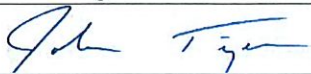




**Region 9 Enforcement Division  
75 Hawthorne Street  
San Francisco, CA 94105**

<b>Inspection Date(s):</b>	August 22, 2022		
<b>Time:</b>	<b>Entry:</b> 11:15am	<b>Exit:</b> 12:30pm	
<b>Media:</b>	Water		
<b>Regulatory Program(s)</b>	Clean Water Act NPDES		
<b>Company Name:</b>	Evoqua Water Technologies LLC		
<b>Facility or Site Name:</b>			
<b>Site Physical Location:</b>	2523 Mutahar Street Parker AZ 85344		
<b>Geographic Coordinates:</b>			
<b>Mailing address:</b>	2523 Mutahar St PO Box 3308, Parker AZ 85344		
<b>Facility/Site Contact:</b>	Russell Smith	<b>Title:</b> Russell Smith	
	<b>Phone:</b>	<b>Email:</b> russell.smith@evoqua.com	
<b>Facility/Site Identifier:</b>	MSGP Permit AZR05I305		
<b>Facility/Site Personnel Participating in Inspection:</b>			
<b>Name</b>	<b>Affiliation</b>	<b>Title</b>	<b>Email</b>
Russell Smith	Evoqua	Russell Smith	russell.smith@evoqua.com
Donald Breaux	Evoqua	Supervisor	
<b>US EPA:</b>			
John Tinger	US EPA	Inspector	Tinger.John@EPA.gov
<b>Federal/State/Tribal/Local Representatives:</b>			
Aaron Whitaker	CRSSJV	General Manager	
Ashley Longanecker	CRSSJV	Lead Operator	
<b>Inspection Report Author:</b>	John Tinger	415-972-3518	
		<b>Date:</b> 9/11/2022	
<b>Manager:</b>	Eric Magnan	415-972-3577	
	ERIC MAGNAN	Digitally signed by ERIC MAGNAN Date: 2022.09.12 14:36:29 -07'00'	<b>Date:</b>

## **SECTION I – INTRODUCTION**

### **I.1 Purpose of the Inspection**

The purpose of the inspection was to evaluate compliance with the NPDES permit and applicable Federal regulations covering the discharge of industrial stormwater into waters of the United States.

## **SECTION II – FACILITY / SITE DESCRIPTION**

### **II.1 Facility Description from Notice of Intent Filed**

Evoqua Water Technologies LLC (Evoqua) operates a carbon regeneration facility located on the Colorado River Indian Tribes (CRIT) reservation near Parker, Arizona. Evoqua's process involves treating spent carbon in a regeneration furnace to purify it for reuse as a commercial product.

## **SECTION III – INSPECTION NARRATIVE**

Facility is generally flat and paved with stormwater traveling in a southwesterly direction across the facility. The facility stores reactivated carbon in large bags outdoors which has potential exposure to storm water. The reactivated carbon is material that has already been processed through the regeneration furnace and is not considered a hazardous nor regulated material. All reactivated carbon appeared to be adequately contained and there was no evidence of spilled reactivated carbon at the facility (see photo 6). Note that the incoming ("spent") carbon awaiting regeneration is stored inside without exposure to stormwater. The loading dock area has potential stormwater exposure to spent carbon, but is enclosed within secondary containment. The spent carbon appeared to be adequately contained and there was no evidence of spilled carbon at the loading area with potential exposure to stormwater (see photo 5).

Control measures generally consist of preventing exposure, with material storage indoors and secondary containment around other areas. Discharge would travel approximately 3 miles prior to discharge to Colorado River.

Due to dry conditions (5" rainfall annually) facility may not be able to conduct quarterly visual monitoring on a regular basis. A review of the 2021 annual report indicated benchmark monitoring was not conducted due to lack of sufficient rainfall. A review of previous annual reports submitted under the 2015 MSGP indicated the facility exceeded the benchmark concentration for Total Magnesium. However, the magnesium appears to be present in local soils and caused by run-on at the facility and would not be expected to be a pollutant of concern at the facility (see photo 4 for run-on area to northeast of facility).

At time of inspection, recent rains in the previous days had allowed facility to collect annual benchmark samples. The samples were being processed by laboratory at time of inspection and were not reviewed.

