_\_\_\_

Site address \_\_\_\_\_

City, State \_\_\_\_\_

1. Does the spent carbon contain constituents from a pure product release or tank vent?

YES  NO  Unknown

2. Is the spent carbon from a clean-up of PCE, TCE or other spent solvents from a dry cleaner or from degreasing or other cleaning operations?

YES  NO  Unknown

3. Is the original process generating the waste an F,K,P, or U-listed process?

YES  NO  Unknown

**NOTE** Check the "Unknown" box if this material is generated from remediation activities and the historical processes have not been determined.

I certify that the information on this form is true and accurately describes the subject spent carbon on the attached spent carbon profile form.

\_\_\_\_\_  
Printed name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

**PROFILE ADDENDUM C - ETHYLENE MANUFACTURING PROCESS UNIT  
WASTES MACT 40 CFR PART 63, SUBPART XX**

Generator name \_\_\_\_\_

Site address \_\_\_\_\_ City, State \_\_\_\_\_

1. Is the Spent Carbon generated from any activity at an ethylene manufacturing process unit subject to 40 CFR Part 63, Subpart XX (the Ethylene MACT)?

 YES  NO

2. If YES to question 1, does the spent carbon contain any benzene which is required to be managed and treated in accordance with the provisions of the Ethylene MACT?

 YES  NO

3A If YES to question 1, does the spent carbon contain any 1,3-butadiene which is required to be managed and treated in accordance with the provisions of the Ethylene MACT?

 YES  NO

3B For carbon that contains any 1,3-butadiene, was the carbon used to manage and/or treat a continuous butadiene waste stream that contained greater than or equal to 10 ppmw 1,3-butadiene and with a flow rate greater than or equal to 0.02 liters/minute?

 YES  NO

**If YES, the Generator agrees that it will:**

- (i) Send a notice with each shipment of spent carbon that is subject to the Ethylene MACT stating that the shipment contains organic HAPs that are required to be treated in accordance with the Ethylene MACT, 40 CFR Part 63, Subpart XX; and
- (ii) Prior to each shipment, test each container of spent carbon subject to the Ethylene MACT test requirements to confirm no detectable emissions using EPA Method 21 upon initial use of the container [40 CFR § 61.345(a)(1)(i)].

In addition to certification on the attached Spent Carbon Profile Form, I further certify that all information on this Addendum is true and accurate, and that all samples and analyses submitted are representative of the subject spent carbon in accordance with the procedures established in

40 CFR §§ 63.1095 and 61.355.

\_\_\_\_\_  
Printed name\_\_\_\_\_  
Signature\_\_\_\_\_  
Title\_\_\_\_\_  
Date

**PROFILE ADDENDUM D - SLUDGE EXEMPTION**

Generator name \_\_\_\_\_

Site address \_\_\_\_\_ City, State \_\_\_\_\_

The following information must be provided before approval of the profile if the generator request that the spent carbon be classified as a non-hazardous sludge for reclamation in accordance with 40 CFR 261.2.

1. Is the subject spent carbon a sludge, as defined at 40 CFR 260,10?

YES  NO

2. Was the subject spent carbon generated from a municipal, commercial, or industrial wastewater treatment plant or water supply treatment plant or air pollution control facility?

YES  NO

3. Is the subject spent carbon a RCRA listed waste

YES  NO

4. Was the subject spent carbon ever placed in contact with or used to treat, a RCRA listed waste?

YES  NO

5. Was the subject spent carbon generated by a RCRA regulated treatment, storage or disposal facility?

YES  NO

6. If question 5 is checked YES, does it "contain" or is it "derived from" a RCRA listed waste?

YES  NO

7. Is the subject spent carbon exempt from hazardous waste regulation in the state of generation?

YES  NO

I certify that the information on this form is true and accurately describes the subject spent carbon on the attached spent carbon profile form. I further certify that the subject spent carbon is exempt from regulation as a hazardous waste.

\_\_\_\_\_  
Printed name\_\_\_\_\_  
Signature\_\_\_\_\_  
Title\_\_\_\_\_  
Date