#### **SECTION IV – AREAS OF CONCERN**

The presentation of areas of concern does not constitute a formal compliance determination or violation.

- None

#### **APPENDICES**

Appendix 1 – Inspection checklist

Appendix 2 – Photograph Log

**Appendix 1- INSPECTION CHECKLIST**

*The following checklist highlights common areas of potential concern but is not a comprehensive list of MSGP requirements.*

GENERAL	
Facility Type	Sector _K 1_ HAZARDOUS WASTE TREATMENT, STORAGE, OR DISPOSAL FACILITIES _____  <input checked="" type="checkbox"/> NOI Submitted <input type="checkbox"/> No Exposure Certification Submitted <input type="checkbox"/> Unpermitted Facility <input type="checkbox"/> Notice of Termination
Inspection Type	<input checked="" type="checkbox"/> Compliance Evaluation (non-sampling)
Weather <input checked="" type="checkbox"/> Dry <input type="checkbox"/> Raining <input type="checkbox"/> Clear <input checked="" type="checkbox"/> Recent Rains    Notes _____	
Was facility notified in advance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Presented credentials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Notes	

ELIGIBILITY CRITERIA	
<b>Receiving Water</b>	Does Facility Discharge to Impaired Waterbody? (2.2.2) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Does Facility Discharge to Tier 2 or 2.5 High Quality Waterbody? (1.1.6.3) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Receiving Water <u>Colorado River</u>
<b>Effluent Limitation Guidelines (4.2.3)</b>	<input checked="" type="checkbox"/> None <input type="checkbox"/> Spray down or intentional wetting of logs (Part 429, Subpart I) <input type="checkbox"/> Phosphate fertilizer manufacturing (418, Subpart A) <input type="checkbox"/> Asphalt emulsion (443, Subpart A) <input type="checkbox"/> Storage piles at Cement manufacturing (411, Subpart C) <input type="checkbox"/> Mine dewatering at stone, sand & gravel (436, Subparts B, C, or D) <input type="checkbox"/> Hazardous waste landfills (445, Subpart A) <input type="checkbox"/> Non-hazardous waste landfills (445, Subpart B) <input type="checkbox"/> Coal storage piles at steam electric power (423) <input type="checkbox"/> Airport deicing (449)
<b>Threatened and Endangered Species (Appendix E)</b>	<input checked="" type="checkbox"/> A: No species present <input type="checkbox"/> B: Another operator <input type="checkbox"/> C1: No Change from 2015 MSGP eligibility <input type="checkbox"/> C2: Changes from 2015 MSGP <input type="checkbox"/> C3: Not Likely to adversely affect Listed species and/or designated habitat <input type="checkbox"/> D: ESA Consultation concluded <input type="checkbox"/> E: Section 10 permit for potential take
→ Is Appendix E documentation available and complete? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<b>Historic Properties (Appendix F)</b>	<input checked="" type="checkbox"/> A: No new construction <input type="checkbox"/> B: prior disturbance/no historic properties <input type="checkbox"/> C: Written agreement SHPO / Consultation <input type="checkbox"/> D: No responses received in 30 days
→ Is Appendix F documentation available and complete? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Notes	

SWPPP REVIEW:	Described in SWPPP?			
	Yes	No	N/A	Not Inspected
Sign is posted for Permit Coverage (1.3.5) and SWPPP is Publicly Available (6.4.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stormwater Team is identified (6.2.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site Description is adequate (6.2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Potential Pollutant Sources, including spills (6.2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Description of Control Measures (6.2.4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site Map (6.2.2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Sampling Data (6.2.3.6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sector-Specific Control Measures are Addressed (8.0)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SWPPP Modifications are documented (6.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employee Training documented and adequate (2.1.2.8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Modifications /SWPPP reviews documented	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Signed and Certified (6.2.7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:				

MONITORING		
	Yes	No
<b>Is Quarterly Visual Assessment of Discharge Required? (3.2)</b>  Subsector: All Frequency: Quarterly Duration: Entirety of permit coverage Follow-up Action: none	<input checked="" type="checkbox"/>	
→ Visual Documentation appears complete, (including color, odor, oil sheen, foam, solids, etc), and collected within 30 minutes of discharge,	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Is pH, TSS &amp; COD Indicator Monitoring Required? (4.2.1.1a)</b>  Subsectors: B2, C5, D2, E3, F5, I1, J3, L2, N2, O1, P1, R1, T1, U3, V1, W1, X1, Y2, Z1, AB1, AC1, and AD1  Frequency: Quarterly Duration: Entirety of permit coverage Follow-up Action: none	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ has pH, TSS & COD monitoring completed and DMRs submitted as required	<input type="checkbox"/>	<input type="checkbox"/>
<b>Is PAH Indicator Monitoring Required? (4.2.1.1b)</b>  Sectors: Any paved surfaces that will be sealed or re-sealed with coal-tar sealcoat. Sector A (exposed areas of creosote or creosote-treated wood); and Sectors C (SIC 2911), D, F, H, I, M, O, P (SIC 4011, 4013, and 5171), Q (SIC 4493), R, and S.  Frequency: Bi-annually (2 times per year) Duration: 1 <sup>st</sup> and 4 <sup>th</sup> year Follow-up Action: none	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ has PAH monitoring completed and DMRs submitted as required	<input type="checkbox"/>	<input type="checkbox"/>
<b>Is Benchmark Monitoring Required? (4.2.2)</b>  Subsectors A1, A2, A3, A4, B1, C1, C2, C3, C4, D1, E1, E2, F1, F2, F3, F4, G1, G2, H1, J1, J2, K1, L1, M1, N1, Q1, S1, U1, U2, Y1, AA1, AA2  Frequency: Quarterly Duration: 1 <sup>st</sup> and 4 <sup>th</sup> year Follow-up Action: AIM	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If YES→ Has Benchmark monitoring been completed as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If YES→ Has monitoring exceeded Benchmarks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Do Effluent Limitation Guidelines Apply? (4.2.3)</b>		
Frequency: Annually Duration: Entirety of permit coverage Follow-up Action: See Part 5.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ has ELG Monitoring been conducted and DMRs submitted?	<input type="checkbox"/>	<input type="checkbox"/>
If YES→ Has any ELG monitoring value exceeded effluent limit?	<input type="checkbox"/>	<input type="checkbox"/>
If YES→ has Exceedance Report been filed within 30 days and corrective actions taken?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Is State or Tribal specific monitoring required? (4.2.6)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ Has monitoring been completed and reported as required?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Is Impaired waters monitoring required? (4.2.5)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ Has monitoring been completed and reported as required?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Is Other monitoring as required by EPA required? ( 4.2.6)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES→ Has monitoring been completed and reported as required?	<input type="checkbox"/>	<input type="checkbox"/>
Benchmark monitoring not conducted in 2021 due to lack of rainfall.		



RECORDS AND REPORTS				
	Yes	No	Not Applicable	Not Reported
Annual Reports (7.5) → Submitted via Net-MSGP and appear complete and adequate to document compliance. <i>Notes:</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routine Facility Inspection Reports (3.1) → Appear complete and adequate to document compliance, Conducted Quarterly (or Monthly); At least one inspection/year during rain event; Qualified personnel; Reports signed/certified <i>Notes:</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corrective Actions Reports (5.0) → If Corrective Actions been required, are Reports Available and Completed within required deadlines (4.3)?  <input type="checkbox"/> Unauthorized release <input type="checkbox"/> Violation of Effluent Limit <input type="checkbox"/> Control Measures found inadequate to meet water quality standards <input type="checkbox"/> Control Measure not installed or not maintained <input type="checkbox"/> Visual Assessment of pollution ~ color, odor, solids, foam, etc <i>Notes:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
AIM Triggering Events (5.2) → If a Trigger Event Occurred, have protocols been followed, adequately documented w/in 14 days?  <input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2 <input type="checkbox"/> Level 3  <i>Notes:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SITE INSPECTION OBSERVATIONS	Do BMPs observed appear adequate?			
	Yes	No	N/A	Not Inspected
Stormwater Control Measures appear adequately selected, designed, installed, and implemented (2.1) <i>Pollutant exposure is minimized</i> <i>Riparian buffers, Treatment interceptors, Structural improvements</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Control Measures are maintained (2.1.2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Good Housekeeping implemented (2.1.2.2) <i>Areas swept/vacuumed; Dumpster lids closed;</i> <i>Minimize waste, garbage and floatables; Storage areas, Maintenance areas, Loading and unloading areas clean</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spill Prevention and Response implemented (2.1.2.4) <i>Spills/leaks cleaned promptly; Chemicals are stored in secondary containment; Containers properly labeled; Spill kits available;</i> <i>Notification procedure for spill events</i> <i>Fueling areas maintained</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Erosion and Sediment Controls minimize discharge of sediment (2.1.2.5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Dust and off-site Tracking is Minimized (2.2.2.10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There is no observed evidence of unauthorized non-stormwater discharge (2.1.2.9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are Sector Specific Control Measures Employed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
→ Requirements:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Were any Single Event Violations (SEV) Observed?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, Describe SEV:	SEV CODE

**Appendix 2 – Photograph Log**

The photographs were taken during the inspection by John Tinger. Original copies of the photos are maintained by EPA Region 9.

Photo 1 from SWPPP onsite

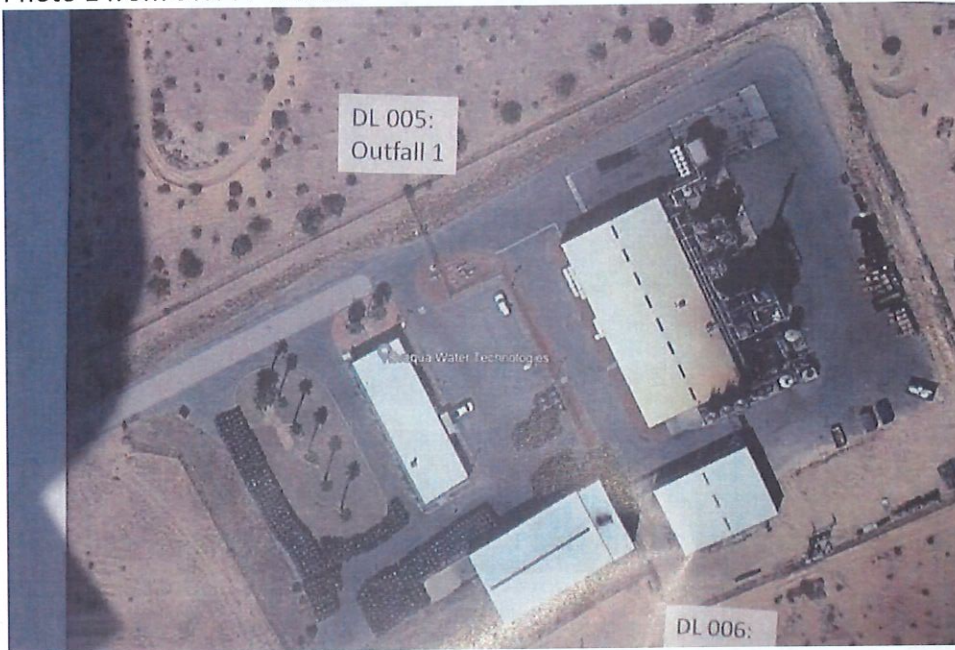


Photo 2: Outfall Point 006

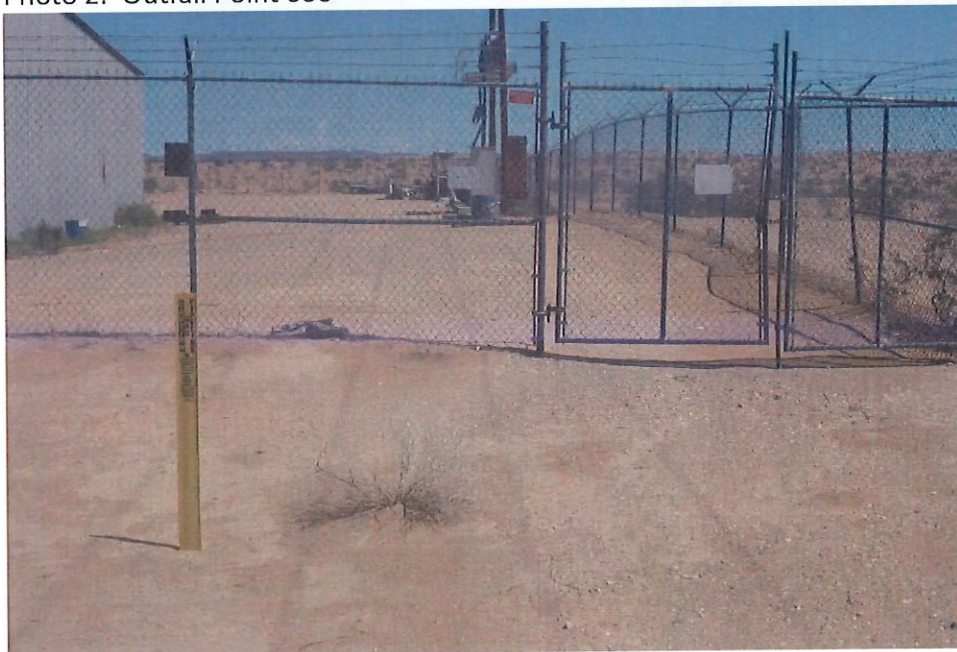


Photo 3: Outfall Point 005



Photo 4: "upstream" area of facility causing run-on

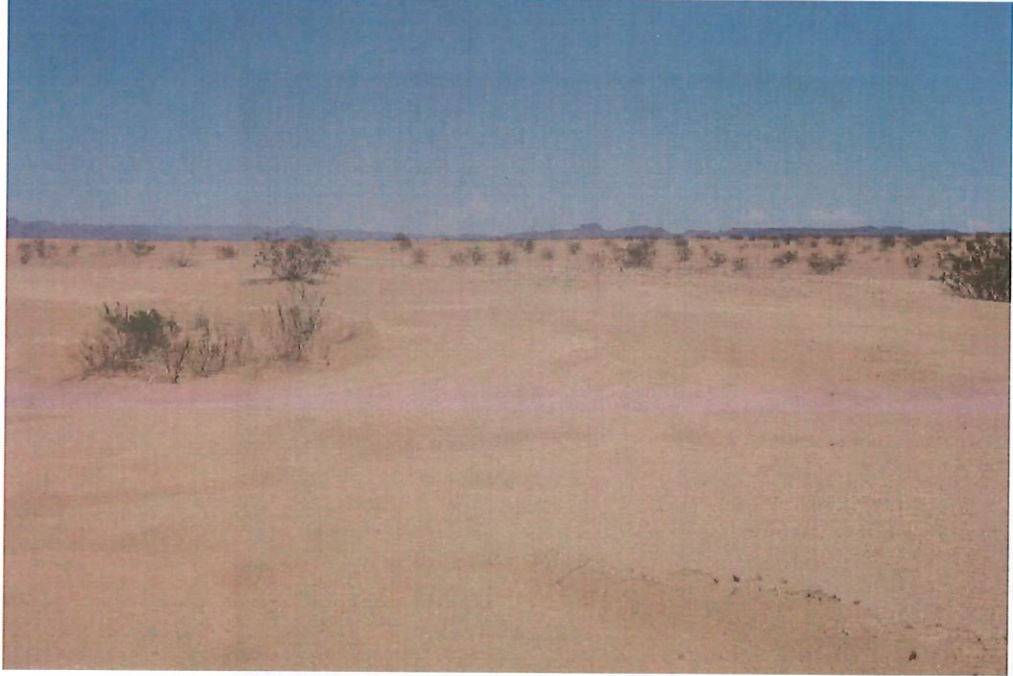


Photo 5: secondary containment around loading area

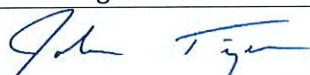


Photo 6: Outdoor Material Storage. All materials stored outdoors is clean re-activated carbon post processing and are contained in bags. All "spent" carbon received prior to re-activation is stored indoors and does not have stormwater exposure.





**Region 9 Enforcement Division  
75 Hawthorne Street  
San Francisco, CA 94105**

<b>Inspection Date(s):</b>	August 22, 2022		
<b>Time:</b>	<b>Entry:</b> 11:15am	<b>Exit:</b> 12:30pm	
<b>Media:</b>	Water		
<b>Regulatory Program(s)</b>	Clean Water Act Pretreatment		
<b>Company Name:</b>	Evoqua Water Technologies		
<b>Facility or Site Name:</b>			
<b>Site Physical Location:</b>	2523 Mutahar St Parker AZ 85344		
<b>Geographic Coordinates:</b>			
<b>Mailing address:</b>	2523 Mutahar St PO Box 3308, Parker AZ 85344		
<b>Facility/Site Contact:</b>	Russell Smith <b>Phone:</b> 928-669-5758	<b>Title:</b> Plant Manager <b>Email:</b> Russell.Smith@evoqua.com	
<b>Facility/Site Identifier:</b>	"Centralized Waste Treatment"		
<b>NAICS:</b>	562211		
<b>SIC:</b>	4953		
<b>Facility/Site Personnel Participating in Inspection:</b>			
	<b>Name</b>	<b>Affiliation</b>	<b>Title</b>
	Russell Smith	Evoqua	Plant Manager
	Donald Breaux	Evoqua	Supervisor
<b>US EPA:</b>			
	John Tinger	US EPA	Inspector
			Tinger.John@EPA.gov
<b>Federal/State/Tribal/Local Representatives:</b>			
	Aaron Whitaker	CRSSJV	General Manager
	Ashley Longanecker	CRSSJV	Lead Operator
<b>Inspection Report Author:</b>	John Tinger	415-972-3518	
		<b>Date:</b> 9/9/2022	
<b>Manager:</b>	Eric Magnan	415-947-4179	
	ERIC MAGNAN	<b>Date:</b>	
		Digitally signed by ERIC MAGNAN Date: 2022.09.15 16:38:32 -07'00'	

## **SECTION I – INTRODUCTION**

### **I.1 Purpose of the Inspection**

The purpose of the inspection was to ensure compliance with categorical pretreatment standards and applicable Federal regulations covering the discharge of wastewaters into waters of the United States.

## **SECTION II – FACILITY / SITE DESCRIPTION**

### **II.1 Facility Description**

Evoqua Water Technologies LLC (Evoqua) operates a carbon regeneration facility located on the Colorado River Indian Tribes (CRIT) reservation near Parker, Arizona. Evoqua's process involves treating spent carbon in a regeneration furnace to purify it for reuse as a commercial product. Operations began at the facility August 23, 1992. The facility was formerly Siemens, US Filter, and Westates Carbon.

Evoqua historically receives approximately 5,000 tons of spent carbon from across the United States. The facility accepts materials classified as hazardous waste.

Spent carbon arrives at the facility via truck. Customers do a profile renewal every two years to determine contents and strength.

Water is added to the spent carbon in a hopper to create a slurry for transportation into one of four spent carbon storage tanks. From the spent carbon storage tanks, the water-carbon slurry is transferred via a screw and piping system to the feed tank then to the reactivation furnace. Water drained from the dewatering screw prior to the furnace is sent to the recycled water tank for re-creating slurry.

The spent carbon is introduced into the top hearth of the furnace and flows downward through the remaining four hearths. The high temperatures remove moisture from the spent carbon, desorb organic contaminants, and reactivate the carbon. The reactivated carbon exits the bottom through a cooling screw while the hot gases enter the air pollution control equipment, which includes an afterburner, venturi scrubber, packed bed scrubber, wet electrostatic precipitator, and emissions stack. The pH of the scrubber water is controlled by the introduction of caustic (via a metering pump) into the scrubber water line just prior to introduction into the venturi and packed bed scrubbers.

The facility operates 24 hours/day.

### **II.2 Wastewater Sources**

Evoqua is classified as a "Centralized Waste Treatment Facility" subject to categorical pretreatment standards under 40 CFR Part 437.46 (d) Subpart D – "Multiple Waste Streams".

(See letter of applicability determination from U.S. EPA Region 9 to Mr. Roy Provins, Westates Carbon, dated September 26, 2001).

Evoqua discharges wastewater to the Colorado River Sewer System Joint Venture (CRSSJV) Public Owned Treatment Works, National Pollutant Discharge Elimination System (NPDES) Permit AZ0021415. CRSSJV does not have an approved pretreatment program. However, Section 1.E of CRSSJV's NPDES permit contains a requirement to implement and enforce pretreatment functions as required in 40 CFR Part 403. Evoqua is the only industrial user discharging to CRSSJV's system. Its average daily flow of 140,000 gallons per day (GPD) represents approximately 20 percent of the POTW's average annual total flow of 750,000 GPD. CRSSJV issued Industrial Wastewater Discharge Permit 1002-96.

According to the Permit 1002-96 fact sheet, facility wastewater is generated from the following areas within the facility: scrubber water discharge (blow-down) from the furnace off-gas system; blow-down of boiler feed water; wastewater from the cooling tower and cooling screw; recycled water (contact motive water); rainwater falling within concrete containment area; and facility wash-down water. According to facility representatives, wastewater generated from the boiler system is recycled back to the slurry hopper. The majority of wastewater discharged to CRSSJV is generated from the air pollution control equipment.

### **II.3 Wastewater Treatment**

Wastewater is collected in the premix tank where it is pH adjusted with sodium hydroxide. Ferric chloride and a polymer are added for coagulation, clarified, and sent to a secondary tank. The wastewater is then treated through a granular activated carbon (GAC) filtration tank prior to discharge to the sewer system.

Solids are treated via plate and frame filter press and landfilled via Clean Harbors for hazardous waste disposal. Facility representatives indicated the filter cake is considered a listed hazardous waste due to the facility's acceptance of listed GAC.

The facility continuously monitors pH, TDS, flow and temperature of the wastewater. Evoqua monitors influent city water for TDS, which typically has a concentration about 1080 mg/L. The existing discharge permit establishes daily maximum limitations for flow, COD, TSS, TDS, Temperature, pH and Total Toxic Organics (TTO).

Facility representatives stated that total dissolved solids (TDS) limits in the permit are a controlling factor for the facility. (The NPDES permit for CRSSJV contains TDS limits to protect the water quality of the Colorado River). Due to the high levels of TDS present in Evoqua's feed water, and due to the addition of TDS through the facility process, Evoqua must carefully monitor TDS levels to remain within permit conditions. Facility representatives stated they will blend materials with known high strengths to maintain consistent throughput and regeneration rates. Evoqua therefore provides continuous SCADA monitoring of TDS influent and effluent



levels, along with burn temperatures and additional parameters to establish operation controls levels within the SCADA system. Evoqua may scale back throughput if TDS effluent levels become a concern.

The wastewater treatment system has the capacity to treat 100 gpm, but typically runs at 75 to 80 gpm.

### **SECTION III – OBSERVATIONS / Operational Status**

1. A review of compliance reports submitted to EPA over the past 3 years indicated typical average flow rates of approximately 100,000 gallons per day, with maximum daily flow observed of approximately 181,000 gallons per day.
2. A review of compliance reports submitted to EPA over the past 3 years indicated effluent concentrations for regulated pollutants typically below non-detect levels for the majority of pollutants. Several pollutants (lead, nickel, titanium, vanadium, zinc) have been detected at levels above laboratory reporting levels. Detected concentrations were observed at concentrations at least an order of magnitude below standards.

### **SECTION IV – AREAS OF CONCERN**

The presentation of areas of concern does not constitute a formal compliance determination or violation.

1. None.

### **APPENDICES**

Appendix 1 – Inspection checklist

Appendix 2 – Photograph Log

**Appendix 1- INSPECTION CHECKLIST**

**I. GENERAL**

Facility Type	<input checked="" type="checkbox"/> Categorical IU <input type="checkbox"/> Significant IU <input type="checkbox"/> Zero Discharge <input type="checkbox"/> Unpermitted <input type="checkbox"/> Other _____		
Inspection Type	<input checked="" type="checkbox"/> Pretreatment Compliance Inspection (non-sampling) <input type="checkbox"/> Pretreatment Compliance Inspection (Sampling)		
Weather	<input checked="" type="checkbox"/> Dry <input type="checkbox"/> Rain <input type="checkbox"/> Clear <input type="checkbox"/> Recent Rains <input type="checkbox"/> Overcast <input type="checkbox"/> _____		
Was facility notified in advance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Presented credentials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Notes:			

**II. RECORDS AND REPORTS REVIEW**

RECORDS	Available onsite?			
	Yes	No	N/A	Not Inspected
Control Mechanism or Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monitoring and reporting records for past 3 years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintenance records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational records/ log books	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spill prevention control and countermeasure (SPCC) plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Slug Control Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Have any Spills or Slug Loadings occurred ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was notification provided to POTW ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are records available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:				

REPORTS	Completed in time frame and frequency as required by permit?			
	Yes	No	N/A	Not Inspected
Has IU submitted Semi-annual reports to Control Authority?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:				

**III. SELF MONITORING PROGRAM**

SAMPLING RECORDS	Yes	No	N/A	Not Inspected
Are monitoring reports submitted in timeframe and frequency required by permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sampling Records have: Dates, times, location, & name of individual performing sampling:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lab Reports have: Analytical methods, results, dates and time of analyses:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are samples collected and preserved using methods approved in 40 CFR Part 136?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Detection limits are reported for "less than" results:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does discharger monitor effluent more frequently than required by Permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, is all data collected reported ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Notes:				
SAMPLE MONITORING	Yes	No	N/A	Not Inspected
Are sample locations and methods representative of Effluent?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
What Flow Measurement Device is utilized?				
<input type="checkbox"/> Flume <input type="checkbox"/> Weir <input checked="" type="checkbox"/> Meter: Type _____ <input type="checkbox"/> Calculation <input type="checkbox"/> Other _____				
Device appears to be functioning properly without obstructions:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is flow meter calibration available onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Date of last calibration				
Calibration performed by				
Notes:				

<b>ANALYTICAL MONITORING</b>				Yes	No	N/A	Not Inspected
Does discharger perform on-site analysis for compliance monitoring?				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
List parameters analyzed on-site:							
Are records of equipment calibration available?				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the on-site laboratory certified?				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification Number							
Expiration Date							
<b>COMPLIANCE MONITORING RATING CODE</b>			Satisfactory	Marginal	Unsatisfactory	Not Rated	
			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Notes:							

**IV. SITE REVIEW OPERATIONS AND MAINTENANCE**

<b>General</b>					Yes	No	N/A	Not Inspected
Does the facility appear to have potential for slug discharges (e.g. raw materials / chemicals without secondary containment)?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there evidence of/possibility for discharge other than at outfalls as described in the permit?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the facility as described in the permit/fact sheet for the following?								
Processes					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treatment Units					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flow and/or Production Rates					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Outfalls & Monitoring Locations					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have there been significant changes in operation since last inspection or permit reissuance?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant schematic is up to date					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:								
<b>Treatment Units &amp; Supporting Equipment</b>					Yes	No	N/A	Not Inspected
Hydraulic and loadings rates appear consistent with the permit and plant design					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tanks, floats, pipes, valves, etc. appear in good working condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equipment appears adequately maintained and functioning correctly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There is no visible evidence of hydraulic short-circuiting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Process controls appear adequate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No safety concerns observed that may interfere with operation, maintenance, monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:				
<b>Operation &amp; Maintenance</b>	Yes	No	N/A	Not Inspected
O &M Manuals are organized and maintained for use:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The maintenance activities, spare parts on-hand, and equipment available appear adequate to ensure continuous operation of treatment system:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is a maintenance management program in place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Number of open work orders:				
Oldest date of open work order:				
Notes:				
<b>Stormwater</b>	Yes	No	N/A	Not Inspected
Does facility have exposure and potential to discharge Stormwater ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is discharger subject to Multi Sector General Permit (MSGP) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes → Filed Notice of Intent?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes → Stormwater Pollution Prevention Plan (SWPPP) available	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there evidence of unauthorized (non-stormwater) discharges?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there signs of spills to soil, groundwater, or surface water ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is adequate equipment available for spill cleanup and containment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are the following areas observed to be free of materials to prevent stormwater pollution?	Yes	No	N/A	Not Inspected
Storage areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fueling areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintenance areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Loading and unloading areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste disposal areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemicals are stored in secondary containment:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes:				

**V. FINAL EFFLUENT**

EFFLUENT APPEARANCE	Yes	No	N/A	Not Inspected
Clear	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Colorless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Free of oil sheen	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Free of floatables	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Free of objectionable odor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Notes:				

**VI. SINGLE EVENT VIOLATIONS**

Were any Single Event Violations (SEV) Observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes Describe SEV:	SEV CODE

**Appendix 2 – Photograph Log:** The photographs were taken during the inspection by John Tinger. Original copies of the photos are maintained by EPA Region 9.

Photo 1: Facility overview. (source: facility Stormwater Pollution Prevention Plan)



Photo 2: wastewater treatment system premix tank, clarifier, and chemical addition.



Photo 3: GAC units after existing clarifier.



Photo 4: Plate and frame filter press.

